



# **UITP's Positions on the 2028-2034 MFF**

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# The Connecting Europe Facility (CEF)

The International Association of Public Transport (UITP) welcomes the European Commission's proposal for the next Multiannual Financial Framework (MFF) 2028–2034, and in particular the continued existence and reinforcement of the Connecting Europe Facility (CEF) as the EU's main transport infrastructure fund. The proposed doubling of the CEF Transport budget to €51.5 billion, with a strong focus on TEN-T corridors and cross-border links, is a positive signal of the EU's commitment to advancing trans-European connectivity and supporting climate and environmental objectives.

However, UITP is deeply concerned by the lack of explicit recognition and dedicated support for urban nodes and urban mobility within the current draft of the CEF III regulation. While the regulation's objectives include the development of interconnected, interoperable, decarbonised, smart, safe, sustainable, resilient, secure, and multimodal transport networks, there is no direct reference to urban nodes, cities, or urban public transport. The absence of such provisions risks sidelining essential investments in urban networks, which are critical for the success of the TEN-T network removing bottlenecks, the European Green Deal, and the EU's climate, social, and territorial cohesion goals.

Urban nodes and multimodal hubs are the starting and ending points of most journeys on the TEN-T network. Their efficient functioning is indispensable for the overall performance, accessibility, and resilience of European transport. The revised TEN-T regulation recognises the growing importance of urban nodes, yet the CEF draft regulation does not ensure their full integration as projects of common European interest. Without explicit eligibility for urban nodes projects, there is a risk that these vital infrastructures will not benefit from CEF funding unless they are directly linked to TEN-T corridors.

UITP therefore calls for the following improvements to the CEF III regulation and its implementation within the next MFF:

1. **Explicitly recognise urban nodes and multimodal hubs as projects of common European interest:** The CEF regulation needs to be amended to include urban nodes and multimodal hubs as eligible projects, not only when directly linked to TEN-T corridors but also as essential components of the network's overall efficiency and sustainability to remove bottlenecks. This would ensure that urban mobility projects receive direct, adequate support and are not overshadowed by cross-border or military priorities.
2. **Safeguard civilian public transport funding within CEF III:** While defence and military mobility are important, the allocation for civilian public transport must be protected and, where possible, increased. There can be no military front without a civilian rear front.
3. **Facilitate access to CEF funding for local and regional authorities** Procedures for accessing CEF grants and blended finance (e.g., through InvestEU and Catalyst Europe loans) should be simplified and made directly accessible to cities and public transport operators. This would empower local actors to implement innovative and resilient mobility solutions.
4. **Ensure that CEF III explicitly covers the full range of investment needs of railway operators,** including: modernisation and adaptation of conventional, regional lines; ERTMS deployment under any implementation pathway (including operator-led projects).

# The National and Regional Partnership Plans (NRPPs)

UITP welcomes the new EU mega-Fund and NRP Plans but warns that urban mobility and public transport lack guaranteed support. UITP urges the EU to create a dedicated budget for clean, affordable public transport, mandate urban mobility chapters with minimum spending targets, and ensure cities and regions are directly involved. The Social Climate Fund (SCF) should prioritise long-term investment in public transport to fight transport poverty and support vulnerable groups. Public transport is key for climate, social inclusion, and economic growth. UITP calls for predictable, substantial funding and easier access for local authorities.

## 1. ASSESSMENT OF PILLAR 1 AND NRP PLANS

The new mega-Fund brings together the European Regional Development Fund (ERDF), Cohesion Fund (CF), European Social Fund Plus (ESF+), Just Transition Fund (JTF), and other sectoral funds under a single programming and governance framework. The NRP Plans are intended to streamline investments and allow Member States to design integrated agendas aligned with national and regional priorities.

### Key observations:

- The new framework offers flexibility and the potential for integrated, place-based investments, but leaves the prioritisation of urban mobility and public transport largely at the discretion of national governments.
- There is no legal guarantee for dedicated urban or public transport chapters in the NRP Plans, nor for minimum earmarks for sustainable mobility.
- The risk of competing priorities (cohesion, agriculture, fisheries, social, etc.) may dilute the focus on sustainable urban mobility, especially in the absence of binding requirements.
- The Social Climate Fund (SCF), now integrated into the NRP Plans, could support public transport affordability and accessibility, but only if Member States choose to prioritize it.
- Local and regional authorities are recognised as key actors, but their effective involvement in the design and management of NRP Plans is not guaranteed by the regulation.

