

Position paper 2024/155

Putting the European rail supply industry on track to reach the Green Deal objectives and create good industrial jobs

Summary - industriAll Europe's key demands relating to the future of the European rail supply industry 1. A European investment plan for rail State aid rules must be revised in a way that will allow governments to provide financial support in line with the unprecedented investment needs that the twin transition entails Public investment in rail must benefit from a green golden rule, where green public investment spending would be exempt from the Stability and Growth Pact rules Next EU budget must strengthen the budget lines dedicated to rail The use of public money for rail must be linked to social conditionalities and must be • conditional on a minimum value-added quota of 50% for "Made in Europe" 2. An industrial strategy for European rail Rail must be recognised as a strategic sector in the EU industrial strategy European funding for technology innovation must be increased Efforts to level the playing field must be dramatically strengthened and existing instruments must be enforced and, where needed, revised to better shield European manufacturers from unfair competition . Public procurements must be in line with the "open strategic autonomy objective" and must implement the MEAT principles Improving working conditions and providing adequate education, training and life-long learning measures, including re-skilling and up-skilling, must bridge the skills and labour shortages 3. A policy framework for modal shift, multimodality and affordability Taxation and subsidy policies applied to transport modes must be in line with the climate targets Mobility strategy must keep rail affordable and attractive, including by securing access to decarbonised electricity at a low price EU must ensure the roll-out of multimodal infrastructures at an adequate pace



Introduction

The European rail supply industry employs 659 000 people in the design, manufacturing and maintenance of rail equipment, such as: locomotive and rolling stock, rail infrastructure, signalling and electrification products¹. This industry is instrumental to reach the European Green Deal objectives that require a 90% reduction of greenhouse gas emissions in the transport sector by 2050². Building on a long history as well as on technological leadership, the European rail supply industry has a prominent position on global markets that are expected to continue to grow in the coming years because of the need to decarbonise transport systems, the train being the collective mode of transport with the lowest greenhouse gas emission intensity³.

Still, available statistics show a deep gap between today's reality and ambition for tomorrow. If in absolute terms, freight and passenger transport has increased in the EU until the time of the pandemic⁴, the share of rail in the EU transport system is decreasing. According to Eurostat, rail transport accounted for 17% of the EU's inland freight transport in 2021, whereas road transport accounted for more than three-quarters (77%). And things are getting worse: in 2021, the modal share of rail in freight transport was below the 2011 level, whereas road transport recorded the highest figure in the past decade⁵.

The picture is no better when considering passenger transport, since the rail modal split fell to 6% in 2021 after a decade of stable growth, leading to an 8% modal share in 2019⁶. In the meantime, passenger cars remain by far the main mode of transportation, with a modal share of 86% in 2021 for the EU-27 countries. Infrastructures are also following a trend that looks contradictory to the political ambition ascribed to rail, with railway lines that have decreased during the last decade from 203 866 km in 2011 to 202 130 km in 2022⁷.

These figures remind us that the positive prospects for the rail industry should not be taken for granted, and tapping this industrial potential requires Europe to urgently tackle a series of challenges through a European rail investment plan, a comprehensive industrial strategy, and a broader mobility framework to spur a shift from road and air to rail. The aim of this document is to share industriAll Europe's vision of what a European industrial strategy for rail should be.

While focusing on rail, this document is building on policy documents recently adopted by industriAll Europe and mainly its position on the "EU Smart and Sustainable Mobility Strategy"⁸, as well as on recent

¹ European Commission, "Study on the competitiveness of the Rail Supply Industry - Final Report", 2019; Employment estimates come from the "Transition pathway for the EU mobility industrial ecosystem" <u>https://ec.europa.eu/docsroom/documents/57674</u>

² EU Sustainable and Smart Mobility Strategy, 2021, <u>https://transport.ec.europa.eu/system/files/2021-04/2021-mobility-strategy-and-action-plan.pdf</u>

³ Perspectives for the rolling stock supply in the EU:

https://www.europarl.europa.eu/RegData/etudes/STUD/2023/747263/IPOL_STU(2023)747263_EN.pdf

⁴ See 2022 Eurostat data for rail freight transport <u>https://ec.europa.eu/eurostat/statistics-</u> <u>explained/index.php?title=Railway freight transport statistics</u> and for rail passenger transport <u>https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Railway passenger transport statistics -</u> <u>quarterly and annual data</u>

⁵ See Eurostat database, Modal split of inland freight transport, EU-27 data.

