Deutsches Verkehrsforum

Position Paper

»Mobility for Europe – Strongly Connected.«

#smartmoves

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Deutsches Verkehrsforum e.V.
10785 Berlin, Klingelhöferstrasse 7
Phone: 030 263954–0
Fax: 030 263954–22
Internet: www.verkehrsforum.de
Email: info@verkehrsforum.de

Responsible for the content:
Ingrid Kudirka

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Position Paper

»Mobility for Europe – Strongly Connected.«

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Europe. Strongly connected.

The European Parliament elections in 2024 will take place under challenging global political circumstances: while Ukraine, supported by both Europe and the US, has been fighting for its existence since 2022, both the upcoming European and US elections could decide whether this support continues or ends. The elections here will moreover determine the future course of European integration within a problematic geopolitical and economic environment and the future viability and openness of Europe as a business location.

Europe must take a stand on key positions that will be convincing to both its own members and the rest of the world. Excessive bureaucracy, high transformation costs and an increasing shortage of skilled labour are serious issues demanding solutions if Europe is to remain competitive. They are also decisive location factors for companies in the transport and logistics sector in Germany. The German Transport Forum (DVF), the voice of the German mobility industry, has compiled recommendations for a sustainable European mobility policy in five key action areas.

- We must secure the location's viability and promote its competitiveness. Achieving this goal will require a balance between regulation and the upgrading of infrastructure, unbureaucratic funding instruments, protection from competitive disadvantages compared to international providers with lower sustainability standards, research and development, digitalisation, artificial intelligence and the availability of skilled workers.

- We must successfully mould transformation and achieve our climate targets. Innovation, investment and a reliable infrastructure are the prerequisites for success. Europe must demonstrate its openness to innovation and its technological flexibility. Revenues from emissions trading in the transport sector and from CO_2 components in taxes and other levies must be channelled back into the mobility sector and to consumers.

- We must develop an infrastructure that is prepared for future challenges and improve interfaces. An efficient transport market requires the integration of all modes of transport into a common European transport system operating on the principle of co-modality in a spirit of partnership and the division of labour. The European single market will be held back from realising its full potential until the structural and technical conditions for cross-border transport have been created.

- We must strengthen the logistics sector and optimise the general conditions for its operation. Market liberalisation has led to more competition, lower costs and greater efficiency. We should not and must not jeopardise these achievements by overregulating businesses. Moreover, the EU Commission must continue to ensure that existing EU legislation is implemented uniformly in all member states. Global business requires international standards for safe transport.

- We need to drive digitalisation forward and organise safe and efficient mobility. Digital information systems aid in the organisation of efficient, safe and cost-effective transport as part of a network even as distances increase. A clear separation of responsibilities between the public and private sectors is essential. EU standards must reasonably limit the scope of accountability of transport companies.

The German mobility industry wants to continue serving as a partner for European politics, striving to secure the position of the European transport sector as an industry of the future and a pillar of our community. The objective is the strengthening of the tangible connective structures within Europe to encourage and foster the continuing growth of closer relationships among the continent's countries.

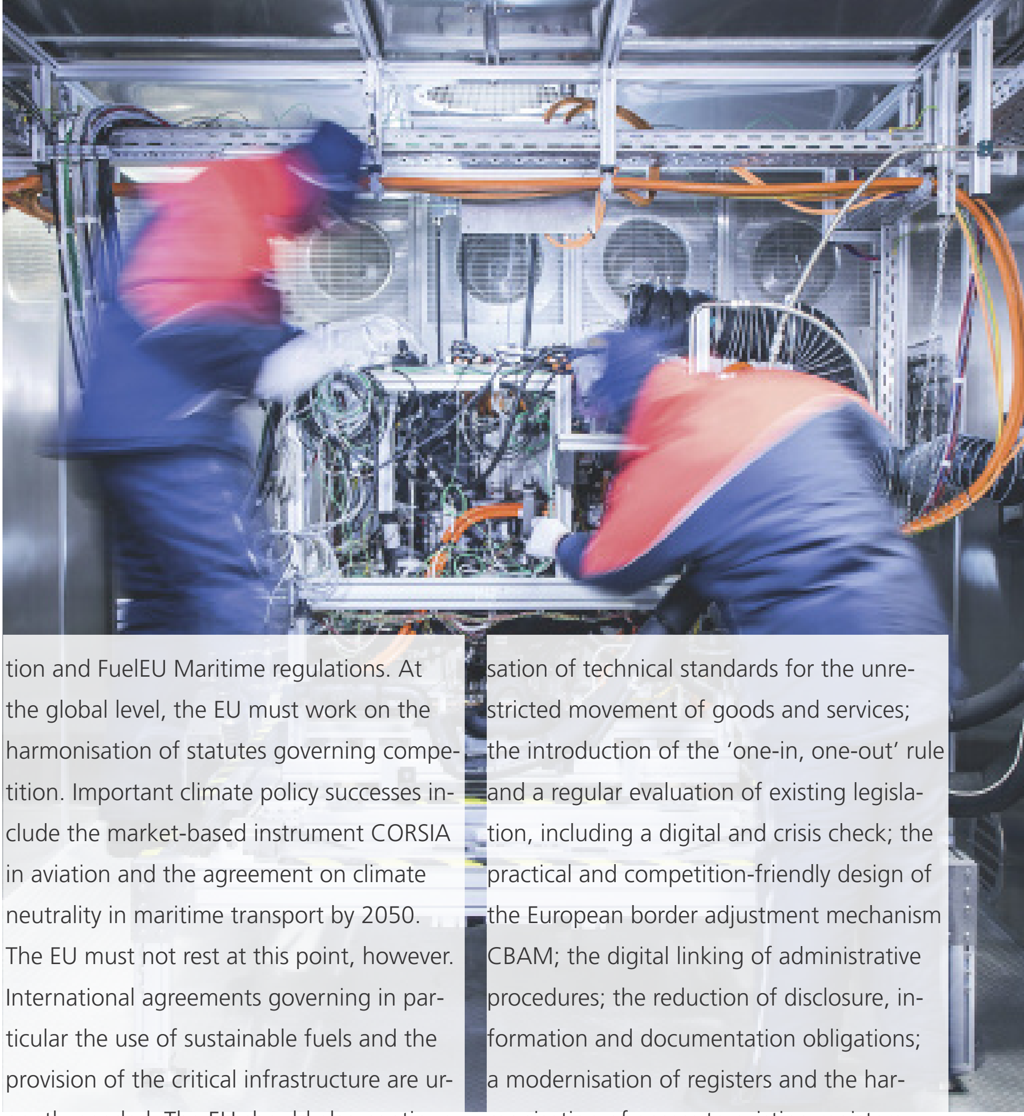
Prof. Dr. Raimund Klinkner
Chairman of the Executive Committee

Secure the Location – Strengthen Competitiveness

If Europe is to continue to play a leading role as a centre of mobility in future, technological innovation and the speed of its implementation at the highest level are indispensable. The European mobility sector is capable of mastering this challenge, but is dependent on support of the appropriate framework: harmonisation of regulation and upgrading of infrastructure, unbureaucratic funding instruments and protection from competitive disadvantages compared to international providers with lower sustainability standards. Key elements of success are research and development, digitalisation, artificial intelligence and the availability of skilled workers. The EU must provide optimal support for these action areas.

