

Stakeholder consultation on the Staff Working Document: "For a resilient, innovative, sustainable and digital mobility ecosystem: Scenarios for a transition pathway"

Fields marked with * are mandatory.

Introduction

The [update of the EU Industrial Strategy](#) highlights the need to accelerate the green and digital transitions of EU Industry. Among the various instruments, the Commission proposed to co-create, in partnership with industry, public authorities, social partners and other stakeholders, transition pathways for ecosystems, where needed. Priority should be given also to sectors heavily affected by the crisis, which benefit from accelerating their twin transition in order to boost their recovery. The mobility ecosystem has been recognised to be one of these critical ecosystems and therefore, it will be tackled among the first ones, by co-creating its transition pathway together with its stakeholders.

The Commission services have prepared a [Staff Working Document](#) to outline possible scenarios for a transition pathway for a resilient, innovative, sustainable and digital mobility ecosystem. This document aims to launch a co-creation process for concrete actions, milestones and commitments with all stakeholders of the mobility ecosystem.

You are invited to engage in this process by sending your input through this online consultation form.

Based on the consultation results, the Commission will organise further meetings with stakeholders in the course of 2022 to deepen the discussions and finalise the transition pathway for the mobility ecosystem.

This survey will be open until 31 March 2022. You are, however, warmly encouraged to send your responses as soon as possible to facilitate early analysis.

In case of questions about this consultation, please send an email to GROW-I2@ec.europa.eu

Organisation and personal information

* I'm giving my contributions as:

- Academic / research institution
- Business association
- Company / business organisation

- Consumer organisation
- Environmental organisation
- Trade Union
- EU institution
- EU citizen
- International organisation
- Local administration
- Regional administration
- National administration
- Other

* Country of origin of the respondent / organisation:

- Austria (AT)
- Belgium (BE)
- Bulgaria (BG)
- Croatia (HR)
- Cyprus (CY)
- Czechia (CZ)
- Denmark (DK)
- Estonia (EE)
- Finland (FI)
- France (FR)
- Germany (DE)
- Greece (EL)
- Hungary (HU)
- Ireland (IE)
- Italy (IT)
- Latvia (LV)
- Lithuania (LT)
- Luxembourg (LU)
- Malta (MT)
- Netherlands (NL)
- Poland (PL)
- Portugal (PT)
- Romania (RO)
- Slovak Republic (SK)
- Slovenia (SI)
- Spain (ES)
- Sweden (SE)
- Other ()

* First name

Fazilet

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Cinaralp

* Email (this will not be published)

f.cinaralp@etrma.org

* Organisation name

European Tyre & Rubber Manufacturers Association (ETRMA)

Publication of information

Unit GROW.1.2 will publish a report on DG GROW website with an overview of contributions and a summary of the input received. No personal information of the respondents will be published.

Link to the privacy statement:

[Privacy statement Mobility Transition Pathways consultation.pdf](#)

I agree with the personal data protection provisions

Consultation questions

You are invited to reflect the different issues and scenarios presented in the Staff Working Document for the key dimensions of Resilience, Sustainability and Digitalisation, as well as the cross-cutting issues identified. You may choose which questions you answer, and leave others empty. Please, in particular, propose concrete actions and targets. Quantifiable evidence is very much welcome.

The mobility ecosystem: opening the gate to the transition

Please read and reflect on the issues presented in sections 1 and 2 of the Staff Working Document.

What synergies can be found between the various sectors of the ecosystem in terms of solutions to the twin transition challenge (e.g. technology development, both digital and clean, investments and skills)?

2000 character(s) maximum

- The pathway represents a coherent perspective for the whole mobility ecosystem, which might lead to too high level of policy recommendations, that do not fit the specific needs and business models of the individual transport sectors. Finding synergies is definitely supported by the automotive sector, but specific measures for automotive sector for example (having in mind the size and employment share) would be appreciated.
- The EU economy and mobility ecosystem as such is confronted with the second major crisis in last two years – COVID and current war in Ukraine. Both will have significant impacts both from short and long-term perspectives.
- Green and digital transformation supporting the ambition to reach climate neutrality by 2050 in the EU will be confronted by structural change within the sector, but also by global supply chains disruptions, as now demonstrated with Russia/Ukraine crisis.
- Mobility and the automotive industry will play an important role in the EU. The transition pathway presented must reinforce the link to the new regulatory frameworks that will shape the environment in which the companies are going to operate (need for green public procurement, digital agenda, fuel efficiency etc.).
- More focus should be given to the supportive measures to accelerate investment at manufacturing level. Many of the production sites are beyond their horizon and industry 4.0 as well as digital transformation will further stimulate need for investment into the manufacturing facilities. The supportive measures should go beyond the research and development activities as well (e.g. new plants needed for semi-conductors and carbon black, battery value chain development, etc.).

