

Mobility Memorandum 2023

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Mobia, partner of the government

The mobility federations FEBIAC, RENTA and TRAXIO form an alliance under the name "Mobia". We represent 10,000 companies, 160,000 employees and added value of €11.5 billion, accounting for 2.6% of GDP.

With this memorandum, we are reaching out to politicians to tackle mobility challenges together. We clearly set out our policy recommendations, but above all we want to enter into a dialogue and listen to how we ourselves as a sector can better contribute to the objectives in terms of sustainability, smooth traffic, affordability, road safety and employment.



Our vision of mobility

User-centric approach

Mobility is a right that we must defend, as is the right of citizens to be able to freely choose their mobility, for both private and professional purposes, on affordable terms.

All forms of mobility, actively motorised, electrified, connected, automated, individual or shared, for people, goods or services, face specific challenges that differ fundamentally depending on when and where each citizen needs to move structurally or occasionally, or where goods or services need to be delivered.

In meeting these challenges, we need to be open to all paths that can help solve the complex issue of sustainable mobility with its many unknowns, without excluding specific modes, technologies or fuels even before they have had a chance to prove themselves.

The range of user profiles, travel motives and technological solutions is very wide. Instead of trying to impose a single technology, we should try to find the best possible match between the user's profile and motives and the technology that best meets their mobility needs and financial resources.

"Digitalisation and coordination of the different modes of transport are essential, as is a comfortable and varied offer."

We must ensure that individual mobility does not become a privilege of the few, but remains accessible to as many people as possible, in whatever form.

Every citizen should be free to use a combination of means of transport as he or she wishes, so-called combined mobility, although we are aware that in certain circumstances, in certain places or for certain individuals or target groups, shared transport solutions may be more appropriate.

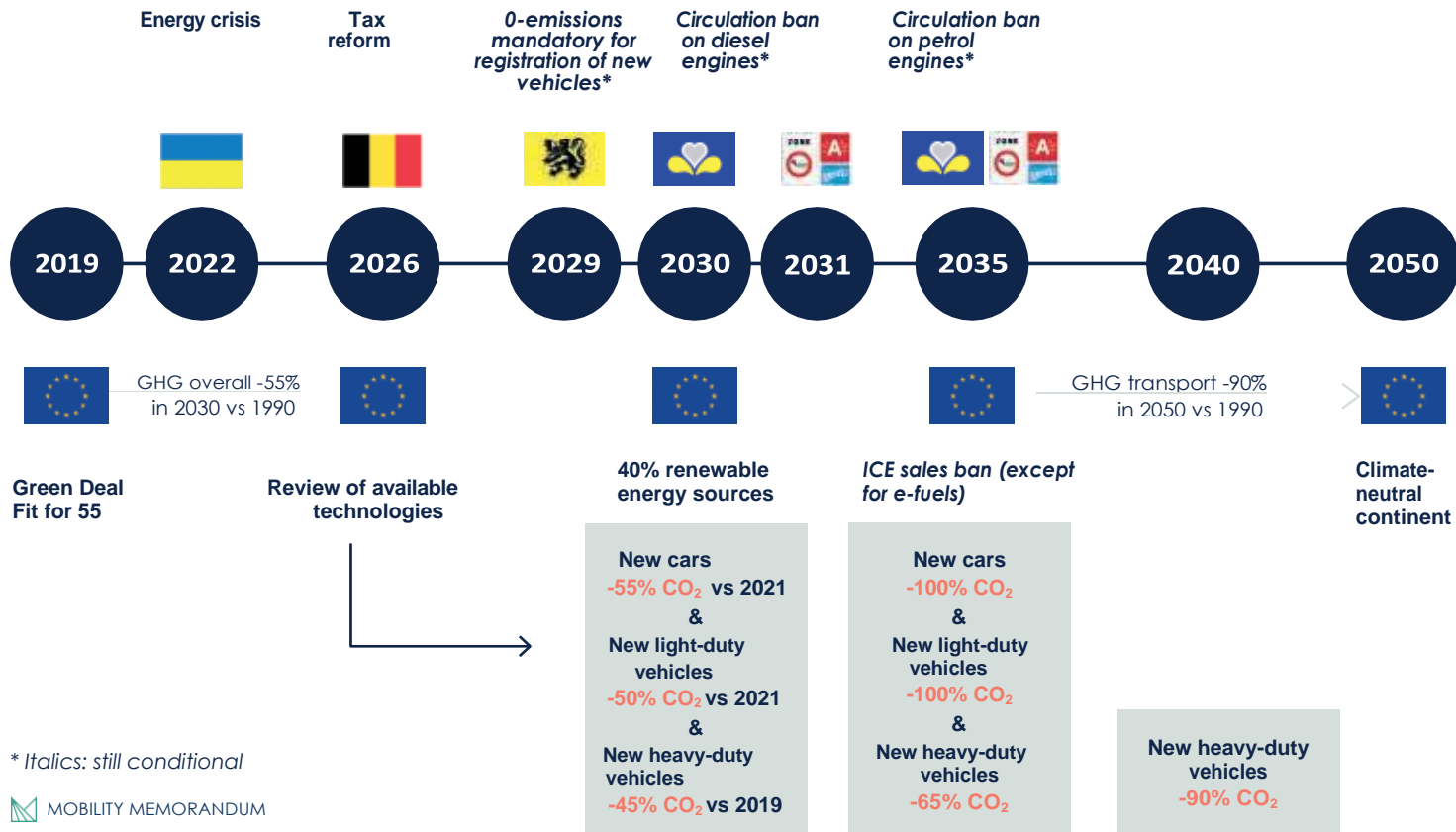
Shared transport solutions must therefore be made more attractive. Digitalisation and coordination of different modes of transport are essential here, as is a comfortable and varied offer. At the same time, we are convinced that such mobility services only have a sustainable future if the business model is profitable for all participants in the chain.