Establishing the European framework for innovation and competitiveness

The enactment of the Inflation Reduction Act in the USA established a significant and effective industrial policy instrument enabling the country to provide support relating to the climate, energy and drives. Governments around the world are initiating similar measures, emphasising in particular hydrogen technology and alternative drive systems and revolving around e-mobility, fuels and artificial intelligence (among others). Europe must not lose the competition for investments, which is why the EU must combine high standards with speed and effectiveness. Top priority for EU funding instruments such as the Connecting Europe Facility (CEF) is of fundamental significance for the mobility sector. The regulations governing the funding must be simplified and accelerated. The IPCEI projects for hydrogen, charging infrastructure, e-fuels, battery technology and artificial intelligence, the Net Zero Industry Act (NZIA) and the EU taxonomy are just a few examples. Furthermore, conflicting provisions among various regulations, directives and guidelines must be avoided or eliminated. For instance, the requirements for alternative drives and fuels in the EU taxonomy must not go beyond the standards that have previously been established in the RED or in the ReFuelEU Avia-



tion and FuelEU Maritime regulations. At the global level, the EU must work on the harmonisation of statutes governing competition. Important climate policy successes include the market-based instrument CORSIA in aviation and the agreement on climate neutrality in maritime transport by 2050. The EU must not rest at this point, however. International agreements governing in particular the use of sustainable fuels and the provision of the critical infrastructure are urgently needed. The EU should also continue to ensure fair competitive conditions on the single market. The Green Claims Directive and the taxation of electricity in the member states are two examples.

Reducing bureaucracy in Europe

European companies opine that regulation and bureaucracy have had significant negative consequences for Europe's competitiveness. The following issues are especially important for the relief of European companies that is of such urgent necessity: the reduction of bureaucracy and the harmonisation of technical standards for the unrestricted movement of goods and services; the introduction of the 'one-in, one-out' rule and a regular evaluation of existing legislation, including a digital and crisis check; the practical and competition-friendly design of the European border adjustment mechanism CBAM; the digital linking of administrative procedures; the reduction of disclosure, information and documentation obligations; a modernisation of registers and the harmonisation of access to existing registers across the EU oriented to corporate needs; the application of the once-only principle; a modernisation of product liability law within sensible limits; and consideration of the viability of sanctions.

The adoption of the General Data Protection Regulation (GDPR) is representative of the EU's efforts to act as a pioneer and role model for progressive data protection law and a correspondingly high level of data protection. When developing data protection law within Europe and at the international level, however, greater attention should be paid to the practicability and feasibility of data protection provisions. During the creation of the legal framework suitable for the data economy, coherence and consistency with existing regulations such as the GDPR are imperative. Data protection rules in particular must not be extended beyond sensible boundaries, and inordinate control depth must also be avoided. This has not always been the case in the past.

Improve availability of skilled labour

Securing a sufficient number of well-trained workers is a fundamental prerequisite for the success of the European economy and for the transformation of the mobility sector in Germany and Europe. The EU has already initiated a number of initiatives in this area such as the promotion of learning and labour mobility. Future European initiatives to secure the availability of skilled workers should address high-quality vocational training, enable higher labour market participation and support better integration into the labour market. There should be a special focus on skills in the future, one that is not limited to the European Year of Skills 2023. Support for blueprint projects such as STAFFER in the rail sector can aid the mobility sector in reskilling and upskilling specialists.

Measures for vocational education and training should promote practical and high-quality vocational training involving commercial operations, establish the equivalence of vocational and academic education, render informally acquired vocational skills visible and assess their value, increase participation in advanced training activities, make the Europass portal usable for companies, incorporate national instruments and promote Europe-wide and international mobility in vocational education and training while broadening its accessibility for SMEs. This also includes improved procedures for recognition of certificates and qualifications obtained abroad such as driving licences. The EU must lower the minimum age for working as professional drivers to 18 as a means of combatting the shortages in this profession.

Measures aimed at increasing labour market participation should leverage employment potential (particularly among women, older people and the unemployed), promote the integration of refugees, manage labour market-oriented immigration sensibly and unbureaucratically and take steps to prevent the exodus of skilled professionals.

Expand R&D funding in key sectors, facilitate access and increase effectiveness

Germany and Europe are world leaders in the mobility industry. This position is now being challenged. Alternative drives and fuels, electromobility and digital networking are changing and revolutionising all modes of transport and their relationship to one another. New competitors are entering the market around the globe. The dynamics of this development are high indeed. The EU must rigorously create the conditions that will enable European manufacturers to compete in this close race. With regard to the digitalisation and automation of transport

— but no less to the issue of a sustainable energy supply — Europe must become a uniform, strong market. The obstacles to such a development must be dismantled quickly.

Nor is the competitive pressure in shipping and among ports in abatement. At present, four of the ten most important international shipping lines are domiciled in Europe. Germany as an export location — especially the automotive, mechanical engineering, chemical and pharmaceutical industries — is dependent on competitive ports and efficient global transport chains. The EU must keep this in mind and ensure good general conditions for European companies.

Being a centre of aviation, the EU must prepare to meet rising demands: new propulsion systems, new fuels and new forms of transport made possible by electrically powered vertical take-off and landing aircraft (eVTOL). Technological leadership must be maintained — an unachievable goal without EU funding. Programmes for the promotion of research and development such as Horizon Europe, SESAR and Clean Sky must be continued and expanded.

The railway sector is in a state of constant change and faces global technological competition as well. Moreover, it has a key role to play in achieving national and European climate targets. Digitalisation and automation are right at the top of the agenda. Global standards are set here. The European Rail Traffic Management System (ERTMS), for example, has become an export hit. The rollout in Europe must be driven forward swiftly in accordance with the agreements on the European transport corridors (TEN-T) in order to increase railway capacities and generally strengthen mobility among the member states. Ongoing research work — which cannot be realised without EU funding — is essential for maintaining the competitive position of European manufacturers.