What should be considered as priority to facilitate the transition of all actors of the ecosystem, including the SMEs and how to ensure their involvement in developing a credible and coordinated project pipeline to support the twin transition?

2000 character(s) maximum

The European Tyre & Rubber manufacturers Association is urgently calling for the following Actions:

1. Monitor the impact on supply chains to identify issues which require political support. This concerns energy, raw materials, technology, transport of goods/logistics. This is especially valid for the current Russian/Ukraine crisis.
2. Create a government-automotive stakeholders forum for exchange of information on supply chain resilience.
3. Support to market uptake of best performing tyres (purchase incentives based on labelling, public procurement etc.) would contribute to immediate decarbonisation of mobility.
4. Speed up the regulatory work on Digitalisation of Transport, facilitate investment in next-generation digital infrastructure and enable fair and open access to data in order to create new business models.
5. Update the transition policies in light of the current crisis, including the Skills Agenda. Support a sectoral Skills Pact for the automotive sector, support up- and re-skilling of the labour force with concrete measure and financing mechanisms.
6. Ensure an ambitious Horizon Europe budget to support climate-neutral road transport system, as well as enhance innovation-focussed public procurement in transport and mobility through ESIF, including the EIB funding mobility initiatives.
7. Ensure EU competition policy in sync with national support measures for industry.

What additional considerations, if any, should be taken into account by all ecosystem's actors to plan and implement an inclusive and fair transition of the mobility ecosystem, in particular for SMEs and consumers?

2000 character(s) maximum

- Global supply chains must remain resilient.
- Further deepening the Internal market, smart regulation and measures supporting global competitiveness of EU businesses must be essential priorities across the policy-making decisions in future. Political intervention in supply chains only where there is risk of market failure.
- Both the risks to supply chain security and the emerging energy crisis have implications for the balance that should be achieved between economic stability and the unquestioned necessity to address climate change. Navigating a successful course for both is now significantly more challenging and requires timely analysis, partnership, and action.

A resilient and competitive EU mobility ecosystem

Please read and reflect on the issues and scenarios proposed in section 3 of the Staff Working Document

Do the actions listed in the staff working document comprehensively address the resilience challenges? If not, what are the gaps and what measures should be considered as a matter of priority (providing relevant data / evidence)?

2000 character(s) maximum

The tyre sector and its value chain have a vital role to play in creating a future with environmentally friendly, safe, efficient and accessible mobility for all. Tyre products and services are crucial for ensuring safe mobility and the sector continues to research and develop tyres and related solutions that contribute to improved safety and reduced environmental impact, for example through optimized wet grip, tread wear and rolling resistance performance, i.e. fuel efficiency and thus improved CO2 footprint.

What additional or different outcome scenarios could be envisaged?

2000 character(s) maximum

Can you identify already existing projects or good practices to ensure resilience of the sector you represent that could benefit other sectors of the mobility ecosystem?

2000 character(s) maximum

The European tyre manufacturers have been investing in cleaner technologies to modernize the production plants in the EU;

- Technology leadership in tyre manufacturing plants (~ 100 factories in Europe), Tyre industry keeps investing in CO2 emissions reduction (>20% of CO2 emissions reduced from our plants in the last decade), automation & upskilling our European workforce in AI and robotics, and in modernizing the manufacturing environment. In concrete terms:

--> 200m EUR have been invested by the sector in the last 7 years in decarbonisation of manufacturing facilities in EU. To be highlighted that new machinery investments account for about 100k EUR/employee in the last 7 years.

The automotive ecosystem, of which the European tyre and rubber industry is a key stakeholder, we are in the midst of an emerging energy crisis. With the price of oil, electricity and gas rising, the industrial impact can already be seen in energy intensive sectors where production facilities are now idle. This will have a direct effect on our manufacturing capacity and costs.

Both the risks to supply chain security and the emerging energy crisis have implications for the balance that should be achieved between economic stability and the unquestioned necessity to address climate change. Navigating a successful course for both is now significantly challenging and requires timely analysis, partnership and action.

What should be the role and responsibilities of public authorities (EU, National, Regional and local levels) to successfully address the upcoming challenges?

