Brussels, 24 November 2021

Dear Executive Vice-President Mr. Timmermans,
Dear Commissioner Ms. Vălean,
Dear Commissioner Mr. Sinkevičius,

We understand that you are in the process of finalising a new Urban Mobility Package.

Many European cities are already world leaders when it comes to urban mobility. But we now need the support of EU policies to scale-up these efforts and make sure that all European city dwellers can enjoy liveable and loveable cities.

The climate emergency and the latest air quality guidelines of the World Health Organization\(^1\) mean that we have no time to lose and must now take decisive action.

Citizens of Europe have the right to clean, safe, efficient and affordable ways to get around in their cities. This will not only help curb climate change but will also benefit the health of all urbanites and will prevent over 300,000 premature deaths each year.\(^2\) In addition, attaining the Green Deal objectives for the transport sector in European cities could lead to net benefits of up to €177bn by 2030.\(^3\) A clear majority in cities demand more space and action

---

\(^1\) World Health Organization (2021). New WHO Global Air Quality Guidelines aim to save millions of lives from air pollution. [Link](#)
\(^2\) European Environment Agency. (2021). NEWS Cleaner air could have saved at least 178,000 lives across the EU in 2019. [Link](#)
\(^3\) EIT Urban Mobility. (2021). Urban Mobility Next #5 - Costs and benefits of the sustainable urban mobility transition. [Link](#)
for clean mobility: 68% want more effort by cities to promote the use of public transport, and a majority also want more space to be reserved for pedestrians (66%) and cycling (56%).

These goals and ambitions need to be matched by policies.

Although we understand several positive elements are being considered for this review, including steps towards requiring Sustainable Urban Mobility Plans, we are concerned that what's currently being considered falls well short of what is needed, and demanded by citizens and organised civil society. Specifically, postponing clarity on what constitutes ‘sustainable’ mobility and how this will be translated into binding requirements would severely undermine the credibility of the Urban Mobility Package. References to “carbon neutral” or “alternatively fuelled”, which would allow for biofuels or synthetic petrol or diesel fuels that cause local air pollution, should not be part of the UMP. The following three changes would make the urban mobility package more fit for purpose:

1. **Require SUMPs to include binding targets for zero-emission mobility by 2030 in the TEN-T regulation.** Cities are ideally suited to spearhead the EU’s necessary transition to a zero emission mobility system dominated by walking and cycling, public transport, zero emission freight and shared and electric vehicles. A concerted effort by EU cities will provide a major boost to the EU Commission's proposals to transition to 100% emissions free cars as well as ubiquitous charging, across Europe. Setting a clear and easy to understand goal will help cities and civil society to mobilise towards, and prepare for the achievement of this goal.

2. **Require SUMPs to include binding targets to increase the share of active mobility and public transport modes by 2030 in the TEN-T regulation and make EU funding conditional upon the implementation of these plans.** The Urban Mobility Package should require cities to set clear targets for reduced private car travel, modal shift and space reallocation. The UK, for example, wants half of all urban journeys to be cycled or walked by the end of the decade, which is something that Europe should follow suit on. According to the Commission’s own data, the negative externalities of motorized transport amount to 800 billion euros per year. This is an expense which must be addressed by reducing space for private cars and prioritizing investments in active modes as well as public transport. In order to reinforce this momentum, EU funding should be made conditional upon the adoption and implementation of SUMPs that enshrine these targets.

3. **The Commission should do nothing that restricts cities' ability to introduce Low and Zero Emission Zones or any other forms of urban access regulations and pricing schemes:** More than 250 LEZs are already in place in Europe. Cities from

---

across the continent are all different and it is paramount to allow local authorities to design LEZs with local people and conditions in mind; the European Commission should avoid following the one-size-fits-all rule here. And people also want this: A recent Yougov survey by the Clean Cities Campaign shows that a majority of European urbanites want only emission-free cars in cities after 2030. The European Commission’s analysis found that the necessary technological and material tools already exist and eight major European cities have already adopted plans for Zero-Emission Zones. Analysis suggests that Low and Zero Emission Zones are powerful tools in reducing overall pollution from transport and play a catalyst role in driving zero emission mobility. Not only that, but LEZs can also have a positive impact on the economy, as the example from Madrid shows.

At the time of the climate crisis and the global Paris accord, incremental improvements are no longer sufficient - only zero emissions solutions will deliver the necessary transformation. Technology and policy tools are all there to make cities zero emission, what we now need is political leadership to scale and implement them. The time is now and the decision is in your hands.

Yours sincerely,

William Todts
Executive Director
Transport and Environment

Barbara Stoll
Director
Clean Cities Campaign

Transport & Environment is Europe's leading clean transport campaign group.

The Clean Cities Campaign is a coalition of over 55 organisations from across Europe campaigning for zero emission urban mobility by 2030.

---

6 European Commission. (2020). 100 climate-neutral cities by 2030 - by and for the citizens. Link
7 ICCT. (2021). A global overview of zero-emission zones in cities and their development progress. Link
8 Transport & Environment. (2019). Low-Emission Zones are a success – but they must now move to zero-emission mobility. Link
9 Forbes. (2019). Closing Central Madrid To Cars Resulted In 9.5% Boost To Retail Spending, Finds Bank Analysis. Link