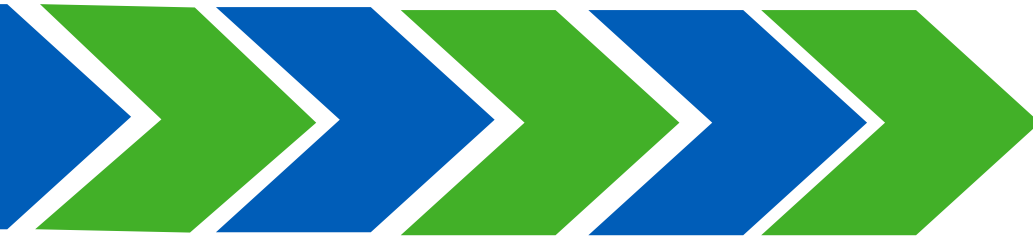




Brussels, 23 September 2020

EU Strategy for a Sustainable and Smart Mobility

- ETF answer to the public consultation -



This paper expands the answers submitted in the questionnaire. It is divided into three parts:

- [Evaluation of the targets of the 2011 White Paper;](#)
- [Impact of the technological and societal changes on the transport sector since 2011;](#)
- [Vision for the future Mobility Strategy.](#)



1. Evaluation of the targets of the 2011 White Paper on transport

The White Paper set quantitative and qualitative headline targets. In this section, we present our evaluation of different aspects of these targets:

1.1. Sustainability of transport services

The sustainability-related objectives of the White Paper were not reached. It has been partly caused by the fact that the strategy did not address the issue of social dumping that has contributed to the unsustainable expansion of civil aviation and road transport. In addition, there was no political will among the Member States to achieve the targets: 'more transport' has been still seen as a priority instead of 'better transport'.

1.2. Accessibility and affordability of transport services to individuals and companies to satisfy their mobility needs

Little progress has been made to make greener transport modes more accessible and to encourage a shift to them. It is also linked with the issue of affordability and quality of working conditions, see below.

It is necessary to note that push towards market opening and lowering transport costs (so 'affordability of transport services') in certain transport modes often happened at the expense of the working conditions and salaries of people employed in the transport sector.

The externalisation of these social and labour costs have also created an uneven level playing field, where the 'greener' modes of transport are not competitive.

EXAMPLES

Disparities in wage levels and social security contributions are a significant source of differences in competitive conditions between Member States. A massive salary gap still exists between EU 13 'newer' and 14 'older' Member States, fuelling illegal and/or unfair social dumping practices. Due to these practices, working and social conditions have deteriorated sharply over the last years.

For instance, road transport is cheap, mainly because road operators cut down on labour costs circumventing laws (e.g. via letterbox companies) and resorting to dumping practices, such as making drivers work long hours and not paying them well. Labour represents about 30% of the operational costs of a road transport operator. But unlike fuel costs, labour ones can be reduced via fraud and illegal practices.

Similarly, in the civil aviation sector, the transnational nature of workers makes them vulnerable. Due to the lack of clarity on applicable laws and lower protection in certain countries, several air carriers gain advantage by unfair competition and social dumping.



Social protection of workers has to be unified and strengthened for all workers regardless of their work contracts, and coordinated to prevent abuses of atypical employment and to stop the spread of unsustainable practices.

1.3. Quality of transport services

The accessibility, affordability and quality of transport services highly depend on the Member States. Satisfaction is very high in countries where public transport is seen as an important pillar of social, transport and environmental policy. There is no connection between liberalisation and high levels of satisfaction or good transport quality in (periphery) regions. Proper funding of the operators under public service obligations (PSO), including high-quality working conditions and investment in quality infrastructure, is essential for the quality of transport services.

In addition, as further explained below, staff shortages caused by bad working conditions or understaffing coming from the cost-cutting practices also impact the quality of services.