2000 character(s) maximum

To this end, we expect from the Public authorities to:

- Support a new regulatory framework for tyres fuel efficiency as well as safety performances (as being promoted within UNECE WP29/GRBP).
- Incentivize the market uptake of a long-standing design-for-reuse strategy promoted by the tyre industry is truck tire RETREADING. Retreading truck tyres leads to 70% material savings thanks to material recovery and a longer lifespan. Specific actions from the Public Authorities shall include:

Support the inclusion of retreaded truck tyres into the scope of the EU Tyre Label,.

EC and Member States to step up market uptake through Green Public Procurement and other policies to incentivize retreading as a contribution to resource efficiency and circular economy

- Accelerate and step up investments to ensure rapid market deployment of environmentally sustainable processing technologies, and sustainable, safe and efficient recycling processes for production scrap material as well as End of Life tyres

Are there specific challenges faced by individual actors of the ecosystem, in particular SMEs, that should be addressed?

2000 character(s) maximum

Please read and reflect on the issues and scenarios proposed in section 4 of the Staff Working Document

Do the actions listed in the staff working document comprehensively address the green transition needs? If not, what are the gaps and what measures should be addressed as a matter of priority (providing relevant data/evidence)?

2000 character(s) maximum

The tyre sector and its value chain have a vital role to play in creating a future with environmentally friendly, safe, efficient and accessible mobility for all. Tyre products and services are crucial for ensuring safe mobility and the sector continues to research and develop tyres and related solutions that contribute to improved safety and reduced environmental impact, for example through optimized wet grip, tread wear and rolling resistance performance, i.e. fuel efficiency and thus improved CO2 footprint.

In addition, circularity and resources are important initiatives to be further promoted, through among others an urgent clarification on end of waste status for rubber granules and shreds to foster circular economy. Finally, low RR tyres enable to reduce immediately CO2 emissions of vehicles, therefore, the need to contribute and incentivize market uptake.

Based on data available to you, what additional or different expected output scenarios could be set until 2030? In order to achieve these, should additional actions be prioritised?

2000 character(s) maximum

What should be the role and responsibilities of the public authorities (EU, National, Regional and local levels) to successfully address the upcoming challenges?

2000 character(s) maximum

Technology development will be essential to achieve a greener, more sustainable EU mobility ecosystem. What type of technologies should be prioritised to deliver these objectives? What technologies could be commonly used by the three sectors constituting the mobility ecosystem? Which barriers exist to the adoption of new green and digital technologies in the ecosystem, specifically for SMEs?

2000 character(s) maximum

Accelerate and step up investments to ensure rapid market deployment of environmentally sustainable processing technologies, and sustainable, safe and efficient recycling processes for production scrap material as well as End of Life tyres

- Incentivize the market uptake of a long-standing design-for-reuse strategy promoted by the tyre industry is truck tire RETREADING. Retreading truck tyres leads to 70% material savings thanks to material recovery and a longer lifespan. Specific actions from the Public Authorities include:
 - Support the inclusion of retreaded truck tyres into the scope of the EU Tyre Label,
 - EC and Member States to step up market uptake through Green Public Procurement and other policies to incentivize Retreading as a contribution to resource efficiency and circular economy

Can you identify already existing projects or good practices to drive the green transition of the sector that could benefit other parts of the mobility ecosystems?

2000 character(s) maximum

- The European Structural and Investment Funds should be used to enhance innovation-focussed public procurement in transport and mobility.
- Extend the EIB future mobility initiatives to fund innovation.
- Ensure that national market surveillance authorities enforce compliance with the current EU regulatory requirements

How to best address the issue of affordability and acceptability to meet consumers' needs and expectations while ensuring a fair and inclusive transition?

2000 character(s) maximum

Are there specific challenges faced by individual actors of the ecosystem, in particular SMEs and social partners, which should be addressed? Apart from the envisaged measures, how else should social implications of the transition be tackled?

2000 character(s) maximum

Digitalisation of the mobility ecosystem

Please read and reflect on the issues and scenarios proposed in section 5 of the Staff Working Document

Do the actions listed in the staff working document comprehensively address the issues identified with regard to the ecosystem's digital transition? If not, what are the gaps, and what measures should be addressed as a matter of priority (providing data/evidence)?

2000 character(s) maximum

New design technologies, mobility solutions, Tyre as a Service, Cooperative Connected Automated Mobility, new prediction algorithms are a few examples of the unprecedented innovation delivered by the sector.