⁶ See Eurostat database, Modal split of inland passenger transport, EU-27 data.

⁷ See Eurostat database, Total length of railway lines, EU-27 data

https://ec.europa.eu/eurostat/databrowser/view/ttr00003 custom 9513269/default/line?lang=en ⁸ https://news.industriall-

europe.eu/documents/upload/2023/5/638195017322706665 637545228999008711 ADOPTED - EN -Position Paper - A Smart and Sustainable Mobility Strategy for Europe (6).pdf



projects, such as the "Just Transition for mobility project"⁹ run with the European Transport Workers' Federation (ETF), that led to the adoption of a joint statement "Building a Just Transition towards a smart and sustainable mobility"¹⁰. Better linking of transport as a service with related manufacturing industries, and having an holistic approach to mobility based on intermodality, and complementarity between transport modes, are among the guiding principles taken from existing documents and initiatives that have guided the drafting of this document.

1. A European investment plan for rail

The EU Green Deal and Mobility Strategy ascribe ambitious objectives to rail: 90% reduction in transport emissions by 2050, doubling passenger high-speed rail traffic by 2030 and tripling it by 2050, while increasing rail freight by 50% by 2030 and doubling it by 2050. At the same time, harmonised technologies and digital solutions (e.g. ERTMS and DAC) will have to be quickly rolled out. Therefore, the railway system will have to receive massive investment in the coming years to cope with the twin transition. According to the European Commission estimates, EUR 46 billion of annual investment are needed in the rail rolling stock from 2021 to 2030 to reach the EU's climate objectives¹¹. In the same way, infrastructures will require modernisation and extension. The completion of the Trans-European Transport Network (TEN-T) demands EUR 1 500 billion of investment, whereas TEN-T only covers 123 000 km of the more than 200 000 km of railway lines in the EU-27¹². This must be accelerated, as this is the basis for the creation of a cross-border rail network and the increase in European night train services is necessary.

The rail supply industry depends on orders from private and state-owned companies that operate railways, either for freight or for passenger transport, or manage the infrastructures. Even though the liberalisation of the rail sector has made the rail system more complex, governments still play an important role, with most of the rail sector being in the hands of state-owned companies. The financial contribution of users and customers being by nature limited, the rail sector therefore relies on the availability and predictability of public funding (national and European).

State aids are an important source of finance for the rail sector. The EU is currently revising the 2008 "Guidelines on State aid for railway undertakings"¹³. The State aid regime should allow governments to provide investments that are in line with the EU policy objectives, keeping in mind that the rail sector's finances have been hit hard by the pandemic and energy price increases. Those circumstances have severely deepened the indebtedness of European railway undertakings. As a result, the future State aids guidelines cannot remain the same. Thresholds and procedures must be revised in a way that allow for fleet renewal as well as the modernisation and extension of infrastructure¹⁴. In the same way, rail investment should benefit from a green golden rule, where green public investment spending would be exempt from the fiscal rules under the Stability and Growth Pact¹⁵. EU State aid law needs to be reformed in this respect, as it is not yet applied to non-European subsidies. There should be a minimum value-added

- ¹³ <u>https://ec.europa.eu/commission/presscorner/detail/en/ip</u> 21 7049

⁹ <u>https://news.industriall-europe.eu/p/jt4mobility</u>

¹⁰ <u>https://www.industriall-europe.eu/documents/upload/2023/12/638373878345118212 Joint Statement EN-</u> rev ETF - December 5th.pdf

¹¹ European Commission, « Investment needs assessment and funding availabilities to strengthen EU's Net-Zero technology manufacturing capacity », SWD(2023) 68 final.

¹⁴ For detailed proposals on the Revision of Railway State aid guidelines, see: <u>https://cer.be/images/publications/positions/230918 CER Updated Position Paper State aid Guidelines.pdf</u> and <u>https://www.unife.org/wp-content/uploads/2022/04/UNIFE-position-on-the-revision-of-State-Aid-Railway-Guidelines.pdf</u>

¹⁵ See "<u>Fiscal policies to mitigate climate change in the euro area</u>", ECB Economic Bulletin, Issue 6/2022.

quota of 50% for "Made in Europe" (Art. 85 2014/25/EU) for third-country bidders for vehicle procurement by public transport companies and for procurement in the context of awarding public transport services - particularly in local public transport and regional rail transport.