EXAMPLES

In civil aviation, the implementation of the Performance and Charging Scheme as a part of the Single European Sky has put the pressure at the national level to reduce costs of air traffic management, which has had a negative impact on staffing levels, and as a consequence – airport delays. In turn, in ground handling services, the introduction of competitive tendering had a negative impact on service quality. The race to the bottom with regards to cost-cutting impacted negatively working conditions of the staff and in consequence also the quality of the service, since low wages mean high turnover and outsourcing of staff, insufficient training and lacking safety measures.

Similarly, in railway sector, the EU policy promoting market opening and competitive tendering created the incentive to cut costs, which impacted the quality of services, for example through insufficient staffing or even attempts for complete removal of onboard staff. As a consequence, it impacts the passengers' experience and safety while travelling.

1.4. Quality of working conditions for those occupied in the transport sector

Regarding the social dimension of transport, the initiatives enumerated under point 1.2 'Promoting quality jobs and working conditions' of the White Paper remained mostly unimplemented.

In addition, the implementation of the transport policies up to date shows that there is a discrepancy between the aims and undertaken activities and that certain policies contradict

each other. The above-mentioned push towards market opening and lowering transport costs resulted in worsening working conditions in different transport sectors:

- In civil aviation, the practice of bogus self-employment has been growing not only among low-cost carriers but also legacy carriers. This has had an impact on both the social security of workers and industrial relations in the sector.
- In ground handling at airports, liberalisation of the sector in connection with the growth of low-cost carriers exercising market pressure led to serious deterioration of working conditions.



- In road transport, the loopholes and abuse of the Combined Transport Directive and Posted Workers Directive led to numerous cases of social dumping.
- The initiative 1.2.8 (Social code for mobile road transport workers) was misdirected, as only clear, binding and enforceable rules would answer the issues in the sector. The Social Partners, on the one hand, did not have competences to intervene in the areas at stake, e.g. cabotage, and on the other, the interests were too divergent to reconcile. The approach that was ultimately taken by the Commission, i.e. Mobility Package, will hopefully allow for enforceable rules.
- In road transport, unfriendly work schedules, inadequate rest, lack of decent sanitation and / or rest facilities, weekends away from home and poor levels of pay have had a massive effect on the attractiveness of the sector, leaving it to struggle with a significant labour deficit. The average age of trucks drivers is around 45, while the average age of bus and coach drivers is 55 years plus. Additionally, an estimated 98% of the drivers are male, which shows that young people and women think twice about entering the sector and taking up the profession of a truck driver. This led to the situation that operators resort to recruiting non-EU drivers. In 2017 approximately 110,000 3rd country drivers worked in the EU. In 2018 their number went up by more than 30%, to 150,000. These drivers are even more vulnerable, and thus the pay and conditions they are employed on are even worse.
- In river cruises sector there has been an increase of outsourcing of hospitality staff from 3rd countries, often via letterbox companies aimed at circumventing labour and social protection regulations
- In the railway sector, the liberalisation of the market also brought negative impact on working conditions, for example through subcontracting of onboard services, such as cleaning and catering, as well as of maintenance services.
- Similar situation as in railway sector has also happened in urban public transport.
- There has been little change in the conditions for women transport workers. The Commission's initiative on Women in Transport - EU Platform for Change has brought so far no tangible results. Working conditions and the workplace culture in many transport industries are still male-focused, and health and safety policies rarely take account of gender-specific issues.
- There is a persistent lack of access to decent sanitation facilities or no facilities at all are provided for women transport workers.
- Furthermore, the sector has a lot of work to do to ensure that women have equal access to employment with equal access to training, equal pay and equal career opportunities.
- Women transport workers also face shocking levels of sexual harassment and violence at work.
- Finally, there has been a considerable rise in passengers' aggression targeting transport workers.

The examples above are therefore contradictory to the Commission's claim in para 37 of the White Paper that '*market opening needs to go hand in hand with quality jobs and working conditions (...)*'.