To safeguard the continuity of the current businesses in the area of connected services, a European regulation is necessary to open-up fair and secure access to in-vehicle data for all market players. If this is not in place, at the latest by mid-2024, the requirements stemming from the international framework (UNECE rules) will make the delivery of EU competitive services particularly challenging since additional layers of complexity will be required to accommodate the cyber threats. Therefore, the tyre industry is urgently calling for a specific regulation to concretely mandate the implementation of the Data Act principles through standard software design elements. This is of vital importance in order to ensure that the development and functioning of the new, emerging and dynamic digital mobility market will be unambiguously fair for all the interested parties.

Based on data available to you, what additional or different outcome scenarios could be set until 2030? In order to achieve these, should additional actions be prioritised?

2000 character(s) maximum

To unlock further innovations, the Commission should provide the legal and business certainty for deploying high quality services to greater extent and investing in new solutions.

Without taking clear action on implementing the high-level principles of the Digital Single Market (DSM) in the automotive sector, we foresee a reduced capacity for the tyre manufacturers to keep developing their expertise, due to limited ability of accessing data, which is the fundamental asset for service provision.

The lack of semiconductors experienced last year in the automotive sector has also reflected its impact on the component production side, including tyres. In this respect, it is important to ensure the availability of resources and Europe's autonomy for the provision of high quality tyres and tyre related solutions. The latest Ukraine/Russia crisis has exacerbated the vulnerability of some industries in their upstream supply chain, one of which is the European tyre and rubber industry heavily dependent from Russia on carbon black and synthetic rubbers.

What should be the role and responsibilities of public authorities (EU, National, Regional and local levels) to successfully address the upcoming challenges?

2000 character(s) maximum

ETRMA calls on the European Commission to take urgent action on the following points:

- Allow fair competition for all actors in the mobility ecosystem with a clear requirement of separation of duties for the role of OEM as vehicle manufacturer and mobility service provider;
- Help the industry to plan its next steps by clarifying the definition and remit of digital services as they apply to "native" connected vehicles;
- The future governance of vehicle data access must place users at its heart, in line and with the same ambition of the fundamental principles of separation of duties, data sharing and privacy protection.

Technology development will be essential to achieve a smarter, digital EU mobility ecosystem. What type of technologies should be prioritised to deliver these objectives? Are there any commonalities that could be found among the three sectors constituting the mobility ecosystem? Are there barriers to the technology transfer from research institutions to industry? Which barriers exist to the adoption of new green and digital technologies in the ecosystem?

2000 character(s) maximum

Can you identify already existing projects or good practices to drive the digital transition of the sector that could benefit other parts of the mobility ecosystems?

2000 character(s) maximum

The Important Projects of Common European Interest (IPCEI) together with the Digital Europe Programme (DEP) and other funding opportunities should accelerate the uptake of artificial intelligence inside the factories which can significantly improve the production line of factories and contribute to Europe's leadership in key supply chains.

How to best address the issue of affordability and acceptability to meet consumers' needs and expectations while ensuring a fair and inclusive transition?

2000 character(s) maximum

Are there specific challenges faced by individual actors of the ecosystem, in particular SMEs, that should be addressed? What are the social implications (including for workers, consumers and passengers) inside the EU of the digital transition in this ecosystem? How do you think these implications should be tackled?

2000 character(s) maximum

Horizontal and cross-cutting issues

Skills

Please read and reflect on the issues and scenarios proposed in section 6.1 of the Staff Working Document

Do the actions listed in the staff working document comprehensively address the issues related to skills, including for SMEs? If not, what are the gaps, and what elements should be addressed in priority?

2000 character(s) maximum

Transformation of work force is critical to achieve Green Deal and Digitalization objectives. The partnerships created under the Pact for Skills (Automotive Skills Alliance is a flagship in this area - <https://automotive-skills-alliance.eu/>) must receive more support in order to coordinate effectively the reskilling and upskilling agenda for the ecosystems between industry, education providers and regions.

What additional or different outcome scenarios could be envisaged?

2000 character(s) maximum

What unmet skill needs exist in the workforce at all levels of the ecosystem to realise the twin transition?

2000 character(s) maximum

Do cultural and mind-set barriers to the twin transition exist in the ecosystem? If you identify additional barriers or needs that have not been addressed in this document, please share them.

2000 character(s) maximum

What should be the role and responsibilities of public authorities (EU, National, Regional and local levels) to successfully address the upcoming challenges?

2000 character(s) maximum

Investment, financing & public procurement

Please read and reflect on the issues and scenarios proposed in section 6.2 of the Staff Working Document

Do the actions listed in the staff working document comprehensively and coherently address the issues identified in this area? If not, what are the gaps, and what measures should be considered as a matter of priority (providing relevant data / evidence)?