The transfer of the 'shift2rail' joint undertaking to 'Europe's Rail' is a welcome move as it will further strengthen synergies between industry and the public sector. The European Commission should maintain this focus and collaborate with rail stakeholders to create a successor to the Europe's Rail joint undertaking for the next general research programme. Furthermore, the framework conditions required for the acceleration of the implementation of new technologies originating from the Europe's Rail research programmes (DAK; Automatic Train Operation etc.) should be created. R&D

projects should be conducted to drive forward autonomous train operation on railways as it will be a key factor in overcoming the shortage of skilled labour in the future.

Facilitating the game changer of digitalisation and artificial intelligence in development and application

Digitalisation and artificial intelligence are key factors for the further development of mobility, transport and logistics. Data are the fundamental prerequisite for the training of AI applications, better networking of mobility services, resource-efficient logistics solutions, reliable passenger information, preventive maintenance and capacity-optimised management of transport systems. Critical elements of the international competition among locations include the broad application of new digital technologies, the provision of breathing room for innovation and new business models and the protection of these innovations from imitators.

The European framework for AI, data exchange, data protection and cybersecurity must give due consideration to all these aspects. The framework must foster innovation and designate a privileged status for research and development of digital technologies. Intellectual property as well as business and personal data must be protected. Methods for pseudonymisation and anonymisation of data must be approved and mutually recognised in such a manner that their application is possible in all member states. The same is true of the framework for AI, data protection and data exchange. The political agreement on the AI Act in December 2023 acknowledges the weightiness of these principles. On 9 December 2023, the Commission, Parliament and Council agreed on the world's first horizontal legislation for the regulation of AI. The AI Act also defines standards for the protection of fundamental rights and functional security.

AI must not be overregulated, yet regulatory provisions must simultaneously give due regard to the risks associated with AI. The intent behind the AI Act and the establishment of binding standards, including the obligation to test conformity assessments for high-risk products, are therefore welcome. Nevertheless, the disclosure of the methodology must not lead to the divulgence of intellectual property. A graduated risk-based approach that differentiates between areas of use by security level, profiling risk and transparency requirements and that subsequently derives appropriate monitoring obligations is needed. Wherever regulation is indispensable, it must be unbureaucratic; in other cases, there must be trust in self-regulation. Third-party, independent testing organisations with many years of expertise must become involved. The use of digital tools must be mandatory for the fulfilment of any unavoidable reporting obligations.

Honour innovation, consider added value when awarding contracts

Free trade in Germany and Europe strengthens us as an export nation. The rules for free trade must also be implemented in the third countries that benefit from our openness during the conduct of European procurement procedures. European businesses must be protected from unfair competition. An international procurement instrument (IPI) secures a minimum of reciprocity during public procurement tenders and ensures competition for the best products. At present, this market-based approach is distorted by (in some cases, massive) subsidisation from state banks, sovereign wealth funds and state budgets. Unfair competition resulting from foreign subsidisation on the European market must be prohibited and the further development of European antitrust law must be driven with the aim of creating globally competitive 'European champions'.

Innovation must be honoured and permitted on the single market. Award components in tender procedures as well as approval processes involving as little red tape as possible must ensure that innovative elements and sustainable activity as a consequence of a local added-value component are given due regard. To this end, these components of any tender assessment must be denoted at a specific price. Other award criteria unrelated to price such as the most economically advantageous tender principle (MEAT), understood as the best price-performance ratio, must be endorsed.

Balanced and legally secure regulation of EU air passenger rights

A proposal by the European Commission to revise the Air Passenger Rights Regulation 261/2004 has been before the European Parliament and the Council for ten years. An elementary point of the reform is the legally certain definition of the so-called 'exceptional circumstances' aimed at the elimination of the current ambiguities in the legal classification of disruptions to flight operations. This definition should be adopted without undue delay.

Consistent structuring of multimodal passenger rights

The Commission presented a proposal for a regulation regarding multimodal passenger rights as part of its 'Passenger Mobility Package' at the end of 2023. The proposal's objective of encouraging multimodal travel must not be jeopardised by excessive requirements and costs. Especially critical points will be the clear definition of the responsibilities of all involved parties and scope of application and the avoidance of any conflicts with existing passenger rights regulations in the implementation of the new rights. The avoidance of any inordinate bureaucracy should be a priority.

Successfully Mould Transformation – Achieve Climate Protection Targets

The launch of the Green Deal and the Fit for 55 package represents one of the most comprehensive reform projects in the EU's history. The transport and energy sectors take centre stage of the transformation. The DVF emphatically supports the goal of achieving climate neutrality in Europe by the middle of this century.

This requires that we achieve significant reductions of CO_2-emissions over the next ten years also in the transport sector.

Innovation, investment and a reliable infrastructure are the prerequisites for a positive outcome. Europe must maintain openness to innovation and technological flexibility and structure its regulatory projects to be competitively neutral in the course of the transformation. Moreover, all revenues from CO_2 components in taxes and other levies must be channelled back into the mobility sector and to consumers. Consumers, companies and member states must use the funds to finance transport-related climate protection measures.

A further factor is the entry into force this year of the EU Directive on Corporate Sustainability Reporting (CSRD), initially for enterprises of a certain size. By 2026, over 50,000 companies in the EU will be obligated to submit sustainability reports — almost four times as many as at present. While we welcome more transparency in sustainability reporting, the exclusion of independent audit service providers from the performance of external audits pursuant to the CSRD must not be allowed to happen during the transposition of the directive into national legislation.

Develop infrastructure for alternative drives and fuels

The implementation of the Alternative Fuels Infrastructure Regulation (AFIR) is a cardinal prerequisite for the achievement of the climate targets in the transport sector, but will

not be sufficient on its own. The expansion of the charging network in road transport must be significantly accelerated and ambitiously implemented in all member states, inter alia for frictionless cross-border transport. Member states should go well beyond the minimum targets established in the AFIR.