All the factors listed above strongly reduce the attractiveness of transport jobs, which leads to workers shortages in many transport sectors. The attempts to make the sector more attractive to young people or women will fail if PR actions are not backed by raising salaries, improving working conditions, providing facilities such as toilets or rest spaces, or targeting the increase of violence and aggression towards transport workers, both women and men.



1.5. Safety and security

Regarding safety and security, professional drivers' fatigue in road transport has not been tackled by the EU policies and no studies has been made on this topic for over 15 years, whereas the problem persists across Europe. The driver's profession, both in passenger and freight transport, is today more stressful and dangerous than it once was. Fatigue makes it harder for drivers to maintain vigilance, alertness and decision-making capacity in traffic, and this impairs their ability to drive freight and passengers safely to their destination. Keeping roads safe is largely dependent on decent working conditions and sufficient rest of professional drivers.

The tendency towards driver-only operations as a consequence of pure cost-cutting objectives /policies in the railway sector creates safety and security risks. Lack of monitoring and enforcing of driving and rest time creates high safety risks in the liberalised rail sector.

With regards to the maritime transport sector, less coverage by the EU legislation due to the decline in EU fleet registration also has had an impact on safety and security standards. For instance, there have been repeated cases in the sector of the non-respect of working and rest hours or the practice of extending the crew's voyages as a tool to cut deployment costs. The latter has been even more acute during the COVID-19 pandemic.

In turn, in the civil aviation sector, the activities of EASA can be assessed positively.

1.6. External costs to society

The increase of bogus self-employment in the transport sector means that the workers do not have a safety net in case they fall ill or become unemployed, which has put the workers in an extremely precarious condition during the COVID-19 crisis.

In road transport, as mentioned above, circumventing social security legal obligations is one of the two main incentives for operators to open letterbox companies in Central and Eastern Europe. This leads to no protection for drivers in need and deprives the Central and Eastern European member states of revenues from social contributions.

Similarly, as mentioned above, there is the question of the relation between drivers' fatigue and accidents in road transport.



2. Impact of the technological and societal developments on transport sector since 2011

2.1. COVID-19

The pandemic has severely hit the transport industry, and the damage has been especially severe in passenger transport. However, it has also revealed and deepened the cracks that have been present in the sector for years. In order for the transport sector to recover and become more resilient, it will be necessary to address both the short-term damage caused by COVID-19 and the long-term systemic issues that are harming the sector.

For instance, in the road freight transport, when due to the COVID-19 pandemic the borders closed and freight numbers dropped, it exposed even further the issues such as abuses of the single market, letterbox companies, bogus self-employment, remunerations based mostly on bonuses linked to hours worked, precarious employment of 3rd country workers and workers from the EU low-income Member States.

In the maritime transport sector, the pandemic caused distress for hundreds of thousands of seafarers that became confined on their vessels for months while waiting for repatriation. At the same time, the crew members that could not join the ships in the maritime and inland waterways transport lost their jobs and income. Similarly, in the fisheries sector, the workers, whose wages are mostly based on a share of the catch or bonuses, became deprived of their source of income.

As far as civil aviation is concerned, after years of growth, the sector has come to a nearly complete halt in March 2020. Although the airline industry contributed to improved connectivity in Europe, its carbon emissions have been on the rise for years. The pandemic might be paradoxically an opportunity to rethink its future. As the aviation's growth in Europe was to a large extent enabled by social dumping of low-cost airlines and inefficient state aid for the airports serving such carriers, these practices must be ended. A similar situation happened in the bus and coach sector.

In contrast to the examples mentioned above, the delivery companies have experienced a massive surge in business since the beginning of the crisis. While they took full advantage of it, their drivers were left to cope with an enormous increase in pressure and work intensity, with a lack of protective equipment as well as with unsafe and precarious delivery conditions. In general terms, delivery companies using vans operate in a grey area as they do not have to comply with working, driving and rest time rules.

