



**Transport
Alliance for
Clean Air**

The **Transport Alliance for Clean Air** is a group of companies and associations from the transport and mobility space that shares a common vision for *clean air in the EU*.

Manifesto

Introduction

Air pollution remains a major environmental threat to human health and is bad for Europe's economy as it is estimated to cost Europe 15 billion EUR every year in lost working days alone.¹ We believe that the private sector should be at the forefront of action to tackle toxic pollution, by helping authorities to strengthen controls over transport emissions and providing low- and zero-emission technologies, goods, and services. We stand ready to support and help shape a European policy framework that is fit for purpose to support the EU's vision towards Zero Air Pollution by 2050.

More precisely, we believe that more ambitious legislation on air quality is needed at EU level. We therefore ask EU policy makers to promote the uptake of zero-emission and sustainable mobility solutions, such as active, shared and micro mobility as well as public transport, particularly in urban areas. This is crucial to reduce dependency on private vehicle ownership and use - as these mobility modes are cleaner in addition to being more efficient both in the energy consumed, space occupied and consequently increase livability in cities. European Commission initiatives should be consistent in pushing for these sustainable solutions across all sectors e.g. encouraging switch from privately owned cars to alternative solutions to increase resource and urban space efficiency.

There is also a need for better monitoring and measurement of air pollution in order to better assess air quality and to provide adequate and accurate information to citizens on health risks, including monitoring of real emissions from road transport.

Clear guidance needs to be provided to investors, and that is moving away from focusing EU funding on car-centric road transport and instead giving greater incentives towards sustainable modes and shared mobility.

Finally, better tools to quantify air pollution from road transport are needed as it will make it easier to find appropriate measures to reduce those emissions.

We have prepared the following Manifesto with our proposals for the next EU policy cycle based on our vision, regrouping the most important measures that need to be taken by the next EU Commission in order to tackle air pollution from road transport.

¹ [SWD\(2013\) 531 final](#) - referred to in the [2022 AAQD impact assessment](#)

Updating EU legislation on air quality to put Europe on a path to zero pollution by 2050

Exhaust emissions

- **Update the National Emission Ceilings Directive (NECD)**, as required by 2025, including ambitious new targets on pollutants, including nitrogen oxides (NOx) and particulate matter (PM), to put Europe on the path to zero pollution by 2050.
- **Revise the Non-Road Mobile Machinery regulation** to include stricter emission limits in order to accelerate the uptake of zero emission construction machinery and sites in cities.
- **Update the 2014 EU roadworthiness package** that consists of Directive 2014/45/EC on Periodic Roadworthiness tests, Directive 2014/47/EC on technical roadside inspections of commercial vehicles and Directive 2014/46/EC on the requirements for issuing registration certificate in order to:
 - Maintain a vehicle's environmental performance over its lifetime.
 - Add specific emission limits in real-world conditions to effectively use remote sensing measurement as a way to assess vehicles emission levels in the roadside inspection vehicles directive.
- **Publish official guidelines for the use of vehicle emissions remote sensing** in the EU, so that cities and regions can monitor transport real-world emissions on their territories thus avoiding any future emission scandal.

Non-exhaust emissions

- **Extend the new emission limits on brake pollution** for electric cars of 3mg/km agreed by co-legislators under the new Euro 7 emission standard **to all vehicles and all drivetrain technologies**.
- The European Commission should come forward as soon as possible with **implementing legislation for tyre particle pollution**, which should include testing methodology and limits by no later than the end of 2024.
- In order to decrease energy use, emissions, and tyre/brake particles pollution, **the European Commission should regulate the increasing size and mass of private motor vehicles, introducing limits to this expansion**, which will limit tyre particulate emissions.

Making new air quality legislation a reality in Europe (and in cities)

