

Position paper

Prise de Position – Stellungnahme

JANUARY 2010

Position of European public transport undertakings on the White

Paper of the European Organisation for Security (EOS)

“A Global Approach for Mass Surface Transportation Security & Resilience”

Version 1.0, November/2009

(developed by the UITP EU Committee and the UITP Security Commission)

The UITP EU Committee represents public transport undertakings offering rail, road or waterborne urban and regional transport services in the European Union. These include cross-border local and regional rail and/or bus services.

The Security Commission (SecCom) is the UITP members' forum for professional discussions on all issues regarding Public Transport Security (PT Security), including technological, operational and management aspects. It is the working body central to all PT Security related activities. The SecCom seeks to study, assess and promote innovative operation and technology for enhanced PT Security.

1. General Comments

UITP acknowledges the efforts from the Industry to bring further funding for research and development for PT security.

UITP SecCom members are well experienced in security problems, and all European networks which have suffered terrorist attacks are SecCom members. Thus, members are fully aware of the importance of the issue and are far from complacent.

Therefore, UITP welcomes increased and improved dialogue between operators/authority and the industry for the mutual benefit of all stakeholders in the crucial field of security of people and assets in PT installations. As mentioned in the EOS White Paper (WP), UITP has encouraged an open dialogue with EOS and is prioritising exchange with the Industry in its short-term working programme and through European R&D projects in which the interests all relevant stakeholders are taken into account.

Having said this UITP feels it necessary to comment on the EOS WP in order to help EOS achieve a more balanced vision. In particular:

1.1 The EOS WP repeatedly points at a UITP endorsement by way of generous mention of (unspecific) quotes and excerpts of UITP documents and/or discussions. UITP upholds its positions and statements as quoted in the EOS WP. However, this does not imply agreement/endorsement of the document as a whole and the EOS proposals; indeed it disagrees with a number of points, outlined herewith.

1.2 The EOS WP gives too much importance to the terrorist threat. This is not the major concern of public transport undertakings. The title of the WP “global approach for mass surface transportation security & resilience” is therefore misleading. Although the terrorist threat affects all EU27 countries (to differing degrees), the main security challenges for PT operators are the daily security problems such as petty crime, fare evasion and vandalism. However, it is true that by improving anti-terrorism security in a PT network, some of the daily security problems are also indirectly addressed.

1.3 The EOS WP gives too much weight to a top-down European approach. UITP is of the opinion that a bottom-up approach for the sharing of good practices, i.e. coming from the users is the best way how to proceed. This is the very purpose of the SecCom.

1.4 Through the UITP EU Committee, European Public transport undertakings have in the past rejected European legislation on security in mass transport systems (in line with Member States’ opinion). On the other hand, since more than five years, UITP promotes the exchange of best practises, the development of guidelines (e.g. through COUNTERACT project) and recommendations in this area.

1.5 The EOS WP may let think that PT operators are fully responsible for ensuring 100% security of their networks. The responsibility of the local, regional or national authorities in the organisation of PT and in law enforcement (e.g. police forces) is not sufficiently recognised and is kept too much in the background.

1.6 EOS gathers private European security sector representatives, and is does not represent PT operators and authorities.

1.7 The EOS WP presents as references the European Projects EURAM, DEMAAST, EUMASS and COUNTERACT. COUNTERACT is the only project listed which has involved public transport undertakings.

2. Detailed Comments

#	EOS White Paper	UITP comment
2.1	pp6-7, p15 The EOS WP states “there is no standardised framework” for developing a common “concept of operations”.	UITP would only support a “common concept of operations” which includes basic and general principles of PT security in order to satisfy the general needs of PT undertakings, without dictating exactly <u>how</u> this should be achieved. Such a “common concept of operations” should only be developed in full cooperation between the undertakings and the industry, ideally in agreement with their local authorities.