The rise of new technologies should not lead to mobility poverty by taking away some people's individual mobility. Individual mobility that is financially accessible to as many people as possible must be maintained. In a phase of energy transition, we must ensure that the offer of recent vehicles, which already meet stringent emission and air quality standards, remains attractive.

Mobia aims to be a partner in defining a low-congestion and low-emission mobility system that is affordable and accessible to all, especially through individual multi-mode mobility.



Towards low-emission mobility



Social context

The energy transition needed to achieve more sustainable mobility is a major societal challenge. The aim is to reduce our dependence on fossil fuels and develop renewable energy sources, while reducing greenhouse gas emissions and air pollution.

The energy transition for more sustainable mobility poses many societal challenges, including:

- 1. Social justice:** it is important to ensure that the energy transition benefits everyone and leaves no one behind, especially disadvantaged and vulnerable communities.
- 2. Employment:** the energy transition may create new jobs, but also jeopardise some existing industries and jobs, especially in the fossil fuel sector. It is important to manage these changes in a fair and balanced way.
- 3. Costs:** the energy transition may involve high initial costs for governments, companies and individuals. We need to find ways to finance this transition fairly.
- 4. Energy security:** energy transition may affect a country's energy supply by changing its dependence on certain energy sources or energy suppliers. It is important to ensure that the transition is gradual and orderly and to develop strategies that manage energy security risks.

In short, the energy transition for more sustainable mobility requires effective planning, coordination and cooperation with various stakeholders to ensure a fair and equitable transition.



Main priority 1

Modernising taxation for affordable zero- emission mobility

The increasing number of zero-emission vehicles and the congestion of our roads call for a **more modern approach to car taxation**.

One-off or annual car taxes have little impact on mobility behaviour. The overall tax burden on car drivers is already very high today. We argue that these should not further increase. **In time, new taxes should replace existing taxes**, with everyone who uses our transport infrastructure contributing to their costs.

The step to zero-emission driving is still too big for an average car user at the moment. Some will be more inclined to continue driving a current, more polluting vehicle, rather than switching to a more environment-friendly vehicle. It is therefore important to lower the thresholds for individuals and instead encourage them to change the heaviest polluters, usually the oldest vehicles, for more recent technologies..

Financial and tax incentives should be provided for individuals and companies that start driving emission-free, both for passenger and freight transport. This for the vehicles themselves and for the corresponding refuelling or charging infrastructure.



Main priority 2

All out to get the vehicle fleet charged!

The path to carbon-free mobility, whether of people or goods, inevitably runs through electrification in the current state of technology. That transition will happen at breakneck speed in the coming years. Therefore, we ask all regions to **give grid operators the means to adapt their infrastructure** to this new reality.

Obstacles need to be removed for installers, owners and managers of car parks and buildings and charging infrastructure operators so that they can do their share of the work to the maximum. This concerns taxation, licensing policy and regulatory framework more generally.

