

# **EDF feedback to the Urban Mobility Package Roadmap**

## **20 May 2021**

We are European Disability Forum an umbrella organisation of persons with disabilities that defends the interests of over 100 million persons with disabilities in Europe. We are an independent non-governmental organisation (NGO) that brings together representative organisations of persons with disabilities from across Europe. We are run by persons with disabilities and their families. We are a strong united voice of persons with disabilities in Europe.

As it was mentioned in the evaluation of the 2013 Urban Mobility Package (UMP) published on 24 February 2021, the ageing population coincides with an increase of the number of persons with disabilities in the coming years. It is also estimated that over 60 % of EU citizens live in urban areas of over 10 000 inhabitants[[1]](#footnote-1). Therefore, accessibility of public transport and the urban environment is one of the key issues to address in the revision of the Urban Mobility Package, affecting a majority of the EU population.

We would like to underline the importance of an inclusive and accessible urban transport system for persons with disabilities to achieve the climate goals set out in the EU Green Deal and to allow for a just transition, leaving no one behind. At the moment, there is EU legislation on Passengers’ Rights covering most transport mode except urban transport. Likewise, there is a gap in the European Accessibility Act: it only covers websites, mobile applications, and ticketing machines of transport providers but not the vehicles or infrastructure of urban transport. Accessibility of urban transport should be considered within a broader urban accessibility framework, because an accessible bus will be of no use for persons with disabilities if barriers on the way from home to bus stop prevent them from reaching the stop (e.g. lack of curb-cuts, tactile pavement markings, audible traffic lights, etc.).

Therefore, it is crucial to use this opportunity now to improve the legislation to create resilient and future-proof transport networks that will serve all passengers.

For the revision of the Directive, we would like to highlight the following aspects:

* **Accessibility of transport vehicles** (buses, trams, taxis, light rail, rail, etc.) – Rail vehicles are covered by the TSI-PRM but there is no binding legislation for the other transport modes. The result is that still new vehicles are purchased that are not accessible – for example new De Lijn buses in Belgium still don’t have visual and audio information announcing the following stop, which is a basic feature. And we are not even talking about ramps or lifts.
* **Accessibility of transport infrastructure** (stations, stops, multi-modal hubs, etc.) – some aspects will also be covered by the TEN-T Regulation but the UMP should also include smaller stops and stations outside the TEN-T network. It is a sad reality that still bus and tram stops are being built that do not match the vehicle fleet and result in accessibility problems. This has happened for example in Brussels, Belgium.
* **Accessibility of the urban environment in general** (streets, pavements, parks, playgrounds, shopping areas, and all other public places). The new European Standard EN 17210 on accessibility and usability of the built environment should be referenced and its use encouraged.
* **Accessibility of information**: This includes both static and real-time information on board of vehicles, at stops/stations, and on-line. As mentioned above, this should be a standard feature but it is not installed in all vehicles and stations in the EU. Easy-to-read formats are crucial for many persons with disabilities.
* **Sustainable Urban Mobility Plans**: SUMPs should be obligatory and they should include accessibility requirements. Persons with disabilities and their representative organisations should be consulted systematically both on a local and national level about their needs; Start planning now – it is cheaper to make designs accessible from the start; Use and create accessibility standards; Exchange good practices; Enforce the rules; training and awareness raising. The SUMPs should help align all the aspects mentioned above, e.g. when bus stops are renovated it should be made sure that the curb height matches the bus fleet to allow step-free access.
* **Intersectional approach to urban planning:** it is important to consider other barriers which person with disabilities can encounter when trying to access public transport. For example in cities like Brussels, the fact that self-ticketing machines are not accessible for all persons with disabilities can result in a financial loss for passengers with disabilities because it is more expensive to buy a ticket from the bus driver than a ticketing machine at the stop. So, affordability of accessible public transport is also important. Women, LGBTI or racialized persons with disabilities can face further barriers due to pubic harassment or personal safety concerns when using public transport.
* **Public procurement:** This is partly covered by the Public Procurement Directive but there should be clearer rules for accessibility requirements of public transport vehicles, infrastructure, and ticketing machines. Currently, each city procures its own vehicles and the requirements are not harmonized or aligned, resulting in the purchase of inaccessible vehicles and waste of public money. The wheel does not have to be re-invented every time, the technical solutions exist but there is a mismatch between the specifications in the call for tenders, the manufacturers’ proposals, and the reality of persons with disabilities that needs to be fixed.

In conclusion, we fully support the objectives of the Roadmap. In order to achieve the EU’s climate goals, we have to shift to more sustainable transport modes but persons with disabilities can only make this pro-active choice if they have full, independent access to all means of transport, including urban public transport.

## Contact

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1. <https://ec.europa.eu/transport/themes/urban/urban_mobility_en> [↑](#footnote-ref-1)