The bureaucratic hurdles to the expansion of the charging infrastructure should be dismantled and greater discretion during permit procedures for both the charging infrastructure and its requisite ancillary facilities should be allowed. Stringent monitoring by the European Commission and the European Parliament is also necessary. In addition to the charging network for cars and the development of depot charging for light commercial vehicles, there is now the huge challenge of developing the charging infrastructure for heavy lorries. Fast charging stations and lorry charging draw more power and necessitate the provision of suitable power connections and areas — in some cases even to the high-voltage grid. Consequently, regulatory action must pave the way for an anticipatory grid connection, particularly at truck stops and motorway service stations. A desirable target would be standardised digital grid connection procedures such as an online portal. Moreover, further funding programmes are vital for the economically attractive development of a charging infrastructure for e-trucks. Equally important is the construction of the supply infrastructure for hydrogen at sites such as airports, for shore power in harbours, and ground power and pre-conditioned air systems (PCA) at airports. The possible use of overhead catenary technologies for dynamic charging on motorways (electric road systems) should be taken into consideration, too, as part of the electric charging infrastructure for heavy duty vehicles. Without the necessary supply infrastructure, fleet limits for cars, light commercial vehicles, and heavy-duty vehicles cannot be achieved. The preconditions for a successful transformation — a nationwide charging infrastructure and the provision of affordable clean fuels and emission-free vehicles — would simply not exist.

The regulatory, industrial and social conditions for hydrogen applications must be created rapidly as we move along the road to global H_2 readiness. A comprehensive, harmonised regulatory framework with norms, standards and testing obligations is essential for the secure transition to a hydrogen-oriented future. In looking ahead to the future handling of hydrogen infrastructure and plants as well as the expansion of the user group comprising new focus sectors, we recommend the adaptation of the legal framework (NRM H_2) and its harmonisation throughout Europe (ECH_2A).

Exploit further opportunities to reduce CO_2

All available measures for the realisation of the climate targets in the transport sector should be implemented. One example is the revision of the Weights and Dimensions Directive for heavy duty vehicles now under deliberation. Revised provisions mean that the use of vehicles can be more climate-efficient and disadvantages due to the additional weight of alternative drives can be avoided.

Combine climate protection with competitiveness

The EU has assumed a global leadership role with its adoption of the Green Deal. The required pace of transformation and the necessary investments are very high. Consequently, legislators transport as well as other sectors must be vigilant to ensure that European enterprises are not put at an economic disadvantage with respect to their competitors from third countries.

At present, the transport sector is not subject to the Carbon Border Adjustment Mechanism CBAM. This raises the question of how the one-sided burden on European companies can be counteracted. This is particularly relevant for globally operating carriers such as aviation and maritime transport. With this in mind, the European Commission must closely monitor the effects of the EU emissions trading system and the quota requirements for alternative fuel. For the EU quotas for sustainable fuels (ReFuelEU), anything other than a standardised implementation that corresponds 1:1 to the European requirements is out of the question. The European regulations set the boundaries. Individual member states must not be allowed to exceed these limits by adopting even stricter requirements. Legal clarity is needed for SAF quotas in aviation. The binding obligation of the ReFuelEU Aviation that excludes parallel obligations (e.g. via the national GHG quota) is necessary.

There may also be considerable distortions of competition in emissions trading in the coming years due to the rising CO_2 price, increasing certificate prices and the very high costs and scarcity of alternative fuels. The EU has anchored no more than a small amount of so-called 'SAF allowances' in the aviation ETS. The success of the EU's import and ramp-up strategy for hydrogen and e-fuels is of key importance for all modes of transport. In any case, effective instruments that overcome the considerable additional costs to which European carriers are subject are called for. A unilateral energy tax for European carriers that would result in competitive disadvantages must not be introduced. Incentivising companies to invest funds in clean engines and fuels for aircraft, ships and vehicles is far preferable to increasing the financial burdens they must bear. The German government must swiftly adopt national transposition regulations for the inclusion of maritime transport in the emissions trading system. Shipping companies need legal certainty.

Return climate levies to the sector and to consumers

All funds taken from the transport sector as part of carbon pricing must be channelled back into the sector and to consumers for climate investments. This applies in particular to revenue from emissions trading and from the CO_2 share of the lorry toll or CO_2-related components of energy taxes. Similar revenues from the EU and the member states must be used for sustainable transport infrastructure, alternative supply infrastructure, procurement funding for low-emission vehicles on rail and road, aircraft and ships, and overcoming the additional cost of sustainable fuels. Investments in rail transport and rail infrastructure, in the digitalisation of rail freight transport with the Digital Automatic Coupling or ERTMS equipment, in the water-

way system, local public transport and new sustainable forms of mobility are crucial and should be considered accordingly. The use of funds must be transparent, effective and understandable for the players in the transport sector as society's long-term acceptance of climate change levies cannot otherwise be maintained. The general air passenger levies currently imposed in some member states — the aviation tax in Germany — should be transformed into a European climate levy earmarked for a specific purpose. The revenues should be used inter alia to overcome the additional cost of sustainable aviation fuels (SAF).

Introduce an EU climate change levy as an efficient solution for aviation

As the price delta between SAF and conventional aviation fuel will remain large for the foreseeable future, the current design of the European SAF quota (ReFuelEU) leads to a structural disadvantage for European hubs and network airlines (distortion of competition). Alternative transport via non-European hubs also reduces the environmental benefits (carbon leakage). The review phase explicitly anchored in ReFuelEU offers an opportunity for correction. Both the distortion of competition and the carbon leakage effect can be mitigated by imposition of an EU climate change levy on all airlines in relation to their final destination. An EU climate change levy as an instrument of the common EU transport policy (Art. 100(2) TFEU) to finance the SAF quota would be a fair option to ensure a level playing field.

Provide electricity, hydrogen and alternative fuels for the transport sector

The successful transformation of the transport sector in Europe is dependent on the expansion of the production of renewable electricity and the supply of hydrogen and synthetic fuels as well as biofuels in Europe. The expansion also includes the power grids, storage facilities, local power connections and electrolysis capacity. Europe must assume a leading role in hydrogen and e-fuels technologies, create a basic capacity for the production of hydrogen and e-fuels, prepare large-scale imports and diversify their sources. The European Hydrogen Bank and IPCEI (Important Projects of Common European Interest) must consider appropriately transport applications. The connection of transport infrastructures to the hydrogen network must be included in the early planning stages.
The DVF welcomes the increase in the EU's 2030 target for the use of renewable energies within the framework of RED III. However, compared to international standards, the EU adopts a highly regulatory approach even in the early stages of market development. Intense global competition for investments in production facilities for hydrogen and e-fuels has arisen (cf. US Inflation Reduction Act). The EU must become more pragmatic by making its framework conditions and funding instruments more responsive and more attractive to investors, at least during the market ramp-up. The EU should also set strategic targets here and now for the ramp-up of green hydrogen and e-fuels after 2030 as this move would heighten the planning certainty for investments.