The EU budget is an important source of funding that complements State aids. The EU and its Member States must ensure that the EU budget for rail is in line with the required ambition, which is not the case for the moment. Some of the budget lines – such as the Connecting Europe Facility (CEF) for transport - are of the utmost importance to develop further cross-border connections. The CEF II budget available in the current EU Multiannual Financial Framework (MFF) (for the years 2021 – 2027) amounts to EUR 26 billion and does not sufficiently cover the necessary investments to reach the 2030 climate targets (see amount above). The structural funds of the EU budget are also supporting Member States, but the exact amount available for rail is difficult to know at this stage because of the planning procedure. Under the previous MFF, this amount was around EUR 20 billion.

The Next Generation EU and its Recovery and Resilience Facility (RRF) has mobilised EUR 55 billion of grants for rail-related projects, but EUR 225 billion are available as loans. Keeping in mind that the end of the RRF is approaching, and seeing the important investment needs ahead, the EU and its Member States must design the next budget in a way that ensures sufficient resources for the European rail system. The envelope for rail in the CEF funding must be significantly increased and the CEF funding must be extended beyond 2027, in line with the TEN-T objectives for 2030, 2040 and 2050. In addition to the TEN-T objectives, the EU budget must better support rail investment in urban and intercity projects with ERDF and cohesion policy. If needed, additional own resources will have to be envisaged. In future, the 50% "Made in Europe" rule (local content) must be applied to all projects co-financed by European taxpayers through EU funding.

2. An Industrial policy for European rail

If mobilising funding for the rail rolling stock and infrastructure is the first condition to create quality jobs in the European rail supply industry, it has to be rooted in an holistic industrial strategy. At this stage, rail is not receiving the attention it deserves given its strategic importance and growth prospects.

The rail supply industry is in the margins rather than at the core of the EU industrial strategy. In the 2020 EU Industrial Strategy¹⁶, rail has been ascribed to the Mobility Industrial Ecosystem with value chains, such as automotive, bikes, or waterborne. Pursuant to the main policy objectives of the EU industrial strategy (i.e. steering the twin digital and green transition and reducing Europe's strategic dependence), a transition pathway has been drafted by the European Commission with the active involvement of the sector's main stakeholders¹⁷. Even though the transition pathway gives a broad understanding of the challenges ahead for the sectors covered, and if it suggests relevant recommendations for action, it does not make an industrial strategy for the rail sector.

Since the 2020 strategy and its 2021 update, the EU has also launched a series of industry alliances to support the achievement of political objectives in important sectors. Aviation, critical raw materials, photovoltaics, clean hydrogen, battery, low-carbon fuels, semiconductors, industrial data, and strategic medicines now benefit from the enhanced collaboration among industrial actors. Unfortunately, rail is among the sectors that have been neglected while launching the industry alliances. Similarly, none of the Important Projects of Common European Interest approved by the European Commission since 2018 is

¹⁶ <u>https://ec.europa.eu/commission/presscorner/detail/en/ip_20_416</u>

¹⁷ https://ec.europa.eu/docsroom/documents/57674



specifically targeting rail¹⁸- rail being among the theoretical indirect beneficiaries of these expected technology developments.

The same approach has prevailed in more recent EU industrial policy initiatives. The EU Green Deal Industrial Plan of 2023 does not mention rail specifically, even though it intends "to provide a more supportive environment for the scaling up of the EU's manufacturing capacity for the net-zero technologies and products required to meet Europe's ambitious climate targets"¹⁹. In the same way, the Proposal for a Regulation on establishing a framework of measures for strengthening Europe's net-zero technology products manufacturing ecosystem (Net Zero Industry Act), is based on generic technologies that can be rolled out in various sectors. If some of the listed technologies – such as hydrogen or batteries – are of interest to the rail sector, the Draft Act does not provide any clear indication of how the proposed initiatives will benefit the rail supply industry.

The rail industry benefits from a specific support of Horizon Europe, which is the research and innovation programme of the EU that supports the creation and dissemination of cutting-edge knowledge and technologies. The "Europe's Rail Joint Undertaking" is among the nine joint undertakings established by the EU under the current Multiannual Financial Framework 2021-27²⁰. Its main objectives are threefold: "contribute towards the achievement of the Single European Railway Area; ensure a fast transition to a more attractive, user-friendly, competitive, affordable, easy to maintain, efficient and sustainable European rail system, integrated into the wider mobility system; support the development of a strong and globally competitive European rail industry".

