



CONEBI feedback to a proposal for a revision of the Intelligent Transport Systems (ITS) directive

CONEBI represents the European Bicycle, Pedal Assist E-Bike, Parts & Accessories Industries via its national industry members. In the EU there are about 1000 companies providing more than 150,000 direct/indirect jobs. Via the CONEBI's national industry members, more than 600 small, medium and large companies are represented in CONEBI.

CONEBI welcomes the European Commission's proposal for a revision of the ITS directive and supports the efforts to facilitate more efficient deployment and use of ITS solutions. We particularly welcome the adoption of some of the key messages of the industry and explicit mentions about VRUs (vulnerable road users) in the principles of deployment and in Priority Area 3 as well as the emphasis on the role of CCAM in the future, especially in urban areas. As members of the EU CCAM Partnership, we are confident that CCAM research and projects in the following years will take the needs of cyclists into account. However, besides the positive elements, there is some room for possible improvements.

Firstly, the ITS directive proposal seems to be designed primarily with cars and other motor vehicles in mind. Just to provide a few examples, already in the opening section on pg. 1 of the ITS directive proposal, we can read that "*CCAM transforms a driver into a user*", not taking into consideration the mobility developments and needs in the direction of more sustainable and inclusive solutions. From a communications perspective, this is confirmed by the EC's press release that introduced the ITS directive with the headline "*Intelligent Transport Services for Drivers*".

The bicycle industry understands the role of the automotive and automotive suppliers industry in the ITS developments. However, on a regulatory level, it is crucial to strive for inclusiveness of all modes of mobility and all road users, particularly keeping in mind the safety of the vulnerable ones like cyclists and pedestrians (without adding any additional administrative burdens on them). The bicycle industry is uniquely positioned to provide its expertise and contribute to the development of ITS in the EU and the ITS directive proposal should pave the ground for further development of ITS beyond the world of motorized vehicles.

Secondly, the proposal also brings some new mandatory requirements, asking Member States to ensure availability of various data types listed in Annex III of the ITS directive proposal and their accessibility through National Access Points (NACPs). We reckon that high-quality and accessible data is key to the development of future ITS applications.

However, at the moment, the required data listed in Annex III does not include data linked to VRUs. Furthermore, the data to be collected on regulations and restrictions in Annex III only covers areas with access to motorized traffic; cycling and pedestrian infrastructure is not included. The future of ITS and CCAM must take cyclists and pedestrians into account – it is necessary to have sufficient knowledge about VRU dedicated infrastructure as well as infrastructural interfaces between spaces for motorized traffic and bicycle lanes. Limiting the static data collection to areas with motorized traffic would also necessarily lead to harmful path-dependencies in the ITS development, omitting the new trends in mobility and new infrastructural solutions. Similarly, VRU needs should be analysed and assessed, so that they can be addressed from a road safety perspective.

Going beyond the requirements currently listed in Annex III, it would be desirable to even include mandatory datasets on VRU dynamics and accidents. The world of mobility is changing fast and dynamic data collection is a crucial prerequisite for the new mobility services and planning. The successful deployment of future networks and multimodal solutions including sharing systems will heavily depend on high-quality and widely available connected and online data. Development of the multimodal digital mobility services and mobility as a service (MaaS) solutions could receive a significant boost if supported by appropriate measures in the ITS directive revision - and we believe that this is the time to show a high level of ambition in the EU.

Thirdly, as already pointed out, we highly welcome that the protection of VRUs has become part of a priority area. As many ITS use cases are already handled by smartphones and cloud based services (like multimodal transport services or traffic light information) and since the smartphone appears to be a natural choice to integrate VRUs into ITS services, the question arises to what extent smartphones especially in combination with server based services can also be used for use cases whose aim is to enhance the safety of VRUs, but are not safety critical in terms of functional safety (example: information messages which do not require immediate/strong reactions).

We therefore request to endeavor the inclusion of smartphones at least for use cases increasing the safety of VRUs but without functional safety requirements (e.g., ASIL level= QM).

Fourthly, we would like to emphasize that for use cases with functional safety requirements (like strong automated interventions etc.), there will be a need for regulation related to the mutual acceptance of ITS messages exchanged between different traffic participants whose ITS devices and attached sensors were developed based on different functional safety standards:

- ISO 26262 is commonly used in automotive area, but only covers power two-wheeler, passenger cars, trucks, and busses, but not low-power two-wheeler (like mopeds or below);
- EPACs, for example, use ISO 13849 according to EN 15194;
- Tractors and machinery for agriculture and forestry use ISO 25119;

However, all share the same roads.

Since these standards are all derived from IEC 61508, it should not be a problem to exchange messages between systems developed according to those different functional safety standards. ISO 25119-2:2019 contains guidelines (in Annex H) allowing to compare ASIL levels (ISO 26262) with Performance Levels (ISO 13849, ISO 25119). We therefore request to take into account this need for regulation, enabling the ITS-based communication between road users (including VRUs) also for use cases with functional safety requirements (ASIL >QM).

Finally, since the revision of the ITS directive was announced as a part of a larger mobility package, it is important to put the proposal 'in conversation' and in sync with other EC proposals, especially the Urban Mobility Package. The cycling ecosystem has welcomed the Urban Mobility Package proposal, as it provides a significant boost for cycling and sustainable mobility. Importantly, the ITS-related issues within the Package are oftentimes covered in a more ambitious manner than we see within the ITS directive revision proposal itself. It is clear that the Urban Mobility Package is a non-binding document and therefore can include a higher level of ambition; this is welcome. However, we believe that more explicit inclusion of bicycles and cycling within the ITS directive proposal would be beneficial. The world of mobility is changing, with more and more people choosing bicycles for environmental and health reasons; and the new ITS directive must be ready for the future.

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