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FINLAND'S VIEWS ON THE REVISION OF THE ITS-DIRECTIVE EU/2010/40

**-More extensive and faster digital
transformation both in road transport and in
its interfaces with other modes of transport**

PREMISE FOR THE REVISION

Finland welcomes the EU Commission's intention to review the Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport (the so-called ITS-Directive). The key objective of this regulatory review should be, firstly, to bring the ITS-Directive up-to-date with the ongoing digital transformation development, and secondly, to ensure that the regulatory measures endorse the new green vision of the EU. This will guarantee that the Directive continues to support, as efficiently as possible, the safe and effective mobility of people and transport of goods as well as the sustainable development of transport and logistics in the evermore digitalized, automated, data-based and competitive operating environment of the future. The regulation needs to be streamlined in a way, which promotes more extensive and faster digital transformation both in road transport and in its interfaces with other modes of transport. Concurrently, it is important to make sure that the operating environment established by the Directive continues to provide a level playing field and equal opportunities to all actors, while promoting technology neutrality and the effective uptake of new digital solutions, services and technologies. The operating environment needs to be attractive for new investments and innovations, and contribute to the strengthening of trust.

The review process should, in particular, pay due attention to the following aspects

1	Availability, access and use of data and the development of needed data standards and forms
2	Strengthening of trust by maintaining high-level of security and safeguarding of privacy
3	Utilization of generic models in data governance and user rights administration
4	Ensure a level playing field and equal opportunities to all actors
5	Operating environment remains attractive for future investments and innovations
6	Safeguard an open and competitive market, where technology-neutrality is a norm
7	Promotion of multimodality and interoperability between transport modes
8	The establishment of an EU-level digital ticketing and payment system for multimodal mobility
9	Sustainable and efficient logistics through digitalisation

EU level actions aimed at promoting green and digital transition and the creation of a digital single market require close and well-coordinated cooperation within the European Commission and between its Directorates-General. Finland calls the EU Commission to execute effective leadership and coordination to ensure that all EU level actions and legislative processes progress systematically and add up to a harmonised and coherent whole when laying the basis for EU's digital and sustainable future.

Sisällysluettelo

More extensive and faster digital transformation both in road transport and in its interfaces with other modes of transport.....	Virhe. Kirjanmerkkiä ei ole määritetty.
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Data

The starting point of the ITS Directive revision should be to ensure that the proposed amendments are consistent with the objectives of the EU's Digital Package. In this context, Finland finds it important that the regulation under the Directive strives to further improve the availability and reusability of data on fair, reasonable and non-discriminatory terms and promotes the development of the requisite operating models, infrastructure and technologies.

Maintaining a high level of security as well as trust associated with the use of new technologies and data-driven services is crucial when developing regulation for a future digital operating environment. In this respect, efforts are needed to develop comprehensive cyber security across information production and value chains.

Due attention must also be paid on the integrity, reliability and availability of data. Developing user rights administration is in a key role. In this context, generic models should be utilized whenever possible. This will ensure that the data used and collected in transport, together with sector-specific activities, rights and responsibilities of public authorities and digital services enable interconnections with solutions of the wider data economy and other sectors.

Within the framework of the ITS Directive, an effort should be made across Europe to use and deploy information management models underpinned by the MyData principle, as this would support the evolution of a human-centric data economy and promote the development of added value services offered to the users.

More active EU level inputs are needed in the development of data standards and formats that facilitate the interoperability and usability of data. These inputs will render a much needed contribution to the joint efforts aimed at developing a mobility data space and creating a digital single market in the EU.

Multimodality

The revision of the ITS Directive should strive to enhance the interoperability between different modes of transport (multimodal operation). The operative and technical interoperability of both passenger and goods transportation services should be improved, as well as the compatibility of respective business models, data platforms and ecosystems, which support service provision.

By making use of new technologies and data, the development of an open and competitive market for transport and mobility services should be promoted, and the use and effective combinations of different modes of transport should be supported in a sustainable way. In keeping with the principle of proportionality, local, regional, national and European level characteristics and needs must also be taken into consideration in the ITS Directive review.