Create a Europe-wide framework for a carbon management

Technologies for the capture, storage and utilisation of CO_2 represent a decisive contribution in the fight against climate change. From the perspective of the German mobility industry, the EU should assume a coordinating role with the objective of preventing fragmentation among the member states. In addition, a consistent regulatory framework at European and national levels, including clear definitions and standards, also creates planning certainty for investors and companies. The development of a European CO_2 transport and storage infrastructure is crucial for the CO_2 market, which requires the participation of all involved economic players. Alternative transport options in addition to pipelines such as lorries, rail and inland waterways should also be considered. The diversity of these options enables more flexible adaptation to changing circumstances and facilitates the connection of locations for which the construction of a pipeline infrastructure is not cost-effective. The diversification of transport options also increases the efficiency and resilience of the system, a factor that also reduces costs for companies. The prerequisite conditions for the emergence of a European carbon market and added-value chains — alongside the regulatory framework — are a combination of financial incentives, support programmes, technical support and capacity building.

Develop Infrastructure for the Future – Improve Interfaces

The indispensable foundation for the creation of a united Europe is an efficient and modern transport system that brings people, goods and ideas together. An efficient transport market requires the integration of all modes of transport into a common European transport system operating on the principle of co-modality in a spirit of partnership and the division of labour. The creation of close interfaces between the modes of transport and the removal of obstacles at national borders are especially important. The European single market will be held back from realising its full potential until the structural and technical conditions for cross-border transport have been created. The same is true for the connections with important partner countries. Modern transport technologies are required for optimised use of the existing infrastructure and efficient processes. They help to overcome system boundaries and contribute to the reduction of emissions.

Involve key EU partners, expand connectivity strategy

Europe is a trading partner, transit region and foreign policy pillar for its neighbours. Important factors for the strengthening of relations among all parties is the linkage of transport corridors with one another and the continued push to complete cross-border projects. An important first step has been taken with the definition of a corresponding core network in the non-European partner countries. The EU's active support for joint infrastructure projects with Asia along the so-called Silk Road should be continued. Key elements of this connectivity strategy are the introduction of European sustainability and social standards, the observance of international technical standards and the safeguarding of sufficient local added value.

Ensure completion of the Trans-European Transport Network (TEN-T)

The EU has finalised the revision of Regulation 2024. The DVF welcomes, among other

things, the agreement between Parliament and the member states to provide safe lorry parking spaces at intervals averaging 150 kilometres. The aspect of multimodality, whether the planned connection of major airports to long-distance passenger rail transport or the expansion of the network to accommodate 740-metre-long trains as a prerequisite for economical combined transport will play a greater role in the future.

In contrast, the timetable is not very ambitious. European co-financing has been insufficient as of this point and must be increased to relieve the burden on EU member states and accelerate the realisation of the TEN-T corridors. Germany requires disproportionately high financial support as it must develop the largest share of the European core network (six out of nine TEN-T corridors). The negotiations for the Multiannual Financial Framework (MFF) 2028–2034 should be initiated at an early stage so that there is planning certainty regarding the available funds and the financing of the projects can be continued adequately and seamlessly at the beginning of 2028. At the same time, the member states must think more in European terms and complete the TEN-T corridors, especially across borders. Otherwise, the corridors will not fully develop their network effect and will fall short of expectations. Implementation must not be further delayed or thwarted by the financing reservation relating to national budget debates that has been agreed.

Facilitate the expansion and maintenance of transport infrastructure

The European regulations that must be observed when planning and constructing infrastructure in the transport sector are many and varied. Procedural requirements and substantive standards in EU nature conservation law are now so complex and demanding that many important infrastructure projects in Germany are suffering significant delays. It is therefore important that the EU review existing regulations with the objective of accelerating planning procedures and heightening effectiveness. Projects can be accelerated significantly without any lowering of environmental standards by simplifying procedural law. To this end, a deadline regulation should be introduced and the EIA Directive should be revised along the lines of the EU Emergency Regulation. In substantive environmental law, the regulations for agriculture and forestry in this country should serve as a model for the enhancement of population protection. Besides accelerating procedures significantly, this would also promote the faster and more effective achievement of species protection goals. No fundamental conflict of objectives exists between nature conservation and the acceleration of procedures.

Greater involvement of private capital and expertise

The EU must drive forward the use of partnership instruments, including public-private partnerships (PPPs), document best practices and expand the scope of European financing instruments. The involvement of private capital (insurance companies, pension funds etc.) in infrastructure financing must be ramped up as a supplement to financing by the public sector. The EU can support these moves by proactively encouraging the sharing of positive experiences from PPP projects in Europe and ensuring reliable framework conditions. The realisation of partnership procedures during all road and hydraulic engineering projects should be reviewed and must be prioritised whenever projects can be carried out and operated more economically, quickly and efficiently and quality can be improved for all involved parties. The entire life cycle must always be evaluated to ensure a holistic and consequently sustainable assessment of infrastructures. Other innovative partnership procedures such as alliances or integrated project management (IPM) must be considered as an option. When doing so, the specification of the right framework for the resource-efficient conduct of a project must be a part of the terms and conditions of any tender.

Reinvest revenue from the transport sector

Infrastructure-related user revenues from the transport sector must be invested in full in transport routes. The provisions of the EU Eurovignette Directive already in force today mandate the use of these revenues without exception for the maintenance and expansion of the transport infrastructure, but they are not always observed. The EU Commission and the EU Parliament must work toward the establishment of closed financing cycles in the member states with the aim of restoring transport routes, some of which are in disastrous condition. Similarly, the

revenues of the EU and the member states from climate policy levies must be reinvested in climate protection measures that benefit the transport sector or are returned to consumers without any diversion of funds.

Increase efficiency in European airspace

The realisation of the Single European Sky (SES) remains a primary goal on the European aviation agenda. Modernisation of the structures of European airspace is essential for the reduction of CO_2 emissions and simultaneously increased efficiency and capacity. Regrettably, the EU has made little progress towards this goal in recent years. According to EASA, the SES environmental targets have not been met. Diversions in air traffic still lead to increased fuel consumption and avoidable CO_2 emissions. According to the Single European Sky Performance Review Board, delays in European airspace are also far above the target value. The opportunity to realise potential savings of up to 10 per cent of CO_2 emissions by revising the Single European Sky Regulation has so far been wasted. The EU should therefore immediately advocate the implementation of an airspace that will exploit the environmental and efficiency potential necessary for the achievement of climate targets. The automation of air traffic control processes must be advanced to reduce the workload of air traffic controllers.

