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WORKING PAPER

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° prev. doc.:	ST 6167/23 REV 4
N° Cion doc.:	ST 15114/21 + ADD1
Subject:	Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport - Further revised Presidency discussion paper - Comments by the Netherlands

Delegations will find in the annex, comments by the Netherlands on the document mentioned above (ST 6167/23 REV 4).

Geographical coverage and deadlines

A broad geographical scope is important to ensure the best application and use of the data published. A too narrow geographical scope could exclude certain municipalities and roads, which would have the Directive lose its value. Services such as informing on maximum speeds and urban vehicle access regulations (UVAR) have less effect if the service can only apply to part of the network.

Regarding speeds limits, we cooperate with service providers to provide in-car information. However, an evaluation has shown that the incorrect speed limits are often shown (e.g. the time-dependent speed limits on NL highways). The revision of the ITS Directive will help us improve such public-private cooperation, and hence help show the correct speed limits. Regarding UVAR's, making such data available is crucial to meet our sustainability related goals. In order to achieve that, we need a broad geographical scope, to ensure that cities both larger and smaller make such data available. This also links to navigation services. We want to avoid situations where navigation services lead you to a UVAR where your car is not allowed to go. When the right data is made available, such situations are easily prevented.

At the same time, we understand that publishing certain data types asks for additional investments and efforts amongst others from municipalities – investments and efforts that have to be made on top of other pressing issues.

In that regard, public-private cooperation can lend a helping hand to realize greater data quality (ally, in addition or as an alternative to make or buy). Additionally, digitalization is a way for municipalities to organize their work load in a more efficient way, and is an opportunity to provide more insight into their workload and responsibilities.

Hence, we welcome the proposed changes to the following description of the geographical scope: 'The Member State may choose to limit the coverage in cities at the centre of Urban Nodes ~~with a population of more than [1 million inhabitants]~~ to streets where the annual daily traffic is more than [8500] vehicles. The Member State taking that decision shall notify the Commission ~~thereof of streets covered in the Urban Node~~ by [date of column 3]'

We do wonder whether the amount of traffic of 8500 is set too high, and propose to lower that number. To come to a new number, we would like to understand better the reasoning behind the initial proposal of 8500.

Possibility to introduce changes to obligations

We appreciate the progress that is being made in the discussions on the use of delegated and implementing acts. We can support the use of both delegated and implementing acts. First and foremost, we value a lawful process. Hence, we can agree on both option A and B, as put forward by the Commission in document ST08456. Option C is not a preferred option, and would take away flexibility in making necessary changes to the directive, which would make moving in pace with technological developments more difficult.