

# Transport Lending Policy

## Issues Matrix

21 June 2022



European  
Investment  
Bank

*The EIB bank*



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To accommodate scheduling limitations, this publication has not undergone standard EIB copyediting and proofreading.

This issues matrix provides a consolidated overview of the contributions to the public consultation on the revision of the EIB's Transport Lending Policy (TLP), together with the EIB's reasoned comments on the contributions.

The contributions are published in full on the [public consultation website](#). Each contribution is assigned a unique ID number, which is used on the public consultation website and in the issues matrix where individual contributors did not consent to the publication of their personal data.

The issues matrix reflects the structure of the consultation questionnaire. It summarises responses to both closed and open questions of the consultation questionnaire, as well as contributions received via email.

All project-specific issues contained in the contributions are excluded from this document as they fall outside the scope of the public consultation on the revision of the TLP. Full contributions are publicly available on the EIB's website. Project-specific issues can be addressed to the EIB Infodesk ([Infodesk@eib.org](mailto:Infodesk@eib.org)) and complaints can be addressed to the EIB Group Complaints Mechanism ([complaints@eib.org](mailto:complaints@eib.org)).



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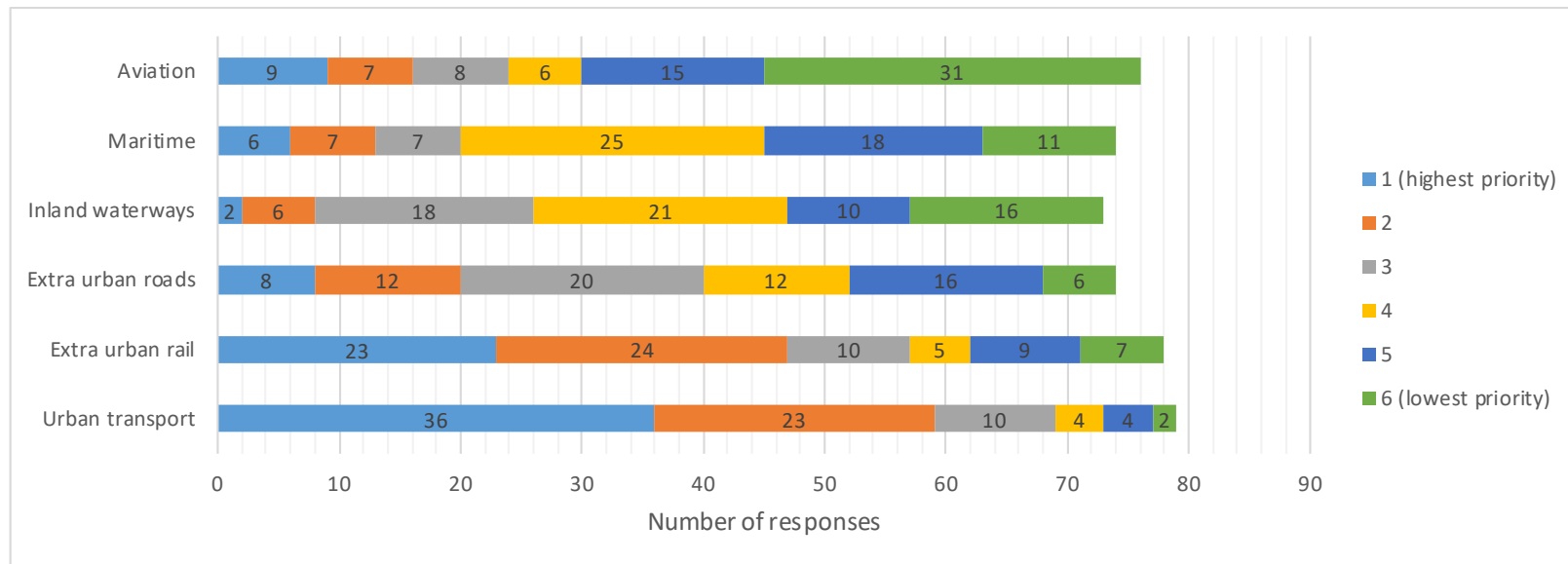
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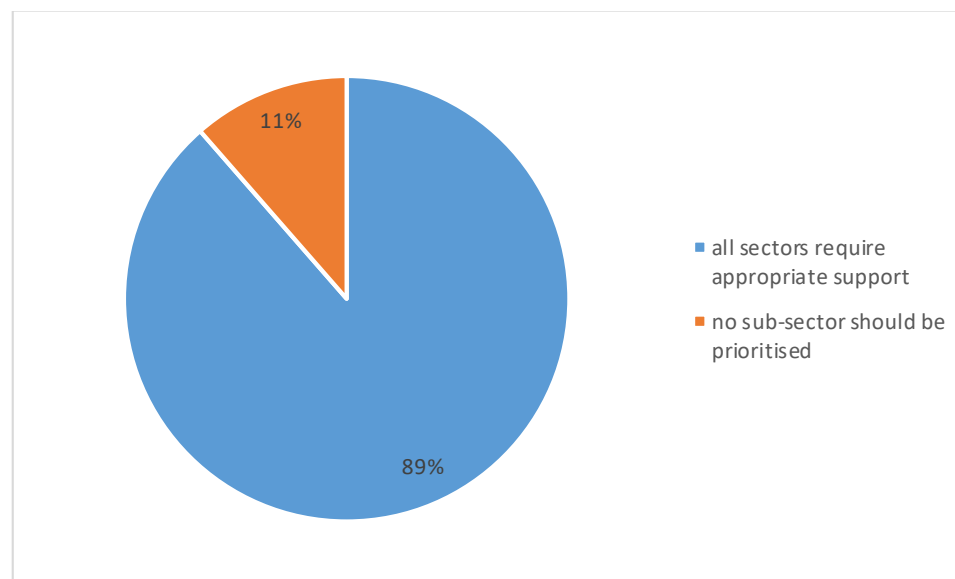
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## Chapter 2 – General

Question 1 – Within the European Union, please rank the six sub-sectors identified by the EIB by their need for support to invest in decarbonisation. Please rank in order of priority, from (1) highest priority to (6) lowest priority.



If you believe that no sub-sector should be prioritised or that all sectors require appropriate support, please leave the ranking blank and instead check the relevant box below.



Ref	Summary of Contributions	Contributor	EIB comment
1.	Only <b>rail</b> is capable of economic-friendly mass transport, is affordable for everyone (or should be) and combines the conflict of speed and low carbon foot print.	Jori Milbradt	As per EIB's CBR, all EIB activities need to be aligned with the Paris Agreement's temperature and adaptation goals, and "consistent with pathways towards low-carbon and climate-resilient development".
2.	Rail transport must be prioritized as the most important land transport. After that, water transport should be prioritized!	Railway Signalling Automation Telecommunication And Industry Association	The modal shift of passenger and goods traffic away from roads towards the greenest modes, namely rail and inland waterways, constitutes a central pillar of the EU transport decarbonisation strategy. In fact, the EU's modal shift strategy sets out that rail freight traffic should increase by 50% by 2030 and double by 2050, whereas transport by inland waterways and short sea shipping should increase by 25% by 2030 and by 50% by 2050.
3.	Terrestrial rail mobility for passengers and goods should be prioritized as they are the most interesting to quickly reduce GHG emissions.	NEOLINE Développement	

Ref	Summary of Contributions	Contributor	EIB comment
4.	The effective decarbonisation of transport through an ambitious modal shift to rail – as the greenest mode of mass transportation – will certainly be crucial to achieve the Green Deal objectives. Achieving truly sustainable and carbon neutral mobility will be only possible with rail as the backbone of sustainable transport.	UNIFE	<p>Rail is an important transport mode and is an essential part of many sustainable and multi-modal transport systems. These systems should be designed in line with relevant strategies and plans, and consider the contribution of all relevant transport modes. Extra-urban rail and urban collective mobility systems will continue to be identified as EIB priority areas in the revised TLP and can contribute to, inter-alia, environmental and climate objectives.</p> <p>For more information on the rail sector, please see our responses to Chapter 4 of the issues matrix; or see Chapter 5 of the revised TLP.</p>
5.	Rail transport should be promoted in order to promote medium-distance mobility with low carbon impact. Standardisation at European level, through more cooperation between the railway companies in each country, is necessary so that this mode of transport can really be envisaged for private individuals (tourism in particular).	Response 704118868	
6.	Cross-border international long-distance rail	Back on Track Belgium vzw-asbl	
7.	Rail transport investments should be prioritized as railway is the sector that contribute most to meeting climate targets, mainly in the passenger business but also in the freight sector.	Ferrovie dello Stato Italiane S.p.A	
8.	Rail transport, being the most energy efficient transport mode, needs investment to become borderless, flexible, seamless, faster and easier so as to better compete with road and aviation for passenger transport and with road, aviation and maritime for freight transport. Other modes need investment to help their transition to become more sustainable.	UNECE	
9.	In ranking the need of decarbonization of individual sector, I took into the account <b>feasibility</b> of the implementation.	Institute for European Cooperation	<p>The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR).</p> <p>EIB project-level support shall take account of feasibility and implementation issues. The EIB's due diligence assessing the project viability incorporates economic, environmental and social components.</p>
10.	A correct vision of an integrated European mobility policy should consider <b>all transport modes</b> in a joint and balanced manner as well as a geographically differentiated approach.	Confederación Española de Transporte en Autobús - CONFEBUS	The EIB supports EU transport policies, covering all transport modes, and EU regional development policies.