## 2. UITP EUROPE'S RECOMMENDATIONS FOR PILLAR 1 AND NRP PLANS

To ensure that the MFF delivers on the EU's climate, social, and territorial cohesion ambitions, UITP Europe recommends:

- **Defining clear priority areas** (including public transport) at the European Level to guide the preparation of the Partnership Plans. This will ensure that essential sectors are not overlooked and that funding allocations remain aligned with overarching EU objectives.
- **Establishing a dedicated "urban and local mobility envelope" within the NRP Plans and the mega-Fund**, to guarantee predictable and direct investment in clean, affordable, and resilient public transport systems across all EU territories.
- **Mandating urban and regional mobility chapters in all NRP Plans**, with minimum spending targets for sustainable public transport, and ensuring the direct involvement of cities, regions, and public transport authorities in the design and management of investments.
- **Ringfencing a fixed percentage of ERDF and Cohesion Fund allocations for public transport and sustainable urban mobility**, including for outermost, rural, and peripheral regions.
- **Ensuring that the Social Climate Fund is used to support affordable public transport services and fare support**, with the creation of a "social mobility facility" to directly address transport poverty.
- **Facilitating access to EU-backed loans (e.g., Catalyst Europe, InvestEU) for local and regional authorities**, and simplifying procedures for blended grant-loan packages.
- **Coordinating the targeting and management of the mega-Fund with other EU instruments** (Just Transition Fund, Recovery and Resilience Facility, etc.) to maximize synergies and administrative efficiency.

## 3. OPPORTUNITIES AND RISKS

### Opportunities:

- The NRP Plans could enable cities and regions to negotiate substantial funding for sustainable public transport, if national governments prioritise it.

- The integration of the SCF and the flexibility of the mega-Fund could support innovative, place-based solutions for mobility and inclusion.

**Risks:**

- The absence of binding requirements for urban mobility may result in insufficient investment in public transport.
- The focus on performance-based logic and competing priorities may sideline sustainable mobility projects.
- The effective involvement of local and regional authorities is not guaranteed.

UITP Europe urges the European Commission, Parliament, and Council to reinforce Pillar 1 of the MFF by establishing a dedicated urban and local mobility envelope within the mega-Fund and NRP Plans, mandating urban mobility chapters with minimum spending targets, and ensuring the direct involvement of local authorities. Only with clear, predictable, and sizeable investment in public transport can the EU achieve its climate, social, and territorial cohesion goals.

## The European Competitiveness Fund (ECF)

The International Association of Public Transport (UITP) welcomes the European Commission's proposal for the European Competitiveness Fund (ECF) as part of the Multiannual Financial Framework (MFF) 2028–2034. The ECF represents a significant step towards consolidating EU financial instruments to support competitiveness, innovation, and the green transition across the continent. UITP supports the Commission's ambition to simplify, harmonise, and increase the impact of EU funding, and recognises the ECF's potential to drive investment in strategic sectors, including clean transition, digitalisation, resilience, and industrial innovation.

The upcoming Competitiveness Fund is a strategic step to reinforce Europe's industrial base and economic competitiveness. To maximise the impact of the Fund, UITP calls for it to support the innovation potential of public transport supply, manufacturing and R&D value chain. Access to simplified and sustainable financing – also under the Framework Programme 10 (FP10) – will reinforce the role of public transport as a vital component of a competitive transition. Such support has the potential to create a multitude of green local jobs, scale up a vast mobility start-up scene, and ensure that made-from-Europe electric buses, MaaS applications, ticketing solutions, predictive maintenance tools or AI-driven traffic management systems can compete globally. Owing to their wide reach and service-oriented nature, public transport systems provide a robust platform for the large-scale deployment of innovations, with R&D playing a pivotal role in enhancing the quality, accessibility, and sustainability of mobility services. Strengthening R&D efforts in this area can not only prevent chronic under-investment in R&I from being an obstacle to modernising public transport but also support existing public-private innovation partnerships like **Connected, Cooperative and Automated Mobility (CCAM)** or **Europe's Rail** (interoperable rail innovation).