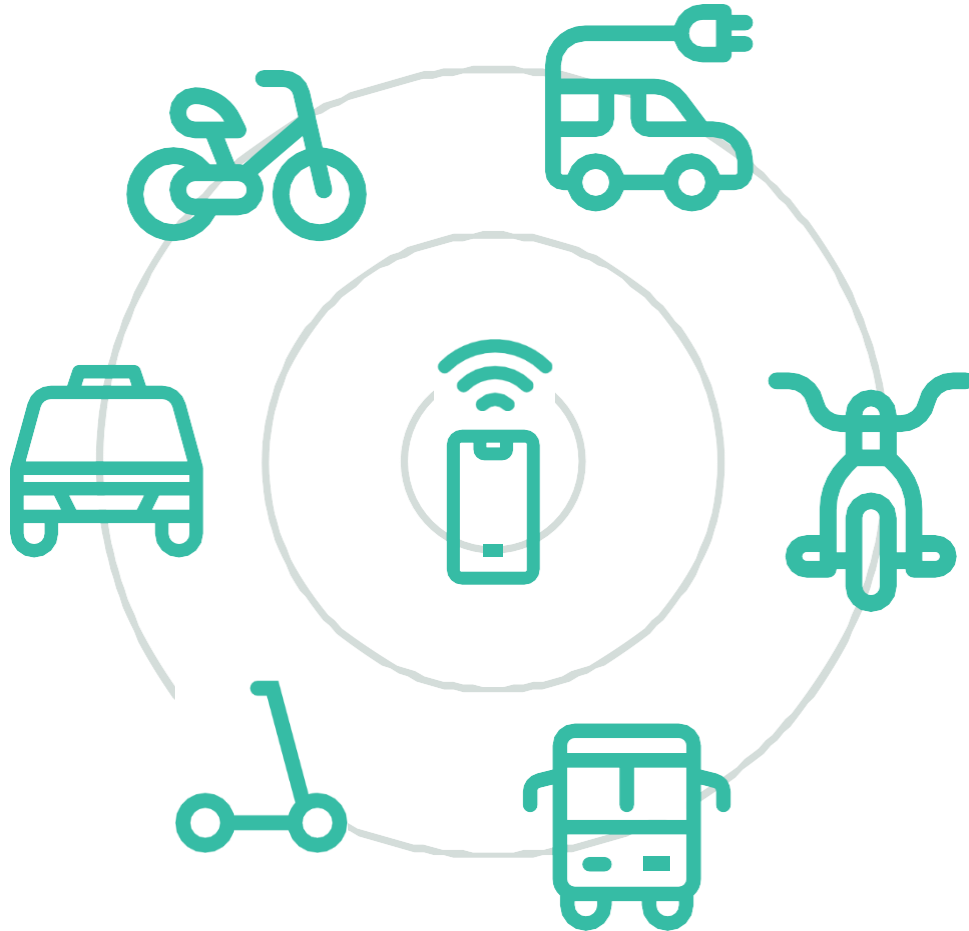
It is also extremely crucial that there is **sufficient and low-carbon electricity supply** at all times in the long run and that we do not make ourselves too dependent on geopolitical twists and turns.



Main priority 3

Getting the mobility sector ready for tomorrow's jobs

1. **Invest in training and education** to ensure mobility workers have the skills and knowledge to meet future needs.
2. **Promote innovation and research with universities and research centres** as the mobility sector is constantly evolving.
3. **Encourage inclusion and diversity**, not only in people but also in ideas and perspectives.
4. **Promote sustainability** so that the mobility sector is prepared for these challenges.

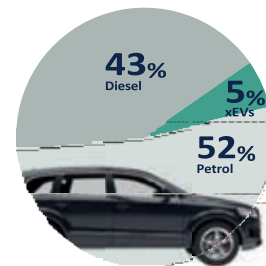


Some key figures

Sources: Mobia, DIV, Statbel. Figures 2022.