Ref	Summary of Contributions	Contributor	EIB comment
11.	Different approaches to decarbonization should be put in place for different transport sub-sectors, based on different technology roadmaps, different required mixes of technology, behavioural and supply chain organization measures. Support for each subsector should reflect these differences.	Arthur D. Little	<p>In terms of decarbonisation, the EIB CBR, sets the broad sectoral eligibility for different sectors – including for transport (and its sub-sectors).</p> <p>The EIB will prioritise transport according to the TLP, and following four pillars of sustainable transport: (1) Safety and Security, (2) Accessibility, (3) Environment and social (Green) and Resilience as well as (4) Efficiency.</p>
12.	All the modes of transport listed should be supported in the same period of time because the decarbonisation policy only will have global results if we face the environmental problems as a whole problem, not in a partial view, and take the appropriate measures in the many aspects as possible we can face it.	Município de Faro	
13.	To greatly decentralize the transport systems	Mutakwa Samuel Sikazwe	
14.	All sectors shall be treated equally.	Croatian motorways Ltd	
15.	All subsectors of transport need financial appropriate support as there is no positive business case yet with the various pathways for decarbonization.	Ministry of Infrastructure and water Management	
16.	The EIB should actively seek to build a project pipeline promoting the avoid-shift-improve principle and aim to improve the mode of transport. Progress towards these investment priorities should be regularly revisited, based on scientific, technological and societal advances.	Joint contribution made by NewClimate Institute and Germanwatch	
17.	Our economy needs all offer of transport to fulfil the needs of companies and citizens	Federation of Belgian Enterprises FEB-VBO	
18.	All areas contribute significantly to the decarbonisation of the transport sector	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	
19.	Investments can contribute to the necessary decarbonisation in all sectors, regardless of their current level of carbonisation.	Bundesverband der deutschen Luftverkehrswirtschaft e.V.	

Ref	Summary of Contributions	Contributor	EIB comment
20.	All sectors require appropriate support of EIB. It is however very important that sectors which are already to a large extent decarbonised, such as the railway sector, are not penalised for already being 'green'.	European Rail Infrastructure Managers (EIM)	
21.	BusinessEurope considers that the ambitious climate goals require a massive overhaul across all modes of transport, as all of them have the potential to contribute to those goals. All sectors should be given a supported opportunity as they all serve essential needs of the society.	BusinessEurope	
22.	An <b>inter-modal</b> European transport system is key for the future smart, robust and sustainable European mobility	Community of European Railway and Infrastructure Companies (CER aisbl)	The EIB recognises the importance of intermodal transport in the freight sector and wider transport systems, and as such will be a priority in various (sub) sectors.
23.	Extra-urban road traffic may not be the largest source of greenhouse gases, but it is in the focus of public opinion. Second is aviation, while inland waterways are believed to be of minor importance.	Response 974739687	According to the EC Reference Scenario 2020 and in line with EU energy and transport policies, the road transport should be largely decarbonized by 2050. Given the relatively clear sectoral pathway towards decarbonisation, the EIB will address concerns around capacity expansion through an adapted economic test for large projects. In particular, demand forecasts will be adapted in line with recognised long-term modelling studies, with due attention to penetration rates of electric vehicles. Net emissions from the project will be valued at a shadow cost of carbon, which is consistent with the path towards a 2050 climate neutrality target. This approach will screen out projects dependent on high short-term traffic growth (and hence emissions). The EIB will continue to support robust projects designed to improve existing traffic flows, rehabilitation projects, or projects with strong safety elements. (EIB CBR 4.35).
24.	<b>GHG emissions reduction</b> at minimum costs and maximum impact can be reached by prioritizing the sub-sectors based on their individual GHG contribution and the cost of abatement.	Ralph-Uwe Dietrich	
25.	Prioritisation should be done based on the contribution of transport projects to the overall decarbonation of the sector and in particular their CO2 emissions per passenger. In particular, Zero emission projects should have priority over non-zero emission ones.	Alstom	
26.	All sub-sectors have to play their role, however extra-urban road sector is responsible for most of GHG emissions.q	Ministry of Infrastructure	
27.	Priority for investment should be given to the most sustainable forms of transport – modes that provide the most accessible and equitable mobility and are the lowest emitting. Investment should support the urgent need for a shift to low emitting modes as well as the need to improve and decarbonise all modes of transport. Priority should also be given to projects that are multi-modal and take a system level view and promote collaboration with other modes and sectors. It is important to	International Union of Railways	
			The EIB applies own carbon footprint methodology for the calculation and reporting of GHG emissions of projects.  The EIB recognises the importance of (mapping) both intermodal and multimodal transport systems, as well as the opportunities therein to contribute at a system-wide level to the four pillars of sustainable transport: (1) Safety and Security, (2)

Ref	Summary of Contributions	Contributor	EIB comment
	encourage those projects that promote and improve connectivity between the modes, for improved efficient and ease of movement. This would support the choice of the most sustainable mode choice for a door to door journey		Accessibility, (3) Greenness and Resilience, and (4) Efficiency.
28.	EIB needs to clearly prioritise the most cost-effective investments that support sustainable, low carbon transport services - and entirely halt the support for unsustainable, high carbon modes and any projects that induce demand for high carbon transport services. Ensuring projects promote and improve connectivity between modes, for affordable, efficient and equitable means of movement.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	Please refer to the answers provided to questions 10-21.
29.	The path towards carbon neutrality and the technological constraints are not the same for the different modes of transport. Therefore, the EIB criteria and project selection grid should account for these aspects.	Aerospace and Defence Industries Association of Europe (ASD)	
30.	Priority shall be given to those projects that address problems caused by most polluting/harmful transport modes (those causing more negative impacts to health and biodiversity per person and kilometer or ton and kilometer, respectively), starting by urban transport which is road based, intensive in fossil-fuels and leads to significant negative health impacts.	ECTRI	
31.	Decarbonisation is most urgently needed for those modes of transport that emit a lot of CO2.	Response 974008607	
32.	EU Commission reports highlight that <b>maritime</b> sector (like aviation) are the most challenging sector to decarbonize. Maritime is also the sector that benefit from the smallest EU Member States contribution support for Alternative Fuel Infrastructures in comparison with all other modes of transport: less than 5% of Member States budget for AFID.	Costa Group	<p>EIB shall continue to support the waterborne transport sub-sectors – including maritime and inland waterways transport.</p> <p>The EIB shall, inter-alia, support the improvement of the environmental performance and the decarbonisation of the maritime shipping and inland water transport fleets through the financing of new-builds as well as the retrofitting of existing vessels.</p> <p>Please see Chapter 5 of the TLP for more details on the EIB's approach to maritime and inland waterways transport, including its priorities in decarbonisation, as well as Chapters 6 and 7 of the issues matrix.</p>
33.	SEA Europe calls upon the EIB to significantly broaden the scope and volume of its lending and financing support devoted to the waterborne transport sector, through additional resources and through dedicated, easy-to-access tools that could more directly benefit also Europe's shipbuilders and equipment manufacturers.	SEA Europe (European Shipyards and Maritime Equipment Association)	
34.	The sources dedicated to the shipping industry under the TLP should be proportionate to the importance of the maritime	ECSA	

Ref	Summary of Contributions	Contributor	EIB comment
	sector. The shipping industry is capital intensive: access to competitive (green) financing within Europe should be a priority and the global level playing field should be ensured. Asset life-time is long: facilitate the development of future technologies without downgrading the ones we assessed as transition technologies today.		
35.	Maritime and inland waterways should be also strongly supported as, energy-wise, they are the best ways to carry goods.	NEOLINE Développement	
36.	<b>Aviation</b> , like other sectors, needs investment in decarbonisation	Flughafenverband ADV	
37.	Aviation should be less used until there is a clear perspective of low-carbon flying system.	NEOLINE Développement	<p>The EIB eligibilities for air transport are the ones set by the CBR and will remain valid until its forthcoming revision, which is planned for 2025.</p> <p>The EIB wishes to play a role in supporting the aviation sector efforts to gradually end its dependency on fossil fuels:</p> <ul style="list-style-type: none"> <li>• The CBR allows the EIB to support RDI and construction of SAF production plants in accordance with the specific criteria included in the document and EU regulation and has as a priority investing in RDI for disruptive technologies in the sector.</li> <li>• The Bank also follows with interest the developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy and can already finance zero direct emission aircraft and those fueled by verifiable zero net emission fuels.</li> <li>• The Bank supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace.</li> </ul> <p>Finally, the CBR allows the EIB to support airports by improving existing capacity through safety and security projects, rationalisation and explicit decarbonisation measures.</p> <p>In general, EIB support will follow EC policy priorities including the greening of airports, fleets and related services; safety;</p>
38.	Focus should be not only on the sectors with existing decarbonisation plans but especially the "hard to abate" sectors where investment offers the most impact from public lending intervention. Specifically, investment in the decarbonisation of air transport is sub-optimal because the risks of investment are higher.	Airports Council International EUROPE	
39.	Civil aircraft in operation account today for 2% to 3% of global CO2 emissions from human activities, but the significant expansion which is expected in air transport in the long term makes the transition to a sustainable aviation an absolute priority. Given the high level of investments needed in the aviation sector to develop new technologies and sustainable aviation fuels capacities at EU level, the EIB should adopt an approach to make the decarbonisation of the aviation sector a priority.	Aerospace and Defence Industries Association of Europe (ASD)  AIRBUS	
40.	Financing policies, including EIB lending rules, need to consider the limited range of decarbonisation solutions available to airlines to reduce their carbon footprints, unlike other modes of transport. Legislators must consider prioritising the feedstock, energy and SAF available in Europe for the aviation sector vis-à-vis other modes of transport, such as road transport, which enjoy a wider range of technological alternative solutions to decarbonise. EIB support should be based on objective criteria for measuring, reporting and	Airlines for Europe A4E	