### Public Transport: A Pillar of Competitiveness and Decarbonisation

UITP emphasises that public transport is a key enabler of European competitiveness, territorial cohesion, and climate neutrality. The sector not only reduces greenhouse gas emissions and improves urban quality of life, enables social participation (by allowing people to travel to work or pursue leisure activities), but also drives industrial innovation and creates local, non-relocatable jobs, and is thus an essential pillar of economic stability. The ECF must therefore place public transport at the heart of its priorities, in line with the objectives identified in the draft regulation.

### Strategic Role of Public Transport in the ECF

- **Competitiveness:** Public transport should be recognised as a strategic sector that generates value, innovation, and European industrial know-how. Investments in networks, rolling stock, digital systems, and charging infrastructure must be eligible for reinforced ECF support.
- **Clean Transition:** The transition to clean and multimodal mobility requires strong support for electrification, hydrogen, alternative fuels, digitalisation, intermodality, and modal shift towards public transport. Public transport should be prioritised in the allocation of decarbonisation funds, as foreseen in Article 33 of the draft regulation.

## Focus on “Clean Transition and Industrial Decarbonisation”

UITP insists that the “Clean Transition and Industrial Decarbonisation” component of the ECF must concretely finance public transport, as provided for in the text.

This should include:

- Funding for intermodality and multimodality, especially through the development of multimodal hubs connecting various transport modes (rail, bus, tram, cycling, etc.).
- Support for resilient infrastructure, particularly urban rail, which is the backbone of sustainable mobility in metropolitan areas.
- Assistance for fleet greening, both for infrastructure (depots, charging stations) and rolling stock (electric, hydrogen, biogas buses, etc.) including not only the acquisition of new rolling stock, but also modernisation, refurbishment and retrofit projects. Investments in maintenance facilities and associated infrastructure linked to fleet renewal and modernisation should be eligible, including energy efficiency upgrades and technological adaptation.
- Financing projects that encourage modal shift from private cars to public transport, which is essential for achieving climate and air quality objectives.
- Support for digitalisation and interoperability and innovation ((integrated ticketing, digital systems, cybersecurity, smart mobility solutions), to make public transport more attractive, efficient, and accessible.
- The Fund shall support the research, development, deployment and large-scale roll-out of automated mobility and autonomous driving technologies in the public transport sector, including CCAM systems.
- The Fund shall also promote sustainable financing models for large autonomous public transport fleets, with the objective of enabling long-term, system-wide benefits for European mobility, competitiveness and social inclusion.

## Focus on Autonomous Mobility

To fully realise Europe's digital and green transition ambitions, the ECF should explicitly support the deployment of **automated mobility and autonomous driving technologies within the public transport sector**. Automated public transport can enhance safety, service reliability, and energy efficiency while addressing driver shortages and improving accessibility in underserved areas. A critical barrier to large-scale CCAM deployment in public transport is the absence of sustainable, long-term funding models for large autonomous fleets with the potential to have long-lasting impact on overall mobility systems. Dedicated funding for the large-scale deployment of CCAM in public transport would accelerate innovation beyond pilot projects, foster data-sharing ecosystems, and ensure that the societal benefits of automation remain a public good. By backing interoperable, scalable autonomous mobility solutions under the ECF, the EU can strengthen its industrial leadership in advanced mobility technologies and support a sustainable, inclusive transition for all European regions.

### Proposed Amendments and Justifications

UITP supports amendments to the ECF regulation to:

- Explicitly include urban nodes and multimodal hubs as eligible infrastructure, recognising their central role in European competitiveness and TEN-T interconnection.
- Ensure that clean, multimodal, accessible, digitalised, safe, and resilient transport solutions—including maintenance—are eligible for funding.
- Simplify and harmonise access to EU funding, reduce administrative burdens, and facilitate participation by public and private operators, especially SMEs and local authorities.

## Access and Implementation

UITP welcomes the Commission's intention to simplify access to funding, reduce fragmentation, and facilitate participation by all relevant actors. Procedures must be adapted to the realities of public transport operators to maximise investment leverage and accelerate project delivery.

This includes:

- Direct payments to project partners to reduce administrative burdens on coordinators.
- Improved participant portals to avoid redundant document requests.
- Multiple annual cut-off dates for calls to better align with investment cycles.
- Eligibility rules allow projects whose contracts were signed prior to the start of the 2028–2034 period, provided that the related expenditures are incurred within the new MFF (phased payments).
- Harmonisation of eligibility criteria and reduction of audit and reporting burdens.