2.2. Digitalisation and automation

Due to the expansion of online ride-sharing platforms (Uber, Deliveroo, etc.), digitalisation has had a negative impact on working conditions and does not contribute to the shift towards collective modes of transport, but in turn, increases congestion in urban areas. Similarly, the expansion of food delivery platforms has been linked to the circumvention of labour regulations. It is, however, important to stress that the labour issues are not caused by the technology per se, but by the business models that are built on the externalisation of social costs.

New technologies have also had an impact on OHS in transport.



On the positive side, in certain sectors, it alleviated work, e.g. in ground handling operations. Automation and digitalisation can also improve the attractiveness of jobs in inland waterways and maritime transport by moving some jobs on shore.

However, automation and digitalisation can also increase work-related stress, when one worker is requested to perform or supervise tasks that were done before with more workforce (e.g. automated terminal operations in ports). Additionally, automation implies lower levels of job rotation, less multi-skilled workers and therefore, higher health risks, due to the repetitiveness of tasks. There is also the question of the location of remotely-performed jobs, as they can be moved to countries with cheaper labour.

It should be therefore obligatory to conduct an extensive analysis of the planned automation and digitalisation projects with regard to the changes that the new technology will have on skills requirements and job conditions.

Additionally, despite previous ambitious forecasts according to which automated driving will take over by 2020, in road transport, we see ourselves today limited to platooning as the most probable scenario for the foreseeable future. With the traffic conditions in today's Europe, doubled by a lack of investment in dedicated lanes for autonomously driven heavy-duty vehicles, the presence of professional drivers will remain a key element in future.

The World Economic Forum has already identified in 2016 that women would be more affected by the coming changes due to automatisisation and digitalisation than men and the expected new trends might sustain or even worsen existing gender inequalities. However, in the EU debates and policy developments, there is no link between the digital agenda in transport and how these developments will affect women transport workers.

2.3. New business models, changes to consumer behaviours, the evolution of e-commerce

A strong growth in air travels, propelled by the expansion of the low-cost air carriers that base their business model on social dumping (e.g. bogus self-employment) or indirect subsidies, goes against the CO2 reduction targets.

Likewise, in coach sector, the European expansion of low-cost companies has been possible due to the outsourcing model, putting downward pressure on salaries. A similar mechanism could be seen in relation to the expansion of e-commerce with 'next day delivery'. The efficiency has been often achieved at the cost of working conditions of the delivery workers, often forced into bogus self-employment or precarious contracts. As mentioned above, COVID-19 has put even more pressure on logistics workers.

The above trends have been facilitated by the lax enforcement of the existing EU and national labour regulations, as well as the difficulty in certain cases to establish the beneficiary owner/principal place of business.

In the maritime transport and port sector, alliances and vessel sharing agreements practices, along with vertical integration of shipping companies into container terminals have a significant impact on ports, with a particularly negative effect on the financial profitability of terminals and other segments of the maritime industry, such as the tug sector and feeders, and adversely affect maritime jobs.



The impact on container shipping, due to the growing power of the alliances, the relation between the shipping companies that are part to the alliances and both the ports and the companies providing services in ports is highly unbalanced. This situation impacts the economic profitability of terminals and other service providers, especially in a context where, due to the ever-increasing size of ships, constant and significant investments from terminals are required. This situation puts downward pressure on working conditions and job security in ports.

The influence of shipping companies on ports and terminals needs to be framed in a wider context, which includes a growing trend towards vertical integration in terminals, the above-mentioned increasing size of ships and generally favourable taxation and state aid systems that are granted to shipping lines. The maritime sector being wider than maritime transport only, a more inclusive approach of all those involved in the sector, including the workers, is therefore needed in order to design policies and legislation that are able to guarantee a sustainable future for the sector under both an economic and social perspective.