Ref	Summary of Contributions	Contributor	EIB comment
	<p>verification of the actual emission level, where the methodology should be based on lifecycle emissions a relevant boundary to compare sector.</p> <p>We disagree with Climate Bank Roadmap provision specifying that the EIB's support of aviation is limited to investments in decarbonisation and resilience of infrastructure and the roll-out of direct zero-emission aircraft, only exceptionally to conventionally-fuelled lifeline aircraft or digitisation. Instead, we advocate for an approach similar to the one adopted by the EIB in its "Urban Mobility" policy in which vehicles meeting a "substantial threshold" are considered aligned with the Paris agreement. In fact, such "substantial contribution" threshold is also under consideration in the context of the EU Taxonomy for air transport.</p> <p>The approach taken by the EIB also disregards the important fact a current fleet of aircraft that can blend up to 50% SAF, requiring no infrastructure investments, whilst the EIB approach would include hybrid and full electric architectures providing +25% improvement in energy efficiency.</p> <p>Pending clarification on the application of the Taxonomy to aviation, the lending policies of the EIB should also reflect that thanks to SAF and latest generation aircrafts already commercially available, an aircraft operator's emissions can be reduced to thresholds close to the 50 g CO2 per passenger km by 2030.</p>		<p>security; and digitalization, including the improvement and digitalization of the Air Traffic Management system.</p> <p>The EIB recognises that the decarbonisation of the sector is possible, but requires significant investments and institutional support.</p> <p>Please see Chapter 5 of the TLP for the EIB's approach to and priorities in Aviation, including its priorities in decarbonisation and operational resilience, as well as Chapter 8 of the issues matrix on Aviation.</p> <p>The EIB also supports investments in alternative fuels, as well as in hydrogen vehicles and vessels, and its supporting infrastructure, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p>
41.	Whilst being one of the harder-to-abate sector, the European air transport sector is committed to the ultimate objective to reach a net-zero emissions aviation ecosystem in Europe by 2050, as well as strongly contributing to the EU's 2030 ambition ( <b>Destination 2050</b> – A Route to net zero European aviation).	AIRBUS, Airlines for Europe A4E	
42.	It is critical that the industry has time to recover from the COVID that has been the most devastating crisis in its history. This will require an enabling regulatory and financial environment facilitating a path towards a sustainable growth of air transport that strikes the right balance between	AIRBUS	

Ref	Summary of Contributions	Contributor	EIB comment
	environmental regulations on one hand and the necessary investments required to support the decarbonisation of European Aviation on the other.		
43.	With regard to aviation, in line with the EIB Climate Roadmap, we would like to stress that given the state of current and medium term technological advancement, expansion of aviation capacity is not Paris aligned.	Joint contribution made by NewClimate Institute and Germanwatch	
44.	<b>Extra-urban roads</b> should not be the priority.	NEOLINE Développement	<p>(Extra-urban) roads are an important component of national and European strategic transport systems. According to the EIB's CBR, the decarbonisation pathway for the road sector includes modal shift, efficiency improvements, increased electrification, as well as the increased use of alternative fuels (biofuels, low carbon hydrogen). The CBR foresees continued support to the road sector, but makes investments in road capacity expansion projects subject to compliance with a stricter economic test, which, inter alia, ensures that capacity expansion projects which rely on high short term (i.e. not yet decarbonized) vehicles are not supported. As per EIB's CBR, all EIB activities need to be aligned with the Paris Agreement temperature and adaptation goals, and "consistent with pathways towards low-carbon and climate-resilient development".</p> <p>EIB-supported road projects in the EU are subject to, inter-alia, road and tunnel safety and security, alternative fuels, ITS, road pricing and other requirements in line with relevant EU legislation.</p> <p>The EIB prioritises road projects implemented in the context of an Integrated Regional Development program or equivalent strategies and plans designed to ensure sustainable and balanced territorial development, addressing issues including accessibility and transport poverty.</p>
45.	The market of goods transport by road is a market in which predominantly micro small and medium enterprises are active. Their vulnerability, as well as business model changes in Europe, should be considered in future policy, legal and financial framework.	European Road Haulers Association (UETR)	
46.	Road transport should be prioritized as it accounts for roughly three times the GHG emissions as aviation and maritime combined, at least for the EU. It is also the fastest growing source of CO2 emissions in developing countries.	Bank Information Center	
47.	Priority to the cities	Marc Olivier Leclercq	<p>The EC's policy priorities concerning urban mobility are the promotion of the shift from individual car use to public and collective transport, walking and cycling and the adoption of zero emission transport technologies for the decarbonisation</p>
48.	The needs are very high in the smallest agglomerations (a few hundred inhabitants) to the largest ones (e.g. Paris). Many	Response 290033127,	

Ref	Summary of Contributions	Contributor	EIB comment
	neighbourhoods and cities are still underserved throughout France. The situation of public transport in the countryside is very complicated.	Response 704118868	of public fleets, with the development of related infrastructure.
49.	Urban public transport and rail transport play a central role in decarbonisation. Only if public transport can provide a good (CO2-neutral) offer will it be possible to switch more from private motorised transport to environmentally friendly means of transport and traffic flow.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	In support of this, the EIB's revised TLP will (continue to) focus on urban collective, active and shared mobility schemes, ITS and digital solutions, rehabilitation of urban roads and streets and certain sustainable road vehicle fleets.
50.	Many of the current mobility and climate challenges – particularly decarbonisation – can be successfully addressed by the contribution of sustainable local public transport, including urban/suburban rail, walking, cycling and shared mobility modes.	International Association of Public Transport UITP	The EIB will take into account both land-use and transport strategies in its project appraisal. Approved Sustainable Urban Mobility Plans (SUMP) and Land-Use Master Plans or equivalent, are a pre-requisite for the EIB's support.
51.	The support to public road transport is essential, allowing an adequate solution for users and reducing the number of private vehicles.	Associação Rodoviária de Transportadores Pesados de Passageiros (ARP)	
52.	Transport is an important sector for reaching the Paris Goals, as it is a sector where we are missing the reductions we need. Moving away from individualised traffic is most important. Thus investments in public transport within and between cities is of highest priority.	urgewald	
53.	Each European Member State (EU MS) requires a distinct investment support, because each state holds a different stage in the development of its transportation system. For instance, some EU member states need investments for maritime transportation, while other EU member states do not need maritime investments, but rather investments for aviation transportation.	Ministry of Transport and Infrastructure	The movement of people and goods supports livelihoods and underpins the global economic and social system. The EIB acknowledges that a balanced and sustainable development of regions necessitates the promotion of equal access to mobility of all citizens, regardless of where they live.
54.	It is necessary to develop the capacity of the most climate friendly modes of transport while engendering a shift away from private car use. It is necessary to do this in a just manner, and take full consideration of workers affected. Therefore, it is right to consider investment considering the <b>social impact</b> of the investment, specifically its effect in creating employment and particularly maintaining employment of current workers. Road	European Transport Workers' Federation	As transport will be increasingly multimodal and international, the efficiency of door-to-door journeys of people and goods will also be more and more dependent on seamless connections between different transport modes and between countries, in particular within the Single Market of the EU.  As such, and subject to the specific criteria in the CBR, the EIB will remain demand-driven and focused on the (sub-)sectors where significant investment needs remain, while taking into

Ref	Summary of Contributions	Contributor	EIB comment
	Transport is one a sector of transport with the highest amount of workers in Europe, and particular attention should be paid to the employees in this sector, through retraining and reskilling, etc.		account of affordable solutions for economically, socially or other disadvantaged groups and the impact of operations on jobs and capacity building where needed
55.	<p>Funding more R&amp;I projects are required to build a comprehensive performance indicators' system covering all sustainability (with special focus on social and environmental) dimensions that could support policy and decision-making in a dynamic way. Social and territorial cohesion along with quality of life and health issues may justify funding for specific R&amp;I demonstration/implementation projects in specific countries/Member States - these will need to be integrated in the transport system priorities and be part of the funding structure.</p> <p>Although all sectors require support there are limited resources for funding. Therefore, prioritization is needed with the support of <b>appraisal tools</b> such cost-benefit analysis project studies, including the quantification of social and environmental impacts and distributional analysis (impacts on project stakeholders).</p>	ECTRI	<p>The EIB takes note of the need to support research and innovation. The EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The EIB also recognizes the importance of a robust planning framework in the transport sector. The EIB advisory and technical assistance offer to support strategic planning, and early project preparation is becoming an increasingly important facet of the added value of EIB participation in projects (e.g. the Joint Assistance to Support Projects in European Regions (<a href="#">JASPERS</a>) is increasingly working on planning and strategic level advisory assignments in transport in particular). Proper planning is key to develop a sound and sustainable project pipeline aligned with Paris Agreement objectives, as well as to enhance its cohesion, social and broader sustainability impact.</p>
56.	The prioritization of the sectors should be based in the efficiency resources invested. Probably a sound CBA type study should be carried out to understand the efficiency or socio economic and environmental profitability of the allocated resources. I think that urban public transport is probably the most efficient mode because is appropriate for mass transport, has economy of scales, the population tends to live in metropolitan areas and reduces the land use needed by an infrastructure if you take into account the passenger volume.	Miguel de Ortuzar	<p>The EIB does indeed carry out a comprehensive cost-benefit analysis on investment operations. Its approach is described in the document "The Economic Appraisal of Investment Projects at the EIB" (<a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a>), which is currently under revision.</p> <p>Moreover, the EIB's framework for assessing the additionality and impact of projects and its own intervention is described in: <a href="https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality">https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality</a>.</p> <p>The AIM assessment applies to every project financed by the EIB. It seeks to show how the EIB delivers additionally and impact, including social and environmental impacts.</p>
57.	The UTP wants urban public transport and rail transport, whether passenger or freight, to be considered at the same level of priority (level 1). Extra-urban road transport comes second or third on condition that it is collective road transport operated by coach. In the case of self-driving cars, the priority is reversed (in 5th position, just before the air)	UTP (Union des Transports Publics et ferroviaires)	