Ensure a consistent set of rules in the rail sector

European lawmakers have compiled a sufficiently detailed set of regulations for the market structures of the railways in four railway packages. The next step is to transpose these rules fully into national law, to apply them in practice and to entrust regulatory authorities with the monitoring of their impact before they are evaluated. There is currently no need for a fifth railway package. On the contrary, the objective should be to streamline regulations.

The structure of the European Railway Agency (ERA) must enable the organisation to perform its duties and responsibilities in their full scope and yet not become a bottleneck (e.g. vehicle approval procedures). There must be no more budget cuts like those of the past. A more effective, simplified and cost-effective Europe-wide vehicle approval process is essential for the completion of the Single European Railway Area.

The European Railway Agency (ERA), supported by railway companies and industry, must utilise its approval competence to guarantee an internationally compatible version of the ERTMS (European Rail Traffic Management System) to prevent any compatibility issues during its implementation. Close cooperation between national and European railway agencies is essential for the successful realisation of the technical pillar of the fourth railway package.

Make ERTMS a success

ERTMS (European Rail Traffic Management System) is the key to interoperable European rail traffic and the digitalisation of rail service in Europe. It lays the groundwork for important innovations to heighten the efficiency of the rail system and is a fundamental prerequisite for the completion of the Single European Railway Area. Despite the obvious advantages, the installation of the ERTMS along the most vital European corridors (TEN-T) has been delayed. The enormous financial expenditures required cannot be provided by the industry alone. The financial resources provided under the Multiannual Financial Framework and the Connecting Europe Facility (CEF) must be increased and urgently supplemented by national funding. Compliance with the updated European implementation plan and acceleration of the ERTMS implementation are paramount. Conditions at the national borders often resemble a patchwork quilt because (one example) the European corridors have not been outfitted with ERTMS across country borders. The Commission must provide incentives to overcome these system breaks at national borders so that interruptions in cross-border rail transport are avoided. In this sense, centralised governance of the installations by a strong European ERTMS coordinator is crucial. If ERTMS is to be successful, the vehicles must be able to use the infrastructure after the retrofitting. A major key to success is therefore the promotion of one-off retrofitting of existing vehicles with on-board units (OBUs). Taking this action can avoid the higher costs of outfitting the infrastructure twice and system advantages will also benefit older vehicles during the long years of the conversion phase.

Roll out automatic couplers in rail freight transport across Europe

Rail freight transport must become more competitive for the future. In this respect, the Europe-wide introduction of a digitalised automatic coupler (DAC) is essential. The units simplify the coupling of multiple freight trains, and their introduction will create the prerequisite conditions for digitalisation and automation in rail freight transport (creation of the ‘intelligent freight train’). EU funding is mandatory as the introduction must take place simultaneously across all of Europe.

More efficient traffic management in cross-border rail transport

Cross-border rail services require better coordination across networks and standardisation of time periods and processes in capacity management. In this sense, the EU proposal for the utilisation of railway infrastructure capacities in the Single European Railway Area is a welcome one. Nevertheless, the frequency and regularity of rail service envisioned in the Deutschlandtakt must still be possible under a new European regulation, and the rules must be designed to be practicable.

European metropolitan rail network

If the Commission's ambitious goals for the development of rail passenger transport in the EU (doubling transport by 2030 and tripling it by 2050) are to be achieved, an infrastructure that provides attractive, synchronised transport services among all major European cities must ultimately be established. Connecting all 230 metropolises and metropolitan areas to high-speed transport and offering hourly service as a minimum will mean laying or expanding about 21,000 kilometres of tracks across Europe.

Continue development of the European Electronic Toll Service (EETS).

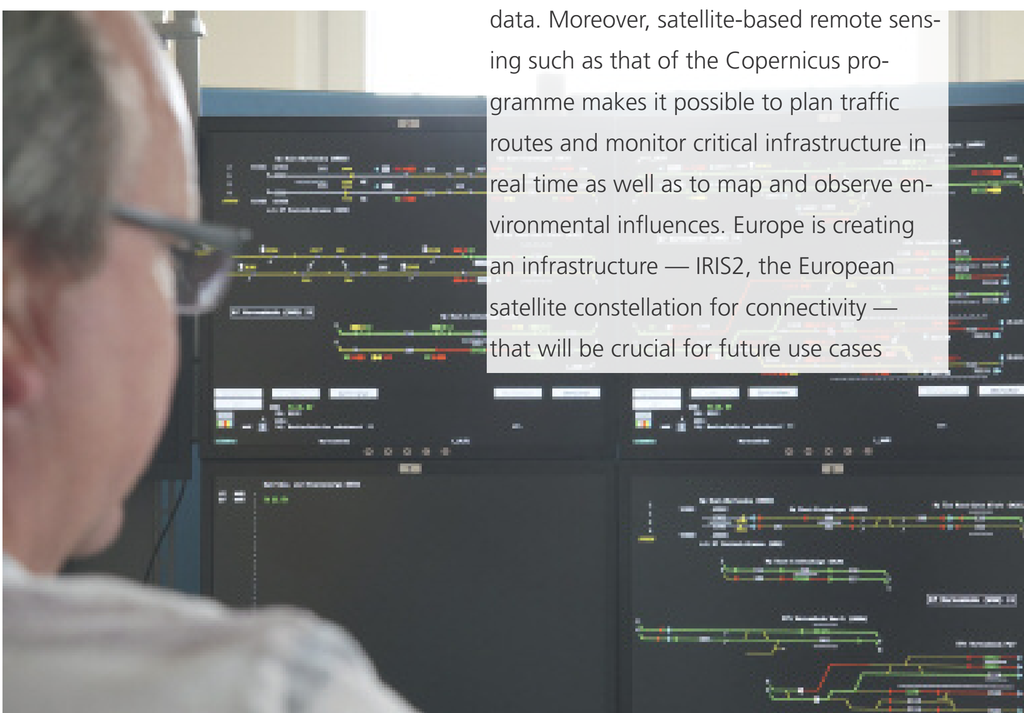
Cross-border road freight transport must not be hindered by the system boundaries of national toll collection systems.

The friction-free functioning of EETS in the EU member states will require a minimum degree of harmonisation of the electronic interfaces among the involved parties, in particular between toll chargers and EETS providers. National toll chargers should further simplify and support toll collection by EETS service providers.

Efforts should be made to standardise the certification processes for on-board units (OBUs) in the various countries in accordance with the applicable laws.