Fleet

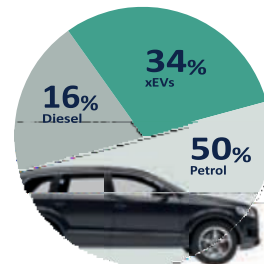
Cars



Fleet

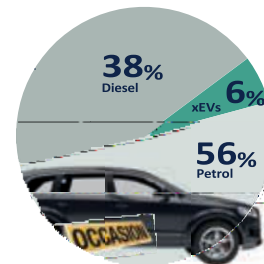
5.9 million

Market



New cars

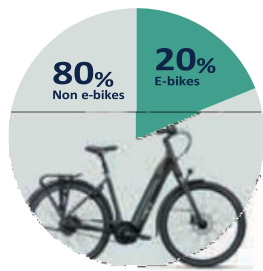
366.000



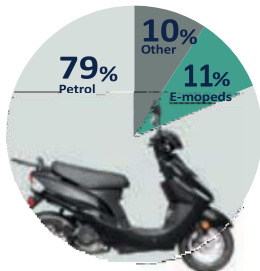
Used cars

650.000

Two-wheelers



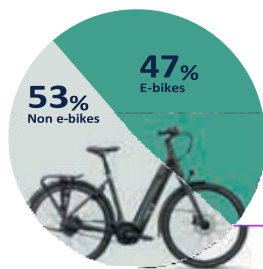
Bike park
8.6 million



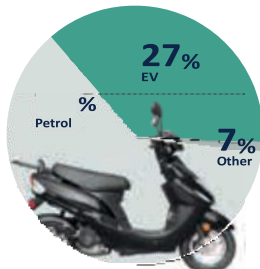
Moped park
205.000



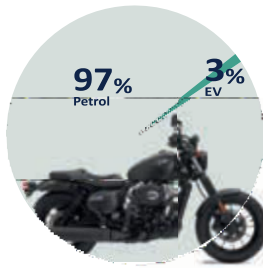
Motorbike Park
525.000



New bicycles
696.000

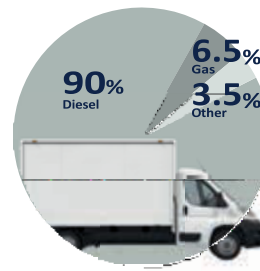


New mopeds
33.000

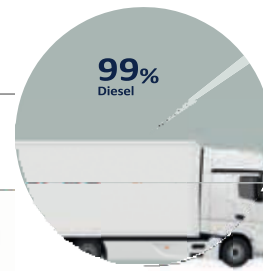


New motorbikes
25.000

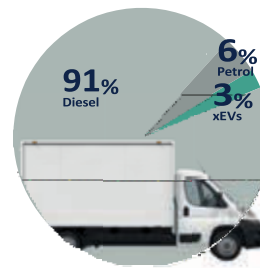
Commercial vehicles



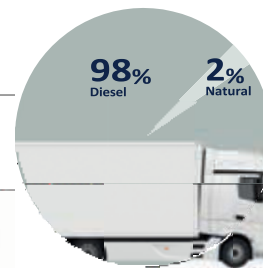
Light commercial vehicle fleet
850.000



Heavy commercial vehicle
150.000



New light commercial vehicles
56.000



New heavy commercial vehicles
9.000

Themes with recommendations

SUSTAINABLE MOBILITY

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- Implementation of Green Deal & Fit for 55
- Carbon neutrality
- Circular economy
- Technological neutrality
- Low-carbon energy sources
- Electric rechargeable vehicles (ECVs)
- Charging infrastructure for light vehicles
- Charging infrastructure for heavy vehicles
- Alternatively powered freight vehicles and mobile construction machinery

AFFORDABLE MOBILITY

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- Affordable energy transition
- Future-oriented taxation

FUTURE-ORIENTED MOBILITY SECTOR

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- Employment and training

SMOOTH MOBILITY

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- Mobility budget
- (e-)two-wheelers
- MaaS
- Automated and connected vehicles

SAFE MOBILITY

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- Safety measures
- Modernisation of road network
- Traffic fines

SECTOR-SPECIFIC TOPICS

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- Measurement of exhaust gases
- Technical inspection
- Revision of commercial number plate system
- Smoother handling of homologation, registration, breakdown assistance and inspections

Implementation of Green Deal & Fit for 55

Transport in total is responsible for 22% of CO₂ emissions in Europe

2030 objectives



-55% GHG
(vs 1990)



-55% CO₂
(vs 2021)

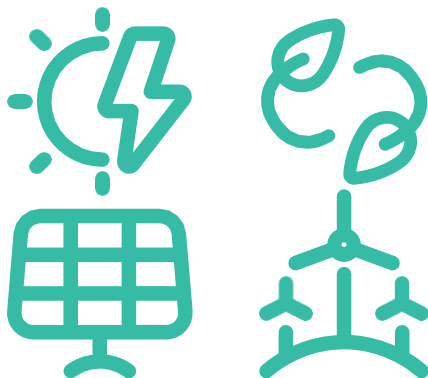
Policy recommendations

- Our country must fully subscribe to the plans drawn up by Europe. The EU timetable is ambitious but achievable: the agenda of our country's governments must be aligned with it and not ahead of it; our companies must be given a level playing field as elsewhere in the EU, not least to remain competitive with our neighbours. After all, (transport) markets do not stop at national borders.
- The regions and the federal government must speak with one voice and agree on measures to achieve the climate goals. Citizens and companies must be able to anticipate these decisions: they want clarity and a unified approach. Citizens struggle with a patchwork of rules, while companies need predictability and legal certainty to ensure the continuity of their operations.

Source: European Environment Agency (EEA)

Carbon neutrality

The European Union wants to be climate neutral by 2050.

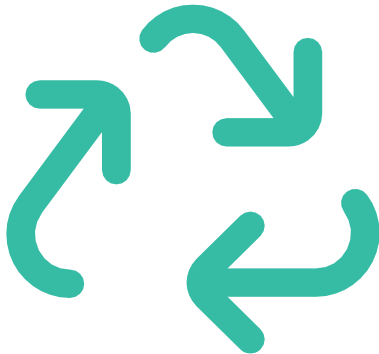


Policy recommendations

- The creation of an overall observatory, consisting of the federal and regional governments and relevant civil society organisations, to monitor, guide and realise a sustainable and affordable decarbonisation of motorised transport in our country.
- Supporting the development and marketing of low-carbon and renewable fuels, in order to make the moving vehicle fleet also contribute to the climate goals.
- Increased use of structural "hybrid" teleworking to address structural congestion by reducing the number of rush hour kilometres.
- Include the entire life cycle of different modes of transport and their transport efficiency in the CO₂ balance sheet and roadmap towards climate-neutral mobility.
- Timely define clear transitional arrangements in line with EU agenda.