Ref	Summary of Contributions	Contributor	EIB comment
			<p>The EIB's Climate Bank Roadmap (CBR) specifies the types of investments that the Bank considers as aligned with the Paris Agreement and that are therefore eligible for EIB support. The alignment of EIB support and the EU Taxonomy of Sustainable Activities is described in the CBR. The TLP, in turn, specifies the priorities of the EIB's support to the transport sector, within the eligibilities specified in the CBR. The EIB will prioritise transport according to the TLP, and following four pillars of sustainable transport: (1) Safety and Security, (2) Accessibility, (3) Environment and social (Green) and Resilience as well as (4) Efficiency.</p> <p>Please see Chapter 5 of the TLP for the EIB's priorities in the different (sub-) sectors.</p>
58.	I am looking at the lens of investment in the sectors through the lens of a Low Income Country (LIC)	WhereIsMyTransport	<p>Given that transport is pivotal to the development of a more equitable world, and to ensure that no one is left behind, people should have access to transport services that meet their needs. These services must not only meet the needs of the many, but also those disadvantaged by inter-alia, geographies, gender, age, physical ability and economic hardship. Access to employment and education opportunities, essential services such as hospitals and emergency services, leisure activities and goods deliveries should be equally available to all.</p> <p>Improving accessibility will be particularly important for many developing countries, where universal accessibility is still far from reality and where considerable transport poverty persists.</p> <p>Although focused on lending activities, the TLP also refers to advisory and technical assistance activities in the transport sector. This is notably the case for developing countries in general and LICs in particular, where the EIB offers a wide range of project-related technical assistance facilities to contribute to improving the quality of lending operations throughout the project cycle and enhancing their development impact, in partnership with the EC and other co-financiers.</p>
59.	Supporting railway transport (both extra-urban and urban) is the best way to serve the goals of decarbonisation. In case of extra-urban roads, feeder buses shall be supported.	MÁV-Volán Group	
60.	Investment (public and private) will be needed to decarbonize transport, but some sectors will need more public support than others. One of the key priority sub-sectors for the EIB should be aviation. Extra-urban roads and urban public transport also need special attention from the EIB. Other sectors, such as extra-urban rail and maritime should be lower in the EIB priorities list because the process of decarbonizing those areas is already in an advanced stage.	Global Infrastructure Investor Association	

Ref	Summary of Contributions	Contributor	EIB comment
61.	For other transport modes (especially Heavy Goods Vehicles (HVG), Inland Water, Maritime and Aviation) new drive trains, energy carriers and infrastructure need to be further developed.	Ministry of Infrastructure and water Management	The completion and efficient functioning of the EU internal market is dependent on the connectivity of the logistic chains that support it, and therefore on the infrastructure and technology that enable these logistics chains. The growing demand for the transport of goods and freight will have to be managed in a cleaner and more efficient manner in the future. This will affect all modes of transport and the challenges are complex. The containerisation of freight has dramatically altered the transport of goods but bulk cargo is still required to feed resources into the economy and high value cargo still has a time premium. Economies of scale are an important consideration, and shipping and rail therefore have advantages for longer journeys, but more and more journeys start and end with short 'last mile' trips that often take place in urban areas. Different solutions are therefore required at each stage of the supply chain, some of which imply the need for intermodal capability.
62.	The focus of the EIB should be on reducing demand in carbon-intensive transport including a drastic reduction in air travel, less cars and freight transport, and promoting instead public transportation, active mobility, shared zero emission vehicles and modal shift. The EIB needs to recognize that the endless growth of road, air and maritime transport is unsustainable and may lead to future stranded assets. It is crucial to avoid any further lock-ins into carbon intensive infrastructure, including for instance motorways and highways. While the EIB is certainly interested in financing more climate-friendly projects, unfortunately its impact is still severely impaired by its financing of climate-damaging projects. Considering the huge efforts needed to decarbonize European mobility, public finance should support sustainable transport modes and infrastructures, and fund research to develop means of reducing traffic (for example through better urban and spatial planning).	Greenpeace	<p>The EIB takes note of your comment on prioritisation of investments that reduce transport demand, and shifting transport from more polluting and carbon intensive modes. As per EIB's CBR, all EIB activities need to be aligned with the Paris Agreement temperature and adaptation goals, and "consistent with pathways towards low-carbon and climate-resilient development".</p> <p>The CBR withdraws support from conventionally fueled aircraft and airport capacity expansions. Aviation still provides vital connectivity on a national, regional and international scale and is increasingly difficult to substitute as travel distance increases. For that reason, the EIB closely monitors regulatory and technology developments that will eventually allow the sector decarbonize in alignment with the Paris agreement. Please, note that both The Clean Planet for All communication and the Smart and Sustainable Mobility Strategy from the EC allow for a certain growth in aviation that is deemed compatible with EU decarbonisation targets.</p> <p>For the moment, the EIB has as a priority investing in RDI for disruptive technologies in the sector and zero emission aircraft. In addition, the Bank supports the deployment of the</p>



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			<p>Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace. The CBR also allows the EIB to support RDI and construction of SAF production plants in accordance with the specific criteria included both in the CBR and in EU regulation. Finally, we also support improving existing airport capacity through safety and security projects, rationalisation and explicit decarbonisation measures.</p> <p>Roads currently account for about 72% of all transport related emissions. In line with the core themes of the EC's long term policies, including the Green Deal, EIB's CBR (para 4.29) outlines a mix of solutions to addressing this urgent decarbonization need in the sector; i.e. (i) modal shift, (ii) efficiency improvements; and (iii) increased electrification and use of alternative fuels, including biofuels and low-carbon hydrogen. Electrification is already technologically possible for about 75% of roads vehicles, i.e. passenger cars and light goods vehicles. It is the role out at scale of increased electrification which needs support. Accordingly, the CBR envisages support for both EV charging infrastructure and fleet electrification. We agree that there are still some challenges in circular economy aspects in electro-mobility and that electrification process will have to be accompanied by reducing emissions in electricity production Progress in these areas is underway.</p> <p>The priorities to support avoid and shift investments can be found in Chapter 2 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.</p>
63.	As a matter of priority the EIB should make the reduction of transport demand a central goal in the Transport Lending Policy.	Counter Balance WWF EPO	Please see comments on point 63 above.
64.	It is crucial that the EIB stop financing harmful projects while increasing its financing of environmentally-friendly ones.		The EC's policy priorities concerning urban mobility are the promotion of the shift from individual car use to public and collective transport, walking and cycling and the adoption of

Ref	Summary of Contributions	Contributor	EIB comment
65.	As a priority, the EIB should end the financing of any expansion / capacity increase in motorways and highways. Considering the huge efforts needed to decarbonize European mobility, public finance should support sustainable transport modes and infrastructures, and fund research to develop means of reducing traffic.		zero emission transport technologies for the decarbonisation of public fleets, with the development of related infrastructure.  In support of this, the EIB will focus on collective, active and shared mobility schemes, ITS and digital solutions, rehabilitation of urban roads and streets and certain sustainable road vehicle fleets.
66.	As a priority, the EIB needs to end support/financing of: <ul style="list-style-type: none"> <li>- any expansion / capacity increase in motorways and highways.</li> <li>- LNG terminals, and LNG fuelled vessels;</li> <li>- port expansions in Europe and related transport and industrial infrastructure including the expansion or creation of special economic zones;</li> <li>- airlines and aircraft manufacturing except for synthetic fuels such as power to X made from additional renewable electricity;</li> <li>- manufacturing of internal combustion engines (including hybrid vehicles) in the automotive sector</li> <li>- gas vehicles for transport and the associated production, transport, distribution and refuelling infrastructure</li> <li>- biofuels and blue hydrogen as alternative fuel source.</li> </ul>		The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR). The CBR refrains the EIB from supporting biofuels production that make use of feedstocks that can serve as food or compromise food security.  The priorities to support avoid and shift investments can be found in Chapter 2 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.
67.	As a priority, the EIB should support: <ul style="list-style-type: none"> <li>- the electrification of trucks, coaches and vessels and not support powertrains relying on gas, biofuels, or oil;</li> <li>- financing for zero-carbon transport infrastructure, new mobility concepts, active mobility, urban electric public transport and rail electrification, and zero-emission multimodal transport services.</li> <li>- renewal of public transport fleets towards zero emissions vehicles, especially to promote joint tenders of various cities across Europe.</li> <li>- renewal and electrification of rolling stock for rail passengers transport (including night trains).</li> <li>- urban and local roads only if actively contributing to sustainable mobility (more space devoted to pedestrian, public transport, active mobility).</li> </ul>		
68.	The EIB should use the possibility of applying stricter standards than in the EU taxonomy.		



Ref	Summary of Contributions	Contributor	EIB comment
69.	R&I should be limited to zero-emission technologies and new mobility concepts and not enable small incremental innovation to be eligible for EIB loans.	Joint contribution made by NewClimate Institute and Germanwatch	See response to points above.
70.	The EIB should stop any funding for R&I in any crop-based biofuels and only support research on advanced (waste/residues) biofuels and renewable synthetic fuels for aviation and renewable hydrogen and ammonia for shipping.		
71.	<ul style="list-style-type: none"> <li>- Avoid transport needs</li> <li>- Enabling modal shift with transport-oriented development in urban contexts.</li> <li>- Investment roadmap to completely decarbonise / electrify European rail</li> <li>- Efficient, forward-looking freight infrastructure. Shipping – foster the research, development, and deployment of decarbonisation solutions (including for ports)</li> <li>- Building the required infrastructure to support electric (shared) mobility</li> <li>- Dense urban environments should be front-running in the transition</li> </ul>		
72.	We do see a role and important need to support the development and upscaling of synthetic alternative fuels based on renewable energy. LNG, which is a fossil fuel, should not be supported as a shipping fuel. Current electric mobility does not permit long-distance transport. Thus, for maritime (and aviation) transport, with no to limited possibility to refuel, alternative solutions may be needed, such as renewable synthetic fuels.		