## Horizon Europe and Public-Private Partnerships (PPPs)

UITP, the International Association of Public Transport, welcomes the European Commission's proposal for the Horizon Europe programme for 2028–2034. This proposal is a crucial step in structuring European support for research and innovation, in close connection with the European Competitiveness Fund (ECF), and in line with the EU's strategic priorities for ecological transition, industrial competitiveness, and social cohesion.

UITP commends the Commission's efforts to simplify, harmonise, and create synergies between European instruments, notably through the integration of collaborative aspects of Horizon Europe into the four pillars of the ECF. The articulation between research, innovation, demonstration, and industrial deployment is essential to maximise the impact of EU funding.

### Public Transport: A Strategic Driver for a Competitive Transition

UITP wishes to emphasise that public transport is a strategic lever to address the EU's climate, social, and economic challenges. It contributes to decarbonisation, territorial resilience, industrial innovation, economic growth and the creation of local jobs. As such, public transport must receive reinforced support under Horizon Europe.

UITP calls for public transport to be fully integrated into Pillar II "Competitiveness and Society" of Horizon Europe, especially in collaborative projects linked to the "Clean Transition and Industrial Decarbonisation" window of the ECF. This support should enable funding for:

- **Collaborative research projects** on intermodality and multimodality, including the development of connected and resilient multimodal hubs;
- **Innovations in urban transport infrastructure**, particularly urban rail, to strengthen efficiency, resilience, and digital integration;
- **Innovations for the electrification of rolling stock**, including smart charging infrastructure, bus depots transformation (including fire safety issues), and rolling stock (batteries, eco-driving, brake particle reduction, etc.);
- **Solutions promoting modal shift from private cars to public transport**, in line with carbon neutrality and air quality objectives;
- **Development of intelligent mobility systems**, including traffic management, connectivity, automation, and digital services;
- **Development of resilient transport solutions and crisis management**, as critical entities (climate change, cyber risks, terrorism, pandemics, etc.).

### Public-Private Partnerships

Public-private partnerships, such as the European Joint Undertaking Europe's Rail (EU-Rail), which brings together industry, operators, and research centres across Europe and is increasingly open to public research, SMEs, and territories, are an important tool to coordinate research and innovation efforts, share risks, and accelerate the effective implementation of solutions. This model, which mobilizes private investment, creates synergies with other sectors, and offers a forum for sustainable mobility challenges, should be renewed in the next MFF.

To maximise the impact of EU-funded research and innovation, it is essential to foster conditions that enable strong market uptake. **This requires inclusive access to funding mechanisms, particularly for non-industrial, local, and smaller stakeholders who are often excluded from PPPs due to restrictive access rules and limited co-funding.** Project-level instruments should be implemented to broaden participation beyond core PPP members, drawing inspiration from Horizon Europe's co-funding models. Moreover, the active involvement of end-users—citizens, passengers, and public transport operators in case of mobility topics—in the research and development process is critical. Their needs and expectations must be formally captured and integrated into product/service development to ensure relevance and competitiveness. The participation of buyers and stakeholders from the early stages of innovation is a key condition for successful market uptake, and the European Commission should pay close attention to this dimension in future regulations (notably with the PPP).

In addition, we would like to alert the Commission on the article 11 of the proposal regarding European partnerships. The proposal foresees that partners must contribute financially – not *in kind* – to the operational budget of any JU, whereas today partners contribute only in kind. This change would make the participation to any JU more expensive for partners. **We ask the Commission to keep the possibility to contribute to the operational budget of the PPP with in kind contribution** to ensure the participation of public transport operators within European partnership.

## For a European Public-Private Partnership for Rail Research and Innovation

UITP fully supports the continuation and amplification of the Europe's Rail PPP, **stressing the need to fully integrate urban rail** (metro, tram, suburban rail, etc.) alongside long-distance and regional rail.

Urban rail is a major vector for sustainable mobility, with specific challenges in:

- System digitalisation (CBTC, automation);
- Infrastructure resilience to climate and geopolitical challenges;
- Interoperability and standardisation of technical components;
- Attractiveness of rail professions and training of engineering talent.

Urban rail plays a vital role for the EU's economy, security, and sovereignty, while reducing the environmental footprint of transport and mobility. Rail (urban rail included) is a strategic pillar of the single European market, combining economic performance and environmental excellence. It moves over 9 billion passengers annually across the EU, provides more than 2 million direct and indirect jobs, and has a remarkably low carbon footprint, with CO<sub>2</sub> emissions per passenger-kilometre up to 8 times lower than cars. Rail fosters territorial cohesion, supports industrial competitiveness, environmental resilience, and the Union's defence capacity.