2.2	<p>p6, p14 The EOS WP states that “There is currently poor common approach across Europe to assessing security risks for mass surface transport networks...some networks...have not been security risk assessed at all...”</p>	<p>This problem was identified and addressed in the COUNTERACT project, coordinated by UITP. As a result, generic guidelines for conducting security risk assessment in PT networks were developed, as a first step. Both UITP and the European Commission are promoting the practice of conducting of risk assessment, with these guidelines as a tool.</p>
2.3	<p>p7 “Security in mass transportation systems is not given a high enough priority by policymakers.”</p>	<p>UITP does not fully agree with this statement. Whilst in some countries, security in mass transportation systems is not given a high enough priority, in various other EU Member States such as in France, Germany, UK, etc. local, regional and national policy makers are well aware of security issues in public transport. This is one amongst other reasons why public transport undertakings have increasingly introduced security measures such as video surveillance, more security staff, close co-operation with police authorities etc.</p>
2.4	<p>p9 The EOS WP states that “national and local infrastructures are consequently left under the control of national/local organisations, thus leaving an unacceptable gap in the protection of the infrastructures...”, including PT infrastructure.</p>	<p>UITP is opposed to the notion of this sentence which could be interpreted in the sense that local/regional organisations do not sufficiently ensure security in public transport and that only a European approach would help to solve this potential “problem”.</p> <p>Due to the open and accessible nature of PT networks, gaps in security are inevitable. Furthermore, it is essential that local transport remains under the control of local authorities. In addition, short travel times are absolutely crucial for the acceptance of public transport by users.</p>
2.5	<p>p11 The EOS WP states that “Security measures and risk mitigation required resources and may constrain speed of passenger throughput or ease of access: these trade-offs should be recognised and considered by operators at a senior level”.</p>	<p>During normal operations, maintaining the speed of passenger throughput and speed of access is an absolute priority for PT operators, and is not something normally considered as a subject for trade-off. Only in the event of a major incident or assessed threat based on intelligence would measures be considered which would hinder the speed of passenger throughput or ease of access, if it allowed to continue operations.</p>
2.6	<p>pp12-13 The EOS WP recommends the “creation of an EU platform on security and resilience of mass transportation security and the protection of passengers”.</p>	<p>Various structures do already exist, for example the UITP SecCom and the EU Urban Transport Security WG. In addition to limited resources availability of the real public transport security experts, <u>UITP opposes any additional new structure</u>. Instead, a closer cooperation of the current bodies would be appreciated in order to share views/positions without the need for a “mega-platform” that would be too big to manage, of little use and need additional resources.</p>

2.7	<p>p15 The EOS WP envisages “a minimum level of regulation for mass transportation systems acceptable to operators...”</p> <p>p17 The EOS WP calls for the “implementation of ECI (European Critical Infrastructure) Directive to mass transport systems”</p>	<p>Through the UITP EU Committee, European Public transport operators have in the past rejected European legislation on security in mass transport systems including the implementation of ECI Directive to mass transport systems (in line with Member States’ opinion).</p> <p>On the other hand, since more than five years, UITP promotes the exchange of best practises, the development of guidelines (e.g. through COUNTERACT project) and recommendations in this area.</p>
2.8	<p>p17 The EOS WP call for “initiation of the development of common standards for mass transport system” and for “agreement on procedural standards”</p>	<p>Operators would only support standards that they have been directly involved in producing.</p> <p>Operators could envisage considering voluntary standards on technical applications, for example surveillance systems, in order for off-the-shelf technologies to become more suitable and affordable. However operators could not accept standards which impose specific operational or procedural compliance, or have the potential to be disproportionate to the risk.</p>
	<p>P22 The EOS WP states that “Passengers travelled more than 75 million km by metro and tram during 2004, a rise of 16% over a decade” and makes reference to “1. Eurostat, Panorama of Transport, 2007 edition. UITP Public Transport Statistics Report Issue 1, May 2007 www.uitp.org/knowledge/Statistics.cfm</p>	<p>This quote does not exist and is obviously wrong (taking RATP metro alone, passengers travelled about 6.8 billion km in 2004!). Therefore all other quotes may be questioned as well.</p>
	<p>P32 to 34 The EOS WP presents as references of equal importance four European projects: EURAM, DEMASST, EUMASS and COUNTERACT</p>	<p>Only <u>one</u> of the mentioned project has been really involving public transport undertakings: COUNTERACT.</p> <p>EURAM does not provide information on the partners of the project, nor the “critical infrastructure” object of the project.</p> <p>DEMASST has not produced any outcome so far.</p> <p>The EUMASS objective is the delivery of a unified, innovative solution for risk assessment methodology. Such a methodology has already been developed by COUNTERACT for terrorist threats, and is currently considering other security threats in the project MODSAFE. The potential added value of EUMASS for operators – if any - needs to be clarified.</p>