Question 2 -If you believe the EIB should prioritise its support for the transport sector in another way, please indicate how:

Ref	Summary of Contributions	Contributor	EIB comment
1.	In the above ranking pedestrian and bicycle infrastructure is missing. I would give them the highest priority.	Response 1039141480	<p>The EIB notes that pedestrian and bicycle infrastructure is broadly included under urban transport in the question referred to – along with other transport sub sectors such as urban public transport and urban roads.</p> <p>The EIB also notes that pedestrian and bicycle infrastructure may also be included as part of other transport projects as integrated infrastructure. Such investments are a high priority for the EIB.</p>
2.	Even though it may be understood that is included in urban transport, pedestrian and cycling infrastructures are vital to decarbonization. Besides pedestrian and cycling security is a key element to reduce fatalities and injuries.	Miguel de Ortuzar	
3.	Public access (without needing a car)	ASDF	
4.	Rail infrastructure	OTIF	<p>Rail is an important transport mode and is an essential part of many sustainable and multi-modal transport systems. Extra-urban rail and urban collective mobility systems are identified EIB priority areas and can contribute to, inter-alia, environmental and climate objectives.</p> <p>The EIB supports the development of the railway sector, including investments in rail infrastructure and rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Please see Chapter 5 of the revised TLP for the EIB's approach to the railway sector.</p>
5.	The support should give a large recognition to transition fuels and technologies as recognized by the Taxonomy regulation. We understand this is the today's approach as foreseen by the EIB Group Climate Bank Roadmap 2021-2025, which "will continue to provide support for LNG-fueled vessels".	Costa Group	<p>The EIB will continue to support both the development of new technology in the transport sector, and its roll out at scale and in compliance with the EIB's CBR. It is already the case for investment needs related to electrification in the road sector. As mentioned in Chapter 5 of the revised TLP, the deployment of E-buses, taxis and automated shuttles and the related charging infrastructure, as well as other clean vehicles, will be a particular focus for the EIB. In other transport sectors, the transition requires other technological solutions (e.g. hydrogen, or bio-fuels or synthetic fuels for aviation, or from bio-based to synthetic energy carriers in case of shipping, etc.). The EIB will remain technology-neutral in its</p>
6.	GHG emissions reduction at minimum costs and maximum impact can be reached by prioritizing the sub-sectors based on their individual GHG contribution and the cost of abatement.	Ralph-Uwe Dietrich	
7.	Take Well-to-Wheel GHG avoidance costs per t/km and capita provide a good basis for decisions	Antje Wiilnow	

Ref	Summary of Contributions	Contributor	EIB comment
8.	Prioritisation should be done based on the contribution of transport projects to the overall decarbonation of the sector and in particular their CO2 emissions per passenger and freight. In particular, zero emission projects should have priority over non-zero emission ones.	UNIFE	investments, and open to new technological developments and alternative fuels. It has been based on the work of the EU Technical Expert Group and the EU Taxonomy. As per the <a href="#">EIB Climate Adaptation Plan</a> , supporting implementation of information measures (e.g. intelligent transport systems and other measures that can provide early warning and user response) will increase climate resilience on transport.
9.	Some sectors should invest themselves in decarbonation, like car industry, aviation, and leave money lending to subsidized and more essential transportation: public transport, rail, sub-urban rail.	STIB-MIVB	EIB support to energy infrastructure is described in the <a href="#">EIB Energy Lending Policy</a> and the EIB CBR.
10.	An alternative possibility could be to prioritize according to the urgency or necessity level. The possibility to invest rapidly towards significantly important and key-point sectors, as well as vulnerable areas.	Ministry of Transport and Infrastructure	The EIB follows a carbon footprint methodology for the assessment of project GHG emissions and emission variations. The EIB's methodology for assessing and reporting the carbon footprint of projects is described in the document "EIB Project Carbon Footprinting Methodologies", available at: <a href="https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf">https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf</a>
11.	Prioritisation should also cover the financing structure under the loan with a specific focus on direct payment rights, sustainable terms of payment and if & when relevant rating monitoring on bank guarantee.	Alstom	The EIB recognises that governance and financial structures may vary by location, transport sector and by individual projects. It is typically a function of markets, regulatory and other operating environments. Relevant financial terms for EIB finance are negotiated and determined at the relevant stage of the life-cycle for potential operations, and is based on many factors including capacity of the Borrower and associated risks.
12.	EIB is very selective and demanding on the projects characteristics with a focus on their ESG impact. We believe it could worth deliver more funds to most sustainable projects also providing for more incentives in terms of pricing in this respect. This could motivate the companies to do better and EIB to become even more rewarding.	Ferrovie dello Stato Italiane S.p.A	The TLP highlights that the Bank allows for the achievement of multiple objectives among Safety and Security, Accessibility, Greenness (environment) and Resilience as well as Efficiency in parallel. As such, the EIB prioritizes those projects and activities that accelerate most the transformation towards sustainable transport systems.
13.	- low interest rate or null; - increase in grace period.	Município de Lousada	
14.	Through investments (significant risk taking must be secured/depreciated)	SNCF	
15.	Combined Transport infrastructure (terminals)	OTIF	As transport will be increasingly multimodal and international, the efficiency of door-to-door journeys of peoples and goods will also be more and more dependent on seamless
16.	An additional and transversal subsector should be added to cover investments in multi-modal transport hubs that can support decarbonisation through modal shift.	European Union Agency for Railways	

Ref	Summary of Contributions	Contributor	EIB comment
17.	Maximising access through investments in projects that support an integrated system of low carbon transport services that enable industry and individuals to develop sustainably should take precedence over efforts to decarbonise individual transport modes.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	<p>connections between different transport modes and between countries, in particular within the Single Market of the EU.</p> <p>The EIB recognises the importance of (mapping) both intermodal and multimodal transport systems, as well as the compounded opportunities therein to contribute at a system-wide level to the four pillars of sustainable transport: (1) Safety and Security, (2) Accessibility, (3) Greenness and Resilience, and (4) Efficiency.</p> <p>The EIB follows a carbon footprint methodology for the assessment of project carbon emissions. Its approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR).</p>
18.	If the objective is focused on decarbonisation, support is also possible indirectly through the energy market.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr, FEBIAC	<p>Support for the energy sector is covered in the EIB's Energy Lending Policy (<a href="https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf">https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf</a>) as well as in the EIB Climate Bank Roadmap.</p>
19.	Support the production of green electricity and green hydrogen.	Arthur D. Little	<p>The EIB supports the production and supply of green electricity and hydrogen, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table A which is in line with the criteria set out in the Energy Lending Policy:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a> and <a href="#">EIB energy lending policy - Supporting the energy transformation</a>.</p> <p>In addition, under conditions set out in the EU Taxonomy first Delegated Act, these investments can account to the EIB Group climate action and environmental sustainability targets. The revised transport lending describes in chapter 5 the priorities for EIB support which include support to vehicles and vessels with low and zero tailpipe emission which includes those with electric propulsion (running on electricity and hydrogen).</p>

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			The TLP does not cover the production and distribution of hydrogen which are covered under the ELP.
20.	In the pillars of the Way Forward, the pillar on safety could be expanded to include safety against climate shocks (floods, heatwaves, sea level rise, and droughts).	Everbridge	<p>The pillar on green (environment) covers these environmental factors.</p> <p>The EIB approved its first <a href="#">Climate Adaptation Plan</a> in 2021, with the aim to strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure. It describes, among other things, how the EIB will increase its efforts to promote the consideration of physical climate risk in investment decisions.</p> <p>The EIB's Adaptation Plan is available at: <a href="https://www.eib.org/en/publications/the-eib-climate-adaptation-plan">https://www.eib.org/en/publications/the-eib-climate-adaptation-plan</a></p>
21.	Climate potential of inland waterways is not yet released. Extra financial support could be defensible.	Federation of Belgian Enterprises FEB-VBO	EIB shall continue to support the waterborne transport sub-sectors – including maritime and inland waterways transport. The EIB shall, inter-alia, support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet through the financing of new-builds as well as the retrofitting of existing vessels.
22.	Complementarity of the public-private investment and the value-added in terms of efficiency and environmental gains through free cross-border transport services should be one of the key criteria for financing at the EIB.	BusinessEurope	<p>The Transport Lending Policy recognises and emphasises the importance of private sector involvement in the financing and delivery of sustainable transport infrastructure. Many EIB operations in the transport sector include public and private support at differing levels.</p> <p>The EIB has supported and will continue to support PPP/concession-type projects in the transport sector when demonstrated to be the appropriate way forward – including in terms of value for money.</p>
23.	Priorities shall be aligned with the United Nations SDGs and targets set by European policy strategies, including incentives to promote Circular Economy principles within and across modes.	ECTRI	The framework adopted in the TLP for prioritising EIB support draws on the United Nations' Sustainable Development Goals as well as the European Commission's Green Deal and the Smart and Sustainable Mobility Strategy. It closely follows EU

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			<p>policies and principles (including the principles of circular economy), and contributes to European aspirations to transformation of the transport sector, alongside other sectors, so as to achieve greenhouse gas emissions neutrality by 2050.</p> <p>Moreover, the 2022 EIB Group Environmental &amp; Social Sustainability Framework (ESSF) defines the Group's vision to 2030, which is to actively contribute to new sustainable development and inclusive growth in all sectors, including Transport. It is the Group's response to the global environmental and social challenges and opportunities of our time.</p>
24.	<p>The EIB should more directly support the ongoing efforts of Europe's shipyards to build and retrofit innovative climate-neutral ships as well as Europe's maritime equipment companies to manufacture and supply climate-neutral maritime technologies and maritime applications of clean fuels. Additionally, financing support will be key for the availability of infrastructure and the ability of the European port and waterway authorities to provide zero-emission and climate-resilient infrastructure.</p> <p>EIB should finance not only « ships », or « infrastructures », but « ecosystems », that would be able to solve the chicken-and-egg problems, for decarbonization as well as for automated vehicles.</p>	SEA Europe (European Shipyards and Maritime Equipment Association)	<p>EIB shall continue to support the waterborne transport sub-sectors – including maritime and inland waterways transport. The EIB shall, inter-alia, support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet through the financing of new-builds as well as the retrofitting of existing vessels.</p>
25.	It would be interesting for the policy to take local resources into account, and focus on "poor" sectors	Ministère de la Transition écologique	<p>Support both inside and outside the EU will be considered, amongst other factors, on their contribution to increasing cohesion, and alleviating transport poverty in less developed regions and partner countries, while taking into account local needs and conditions. Resource efficiency and circular economy are important aspects of sustainability and is a priority in the TLP.</p> <p>The EIB will also prioritise projects implemented in the context of an Integrated Regional Development program or equivalent plans designed to ensure a balanced territorial development or</p>