Goal-oriented efforts to promote the interoperability of digital ticketing and payment systems in multimodal transport should be made in the EU. Third parties' possibility to access and make use of essential data and information systems should be taken into account in the operating models to be developed. Access to essential data on different travel services should be enabled for suppliers of ticketing and payment systems for transport and MaaS services, including information on stops, timetables and accessibility. This data should be available in a machine-readable format across an open API. In addition, an effort should be made to ensure that the quality of the data is adequate and data is updated in real time, where possible.

For service providers access to the necessary interoperable payment interfaces should be secured. The aim should be to achieve EU-wide interoperability at systems level, which would also promote the development of cross-border travel chains. Consequently, the remaining commercial and legislative challenges associated with the interoperability of ticketing and payment systems should be resolved in the context of the review.

Correctly targeted and dimensioned policy actions would ensure that multimodal travel chains, together with the new types of MaaS services they enable, promote the energy efficiency of the entire transport system and reduce the need for private car use. By combining transport services, for example, MaaS services can also create new, more economically sustainable ways of organising mobility services for sparsely populated areas and contribute to solving the growing problems related to service availability.

Alternative fuels

EU level actions are needed to harmonise and improve the regional coverage of the alternative fuel distribution infrastructure. In connection with the review of the Alternative Fuels Infrastructure Directive (AFID), it is important to consider not only alternatives to more binding goals in infrastructure deployment but also actions that would ensure the interoperability of services related to infrastructure use. In particular, attention should be paid on the different charging services for electric vehicles and their interoperability. For smart charging of electric vehicles, real-time information on the availability and use of charging points as well as user-friendly and well-functioning payment practices are needed. A strong focus on these issues in the context of the ITS Directive review would also be justified.

Logistics

Finland's goal is to promote sustainable and efficient logistics through digitalisation to enable more efficient, seamless and safer transport services. This may be achieved by promoting actions towards green logistics. Finland is working to promote interoperability and common guidelines in the digitalisation of transport corridors with the neighbouring regions, at the EU level and globally. To achieve the efficiency, safety and sustainability benefits enabled by the digitalisation of logistics, the sharing, reuse and production of data should be improved in transport corridors and nodes. The sharing and flow of essential data must be interoperable and realtime, in order to create integrated logistics corridors, where data flows seamlessly through corridors, hubs and nodes such as ports, terminals and airports. By means of legislation and cooperation across networks, preconditions should be created for efficient multimodal and cross-border digital data sharing.

Regulatory environment

In the review of the Directive, particular attention should be paid to making sure that the regulated operating environment remains attractive for investments in digital technologies and capabilities, as

they play an important role in creating new jobs and strengthening competitiveness. The aim should be at offering a level playing field for all actors in the transport sector. Sector-specific special legislation on transport and administrative obligations should only be opted for in situations where this is essential in order to achieve the societal objectives set for the Directive review. At the same time, technology-neutral regulation should be the norm, enabling the use of not only existing technologies but also new ones and innovations in the market as efficiently as possible.

Impact assessment

Finland considers that the Impact Assessment analysis on the review of the ITS-Directive commissioned by the European Commission should, as far as possible, contain concrete descriptions of the possible implications that the different options for moving forward will have for the transport sector. This analysis should, in particular, focus on such aspects as costs, markets, competitiveness, traffic safety, the environment, information security and traffic volumes to make sure that further work on the ITS Directive review can be carried out as efficiently and appropriately as possible.

National reporting

The Commission's objective of streamlining and developing the obligations related to national reporting required under the Directive and the delegated acts issued by virtue of it, merits full-hearted support. The definitions concerning reporting and reporting schedules in the delegated acts issued by virtue of the ITS Directive are somewhat inconsistent. Consequently, the obligations related to national reporting as well as the reporting schedules should be clarified and harmonised in connection with the Directive review.

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