A coordinated EU approach is needed to ensure interoperability of rail solutions and harmonization of operational systems. This strategic coordination should continue to erase the historical fragmentation of the European network, especially through the deployment of ERTMS, the future FRMCS, and advanced CBTC systems for urban rail, all equipped with the latest technologies. Standardisation of components and technical protocols significantly reduces production and implementation costs through economies of scale and prevents redundant developments by individual actors, avoiding waste of financial and intellectual resources. The rail value chain is inherently European, with actors spread across the continent, requiring European action to support and maintain high-performing networks and strengthen the competitiveness of European industrial champions.

The PPP model is particularly suited to catalyse this collective dynamic, aligning the strategic interests of public authorities with the agility and innovation capacity of the private sector, while ensuring balanced sharing of financial and technical risks. The Europe's Rail PPP must remain open to public operators, territories, SMEs, and research centers, in an inclusive and transparent logic.

## For a European Public-Private Partnership for Automotive

After the presentation of the Automotive Partnership at the last ERTRAC plenary meeting and the ERTRAC Conference in July 2025, we have expressed concerns about the future of road transport research (RTR), ERTRAC and the positioning of the Automotive Partnership. The partnership, by its very nature, is likely to place a strong emphasis on vehicles and technological innovation. If so, the automotive partnership should however explicitly refer to the need for a system

approach including users, infrastructures, and specific use cases and services such as freight and shared and public mobility. It has to recognise the needs of all road transport users and be linked to research funded elsewhere in FP10, especially in areas like safety, infrastructure, active mobility, and wider mobility systems. To ensure successful market uptake, the partnership must also consider planning, governance, business models, regulation, and other factors that enable practical deployment of solutions. Strong cooperation with public authorities, operators and service providers, and other stakeholders is essential. Inclusive collaboration across the European road transport research ecosystem will strengthen the competitiveness of the automotive industry over time, ensuring developed products answer to the needs of all users. Effective long-term success of product research and development requires also clarity about the future of research partnerships CCAM and 2ZERO.

## For coherent, comprehensive and structured activities about European Autonomous and Connected Mobility

The automation of public transport vehicles is likely to generate a systemic shift in the sector. It will profoundly change business models, enable new approaches to public transport services, and even alter perceptions of public transport. Large-scale deployment of this innovation requires Level 4 vehicles adapted to public transport requirements and homologated, which are currently lacking in Europe and only emerging with difficulty elsewhere. Apart from rare exceptions (e.g., Weride shuttles, Holon shuttles, Karsan minibuses), a suitable offer for public transport is non-existent. It is essential to have vehicles available to work on service development, business model impacts, and the emergence of a genuine European market.

Automated mobility's innovation lies not in the technology itself, but in how the technology is used to move people efficiently and answering the needs of all users. Public transport is leading this innovation. **Thus, future activities (including a possible partnership), should not be limited to automotive but rather to autonomous mobility in a systemic approach with a significant share dedicated to public transport** (including buses and shuttles).

The funding needs of the sector are immense and must address both the industrial development of Level 4 technology in Europe, and the deployment at scale of such vehicles, integrated in public transport. Greater focus of investments on significant projects, showcasing sustainable use cases, as well as mature L4 technology is preferable.

## Recommendations for Simplifying Access to European Funding

To encourage innovation and modernization in transport, the EU must rationalize and simplify funding access procedures. Preparing applications for European project calls is currently time-consuming and complex, discouraging many actors from seeking these funds. Key difficulties include:

- **Consortium project management:** Currently, project coordinators are responsible for distributing funds to partners, which is administratively burdensome. It would be relevant to consider a mechanism allowing the European Commission to pay partners directly once contractual elements are validated.
- **Lump sums:** While we welcome measures that simplify the implementation of EU-funded projects, the use of lump-sum payments in EU funding programmes can create challenges: payments depend on Project Officers' assessments of whether tasks and work packages have been fully completed. This carries a risk of subjectivity, because different Project Officers may interpret requirements, quality standards, or completion criteria differently. Such inconsistencies can lead to unequal treatment of beneficiaries, disputes over payment decisions, and uncertainty for those implementing the projects. Without clear, objective, and verifiable benchmarks, the lump-sum approach may undermine fairness, transparency, and confidence in the funding process.
- **Funding rates:** Large enterprises should also be eligible for 100% funding for projects at TRL 5. At this stage, the activities still focus on validation in a relevant environment and are associated with high technological and market-related risks as well as limited short-term commercial returns. Without full cost coverage, large enterprises may be discouraged from investing in such early-stage innovations, particularly in areas of strategic importance for the EU. Supporting their participation at this level ensures that critical industrial capabilities, resources, and expertise are mobilised to accelerate innovation and strengthen Europe's technological sovereignty.
- **Reporting and audit:** Financial reporting and audit requirements are considered excessive. UITP asks for application of lump-sum to remove complexity and administrative procedure only based on clear objective and verifiable completion criteria.