- **The Commission should actively make recommendations to Member States regarding the content of their Air Quality Plans under the revised Ambient Air Quality Directive (AAQD)** in case exceedances to the upcoming air quality standards persist. These recommendations should be based on existing best practice and measures that have been proven to reduce emissions quickly and cost-effectively such as implementing 'last mile' zero (exhaust) emission delivery arrangements, and more importantly implementing vehicle access restriction zones, incentivising cycling and walking.
- In order to accelerate the uptake of the best practice measures cited in the previous paragraph, the Commission **also pay attention to the synergies with the implementation of the Sustainable Urban Mobility Plans** that have become mandatory for urban nodes by 2027 as part of the TEN-T Regulation by supporting local authorities and do the following:
 - Promoting **a development of strong public transport networks** that are safe, accessible, inclusive and affordable.
 - **Incentivising cities to share urban space more fairly**, therefore increasing walking and cycling infrastructure as outlined in the European Commission Proposal for a European Declaration on Cycling, also wider commuting area beyond municipal borders² and transnational routes for cycle tourism.
 - **Facilitating the deployment of low- and zero-emission technologies** for transport in these cities, as well as shared transport.
 - ◊ On-demand and shared electric vehicles should also be deployed in order to make transport more accessible to people with reduced mobility.
 - ◊ Encouraging cities to ramp up their charging infrastructure in addition to differentiated parking fees.
 - ◊ Bicycle parking and electric vehicle charging provisions in the recent review of the Energy Performance of Buildings directive should be effectively implemented, with technical guidance if necessary and appropriate support provided for entities responsible for the implementation.
- **Facilitating the implementation of low-emission zones through additional guidance in SUMP**s and the enforcement for foreign vehicles through the finalisation of the Directive 2023/0052(COD) on Cross-border exchange of information on road-safety-related traffic offences.

² As laid out in the European Commission Proposal for a European Declaration on Cycling

Allocate funds to support deployment of sustainable low- and zero-emission technology and mobility solutions

- **Funds from the Recovery and Resilience Facility, ERDF and Connecting Europe Facility** among others, should support the deployment of infrastructure allowing to shift away from polluting modes of transport, such as cycle lanes and more space for walking.
 - The EU should increase and earmark funds for cycling within European funding mechanisms such as EU Structural and regional funding for cycling infrastructure³.
 - The EU should introduce quality requirements for cycling infrastructure, so EU and national funds are efficiently used for quality infrastructure.
 - Encouraging private and public partnerships in order to promote the uptake of low and zero-emission mobility solutions in EU funded projects.
- **The European Commission should also incentivise the private sector to electrify its fleets**, and making EVs more accessible by:
 - Launching an ambitious and enforceable green fleet mandate, including corporate and urban service fleets (such as taxi and ride-hailing) to accelerate the transition of high km users.
 - Provide adequate financial support to high km users such as professional drivers in their EV transition.
- **Ensuring consistency between EU funds use and public transport / vehicle fleet greening goals** by:
 - Encouraging Member States to include fleet greening financing plans in their National Energy-Climate Plans.
 - Redirecting available funds towards public transportation (CEF, HORIZON, ERDF, ESF), especially Cohesion Fund towards peri-urban areas to account for changes in the TEN-T regulation.
- **Addressing the transport skills challenge by creating an Erasmus for Public Transport programme** in order to facilitate training and boost attractiveness of transport careers.⁴

³ <https://ecf.com/what-we-do/european-funding/unlocking-eu-funds-cycling-investments>

⁴ According to the [World Economic Forum](#), 105,000 bus and coach drivers are currently lacking in the EU while projections show that more than 2 million of these jobs could be created by 2027 in the EU, in addition to close to 2 million jobs as mechanics



Broadening our understanding of air pollution

- The new **Sustainable Urban Mobility Indicators (SUMIs)** should provide reliable, relevant and up-to-date mobility and air pollution emissions data in open access.
 - Providing sensible Safety KPIs for cycling such as infrastructure provision, cycling numbers, and modal share.
- The **Count Emissions EU mechanism** should be replicated for air pollutant emissions in order to identify ways to reduce emissions more effectively.
- The **EU should implement an effective market surveillance on real-world vehicle emissions using remote sensing networks** so that the European Commission supervises that vehicles emit as expected. Member States should provide minimum samples of data for a centralised analysis at the EC's JRC.
- **Additional attention and analysis of the social and territorial impacts should be dedicated to future regulation**, in order to ensure a just climate transition.
 - This should notably be done by updating the European mobility strategy and emphasising on increasing the offer of public transport, particularly linking urban and suburban areas in order to reduce territorial disparities.
- **The European Commission should promote the adoption of CEN/TS 17660:2022 as an EU Standard across Member States.**

This would ensure consistency with the data quality objectives for Indicative Measurements outlined in the Air Quality Directive 2008/50/EC. Standardizing CEN/TS 17660:2022 would facilitate the deployment of Class 1 air quality sensor systems in low-emission zones and other projects, thereby enhancing regulation enforcement and improving data reliability for impact assessment.