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			to address issues of accessibility or transport poverty. The Bank's external mandate also include provisions for the support of such projects outside the EU.
26.	The EIB should rank each sector's potential development from "very developed" to "rejected or abandoned". Aviation or truck transport should be largely abandoned in favour of rail freight, for example.	Response 981558580	<p>Multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions. Investments in safer and greener modes, like public transport and walking and cycling, need to be made in a multimodal and land-use context to harness their maximum potential, incorporating also last mile considerations into investment decisions concerning transport between hubs. Also, supporting investments in digitalisation are needed for efficient multimodality, both in freight and in passenger transport.</p> <p>The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed emphasise the role of the transport sector in the EU's broader development and decarbonisation efforts. The EIB's CBR specifies the types of investments that the Bank considers compatible with the goals of the Paris Agreement and that, therefore, are eligible for EIB support.</p>
27.	Investment in paratransit electrification/retrofitting should be the priority in urban public transport.	WhereIsMyTransport	<p>Due to their relatively small investment size, these types of investments are usually bundled, for example with other transport schemes as part of comprehensive urban or regional development programmes/plans and justified in that context.</p> <p>The EIB will also prioritise support for investments in the development of vehicle sharing services, to foster efficiency in the use of space and vehicles. As indicated in the EIB's Climate Bank Roadmap (CBR), measures and retrofits that bring demonstrable environmental, safety and security improvements (excluding mid-life retrofits that significantly extend the physical life of the asset) are eligible for all types of fleet.</p>
28.	The EIB needs to prioritize their role as the institution that de-risks investment in nascent technologies. We believe there is a crucial role of the EIB in identifying the technologies that could be more useful to decarbonize transport and invest	Global Infrastructure Investor Association	The scope of the TLP is limited to EIB support to the roll-out of new technologies and to investment in mature Paris-aligned technologies in the transport sector and the provision of mobility services.

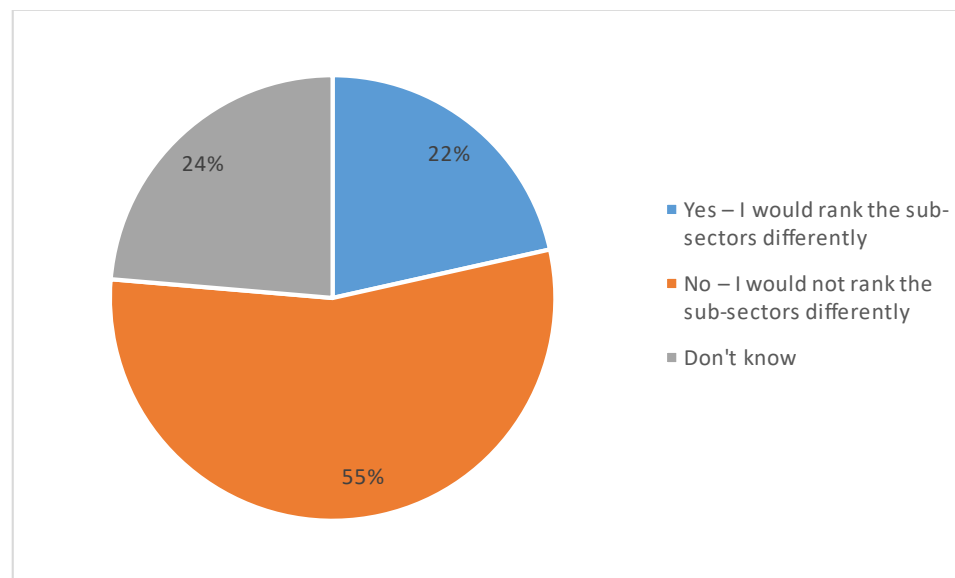
Ref	Summary of Contributions	Contributor	EIB comment
	<p>heavily in them. Once the system is up and running at a considerable scale, then long term investors can replace the role of the EIB and continue investing in this technology and finding new ways to apply it.</p> <p>Success for the EIB should be measured on whether the EIB can deploy capital to projects that deliver new investment and provide additionality within the market.</p>		<p>The TLP applies to all types of instruments used to extend the EIB's support: investment loans, intermediated lending, as well as risk-bearing and risk-sharing operations, such as equity-type instruments, including investments in funds. The EIB's framework for assessing the additionality and impact of projects and its own intervention is described in: <a href="https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make.alternatives%20is%20defined%20as%20additionality">https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make.alternatives%20is%20defined%20as%20additionality</a></p> <p>The AIM assessment applies to projects financed by the EIB. It seeks to show how the EIB delivers additionality and impact, including social and environmental impacts.</p>
29.	If a multimodal approach in new infrastructures is adopted probably less resources would be needed, and the carbon footprint would be reduced	Miguel de Ortuzar	<p>Multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions. Investments in safer and greener modes need to be made in a multimodal context to harness their maximum potential, incorporating also last mile considerations into investment decisions concerning transport between hubs. Also, supporting different types of investments in new (types) of infrastructure, such as through digitalization, are needed for efficient multimodality, both in freight and in passenger transport.</p> <p>The framework adopted in this TLP for prioritising EIB support draws on the United Nations' Sustainable Development Goals as well as the European Commission's Green Deal and the Smart and Sustainable Mobility Strategy.</p>
30.	Different transport modes have different pathways to decarbonization. The development of technologies is also at different stages. Thus needs for financing will be different.	CEOE	
31.	Rather than focusing on decarbonization by sub-sector, EIB should take a whole-system approach, analyzing how transport modalities may shift within the sector from one sub-sector to the other. The link of decarbonizing transport needs to be made explicit in the context of the Green Deal and the EU's connectivity strategy.	E3G	
32.	<p>As a matter of priority the EIB should:</p> <ul style="list-style-type: none"> <li>- Make the reduction of transport demand a central goal in the Transport Lending Policy.</li> <li>- End the financing of any expansion or capacity increase in motorways and highways.</li> <li>- End support and financing for LNG terminals, and LNG fuelled vessels.</li> </ul>	Greenpeace	<p>The EIB's Climate Bank Roadmap, Annex 2, Table C, specifies the types of transport investments that are not considered as aligned with the Paris Agreement and therefore excluded from EIB support, as well as highlights support for investments in clean and collective transport:</p>



Ref	Summary of Contributions	Contributor	EIB comment
	<ul style="list-style-type: none"> <li>- End the support and financing of port expansions and related transport and industrial infrastructure including the expansion or creation of special economic zones.</li> <li>- End the financing to airlines and aircraft manufacturing except for synthetic fuels such as power to X made from additional renewable electricity.</li> <li>- Only support the electrification of trucks, coaches and vessels and not support powertrains relying on gas, biofuels, or oil.</li> <li>- End loans for the manufacturing of internal combustion engines (including hybrid vehicles) in the automotive sector.</li> <li>- End support to gas vehicles for transport and the associated production, transport, distribution and refuelling infrastructure.</li> <li>- End support for biofuels and blue hydrogen as alternative fuel sources.</li> <li>- Support and scale up financing for zero-carbon transport infrastructure, new mobility concepts, active mobility, urban electric public transport and rail electrification, and zero-emission multimodal transport services.</li> <li>- Support renewal of public transport fleets towards zero emissions vehicles, especially to promote joint tenders of various cities across Europe.</li> </ul> <p>Support renewal and electrification of rolling stock for rail passengers transport (including night trains).</p> <ul style="list-style-type: none"> <li>- Funding to urban and local roads must be conditioned on actively contributing to sustainable mobility (more space devoted to pedestrian, public transport, active mobility).</li> <li>- Use the possibility of applying stricter standards than in the EU taxonomy.</li> </ul>		<p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The TLP does indeed consider safety, accessibility and efficiency as critical dimensions of transport systems, alongside their climate and environmental sustainability.</p> <p>The EIB supports projects that are in line with EU policies, including emission targets, and its own CBR. Annex 2 of the CBR contains detailed information about the emission standards applied to the different sectors of EIB support.</p> <p>The EIB recognizes the importance of a robust planning framework in the transport sector. The EIB advisory and technical assistance offer to support strategic planning and early project preparation is becoming an increasingly important facet of the added value of EIB participation in projects (e.g. there is an increasing demand for advisory services from the Joint Assistance to Support Projects in European Regions (<a href="#">JASPERS</a>) to support strategic planning of transport investments). Planning is a key stage to develop a sound and sustainable project pipeline aligned with Paris Agreement objectives, in particular:</p> <ol style="list-style-type: none"> <li>1. to decarbonize transport promoting ASI principle (Avoiding unnecessary traffic /reducing need for long-distance travel; Shifting traffic to more environmentally friendly modes and decarbonizing all modes; Improving the remaining traffic – through all means including technology that in turn also includes the change of drive trains from internal combustion engines to electrification of mobility). It is essential that transport planning is coordinated with land/spatial planning to achieve the overall climate mitigation targets.</li> <li>2. to ensure climate resilience of transport infrastructure and services. It requires undertaking customized climate resilience assessments to identify measures that mitigate climate risk to “acceptable levels”.</li> </ol>
33.	<p>The focus of the EIB should be on reducing demand in carbon-intensive transport including a drastic reduction in air travel, less cars and freight transport, and promoting instead public transportation, active mobility, shared zero emission vehicles and modal shift. The EIB needs to recognize that the endless growth of road, air and maritime transport is unsustainable and may lead to future stranded assets. It is crucial to avoid any further lock-ins into carbon intensive</p>	CEE Bankwatch Network	