Funding technological innovation and its deployment to improve interoperability, accelerate digitalisation and automation, while ensuring standardisation, is of major importance for the sector, but an holistic industrial policy requires much more. Digital sovereignty and digital resilience are crucial aspects. Cybersecurity aspects (KRITIS) must have a high priority and the Cyber Resilience Act should be reviewed with regard to the needs of the rail industry, as it is too focused on end consumer products.

Like many other sectors, the rail supply industry is struggling with higher costs of energy, raw materials and commodities. This requires massive and quick investment in the long term and structural transformation of the European energy system to secure energy supply at a competitive price while reducing the dependence on imported fossil fuels²¹. The EU has launched a series of measures to tackle this structural problem and time will be needed to deliver significant results²². In the meantime, the EU and Member States must use all legal instruments available to mitigate the impact of the high energy prices on industry to shelter jobs during the transformation, while avoiding windfall profits and imposing social conditionalities on supported companies.

Beyond the energy costs, the rail supply industry requires a fair economic competition with its main competitors. The long life cycle of rail equipment implies that orders are less frequent than for other

europe.eu/documents/upload/2022/5/637890078463917744 dopted%20-

¹⁸ <u>https://competition-policy.ec.europa.eu/state-aid/ipcei/approved-ipceis_en</u>

¹⁹ https://ec.europa.eu/commission/presscorner/detail/en/ip 23 510

²⁰ Europe's Rail Joint Undertaking (EU-Rail) is actually the successor of Shift2Rail established under previous Multiannual Financial Frameworks.

²¹ For industriAll Europe's positions on energy, see inter alia: <u>https://news.industriall-</u>

europe.eu/documents/upload/2023/5/638204408277675184 Position paper - Electricity regulation - for a Just Energy Transition and the right to energy - EN.pdf; https://news.industriall-

<u>%20The%20energy%20prices%20crisis%20and%20its%20impact%20on%20households,%20industries%20and%20jo</u>bs%20-%20EN.pdf

²² We hereby refer to the REPowerEU plan, to the EU Green Deal Industrial Plan, and its Net Zero Industry Act and Critical Raw Materials Act.

categories of goods, leading manufacturers to spread their offers over a wide geographical area. According to the OECD, "this makes the rolling-stock market eminently international, as companies compete globally to win large contracts."²³. Global markets are therefore crucial.

Manufacturing activities located in Europe might be undermined by the higher carbon price that the reformed EU Emissions Trading System will generate, due to the acceleration of emission reductions that the Fit for 55 package entails. All things being equal, basic metals production costs will increase in Europe due to the expected higher CO2 price. The introduction of the Carbon Border Adjustment Mechanism (CBAM) will make imported metals equally more expensive, since CBAM will equalise the carbon price between EU producers and importers for six categories of goods: iron and steel, aluminium, hydrogen, electricity, fertilisers and cement.

Being metal-intensive, the rail-related manufacturing activities located in European countries covered by the EU ETS will be exposed to a price disadvantage compared to their main competitors. An assembly plant located in countries covered by the EU ETS and the CBAM will only have access to basic metals that incorporate a significant carbon price, whereas facilities in other countries will be able to use metals that are free of any carbon cost. Therefore, the scope of the CBAM should be extended to the part of the rail supply industry that might be disadvantaged by its implementation.

As mentioned above, the European railway industry is a world leader in the development of railway technologies and solutions, a driving force for the export capacity of the entire European industry. This prerogative must be supported and safeguarded against economic operators that may engage in unfair commercial practices, and the criteria of fair reciprocity established in the GPA (Government Procurement Agreement) must be more strictly applied. A fair trade system also requires symmetry in market access. "With railway companies remaining in government hands, much of the market for passenger rolling stock involves bidding for public contracts issued by state enterprises"²⁴. Hence, the importance of the EU International Public Procurement Instrument, as well as the EU Regulation on Foreign Subsidies²⁵, must be quickly implemented and their impact closely monitored and assessed by the EU. The EU must advocate reciprocity vis-à-vis third-country competitors whose markets are not fully accessible to European companies. This is the only way to establish a fair, rule-based level playing field.

Public procurements are also crucial on the European market where the MEAT principle must apply²⁶. Public welfare aspects must be given greater consideration in public tenders, i.e. social conditionalities, such as respect for collective bargaining agreements, social criteria and greater transparency, must ensure that the provision of public money will create good jobs in Europe in the rail supply industry.