Circular economy

The foundations for circularity in the mobility sector are laid in the products themselves. However, this can only be the starting point.



Policy recommendations

- **Research phase:** consider 5-year development cycles when setting recycling quotas in the sector.
- **Development phase:** base regulation on technologies and materials available at acceptable market prices that improve the net environmental impact without compromising vehicle quality, safety or durability.
- **Production phase:** adopt use-quota systems that, in case of shortage of recycling materials, allow the use of new materials to avoid production stops in factories.
- **Aftermarket phase:** support the market for secondary materials so that our sectors need to use less new material from fossil sources in an economically responsible way.
- **Refurbishment:** having vehicles and their propulsion systems, after their initial phase of use, "refurbished" to make them fit for a second life.

Technological neutrality

Technological choices should be left to the market.



Policy recommendations

- Exclude no relevant solution for reducing CO2 and pollutant emissions.
- Focus policy on the "Fit For 55" targets, not on the means to get there: do not exclude technologies that can contribute to achieving the targets (e.g. via alternative fuels, synthetic fuels or hydrogen).

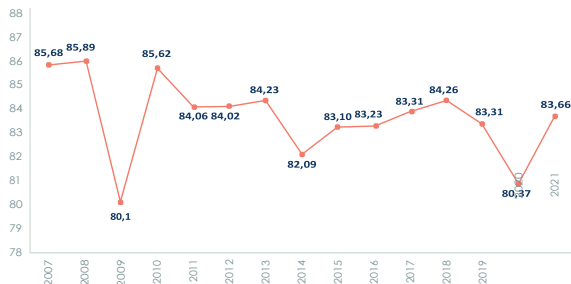
Low-carbon energy sources

The total electricity requirement for an all-electric vehicle fleet in Belgium is estimated at 37 TWh/year.



**37
TWh/year**

=
44% of annual
electricity consumption



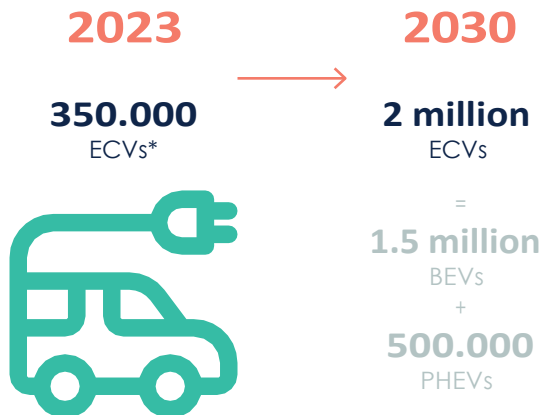
Policy recommendations

- Sufficient and affordable electricity for comfortable and flexible use of electric vehicles on a large scale, as well as for carbon-neutral production and assembly of transport applications.
- Extend investment support for zero-emission vehicles to companies at federal and regional level. Supplement this support with a tax deduction for loading and refuelling infrastructure of these zero-emission vehicles.
- A simple licensing policy, smooth procedures and reasonable timeframes for the construction of alternative refuelling facilities.

Source: www.febeg.be | Figures at 31.12.2021

Electric chargeable vehicles

The number of electric chargeable vehicles (ECVs*) represents almost 5% of the current passenger car fleet. For light commercial vehicles, the share is barely 0.5%.



* ECVs: Electric Chargeable Vehicles
= Battery Electric Vehicles (BEV) +
Plug-in Hybrid Electric Vehicles (PHEV)

Policy recommendations

- Maintaining the tax regime for zero-emission commercial vehicles.
- A financial and tax support for the purchase, leasing, rental and use of zero-emission vehicles by individuals.
- Fiscal, financial and operational support for zero-emission light and heavy goods vehicles and construction machinery.
- Reform of fuel taxes to balance affordability and environment.
- Simple licensing policies, smooth procedures and reasonable deadlines for the construction of alternative charging facilities.

Source: FEBIAC. Figures as at 31/05

Charging infrastructure for light vehicles

For now, the number of public charging points generally follows the increasing demand (1 charging point per 10 ECVs), but there are strong regional/local differences and bottlenecks.

2023

2030

From **23.000** → **200.000** to



public charging points

Policy recommendations

- Create a framework for grid operators to accelerate the roll-out of charging points and infrastructure for low-carbon electricity production.
- Strengthen initiatives to increase the availability of public and private charging points for electrified vehicles in Belgium.
- Encourage "smart" charging options to flatten capacity peaks and charge with green energy as much as possible.
- Regarding public infrastructure (AFIR: Alternative Fuels Infrastructure Regulation): anticipate infrastructure development needed for wider use of low-fossil and carbon-neutral fuels.
- Regarding private infrastructure (EPBD: Energy Performance of Buildings Directive): provide every parking space with technical (pre)equipment and electrical (pre)cabling in new construction and renovation of buildings.