2.4. Climate change

The extreme weather conditions have been occurring more frequently in recent years, which has had an impact on the transport sector in Europe as such due to the damages to the infrastructure, work stoppages, the negative effect on occupational health and safety. However, the actions of the EU and Member States were sometimes contradictory and lacked urgency.

Increased interest of the EU society in sustainability should be a clear sign for the EU to step up the efforts to finally achieve the climate-related targets of 2011 White Paper.

EXAMPLE

Professional drivers have been affected by the heat waves during summer that are increasingly intense over the years. Problem is that most trucks and coaches are equipped with air conditioning systems that switch off when the engine is not running. Moreover, operators forbid drivers to keep the engine on when they take a rest (a.o. for reasons of engine emissions, unnecessary fuel expenses or engine wear) but at the same time they do not provide their drivers with air-conditioning systems that independently function with the engine turned off. Due to the high temperatures in cabins, drivers may be subject to physical discomfort, reduced quality of rest and sleep as well as to heat related illnesses.

2.5. Societal trends

Due to the staff shortages caused by the bad working conditions and attempts to lower the costs even further, there has been a significant increase in the number of 3rd country nationals working in most of the transport sectors (road, ports, maritime transport, river cruise, civil aviation). There has not been any coherent EU approach on hiring these non-EU workers, even though their working arrangements often stretch across the Member States (e.g. a work permit from country A, working in country B for a company from country C). As the current legislation is not clear and the enforcement is lacking, it led to cases of unequal treatment between EU and non-EU workers. In addition, the 3rd country nationals are at a higher risk of suffering from labour abuses leading in extreme cases to slavery-like conditions.



3. Future Smart and Sustainable Mobility Strategy

Transport is clearly a backbone of the European project, and the COVID-19 pandemic has shown how critical it is to ensure the proper functioning of the sector. At the same time, the necessity to make the transport greener remains as urgent as ever. As mentioned earlier (section 2.1), it is crucial to address both the short-term damage caused by COVID-19 and the long-term systemic issues that are harming the sector.

It is also crucial to remember that the EU transport industry is a workplace for 10 million people. The recent pandemic has highlighted their role as key workers, yet they are completely overlooked in the roadmap for the future Mobility Strategy, apart from some general statements. In a situation where labour abuses, bad working conditions and social dumping are a sad reality in the sector, this omission is unfathomable. The social dimension should be considered under the headline targets of the new Mobility Strategy.

In the following sections, more specific proposals are presented in order to bring forward a more socially sustainable transport in Europe.

3.1 Single market and competition

The roadmap mentions in several places the need for removing barriers that remain on the way to a fully single market. It is indicated as a prerequisite to more competition. However, what we have seen during the last years is that in the transport sector this competition was usually based on cost-cutting, equalled to the race to the bottom and, as a result, growing social dumping. It has been the case for all transport sectors. In addition, it has to be stressed that leaving the industry to market forces means that certain groups in society if they happen to live in a 'commercially unattractive' area, have been at risk of transport poverty.

In order to make the future EU transport more resilient, sustainable and accessible, the root issues have to be addressed, and the paradigm of the market liberalisation and cost-cutting should be reversed. 'Affordable transport' cannot be achieved at the expense of the working conditions and salaries of people employed in the transport sector.

Proposed initiatives

ALL TRANSPORT MODES

- Endorse tighter control of transport undertakings operating in a cross-border context, especially when hiring 3rd country nationals, as they have been often exposed to labour abuses—Foster closer cooperation between national law-enforcing authorities, with the support of the European Labour Authority.
- Clarify the legislation concerning the posting of workers in the transport sector and the rules on beneficiary ownership and principal place of business. Ensure the principle that workers performing the same work at the same place receive identical salaries, despite their nationality.
- Introduce mandatory due diligence in the transport supply chains in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs).



- Urge Member States and competent authorities to apply social criteria and implement a compulsory transfer of staff in the case of a change of operator in order to foster fair competition and create a social level playing field.