Job quality must also be the cornerstone of the European strategy to cope with the skills shortages which are not sector-specific, but particularly severe in the rail supply industry. IndustriAll Europe believes that improving working and employment conditions must be the first step to make a sector able to attract and keep skilled workers. In addition, trade unions have been warning against increasing skills shortages already for decades, calling for adequate education, training and life-long learning measures, including re-

²³ OECD, "Measuring distortions in international markets, The rolling-stock value chain",

²⁴ OECD, « Measuring distortion in international markets: the rolling-stock value chain".

²⁵See: <u>https://eur-lex.europa.eu/EN/legal-content/summary/the-eu-s-international-procurement-instrument-ipi.html</u> and <u>https://competition-policy.ec.europa.eu/foreign-subsidies-regulation_en</u>

²⁶ MEAT refers here to the definition used by the European Commission in the Mobility Transition Pathway: "most economically advantageous tender (MEAT) – use of criteria taking account of qualitative, technical and sustainable aspects of the tender, next to price, when deciding on a contract award".



skilling and up-skilling. IndustriAll Europe and its members have made training a central priority, with an individual right to training that should be established²⁷.

3. A policy framework for modal shift, multimodality and affordability

Rail is the greenest mode of mass transport for passengers and freight since the CO2 emission intensity of rail freight is nearly ten times lower than that of trucks (per tonne-kilometre), while emissions of passenger transport are five times lower for rail than for air transport²⁸. Still, its modal share in Europe remains much too low, both for passengers and freight (see above). Part of this trend is the result of economic and societal changes that are irreversible. Therefore, efforts to improve rail's modal share must be complemented by initiatives to develop multimodality. A mobility system in line with Europe's climate goals must increase the role of rail while developing complementarity between transport modes. This requires a policy framework made of a wide variety of measures.

Competition between modes of transport has a direct impact on rail's economic performance and therefore on demand for rail supply equipment. Available data show that road transport and aviation benefit from important direct and indirect fiscal advantages. In 2022, road transport was the sector that benefitted the most from energy subsidies in the EU-27, with EUR 31 billion accounting for 83% of total subsidies to the transport sector²⁹. In the same period, rail transport received EUR 1 billion in energy subsidies³⁰. In other words, for every EUR 1 of subsidy in rail, EUR 30 is spent on road transport. This subsidy policy is detrimental to rail transport and must be reversed. With that objective, the EU must complete the Energy Taxation Directive (ETD) reform to better factor in the CO2 emission intensity of transport modes. Member States must also implement the Eurovignette Directive, revised in 2022 to introduce a charging system based on the CO2 emissions of Heavy Duty Vehicles and taking into account air pollution contribution.

The following principle must apply to all tax incentives in the transport sector: the least climate-damaging means of transport are subsidised the most. The many fiscal advantages that benefit air transport are also undermining rail's position in the transport system. The absence of taxation on aviation fuel, creates a competitive advantage for air transport, which is inconsistent with its climate and environmental impact³¹. Rail travellers must no longer be disadvantaged compared to air travellers for international journeys. The revision of the EU Emissions Trading System will expose domestic flights to carbon price, but more must be done to align transport taxation policy and climate ambition. Here again, the reform of the ETD looks necessary, both for environmental coherence but also for social justice, since kerosene, unlike fuels used by consumers for road transport and heating, is not taxed, whereas its demand does not come from existential basic needs.

The same analysis should be applied in the context of urban transport, where electrified rail systems (tramways, light railways, automatic metros) represent the most appropriate solutions for the sustainable development of urban areas. The electrification of urban transport is an absolute goal, the electric car can contribute to it, but the individual vehicle will continue to generate an unsustainable occupation of roads and public spaces. It is imperative that private cars reduce their modal share and that collective transport becomes the 'lymphatic' system of our cities. In this context, European and national governments must

²⁷ See : <u>https://news.industriall-europe.eu/documents/upload/2023/6/638216433207771551 Adopted -</u> Urgency to invest in workers, training and quality jobs to loosen the tight labour market and meet the shortages - EN.pdf

²⁸ https://www.iea.org/energy-system/transport/rail

²⁹ https://energy.ec.europa.eu/system/files/2023-10/COM 2023 651 1 EN ACT part1 v4.pdf

³⁰ Air transport benefitted from EUR 3.6 billion and waterborne transport EUR 1.8 billion.