Ref	Summary of Contributions	Contributor	EIB comment
	<p>infrastructure, including for instance motorways and highways. While the EIB is certainly interested in financing more climate-friendly projects, unfortunately its impact is still severely impaired by its financing of climate-damaging projects. Considering the huge efforts needed to decarbonize European mobility, public finance should support sustainable transport modes and infrastructures, and fund research to develop means of reducing traffic (for example through better urban and spatial planning).</p> <p>In the face of ambitious international goals to promote sustainable development and to stem climate change and its negative effects, a transformation of urban life can make a significant contribution to reducing emissions, consumption, and land use.</p> <p>However, in order for the urban infrastructure to be truly sustainable, it must meet the needs of the people who will use it – meaning citizens must be involved in its planning – and it must meet the highest criteria in terms of its impact on the environment and human well-being.</p>		<p>Moreover, the EIB, as part of its environmental and social standards, considers stakeholder engagement as a cornerstone of sustainable and inclusive planning and project preparation and implementation.</p> <p>The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift demand to more sustainable modes of transport and improve transport efficiency and reduce environmental and climate externalities.</p>

### Question 3 – Outside the European Union would you rank these sub-sectors differently?



Ref	Summary of Contributions	Contributor	EIB comment
1.	<b>Different regions</b> pose nuanced challenges. Outside of the EU, affordability and equality is a key factor in other region's mobility decisions - especially in lower-income countries. Focussing on the mobility needs of the poorest in society and how sustainable transport measures can empower livelihoods.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	Whilst the implications of poor connectivity and market access still require significant investment in the EU, the EIB recognizes that the same issues can be further magnified in developing countries outside Europe. High-quality strategic and regional transport networks are needed as the basis for economic and social development, where some challenges in developing countries are transport sector-specific.
2.	Depending on different local conditions and industrial development	Budapest Airport Zrt.	As needs, capacities (including to afford and deliver transport) and operating environments differ, one cannot assume that the same solutions can be deployed in developing countries, or in the same timescale, as is happening elsewhere. It is therefore important to take account of the local and regional context. This may be supported, for example, through technical assistance. At the same time it is important that international

Ref	Summary of Contributions	Contributor	EIB comment
			financial institutions do not contribute to “locking in” developing countries to a non-sustainable development path. Please see Chapter 2 of the TLP, for the EIB’s priorities in Connectivity, Equal Accessibility and Development.
3.	When considering public transport, we should take the “affordability” issue into account and of course a public transport network that reaches all districts of the metropolitan area. Investing in cycling and pedestrian infrastructures is very important. Unfortunately outside European Union road transport plays an important role and aiming at reducing fatalities and injuries large investments in road maintenance and new infrastructures to reach metropolitan areas may be needed, and of course to foster transborder mobility.	Miguel de Ortuzar	As above.  In addition, road safety remains a high priority to the EIB on both urban and inter-urban road investments as mentioned under i) Safe and Secure Transport, ii) Urban Mobility, and iii) Extra Urban Roads, Road Safety.
4.	The short distances in EU leads people to use the car. This is different outside the EU with bigger distances.	Response 832108188	Taking into account various transport and mobility needs and contexts, including geographic and location differences, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap.  The EIB supports investments in clean, safe and secure collective transport, including in the urban sphere, inside and outside of the EU, as also specified in the EIB’s Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  As explained in the Transport Lending Policy, such investments in collective transport are a priority for the EIB.
5.	In less developed regions of the globe, it is maybe easier to face the environmental issues and the decarbonisation problems due to transport, and prioritise the modes of transport that need more financing or that pollute more. In developed countries, the problems have already been considered, and relevant measures applied.	Município de Faro	
6.	Public transport in large, less developed cities,	STIB-MIVB	
7.	Urban public transport is a major future challenge for many cities around the world, more so than those in the European Union, which is already more advanced in this field and whose cities are reasonable in size.	Response 704118868	
8.	The most important are the cities	Marc-Olivier Leclercq	
9.	More than 50% of the population is concentrated in cities and urban public transport is key for quality of life. A shift shall be promoted from individual road transport (car-based) to a reduction of transport and shifting unavoidable transport to more sustainable options and more safe and secure.	ECTRI	
10.	All regions globally have the same priorities for climate change mitigation. The only exception would be that for rural communities in emerging economies road infrastructure may be higher priority due to poor current quality of road	International Union of Railways	

Ref	Summary of Contributions	Contributor	EIB comment
	infrastructure as long as it is there to better connect to other more sustainable forms of transport and considers the priority for public transport (buses) and walking/cycling.		
11.	Some countries are landlocked hence not much maritime	Mutakwa Samuel Sikazwe	
12.	Maritime and aviation play another role in the intracontinental logistic mix	Federation of Belgian Enterprises FEB-VBO	
13.	A core difference lies in the available policy support and framework conditions, not least with regard to access to financing, in support of domestic maritime industries and to attract orders at domestic shipyards from international clients. SEA Europe suggests the EIB to very closely monitor, assess and take into account current ship financing trends, practices and instruments available in key (Asian) shipbuilding nations. It is vital that EIB financial support focuses on maritime projects of real European added value to ultimately favor European-grown maritime technology development, rather than oversea competitors in the far-East Asia, and thereby contribute to boost Europe's long-term industrial growth, competitiveness, and strategic autonomy..	SEA Europe (European Shipyards and Maritime Equipment Association)	Please see Chapter 5 of the TLP for the EIB's priorities in inland waterways and maritime transport. Moreover, the EIB's framework for assessing the added value and impact of projects and its own intervention is described in: <a href="https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality">https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality</a> .
14.	Growth in emissions from road transport is an even more serious concern outside the EU, not only for its climate impacts, but for internal combustion vehicles' impacts on health and quality of life.	Bank Information Center	Taking into account various transport and mobility needs and contexts, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap.
15.	The ranking also depends on the economic, societal and ecological structure, which differs outside the EU	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed emphasise the role of the transport sector in the EU's broader decarbonisation efforts, both inside and outside the EU. The EIB's CBR specifies the types of investments that the Bank considers compatible with the goals of the Paris Agreement and that, therefore, are eligible for EIB support.  Moreover, the EIB approved its first Climate Adaptation Plan in 2021, with the aim to strengthen investment and technical support to protect projects from the impact of more extreme
16.	Decarbonisation is a global problem. Therefore the <b>ranking is also global</b> .	Response 1039141480	
17.	Same problems in every industrialized country.	Hanns Kerschner	
18.	Decarbonisation is also most urgently needed outside the EU for those modes of transport that emit a lot of CO2.	Response 974008607	

Ref	Summary of Contributions	Contributor	EIB comment
19.	Priority must be given to transport that reduces greenhouse gas emissions in order to achieve carbon-neutrality objectives such as rail transport.	SNCF	weather and increase climate resilience of existing and new infrastructure. It describes, among other things, how the EIB will increase its efforts to promote the consideration of physical climate risk in investment decisions.
20.	The measure should be the same: GHG emissions reduction at minimum costs and maximum impact – the contribution of each sub-sector might differ in different countries.	Ralph-Uwe Dietrich	The EIB's Climate Adaptation Plan is available at: <a href="https://www.eib.org/en/publications/the-eib-climate-adaptation-plan">https://www.eib.org/en/publications/the-eib-climate-adaptation-plan</a>
21.	As a result of globalization, pollution problems are also global.	MÁV-Volán Group	
22.	No different ranking because environmental/climate-related burdens are the same outside EU.	Antje Willnow	
23.	As transport modes are developed mainly for a worldwide market and standards are usually set at global/regional level, a different ranking is not necessary. However, in some countries public transport is more widely used by the general public. In order to ensure accessibility for all, a strong focus on decarbonizing transport modes that benefit all is key.	Ministry of Infrastructure and water Management	<p>EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed emphasise the role of the transport sector in the EU's broader decarbonisation efforts. The EIB's CBR specifies the types of investments that the Bank considers compatible with the goals of the Paris Agreement and that, therefore, are eligible for EIB support.</p> <p>The EIB will continue to support investments in clean, safe and secure collective transport, including in the urban sphere, inside and outside of the EU, as also specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
24.	Although needs vary from region to region (and so does the weight of the sectors in contributing to CO2 emissions), there should be a level of homogeneity that gives investors reassurance and stability on the policy frameworks that the EIB will use.	Global Infrastructure Investor Association	<p>The EIB TLP will be its policy document for a number of years and also linked to other EIB and EC policies and strategies. Any changes or adjustments will be communicated in due time in line with procedures.</p> <p>The EIB's Climate Bank Roadmap (CBR) specifies the types of investments that the Bank considers as aligned with the Paris Agreement and eligible for EIB support.</p> <p>In the longer term, the EU has set itself a target of being climate-neutral by 2050, fostering an economy with net-zero greenhouse gas emissions. This objective is at the heart of the European Green Deal and in line with the EU's commitment to global climate action under the <a href="#">Paris Agreement</a>.</p>