Source : www.eco-movement.com

Charging infrastructure for heavy vehicles

A truck is not a car. The same goes for e-trucks: they often drive more with less time to charge, have specific loading needs and require more parking space and higher charging capacities.



Policy recommendations

- Provide a truck-specific network of ultra fast chargers ("MW charging") at locations with many short truck stops.
- Provide charging facilities and adapted capacities in places where many trucks stand idle for hours (overnight charging at truck parks, in industrial zones, logistics hubs, company car parks, port area...).
- Regarding public infrastructure (AFIR: Alternative Fuels Infrastructure Regulation): set more ambitious targets to support road transport and focus on developing and adapting infrastructure for wider use of low-carbon fuels.
- Regarding private infrastructure (EPBD: Energy Performance of Buildings Directive): make loading (pre)installations mandatory for e-trucks as well when (re)constructing loading and unloading quays and car parks at depots, logistics hubs, industrial zones, port areas, etc.
- A simple licensing policy to build public charging stations on private land for professional transport.

Alternatively powered freight vehicles and construction machinery

Getting alternative drives on the road more quickly by eliminating their operational disadvantages compared to diesel trucks.



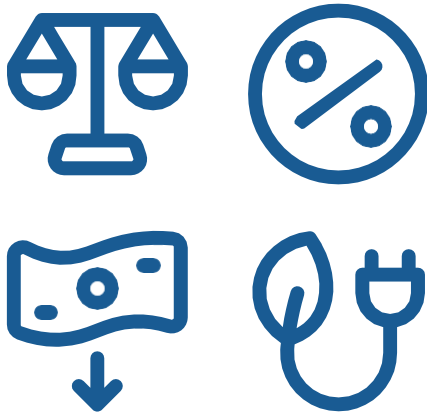
Policy recommendations

- Compensate for the extra weight and volume of alternative propulsion in freight vehicles by increasing the permitted mass and dimensions.
- Give carbon-free trucks a substantial CO2 discount on the rate in the km charge.
- Legally allow carbon-free light commercial vehicles up to 4.25 tonnes to be driven with a B licence, exempt them from the km charge and tachograph legislation, and allow them to tow a trailer.
- A simple permit policy to build public charging and refuelling infrastructure for alternative-powered freight vehicles on private land.
- Provide funding to help customers switch to available but more expensive low-carbon variants of construction machines, light commercial vehicles and fossil-fuel trucks.

Affordable energy transition

Flexible financing formulas are crucial for greening individual mobility and keeping it accessible to private individuals and businesses.

The driving fleet of thermal engine vehicles can reduce its carbon footprint through low-carbon or low-fossil fuel. The supply of these needs to go up and the price at the pump down.



Policy recommendations

- Further development of (Private) Leasing as the driver of accelerated greening of mobility, and this in consultation with the sector.
- Maintain and ensure a good balance between consumer rights, protection from over-indebtedness and accessibility to mobility, in consultation with the sector.
- Avoid creating a social gap between private and company car users.
- The replacement, over time, of existing taxes with new charges in which the principles of "user pays" and "budget neutrality" are key.
- A financial and tax support for individuals to purchase and use zero-emission vehicles.
- Increasing and extending financial and tax incentives for companies in the purchase and use of zero-emission vehicles.
- An operational support to companies investing in zero-emission light and heavy commercial vehicles and associated loading and refuelling infrastructure.

Future-oriented taxation

The greening and diversification of mobility is putting pressure on the government's traditional revenue model. Time to put vehicle taxation on a new footing: make it steering for smoother traffic while keeping individual mobility affordable.



± €20 billion

annual tax revenues from cars,
motorbikes, vans and trucks

Policy recommendations

- Replace existing taxes with new charges, with everyone who uses our transport infrastructure contributing to its cost.
- Do not further increase the overall tax burden on car drivers.
- Provide incentives to individuals and companies that switch to zero-emission both for the vehicle and for the refuelling or charging infrastructure. This for both passenger and freight transport.
- As zero-emission driving is not yet affordable for everyone, users can be fiscally motivated to switch to the latest lower-emission technologies in the meantime.
- Use tax revenues to better maintain, modernise and expand road and cycling infrastructure where needed.
- A stable tax base that allows companies and individuals to make the right choices over the longer term.
- Consultations between the country's different authorities to ensure consistency in mobility taxation between the regions and with the federal government.

Employment and training

Mobility solutions are becoming increasingly electrified, automated and connected. Therefore, the technical workforce needs a wider range of competences, leading to a rise in the number of polyvalent vacancies. There is a shortage of schools offering technical training for (civil) construction workers.