³¹ <u>https://www.eca.europa.eu/Lists/ECADocuments/RW22_01/RW_Energy_taxation_EN.pdf</u>



draw up incentive and financing plans for transport networks, requiring local authorities to apply stringent conditions to discourage and even economically penalise individual transport in urban areas, obviously only after solutions have been implemented that do not reduce the mobility needs of people and goods.

Energy prices are key to improve rail's share in the transport system. Electricity is the main source of energy for passengers (85%) and freight (55%), and its share in the rail energy mix will grow due to the need to decarbonise further the sector itself. Securing in the long run the supply of clean electricity at a competitive price for rail, with an exemption from the electricity tax, must be a priority for the EU and Member States. Rail must be identified as a priority in grid planning and investment. In the same way, instruments such as "power purchase agreements" or "contracts for difference" must be used to supply electricity at preferential terms to railway undertakings.

Regulatory instruments can also play a part in enhancing the role of rail in the transport system. Compulsory piggybacking, where it makes sense and does not create a competition with rail freight, or low-emission zones in cities, are examples of measures that can contribute to the modal shift from road to rail.

Modal shift is a necessary but insufficient means of driving forward the mobility transition. The transport system is and will be made up of different transport modes that can work in a complementary way. Europe therefore needs a multimodality policy. Since 1992, the EU has a Directive on Combined Transport that aims to remove technical and administrative barriers to multimodal transport³². Though useful, this technical and administrative harmonisation is not enough. In addition to the financial incentives mentioned above, multimodality requires specific infrastructures and digital tools. The "Alternative Fuels Infrastructure Regulation" (AFIR) aims "to ensure that there is enough infrastructure for cars, trucks, ships and planes to (re)charge or (re)fuel with alternative fuels (e.g. hydrogen, liquefied methane), with good enough geographical coverage".

The national action framework that Member States must prepare in the context of AFIR (art. 14) must secure multimodal access to charging and refilling infrastructures. The EU and Member States must ensure that rail will be central in the design of this network of recharging hubs to really allow multimodality around rail. The recent green freight package contains a Regulation Proposal on the use of railway infrastructure capacity that might "change the rules for rail infrastructure capacity and traffic management, for monitoring the performance of rail transport, for stakeholder coordination and for the allocation of capacity to rail traffic as part of an intermodal transport chain"³³. This regulation and AFIR must create a coherent policy framework to develop further multimodal infrastructures.

Intermodal and multimodal travel will become easier in the future if better data access and simplified ticket bookings on platforms are created by clarifying an EU legal framework for multimodal travel. There would also be additional potential for modal shift if a functioning European network of night train connections were available. To achieve this, the complexity of different regulations, technical conditions and disadvantages in terms of taxation must be reduced or harmonised through the harmonisation of standards.

Modal shift and multimodality should not lead to overlooking the need to decarbonise further the rail system. This must also be accompanied by efforts to reduce CO₂ emissions from rail by electrifying further tracks and rolling stock, by tackling scope 2 emissions by keeping and developing carbon-free electricity production and use, and by increasing train occupancy rates.

³² <u>https://transport.ec.europa.eu/transport-themes/logistics-and-multimodal-transport/multimodal-and-combined-transport_en</u>

³³ <u>https://transport.ec.europa.eu/system/files/2023-07/COM_2023_443_0.pdf</u>



Mobility is a condition of social integration and must remain available and affordable to all. This must be a guiding principle of the EU transport policy³⁴. In the same way, the principles and proposals of industriAll Europe's Just Transition Manifesto, as well as the conclusions of the Just Transition 4 Mobility project, must be at the core of what governments will do to support workers and communities impacted by the ongoing structural change due to the twin transition³⁵.

 ³⁴ See iAE position on the EU Smart and Sustainable Mobility Strategy <u>https://news.industriall-</u> <u>europe.eu/documents/upload/2023/5/638195017322706665_637545228999008711_ADOPTED__EN__</u>
<u>Position Paper - A Smart and Sustainable Mobility Strategy for Europe (6).pdf</u>
³⁵JT4Mobility project, final report <u>https://news.industriall-</u> <u>europe.eu/documents/upload/2023/9/638297824466369332_IndustriAll_JUST_TRANSITION_EN_23_1%D0%90.pdf</u>