URBAN PUBLIC TRANSPORT and REGIONAL/COMMUTER RAIL

Provide proper funding of the public service obligation contracts (PSO) and ensure that all the and concessions (public procurement) in public transport are available only for the companies that comply with labour laws and with collective bargaining in place.

RAIL Recognise the role of publicly owned railways in particular in view of experiences with COVID-19; develop a true and socially fair policy to promote rail freight transport (including single wagon load) and promote rail passenger transport (including night trains).

ROAD TRANSPORT Ensure that the recently adopted Mobility Package 1 works in practice and thus launching an enforcement roadmap, will clear goals, means and measures stimulating investment in innovation and smart enforcement, for the benefit of targeted and effective checks. On the other hand, as light commercial vehicles are now covered by a number of EU regulations, i.e. driving and rest time for instance, what the sector needs is a full adaptation of the legal frame to this new reality. The driver training directive should be revised to include compulsory training for all categories of drivers.

MARITIME TRANSPORT Promote ship registration under the European flags. Access to the public financial support should be available only for shipowners operating under such flags. A level playing field, through an authentic European Maritime Space, for shipping services within the EU, needs to be created, to prevent unfair competition between shipping companies that are operating according to EU standards when it comes to labour and working conditions requirements and those that are engaging in substandard practices.

PORTS Impose that a fair share of the benefits resulting from the efficiencies deriving from Consortia agreements is passed to the users of the shipping services.

INLAND WATERWAYS

- Establish true social agenda for the sector. Currently, the social aspects are not addressed, save for two Directives concluded thanks to an active role of the Social Partners (Working Time Council Directive 2014/112/EU and Directive on professional qualifications 2017/2397/EU). The lack of flag state legislation facilitating social dumping practices has not been addressed at all, despite the ETF calls for a uniform European legislation on this matter. A genuine link between the owner of the company (beneficial ownership) and the social rights of the workers on board is essential.
- Clarify the rules on social security in the sector that currently do not take into account the nature of workers in the inland waterways sector. For the time being an exception via article 16 of the EU Regulation 883/2004, provides legal certainty and genuine social security coverage for crew members working on the Rhine. Unfortunately, this exceptional framework creates a dual situation parallel to the 883/2004 that is in place for non-Rhine navigation. Member States add to the legal confusion by their national



labour courts interpreting the exceptional Rhine regime differently, thus putting the framework under a lot of additional pressure.

AVIATION Review Performance and Charging Scheme rules that put pressure on the air navigation service providers to lower cost and lead to the indirect adverse impact on the environment. Consider in turn, mechanisms to incentivise airspace users to use the shortest possible route.

3.2. Clean mobility

The ETF supports the shift to carbon-neutral transport. The Strategy roadmaps mentions objectives such as the shift towards clean technologies, low-emission transport modes and multimodality are welcome. It is difficult to disagree with these aims, but it has to be stressed that the previous versions of the transport policy failed to achieve them. We believe that one of the factors that hindered reaching this objective is the fact that in some transport segments costs are kept artificially low by the use of a dubious business model that allows social shopping within the internal market. Without eradicating this phenomenon, modal shift is not likely to take place.

The roadmap rightly mentions internalisation of external costs as one measure enabling green transition. This internalisation should also include fair wages and social contributions, as without it companies that base their business model on low labour costs will have a competitive advantage over other undertakings that want to be both environmentally and socially sustainable. This uneven level playing field does not only further deteriorate attractiveness of work in transport but also hampers the shift to the greener transport modes.

It is also important to note that while the roadmap put the zero-emission (i.e. electric) vehicles as the priority objective, electrification of private cars will not solve the problem of congestion and safety or fair use of urban space. It will, in turn, exuberate the societal inequalities, as new vehicles will be available mostly for better-off groups. The new Mobility Strategy should, therefore place the shift to collective transport and active modes of transport as the ultimate goal.