Expand satellite-based solutions

Satellites are indispensable for Europe as a mobility centre. They open up new fields of application by linking area-wide connectivity from space, navigation and remote sensing data. Moreover, satellite-based remote sensing such as that of the Copernicus programme makes it possible to plan traffic routes and monitor critical infrastructure in real time as well as to map and observe environmental influences. Europe is creating an infrastructure — IRIS2, the European satellite constellation for connectivity — that will be crucial for future use cases



such as the intelligent networking of vehicles and infrastructures. The EU Commission must actively press ahead with development of the Galileo satellite navigation system and supplement it with implementation of the LEO-PNT programme (Low Earth Orbit Positioning, Navigation and Timing) for the further refinement of navigation precision.

Europe must play a leading role in satellite-based solutions. Research activities must be expanded, coordinated and rapidly realised in pilot projects for the exploitation of new satellite technologies. In addition to monitoring functions related to the Regulation for the Protection of Critical Infrastructures [KRITIS], there are possible uses for autonomous transport systems, logistics planning, container localisation or certified position signals, just to mention a few examples.

Strengthen the Logistics Sector – Optimise General Conditions

The European logistics industry is a world leader and connects European companies with their customers worldwide. Road, rail, air and sea transport each contribute their specific strengths to the overall system. Competitive ports and airports open up global markets for European industry and secure Europe's ties to world trade. Combined transport is an important building block for sustainable cross-border transport.

As transport markets have been liberalised at an accelerating pace in recent years, the EU Commission must continue to ensure that existing EU legislation is implemented uniformly in all member states. Market liberalisation has led to more competition, lower costs and greater efficiency. This is a welcome development, particularly in view of the climate targets in transport and the simultaneous increase in transport volumes and should not be jeopardised by overregulation.

In road freight transport in particular, however, price competition has also led to undesirable consequences for the working conditions of professional drivers. Countering the marked shortage of drivers across Europe will require much more effective tracking of the implementation of the regulatory measures initiated for this purpose than has been observed in the past.

In addition, the pandemic and geopolitical crises have brought the issue of safety back to the forefront of attention for the transport industry. The relevance and interdependencies of the logistics sector became apparent, as did the need for redundancies in infrastructure and supply chains.

Global business requires international standards for safe transport. Trade barriers must not be allowed to arise from varying requirements for the security systems, however.

Do not weaken the logistics sector through excessive regulation

At its core, logistics is a strictly entrepreneurial action area. In the interests of an efficient, safe and fair system, the EU's freight transport policy should limit itself to setting a general framework assuring fair and efficient development in this business sector and guaranteeing a level playing field for European companies in international competition, as is also the declared aim of the EU's Mobility Package. EU regulation must simplify and harmonise existing statutes. Above all, companies need long-term planning certainty, consistent legal requirements across the EU, effective controls and unbureaucratic solutions.

According to an EU study, there is an EU-wide shortage of about 400,000 safe lorry parking spaces. EU standards for safe and clean lorry parking spaces are enshrined in law, and funding for parking space construction can be obtained from the Connecting Europe Facility (CEF). Depending on the results of the study on the availability and development of the number of lorry parking spaces planned by the Commission, which is to be presented to the European Parliament and the EU Council of Ministers at the end of 2024, this support should be continued and the member states should be obligated to build parking spaces (by application of the TEN-T Regulation).

Continue to promote combined transport

There is still potential for growth in cross-border combined freight transport, particularly due to the intensive and increasing division of labour among Europe's industrial locations. The initiated reform of the Combined Transport Directive (CTD) embodies the EU Commission's goal of strengthening combined transport by simplifying and harmonising requirements. Moreover, both a reduction in costs and an increase in competitiveness resulting from organisational, technical or financial measures should create incentives to shift road transport to lower-emission modes of transport.

In the opinion of the DVF, the CTD must be unambiguous and easily applicable for companies if these targets are to be met. This means for one a clear and simple definition of which transports will be eligible as CTD for funding in future. For another, even more red tape and diversification of national conditions should be avoided and greater harmonisation of the framework conditions and funding at European level should serve to foster the conditions for a broader use of CT.

Expand digital freight information and link to existing systems

The logistics industry has substantially advanced the digitalisation of freight information in recent years. The EU Commission's Electronic Freight Transport Information (eFTI) initiative is generally well received by businesses. During the drafting of the delegated acts and implementing acts, care must be taken to include existing solutions, assure technological neutrality and interoperability and keep the bureaucratic efforts for certification to a minimum. The training

of authorities and the harmonisation of their requirements are essential for the exchange of freight information; they should be supported during implementation and also be the subject of the intended evaluation as this will enable them to make any subsequent adjustments that are required. The Europe-wide introduction of the electronic consignment note (e-CMR) is also important. Some member states have not yet implemented the e-CMR, and the EU should take steps to encourage its implementation.

Drive Forward Digital Networking – Organise Safe and Efficient Mobility

The European single market should simplify cross-border mobility. Digital information systems aid in the organisation of efficient, safe and cost-effective transport as part of a network even as distances increase. A clear separation of responsibilities between the public and private sectors is essential. Intelligent networking and digital processes optimise logistics and make transport more efficient. The use of artificial intelligence simplifies and accelerates processes in the added-value chains of all mobility sectors.

Even as the intensity and complexity of transport operations continue to mount, transport companies are faced with the challenge of guaranteeing a high quality of transport and ensuring that passenger rights are respected. Nonetheless, EU standards must reasonably limit the scope of responsibility of transport companies in cases such as traffic disruptions due to force majeure.

Cities in Europe have grown heterogeneously and historically, so there cannot be just one universal solution to local traffic problems such as congestion or pollutant emissions. EU requirements must be practicable and must not lead to disproportionate financial or bureaucratic burdens.

Expand open data approach without going overboard, avoid redundant regulation, promote and protect innovation

In the past, the EU issued a large number of regulations aimed at the provision of data in the mobility sector. The passage of the Data Act has added yet another horizontal initiative; however, many questions remain unanswered, and the need for greater specificity is evident. The scope of application and the development of standards and specifications that will ensure standardised framework conditions and, not least, a uniform interpretation throughout the EU are among the concerns. During the course of implementation, it will also be necessary to clarify how new business models can be promoted by means of low-threshold data provision and

what measures and demarcations are simultaneously required to protect existing investments and to continue the incentivisation of innovation within the sense of the mobility transition.