- **Publication of calls and project lifecycle:** Early publication of calls over several years is a notable advance. Further progress could be made by multiplying cut-off dates within a single call, as in the MIE AFIF scheme, to better match investment calendars and project lifecycles. For example, the LIFE programme's single annual deadline poses synchronization challenges.

## Recommendations

- Harmonise eligibility criteria across EU programmes to facilitate access to funding;
- Reduce administrative burdens related to project reporting and audit by enlarging the use of lump-sum in order to make them as the normal funding methodology;
- Maintain multiannual visibility of calls, with several deadlines per call.
- burdens

## EU funding for civil protection, preparedness and crisis response

As representative of operators of vital importance and managers of critical infrastructure (Public transport operators and public transport authorities), UITP wishes to underline the **importance of explicitly considering the needs and responsibilities of public transport within this new strategic framework.**

UITP calls for PTO and PTA to be fully recognised as **critical entities** under the civil protection mechanism, and to be integrated into prevention, preparedness and crisis response arrangements.

**THE DRAFT REGULATION RIGHTLY PROVIDES FOR AN INTEGRATED APPROACH TO HEALTH AND CIVIL CRISES, INCLUDING THE CREATION OF A CRISIS COORDINATION HUB AND THE STRENGTHENING OF THE ROLE OF THE ERCC (EMERGENCY RESPONSE COORDINATION CENTRE).**

## Budget performance

### **Simplification: yes, but without increasing reporting complexity**

Simplifying the performance framework is essential, but it must not result in more complex reporting obligations for beneficiaries. The introduction of cross-cutting standardised indicators (output/result indicators linked to "intervention fields") can be useful for data aggregation, but risks being counterproductive if these indicators are too generic or ill-suited to the specificities of programmes or territories.

### **Transparency of beneficiaries: to be preserved and strengthened**

We fully support the provisions aimed at strengthening transparency on the beneficiaries of EU funds, notably through the single portal ("Single Gateway") provided for in Article 12 of the regulation. Publishing data on beneficiaries and funded operations is a key lever for accountability and for citizens' trust in EU action.

### **Transparency of calls for proposals: towards long-term visibility**

The establishment of a single portal bringing together most calls for proposals and calls for tenders has been a major step forward. However, in order for project promoters to organise themselves effectively, it is essential that this portal provides a forward-looking view of upcoming calls, ideally over a two-year horizon, similar to the Horizon **Europe work programmes.**

### **Indicators: ensure that the performance framework captures the reality of public transport**

The Commission's list of intervention fields and indicators does not yet fully reflect key dimensions of sustainable urban mobility.

UITP highlights the importance of integrating additional indicators that measure:

- **modal shift toward public transport,**
- **reductions in car dependency,**
- **network resilience** (climate resilience, cybersecurity and operational robustness),
- **efficient use of urban space,**
- **accessibility and inclusion,**
- **safety and security for passengers and operations.**

These factors are essential to evaluate how EU spending contributes to climate goals, quality of life and the sustainability of the urban mobility system.

UITP encourages to:

1. **Strengthen mobility-relevant indicators:** Include modal shift, resilience, space efficiency and accessibility metrics in Annex I.
2. **Ensure practical and proportionate DNSH implementation:** Provide operational guidance tailored to infrastructure and mobility projects.
3. **Deliver true simplification for beneficiaries:** Streamline verifications, clarify cost rules and improve reporting tools.
4. **Maintain visibility for sustainable urban mobility:** Ensure intervention fields and indicators adequately reflect public transport's strategic contribution.
5. **Support coherence across EU instruments:** Ensure the horizontal performance framework aligns smoothly with programme-specific regulations without creating new layers of complexity.