2000 character(s) maximum

The SWP lists actions and scenarios with focus and almost undivided attention at the battery / hydrogen supply chain.

Steps should be taken to have broader perspective of the global value chains, to avoid disruptions particularly in the way of coordinating separate policy initiatives.

To this end, the following actions should be declined also include progress for Natural Rubber, where a more organised action plan needs to be sketched out and be holistic enough to include sustainability, resilience, innovation, and circular economy objectives.

- Implement strategies and action plans already set in motion to reduce EU's strategic dependencies, increase circularity in the mobility ecosystem, notably on carbon black, synthetic rubber, batteries and raw material, hydrogen; diversify sourcing of inputs. These sensitivities became particularly evident during the Russian war in Ukraine, which exposed the particular dependence of the EU tyre supply chain to Russia in terms of both carbon black and synthetic rubbers. In the case of carbon black work should be prioritized to support projects aiming to recover carbon black from End of Life Tyres.
- Continue and strengthen technical and regulatory dialogue and cooperation at the international level.
- Implementing of the labour and environmental provisions in the trade and sustainable development chapters of the free trade agreements

What additional or different outcome scenarios could be envisaged?

2000 character(s) maximum

What additional measures could further assist the phasing out of fossil-fuels financing in transport to the benefits of greener technologies?

2000 character(s) maximum

What additional actions, if any, would need to be considered to reflect the specific situation and needs of SMEs within the mobility ecosystem? Are there any systemic barriers in this ecosystem to access to funding for the twin transition - particularly for SMEs?

2000 character(s) maximum

What should be the role and responsibilities of public authorities (EU, National, Regional and local levels) to successfully address the upcoming challenges?

2000 character(s) maximum

Provide the necessary framework to achieve stable and competitive energy prices and international level playing field. When needed activate emergency measures to contain sudden spikes in energy prices. Long term, devise a system – including strategic diversification of supply objectives for Member States - to avoid energy supply disruption.

Achieve a more predictable carbon price and less volatility

Continuation of the co-creation process and next steps

Please read and reflect on the issues presented in section 7 of the Staff Working Document

Considering all elements presented in the SWD, what specific key indicators should be used to track the successful transition in the mobility ecosystem?

2000 character(s) maximum

Beyond the topics and actions listed in the pathway document -as well as in the present submission, the dialogue initiated through this activity should be formalized through the setting up of a Automotive Standing Committee to discuss and co-create possible solutions for the challenges identified in the Pathway document.

What indicators / data are currently collected and used by actors in the ecosystem to measure their performance with regards to the twin transition and their resilience?

2000 character(s) maximum

Which common indicators could be used to monitor cooperation among all actors or the ecosystem?

2000 character(s) maximum

What more, or different, actions would be needed in order to support the transition towards 2030 from the Commission, Member States and the stakeholders at large?

2000 character(s) maximum

General comments

What other general comments would like to give?

Competitiveness of European manufacturers on international markets is another major challenge that require urgent attention and action, as demonstrated by the current UKRAINE/RUSSIA crisis .

To this end, the following actions are considered key by the industry:

- Ensure that FTAs are implemented and enforced not just in its rules, but also in their spirit. In this sense, the work of the CTEO is proving particularly precious.
- Focus on negotiations of FTAs, but only when there is clear Commitment to removal of barriers should be a pre-requisite to negotiations. This is key particularly in the case of country where there are well- and long-established barriers such as India.
- Focus on regulatory cooperation, particularly ensuring that UN 1958 Agreement is globally implemented, particularly with regard to tyre related regulations. Several barriers to trade could be avoided and objectives related to vehicle emissions as well as safety could be more easily attained at global level through international standards and regulations. A system of monitoring and assistance in the implementation of UN Regulations could be established to help this process.

On the otherhand, exports proved an essential asset in the past, but with increased production costs (eg. energy prices) and despite the industry spearheading the constant evolution of products towards enhanced safety and environmental performances, the European Tyre Manufacturers are facing 1/ market access difficulties, and 2/ the need to maintain competitiveness, especially in a very challenging area when it comes to market access.

ETRMA would like to emphasise the need and the importance of continuous dialogue between the legislator and different sectors as well as cross-sectoral synergies to ensure resilience to transition as well as coping with unprecedented crisis.

Communication

Whom should we contact regarding your contribution and possible further involvement in the Mobility Transition Pathway process? We use this contact information when launching a Call for Interest for potential participants in the Stakeholder consultation workshops in the course of 2022.

First name

Fazilet

Surname (family name)

Cinaralp

Function

Secretary General

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Contact

[Contact Form](#)