



European Commissioner for Transport
Madam Violeta Bulc
European Commission
Rue de la Loi 200
1049 Brussels

Brussels, 12 May 2016

Re: Stakeholder consultation on WBCSD indicators

Dear European Commissioner for Transport,

Dear Madam Violeta Bulc,

We, stakeholders representing public authorities and civil society, Walk21, ECF, UITP, ETSC, EUROCITIES, ICLEI and POLIS, have recently learned that the European Commission has endorsed the sustainable urban mobility indicators of the World Business Council for Sustainable Development (WBCSD).

We appreciate the progress you want to make to collect harmonised data on urban mobility and we fully support your efforts to base decision making processes on real-life urban mobility data collected through an internationally acknowledged harmonised method.

We have been contributing to the work of the Urban Mobility Unit for several years. This is for instance the case of the stakeholder consultation on the non-binding guidance documents on urban logistics or accessibility. Being part of the process is greatly appreciated, and we feel grateful for this effective and fruitful cooperation so far.

In this context, we express our strong reservations regarding the endorsement of the WBCSD indicators and we would have welcomed a more transparent approach. While we fully support the concept of EU indicators on urban mobility, we would like to point out the following concerns:

- A lack of transparency in terms of their adoption by the EC: we could not find any publicly available working document justifying the analysis, the implementation procedure for the use of WBCSD indicators by public authorities.
- Albeit constituting a solid basis for discussion, we believe that the WBCSD indicators, if implemented as guiding principles, should be more ambitious and more integrated in its approach. The European Union can and should show more leadership on this topic.
- A first analysis by the organisation listed in this letter revealed that some indicators raise significant concerns in terms of scope, definition and/or implementation. We refer to a non-extensive list of concerns in Annex 1 here attached.
- A continued lack of clarity regarding coherence between these indicators and the Urban Mobility Scoreboard status, as well with the smart cities indicators and green capital indicators. It also raises a question in terms of coherence with Eurostat added-value in this regard.
- The implementation of these indicators would require adequate resources internally at the European Commission to fully use the data collected and raises concern in terms of data ownership.

Bearing in mind all the aforementioned points, we believe that the WBCSD indicators need further discussion and review in order to be in line with the 2013 European Commission communication on the Sustainable Urban Mobility Package and its latest inputs within the European Parliament initiative report on Urban Mobility Package voted in November last year in plenary.

In that regard, we are convinced an official stakeholder consultation process such as the one developed for urban logistics or access restriction would allow for a more transparent and integrated approach in order to endorse an ambitious yet tangible set of indicators that cities and regions could use across the EU, providing its support for implementation through existing financial mechanisms.

We call on the European Commission to provide us with information about this process before the public endorsement at the Smart Cities EIP General Assembly in Eindhoven on 24th of May. We would appreciate this in order to give our members, located in all EU countries, complete information about the procedure and the content of the WBCSD indicators on sustainable urban mobility.



EUROPEAN CYCLISTS' FEDERATION

Yours sincerely,

Ana Lisa Boni

Secretary General Eurocities



Antonio Avenoso

Director ETSC



Dr Bernhard Ensink

Secretary General ECF



Wolfgang Teubner

Regional Director Europe



Jim Walker

Strategic Director Walk 21



Karen Vancluysen

Director Polis



ANNEX 1: FIRST SHARED REMARKS OF THE STAKEHOLDERS (**NOT EXTENSIVE LIST**)

1. Air Polluting Emissions indicator can be improved as not only NOx and PM10 but also PM2,5 NO2, SO2 and benzene should be included. Furthermore, not to include stationary emissions in cities would not give a realistic image of air pollution in urban areas.
2. Fatalities indicator can be improved with exposure data and cities should also be encouraged to measure serious injuries.
3. Net public finance indicator should certainly contain information on investments in different transport modes, otherwise it might be positively evaluated if cities spend less on sustainable urban mobility.
4. The calculation of the Emissions of greenhouse gasses indicator should be improved.
5. Congestion and delays definition and indicator should include the preliminary results of valuable H2020 projects FLOW and CREATE.