The form of the Data Act as horizontal legislation sets limits to its suitability for meeting these challenges. A review of the extent to which the sector-specific legislation on vehicle data announced by the EU Commission can contribute to finding answers to these issues would be expedient, and this will require finding the appropriate balance among widely diverse objectives.

Last, but not least, there must be a clear differentiation between existing regulations and the Data Act if legal uncertainties are to be avoided.

Careful and legally unambiguous regulation by the EU of the access to vehicle data is highly significant. The priority of vehicle integrity and road safety of the highest rank must be assured. However, attention must also be paid to users' freedom of choice, privacy concerns, openness to innovation and non-discriminatory competition. The review of safety and environmental regulations by sovereign and authorised actors is of equal importance.

Drive forward connected and automated mobility

The cooperative use of data in line with the Vision Zero Map can result in an increase of transport safety. The EU Commission should launch initiatives with this in mind.

During the realisation of the EU Directive on the Deployment of Intelligent Transport Systems (ITS) in Road Transport, the EU Commission must limit itself to technical issues and standards and not take any actions that will further increase the costs of mobility while observing existing industry standards and technological trends.

A key factor for the success of digitalisation in the transport sector is the customers' assessment of the costs and benefits, which must be considered during the development and marketing of innovative products and services. During the transposition of the ITS Directive at the national level, care must be taken to ensure that existing cooperation between transport companies and service providers is not excluded and that the national legal standards do not become too bureaucratic and opaque.

The EU must drive forward the legal framework for automated driving at the international level so that related systems can be used in cross-border road transport and a larger European market can be created. User friendliness and legal certainty are prerequisites for broad acceptance of automated and interconnected driving.

Manufacturers and consumers must be able to rely on the lawfulness of automated driving functions across borders in all EU member states. The conduct of cross-border pilot projects and test fields should be continued to assure the ongoing development of the separate stages of automation. At the same time, the intellectual property of companies investing in automated driving must be protected.

The EU must also initiate measures for the support of digital networking in shipping, ports and logistics alongside road transport, rail transport and air transport. Automation in maritime transport is in need of a standardised European framework that simply cannot be realised without a high-performance digital network covering all of Europe.

Mould urban transport locally and avoid overregulation

Cities and communities are in the best position to decide what measures are suitable for ensuring efficient and effective urban transport in their local situations. Nonetheless, a minimum level of harmonised rules is necessary so that local requirements do not lead to new obstacles on the single market. The EU should concentrate on creating such suitable framework conditions, including encouraging the sharing of experience among stakeholders, financial support for innovative transport projects, the adaptation of state grant regulations, research funding and more effective coordination of cooperation among all levels of government as well as with industry.

Whenever restrictions on access to city centres are unavoidable, they must be harmonised to such an extent that citizens and logistics companies have uniform frame-

work conditions throughout Europe, e.g. with regard to vehicle emission requirements or identification obligations. Any requirements regarding the outfitting of vehicles with certain driver assistance and road safety systems must always be regulated on an EU-wide basis so that the unity of the single market is maintained.

Create a balanced framework for booking multimodal digital mobility services

A decisive criterion for the success of multimodal offers is their bookability. Fully exploiting the synergies of different modes of transport on any given journey from A to B often means having to combine offers across different modes of transport and providers. This touches on widely different subject areas such as data access or passenger rights, making it difficult to create a balanced framework that gives due consideration to all interests. This is an important reason why the EU Commission's initiative on 'multimodal digital mobility services' (MDMS) has never made it off the ground. The scope of any adopted regulation must be limited to actual requirements. Priority should be given to ready-to-use solutions already found on the market to avoid duplication of expenditures, effort and delays. Existing and internationally recognised industry-specific solutions must also be considered as they are generally based on international standards for data exchange and in conformity with released access interfaces (application programming interfaces, APIs) that have yet to be established in other sectors.

Establish the European Mobility Data Space (EMDS) as the common framework for the provision of mobility data

The availability and quality of data are quintessential elements new digital applications for the development, implementation and management of innovative mobility and logistics services — even beyond the borders of European member states. The required data, however, are not currently available in a standardised format and description using open standards. The inadequate merging or linking of data — for coordinating intermodal transport, for instance — is also problematic and limits the potential for optimisation. The generation of a European mobility data space is intended to address these challenges for the transport and logistics sector and is a welcome move. The objective must be to open up and connect data silos and to merge the individual platforms and regulatory systems of the public sector into a consistent and transparent system. Existing data platforms should be connected by networking current data rooms and systems via interfaces in open platform architectures as this will simplify and facilitate the use of data. Care must be taken to ensure that this does not entail high costs or more bureaucracy for companies.

Harmonise security requirements, avoid redundant regulation in IT security and give due regard to sector-specific features

The data flows to national or EU institutions now in place should be analysed before any new information obligations for companies are introduced as this would be a practical means for avoiding duplicate notifications. Particular attention should be paid to data protection and reporting obligations related to cybersecurity.

As European and national cybersecurity legislation continues to develop, lawmakers must keep in mind the necessity of a coordinated approach and the consideration of sector-specific characteristics. This is especially relevant for the implementation of the Cyber Resilience Act (CRA) and the NIS-2 Directive. Otherwise, German companies are threatened with unnecessary additional expenditures of time and money (for organisational restructuring, security audits or user information services, for example) without benefitting from any gains in heightened security. Any companies that already provide voluntarily a level of security in line with the proposed law would suffer an especially negative impact.

The German Transport Forum

Our Mission

»Mobility for Germany and Europe«
— Realised by an efficient, networked, affordable, sustainable and customer-orientated transport system.

How We See Ourselves

We are the mobility association of the German business world.

We are advocates for mobility — our mission is to maintain and improve mobility conditions as a basic prerequisite for growth and employment.

We are unique in Europe — we represent passenger and freight transport by road, rail and water and in the air.

We unite under our umbrella more than 170 manufacturers, service providers, consultancies and business and consumer associations — they are the links comprising the full length of the added-value chain in the mobility sector.

We connect the mobility industry with other sectors such as energy, construction, telecommunications, finance and consulting.

We maintain a constant dialogue with politicians, business leaders, academicians and the media while serving in multiple capacities:

- As an interest group: we bundle the common concerns of the mobility industry vis-à-vis politicians, the media and society in Berlin and Brussels.

- As a network: we bring together national and European decision-makers from politics, companies and associations.

- As a platform: we organise more than 30 parliamentary evenings, symposia and expert discussions on key issues and current topics relating to mobility every year.

- As a think tank: we draw on the wide-ranging expertise of our members in our steering and working groups to develop fundamental strategies and positions on all topics relating to mobility.

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