Proposed initiatives

ALL TRANSPORT MODES Ensure that any financial measures aimed at fostering green technologies and promoting a shift to waterborne transport and rail (such as the Motorways of the Sea, TEN-T, CEF, InvestEU, etc.) have a social objective and rely on indicators linked to collective bargaining, job guarantees and stronger social cohesion.

URBAN PUBLIC TRANSPORT and RAIL Introduce a new binding target to double the use of collective rail and road public transport by 2025, require the establishment of this target in the SUMPs (Sustainable Urban Mobility Plans) in particular when using public funds.

RAIL Promote a rail freight strategy as well as cross-border rail passenger strategy based on inter- and intra sector cooperation; stop with the EU rail transport strategy based on intra-sector competition that is promoting cherry-picking to the detriment of public transport in passenger transport and promoting socially unsustainable cannibalising in freight transport.

ROAD TRANSPORT The revision of the Combined Transport Directive will show the real political will to support a climate-friendly modal shift. In our view, this will be achieved only if cabotage restrictions apply to the road leg of combined transport.



INLAND WATERWAY and PORTS

To realise the shift to cleaner mobility, investments will need to be made in the development of green ports and programmes to enhance further the environmental sustainability of inland waterway transport in Europe. It will be important to ensure adaptation of port infrastructures to the changing needs of a greener fleet, and efficient and smooth hinterland connections.

MARITIME TRANSPORT

When discussing the maritime fuels of the future or new sustainable ship designs, including the technologies that will accompany them, risk assessments need to consider workers' health, safety and skills needs.

3.3. Digitalisation and automation

The roadmap places digitalisation and automation as one of the priorities. However, it is critical to remember that new technologies should not be the aim in themselves. Any digitalisation and automation project should be human-centred, for both users and workers, and undertaken only if there is a clear business case to do so and an improvement of working conditions. Push towards automation without consideration of social impact could have a severe impact not only on workers but also on local communities that rely on a specific transport sector, for example ports.

Part of a digital strategy in transport must include social dialogue at all levels. Without the social dialogue, and the involvement of workers and their representatives from the very beginning, there is a great danger of mis-investment when workers do not take up. Just transition, inclusive digital transformation must be in the heart of a digital transport strategy.

All EU research funding (Horizon, Shift2Rail, etc.) must allocate part of the budget to accompanying social impact research to ensure smart investment and smart transition.

Additionally, the competitiveness of new digital solutions cannot be based on circumventing labour laws. It should be prevented and actively fought with under all circumstances, but it is especially shameful in cases where public funds and public data is involved, e.g. in MaaS initiatives.

There is, therefore, an urgent need to address the social dimension of digitalisation in transport, especially in the context of the platform work but also in the so-called on-demand services. We are aware that the Commission plans dedicated initiatives on platform work, however we would like to stress that it will be important to take into account the specificities of the transport sector.

Proposed initiatives

ALL TRANSPORT MODES

Address the issue of automation and digitalisation from the perspective of its impacts on the female labour market in transport as well as their jobs and wellbeing.

URBAN PUBLIC TRANSPORT

- Collective public transport, walking and biking must be the backbone of a smart and sustainable urban mobility strategy. Any MaaS concept and MaaS platform must be in public hands to ensure accessible, affordable and inclusive urban mobility. Each urban mobility service provider must ensure fair social conditions and a level playing field; unfair competition has to be eliminated.



- Include social conditionality clauses for the new business models benefiting from the public funds and public data as part of the revamp of the European agenda for sustainable urban and regional mobility, including i.a. transport-on-demand.

RAIL A digital strategy in rail must be based on social dialogue, just transition, human-centred. It is indispensable to develop a digital tool to better monitor and enforce the respect of working, driving and rest time, and to ensure cross-border monitoring and enforcement of training, health and competence requirements.