Policy recommendations

- An education system focused on broader skills (STEM = Science, Technology, Engineering, Mathematics) to answer the needs of electrified, connected and automated mobility.
- A retraining towards green technologies for workers in the sector.
- Special financial and operational support for additional training and retraining in "green" propulsion technologies, automated and connected vehicles.
- Establishment of vocational training courses for machinery civil construction.
- Opening up dual learning to sectors that have no schools today.

Source: www.educam.be | Figures at 31.12.2021

Mobility budget

Only 1.65% of the beneficiaries, or 1 in 60, uses the statutory mobility budget.

500.000 → **8.250**
commercial
vehicles mobility
budgets



Policy recommendations

- An extension of the system to make it accessible to wage earners without a company car.
- Replace the existing commuting fee systems with a flexible and uniform mobility budget.
- Better alignment with existing system of cafeteria plans.

starting year 2019	corona year 2020	2021	2022
1 in 10,000	1,5 in 1,000	1 in 200	1 in 60

Source: www.acerta.be | Figures at 31.12.2022

(E-)two-wheelers

Electric two-wheelers, such as electric bicycles and scooters, have become very popular because of their ease of use and better infrastructure. Moreover, they have low environmental impact. They are often used as alternative means of transport in cities and urban centres, where distances are shorter.



Policy recommendations

- An overall bicycle registration platform (as in the Netherlands) where local, national and international registration systems can be connected.
- Encourage wearing helmet and fluorescent jacket.
- Extend tax and parafiscal benefits for company bikes to e-steps and zero emission mopeds and scooters.

Mobility as a Service (MaaS)

The government should be more careful to ensure that mobility users retain freedom of choice.

22%

of consumers say they are reducing car use with a shift to bicycle use in particular (+7%).

However, public transport is deteriorating (-8%)



Policy recommendations

- Commuting fees should be flexibly aligned with all modes of transport.
- MaaS should not evolve into a monopoly position for the MaaS operator.
- We argue that the government should promote MaaS as a tool to allow users to decide which mode of transport is most appropriate at any given time.

Automated and connected vehicles

Vienna Convention must anticipate the arrival of tomorrow's vehicles well in advance.

Levels of driving automation

0	1	2	3	4	5
NO AUTOMATION	DRIVER ASSISTANCE	PARTIAL AUTOMATION	CONDITIONAL AUTOMATION	HIGH AUTOMATION	FULL AUTOMATION
THE HUMAN MONITORS THE DRIVING ENVIRONMENT			AUTOMATED SYSTEM MONITORS THE DRIVING ENVIRONMENT		



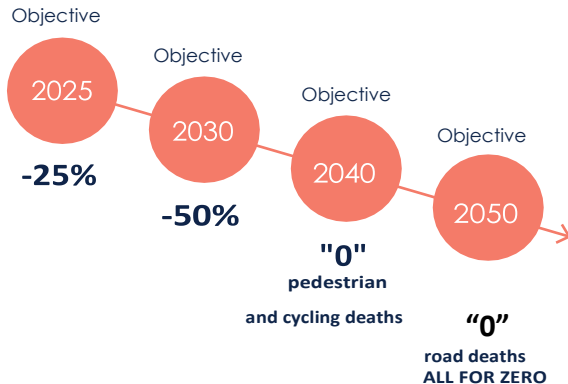
Policy recommendations

- Adaptation and alignment of regional and federal regulatory frameworks to enable the introduction of Level 3 automated vehicles and testing of Level 4 and 5.
- Adjust the code of conduct for testing autonomous vehicles (levels 4 and 5) to allow private companies, for example, to submit projects.
- Accelerate 5G/6G deployment and support standardised in-vehicle data exchange through EU.
- Adapt eCall regulations according to current and future communication standards.
- Commit to building road infrastructure that enables autonomous mobility.

Safety measures

Road safety is an ongoing and priority concern. Governments should allocate the necessary resources to make traffic infrastructure intrinsically safe for all road users.

On the way to "0" traffic casualties



Policy recommendations

- Further improve existing infrastructure to increase traffic safety and avoid conflicts between different types of road users.
- Optimal coordination between local governments and higher authorities, for example in terms of traffic restrictions and data exchange.
- Deeper and more specific analyses and statistics into the causes of all major accidents.
- Making speed regimes and other preventive measures coherent with the layout and function of roads.
- Conflict-free traffic infrastructure between different road users, focusing on smooth flow for all.

Source : www.all-for-zero.be

Modernisation of road network

Car drivers and transport operators contribute more than €20 billion a year to governments and deserve better infrastructure. More of those resources should be invested in road infrastructure.

