



Public Consultation on the proposal for a revision of Regulation (EU) No 1025/2012, also called the ‘EU Standardisation Regulation’

UITP CONTRIBUTION

UITP, representing more than 450 public transport operators and authorities in the EU, wants to remind of the strategic importance of EU standards. The public transport sector welcomes this consultation as an opportunity to remind of key principles for the sector around standardisation.

- 1) Standards should be **defined by those benefitting from them**. This implies the involvement, with additional European Commission and EISMEA (European Innovation Council and SMEs Executive Agency) support, of the relevant market actors in a **bottom-up process**, incl. local public transport stakeholders (lack of human and financial resources available in this decentralized sector to be part of the costly and time-consuming standardization works). Any top-down only approach in the definition of standards has to be avoided, since it does not allow for a recognition of the characteristics of the urban rail/local public transport sector and does not consider the crucial role and priorities of competent authorities and operators on the field.
- 2) Standards are made legitimately mandatory when interoperability of systems is required physically across Europe. This is not the case for local public transport and especially for urban rail systems which are excluded from the Interoperability and Safety directives. UITP members are fully supporting the harmonisation of public transport assets when it is beneficial for the market, provided that:
 - a. The **application of standards is and must remain voluntary for the local public transport sector**;

- b. When works on EU standard may directly or indirectly impact local, non-interoperable, rail systems, it should be first checked with the sector that the EU standards are fit for local stakeholders (as done with EC mandate M/486 for urban rail).
- 3) UITP supports the principle of the **free access to the published norms**. When the application of standards is made mandatory according to EU legislation, the access to such standards should be facilitated for the concerned industrial actors. They should be made free; UITP supports here the 2024 conclusions of the EUCJ ([Case C-588/21](#)). In this Case, the Court considers indeed the following:
- the requested harmonised standards form part of EU law;
 - the European Union is based on the principle of the rule of law, which requires free access to EU law for all natural or legal persons of the European Union;
 - consequently, there is an overriding public interest in the disclosure of the requested harmonised standards.
- 4) There are, in the EU, hundreds of smart cities with their own multimodal public transport network and **local tailor-made integrated fare policy which do not need mandatory European integration**. Indeed, there is no significant short/medium benefit for the very large majority of end users of the local integrated systems.
- 5) The **EU's participation to the global standardisation work should be enhanced**. At international level the participation/coordination of European experts, and of individual EU Member States in the voting process, should be facilitated by the European Commission (such participation is even more complex and expensive than at EU level).
- 6) When multimodal transport is at stake in European legislation, a **clarification of the terms, scope, stakeholders, territory of application and relationship with "global de-facto standards"** is needed:
- Terms: many transport related terms have different meanings in different EU legislations, e.g. travel and travel services, multimodality, public transport, interoperability, information services (ITS and/or ICT), carrier, undertaking, infrastructure...;
 - Scope: multimodal/transverse standards do not precisely specify their practical applicability;
 - Stakeholders: the potential applicability of a standard to several domains should be decided in coordination and agreement between end-users in each domain;
 - Territory of applicability: multimodality/transversality can be achieved at the level of one functional urban area only (without the need of an EU standard), at the level of one country only (with national standards), at the level of multiple European countries (with EU standards), and at international level (with global de-facto open standards). Each territory involves specific stakeholders and end-users which should be addressed in dedicated impact assessment studies;

- Relationship with global de-facto standards: some open “global” specifications are more largely used in Europe than EU standard. Their compatibility with regulated EU markets has to be clarified.

7) Lastly, each legislation sets its own definitions and rules not aligned with the main principles of the regulation on standardisation. The definitions and principles of the regulation on standardisation – supported by UITP - should be applied in all legislations making reference to EU standards. A functional specification is, according to the regulation on standardisation, of voluntary application: **no European legislation should impose unjustified technical specifications to local public transport**, notably for what concerns data management.