ROAD TRANSPORT Despite previous ambitious forecasts according to which automated driving will take over by 2020, we see ourselves today in road transport limited to platooning as the most probable scenario for the foreseeable future. With the traffic conditions in today's Europe, doubled by a lack of investment in dedicated lanes for autonomously driven heavy-duty vehicles, the presence of professional drivers will be a key element in the future. In this context, an adaptation of the of drivers' directive to include newly required skills as part of the curricula will be essential. Also, we expect a clear signal that the driver's profession is a skilled one. This will ensure better treatment of drivers, better recognition of their skills, better pay and working conditions.

INLAND WATERWAYS Introduce the obligation for digital registration of individual crewmembers working and resting times so that they are controllable online and in real-time by controlling bodies and instances.

MARITIME TRANSPORT Support the implementation of a European Maritime Single Window Environment – which has the potential to significantly reduce the administrative burden placed on masters and officers - by the providing the necessary adequate technical programmes and shore-based support and assistance.

3.4. Just transition

As already mentioned, the roadmap mentions just transition as one of the priority. There is, however, no explanation of what initiatives are considered behind this mentioning. In principle, all of the proposed initiatives that are listed throughout this feedback will advance just transition.

We want to stress here the need to guarantee that no worker is left behind when the transition happens, be it related to modal shift or digitalisation and automation. It means, on the one hand, promoting the social dialogue in order to strengthen workers participation in the company life, and on the other – making sure that every worker has an opportunity to up- or reskill in cases where their previous job is scratched.

Proposed initiatives **ALL TRANSPORT MODES**

- Support collective bargaining and social dialogue to anticipate and adapt skills needed for the future transport sector.
- Promote national support schemes (financial and non-financial) for workers that are made redundant due to automation, digitalisation or modal shift.



3.5. Making the transport sector fit for women transport workers

The transport sector in Europe is still a male-dominated industry and not very attractive for women to work in. Only about 22% of all transport workers are women. This percentage is increasing in certain sectors, and women are becoming an important part of the workforce in transport. However, women predominate work in service-related and administrative jobs and often in more flexible work arrangements and in part-time jobs. Also, women often work in mobile and/ or isolated workplaces, e.g. on board of ships or trains, whereas men mainly work in jobs such as drivers, pilots, drivers, technicians or in occupations involving physical work and a heavy workload. Furthermore, there has been little change in the working and living conditions for women transport workers on the ground.

A recent ETF survey on women working in the transport sector in Europe reveals an urgent need for substantial changes to make the sector genuinely attractive for women workers. More than 2770 women transport workers from across Europe shared their experiences of working in the transport sector. According to their feedback what is most needed in the transport sector is to eliminate the entrenched male culture, to provide safe workplaces where women are not exposed to violence and harassment by colleagues, superiors or

customers, to have full access to proper sanitary facilities, to end unequal pay and to foster a good work-life balance.

Proposed initiatives **ALL TRANSPORT MODES**

- Mainstream a gender perspective into EU transport policy; this includes a holistic approach to attractiveness which takes into account the key issues faced by women transport workers, as described above. At the same time, gender equality must be considered as an issue for both women and men.
- Address and combat the alarming levels of violence and harassment against women transport workers. 49% of the respondents to the above-mentioned survey think that their workplace does not prioritise a safe and adequate work environment for women.
- Tackle the gender pay gap and foster pay transparency. The first step must be a study at EU level that provides concrete data about the gender pay gap in the transport sector and analyses why and how it happens.
- Adapt work patterns and working time to parents' and carers' needs so that they are not 'penalised' in terms of pay, career advancement and opportunities while fulfilling family responsibilities.
- Give continuous support to the Women in Transport - EU Platform for Change. The development of a work programme, accompanied by SMART priorities, would guide the work of the platform in a more meaningful way, support and empower the platform members and help to deliver on its objectives. However, any work programme would need to address the real problems faced by the women working in the sector, as described above.