Belgium ranks 53rd in the world in terms of road quality



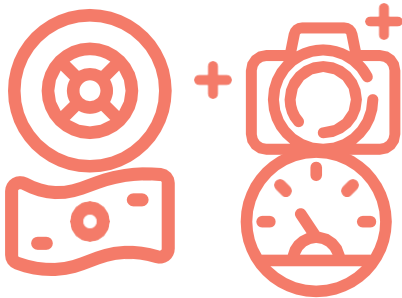
Source: www.the-globalconomy.com

Policy recommendations

- A long-term investment plan in all regions to bring our road infrastructure back up to standard.
- Take measures to increase road capacity at congestion-sensitive points.
- Invest in conflict-free infrastructure for all types of road users on (or near) roads with a major traffic function.
- Equip all main roads with modern traffic control systems.
- Reduce disruption as much as possible during roadworks.
- Commit to dynamic traffic signs and traffic lights that take into account the reality of the moment.

Traffic fines

The number of traffic fines drawn up is increasing year after year but the decrease in road casualties is not corresponding. Repressive actions should have the sole purpose of contributing to road safety.



More than 6 million traffic offences in 2022

+13%
vs 2021

Policy recommendations

- Proportional sanctions according to the offence.
- A wider arsenal of penalties that allow courts to punish offenders on a tailored basis.
- As with speeding, the liability of parking and GAS fines should be placed on the user of a means of transport.

Source: [Verkeerstatistiek.federaalpolitie.be](https://www.federaalpolitie.be/verkeerstatistiek) | Figures at 31.12.2022

Measurement of exhaust gases

Better monitor emissions from the moving fleet of vehicles using a data bank of exhaust measurements.



Policy recommendations

- Measure and analyse all exhaust gases from cars on a regular basis, allowing earlier action to be taken in case of deterioration of anti-pollution systems (O₂, CO₂, CO, NO_x, HC, PN).
- A general database where these measurements are kept so that we have an overview of fleet pollution.
- A procedure that standardises this process (Eco-Expert).
- Duty to inform the customer regarding the results of the measurements.

Technical inspection

Modernisation of technical inspection.



Policy recommendations

- More detailed technical information provided on the inspection report regarding defects.
- Allow (re)inspections to be carried out in garages' workshops.
- To be allowed to organise mobile inspections, including for private cars.
- Extending the validity of the registration certificate after inspection as part of used vehicle sales.
- Abolish unnecessary inspections such as those of new original accessories ex-factory.

Revision of commercial number plate system

The mobility sector wants to be able to count on an even more efficient administration, with extra attention to the reality in the field.

Subject

- Y plates for test drives
- Registration of prototypes
- V professional plates
- V professional plates for trucks
- Traffic from non-completed vehicles

Policy recommendations

- Clarification of technical equipment of vehicles operating under test drive plate (Y plate).
- Non-homologated prototypes should be easier to register under certain conditions to allow (international) field tests and/or to allow professional users to test a truck in real conditions of use.
- Obtain international acceptance of all commercial plates.
- Abolish tachograph legislation, road tax and kilometre tax on professional plates for trucks.
- Take into account the industrial use of trucks for which V professional plates were not designed.
- Allow road transport of uncompleted vehicles between workshops under certain conditions.

Smoother handling of homologation, registration, breakdown assistance and inspections

The mobility sector wants to be able to count on an even more efficient administration, with extra attention to the reality in the field.

Subject

- Inter-agency exchange of (technical) vehicle data
- Exchange of (technical) vehicle data with emergency services
- Reported vehicles or vehicles that are a financing guarantee
- Legal claim of a vehicle

Policy recommendations

- Automation of data exchange between the DIV and regional homologation applications to smoothen the homologation processes.
- Applying a label complying with ISO international standards to the number plate.
- Regular consultation between regions, federal government and federations to optimise the process between homologation (regional), registration (federal) and technical inspection (regional).
- Creation of a centralised database that allows professionals in our sector to check whether a vehicle is reported or a financing guarantee in order to prevent fraud.
- In the context of a legal claim, the magistrate validating the invoice of the towing service (including the police PV) must be able to mandate administrative staff to handle this purely administrative task.

Smoother handling of homologation, registration, breakdown assistance and inspections

The mobility sector wants to be able to count on an even more efficient administration, with extra attention to the reality in the field.

Subject

- Blue lights for FAST or SIABIS+ rapid intervention vehicles
- Right of retention for breakdown services
- Signalisation of dangerous situations involving heavy vehicles on motorways
- Old-timers

Policy recommendations

- Add signalling vehicles in FAST or SIABIS+ intervention to Art. 37.5 of the highway code, which lists all categories that can be granted an exemption from the provisions of the highway code.
- Creation of a fund to cover risks on a flat-rate basis.
- Organisation of an implicit transfer (framed) of the right of retention to the breakdown service.
- Set up standardised procedures for alert obligations regarding interventions on heavy vehicles (> 3.5 T) on motorways with clear delimitation of responsibilities between the parties involved.
- Introduce special arrangements for old-timers, both in terms of access rules and taxation, to preserve this mobile historical heritage.

More info

Contacts

Do you have additional questions about this memorandum? Do not hesitate to contact our specialists at Mobia.

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