Ref	Summary of Contributions	Contributor	EIB comment
			<p>This requires current greenhouse gas emissions to drop substantially in the coming decades. As an intermediate step towards climate neutrality, the EU has raised its 2030 climate ambition, committing to cutting emissions by at least 55% by 2030, as currently embedded in the so-called Fit for 55 Package, which aims to align the EU's Climate, Energy and Transport legislation with this goal.</p> <p>The EIB is a key partner for the EU and its Member States in the attainment of the 2030 and 2050 targets. This will continue to be mirrored in the Bank's goals, policies and long-term support to EU and global decarbonisation efforts.</p>
25.	All EIB investments should go in future-proof, transformative transport projects that work towards a just transition, whether in or outside the EU. There should not be any double standards allowing the EIB to finance carbon-intensive transport projects outside of Europe.	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace	The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed emphasise the role of the transport sector in the EU's broader decarbonisation efforts, both inside and outside the EU. The EIB's CBR specifies the types of investments that the Bank considers compatible with the goals of the Paris Agreement and that, therefore, are eligible for EIB support.
26.	The investments priorities hold true at a global scale.	Joint contribution made by NewClimate Institute and Germanwatch	<p>The SDGs are comprehensive and recognise that any transformation must balance social, economic and environmental aspects of sustainability. Sustainable transport and mobility is fundamental in achieving many of the SDGs, so transforming transportation means finding a balance between all these aspects. A Sustainable Transport system must meet the needs of the present by providing the necessary mobility services, but without compromising the ability of future generations to meet their own needs.</p> <p>Please see Chapter 4 of the TLP on Transforming Transportation.</p>
27.	A key criterion is who is the sponsor of the action and if the sponsor is capable to implement the actions (if the institution has access to financing and co-financing).	Institute for European Cooperation	Whilst the problems of connectivity and market access still require significant investment in the EU, the EIB recognizes that the same issues are further magnified in developing countries outside Europe. High-quality core transport networks, taking into account both sectoral needs and multimodality, are needed as the basis for economic and social
28.	Due to the high variety of specific transport development, each state has a different development.	Ministry of Transport and Infrastructure	

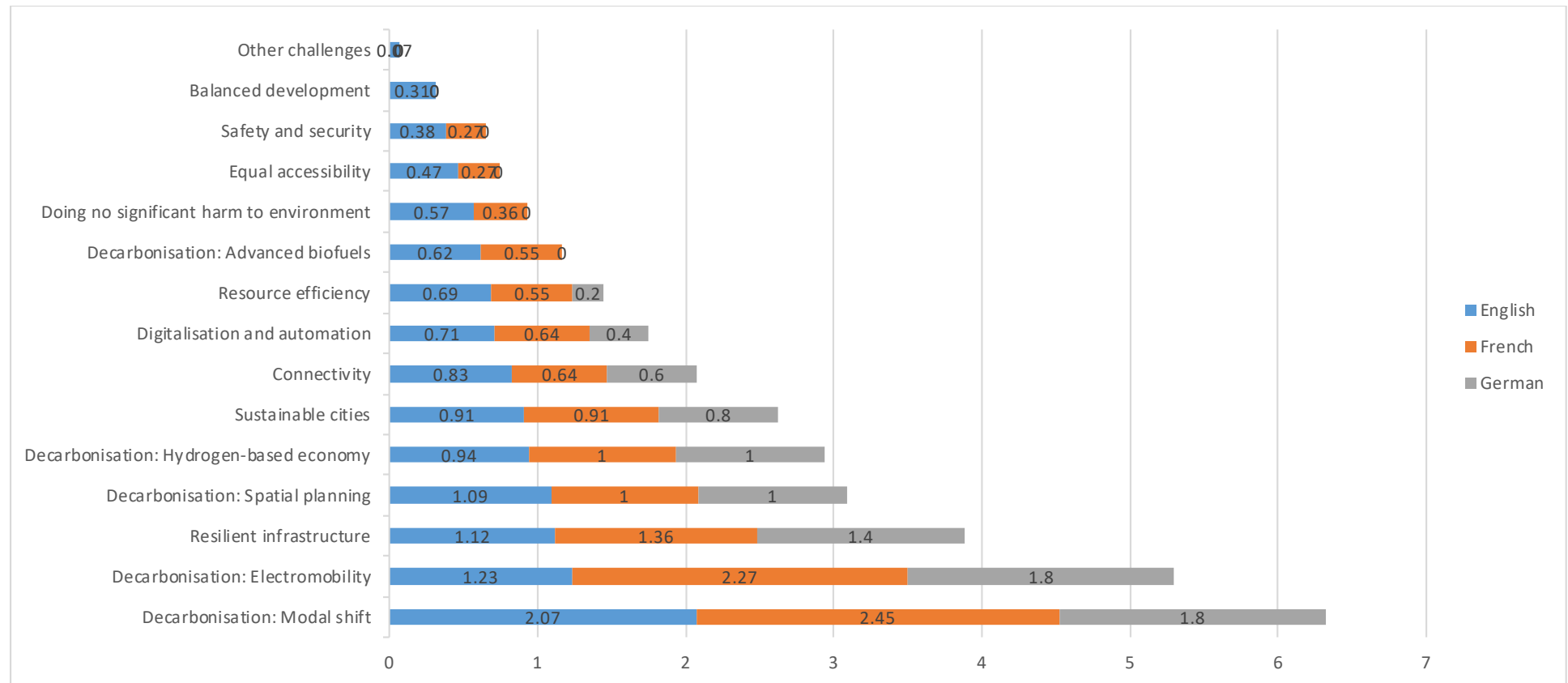
Ref	Summary of Contributions	Contributor	EIB comment
29.	An analysis needs to be made based on context.	Everbridge, Joint contribution made by NewClimate Institute and Germanwatch	<p>development, where some challenges in developing countries are transport sector-specific.</p> <p>As needs, capacities (including to afford and deliver transport) and operating environments differ, one cannot assume that the same solutions can be deployed in developing countries, or in the same timescale, as is happening elsewhere. It is therefore important to take account of the local context, including the need for technical assistance. At the same time it is important that international financial institutions do not contribute to “locking in” developing countries to a non-sustainable development path.</p> <p>Taking into account various transport and mobility needs and contexts, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap (CBR). According to this Roadmap, all EIB activities need to be aligned with the Paris Agreement temperature and adaptation goals, and “consistent with pathways towards low-carbon and climate-resilient development”.</p> <p>Please see Chapter 2 of the TLP, for the EIB’s priorities in Connectivity, Equal Accessibility and Development.</p>
30.	EU real economy much relies upon trade and commercial exchange of goods, so priority to road infrastructures and freight transport sector must be given.	European Road Haulers Association (UETR)	
31.	Depending on the economic structure of a given country.	Ministry of Infrastructure	
32.	It is important that investments outside the EU are dedicated to transformative activities. Therefore, the EIB should apply rigorous standards that do not undermine those set inside the EU.	WWF EPO	
33.	Coupled with loan guarantees, grants and tax support for carbon capture and storage (CCS) and green bond investments, the USA are clearly becoming the most advanced region of the world to produce and use SAF. We have been disappointed by the interest/support to SAFs granted in the national Recovery Plans. This does not bode well for the EU’s sustainable aviation fuels ambitions, also impacting the competitiveness of the transport sector and the speed of decarbonisation in Europe.	Airlines for Europe A4E	<p>EIB support to the aviation sector will be in line with the EIB CBR. In general, EIB support will follow EC policy priorities including the greening of fleets.</p> <p>The EIB also supports investments in alternative fuels, as well as in hydrogen vehicles and vessels and its supporting infrastructure, as specified in the EIB’s Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p> <p>Please see Chapter 5 of the TLP for the EIB’s broader approach to Aviation, including its priorities in decarbonisation and operational resilience.</p>



Ref	Summary of Contributions	Contributor	EIB comment
34.	In order to achieve good environmental friendliness of transport, rail and water transport must be prioritized	Railway Signalling Automation Telecommunication And Industry Association	Taking into account various transport and mobility needs and contexts, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap. Please see Chapter 5 of the TLP for the EIB's priorities in rail, inland waterways and maritime transport.
35.	The decarbonization/green transport objective should be looked at in conjunction with other transport objectives that support the achievement of SDGs. In particular the accessibility aspect and road safety need to be improved with investment in road transport in many countries. Increasing efficiencies in transport is also important.	UNECE	The framework adopted in this TLP for prioritising EIB support draws on the United Nations' Sustainable Development Goals as well as the European Commission's Green Deal and the Smart and Sustainable Mobility Strategy. All road projects supported by the EIB will be developed with due attention to road safety to support of the Safe System approach, the UN Global Plan, and the EU Road Safety Policy Framework 2021-2030.
36.	Although in Africa rail transport will take a long time, it should still be prioritized over lorries in the long term.	Response 981558580	The EIB supports the development of the railway sector globally, including investments in rail infrastructure and rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  Please see Chapter 5 of the TLP, for the EIB's priorities in Rail and Road Vehicle Fleets.
37.	The subsectors and the related sustainable investment priorities towards decarbonisation help the fight for climate change, which is a global challenge.	European Union Agency for Railways	The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed emphasise the role of the transport sector in the EU's broader decarbonisation efforts, both inside and outside the EU. The EIB's CBR specifies the types of investments that the Bank considers compatible with the goals of the Paris Agreement and that, therefore, are eligible for EIB support.
38.	Climate mitigation objective should be pursued so to prioritise transport modes that reduces greenhouse gas emissions.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways	
39.	Regarding the maritime transport, the situation is the same worldwide.	CEOE	Please see Chapter 5 of the TLP for the EIB's priorities in inland waterways and maritime transport.
40.	There is no difference between EU and non EU, in terms of sub-sectors identified.	Croatian motorways Ltd	Please see chapters 2 and 4 of the TLP on multimodal and intermodal solutions, and on Efficient Transport.

Ref	Summary of Contributions	Contributor	EIB comment
41.	We are living in globalized world with supply chain economy. This pandemic and climate change showed us how fragile our transportation infrastructure and transport of passengers and goods are. If we want to have free market and flow of goods and people then we must take all of this into account.	Croatian Chamber of Economy	
42.	Aviation is a truly global industry that requires harmonization of approaches and standards, to ensure emissions are addressed worldwide.	Aerospace and Defence Industries Association of Europe (ASD), AIRBUS	Please see Chapter 5 of the TLP for more information on the EIB's priorities in the aviation sector.
43.	The European shipping industry is a truly global industry. To maintain and advance its competitive edge vis-à-vis its key global competitors (notably in the Far East), EU shipping needs access to competitive financing in Europe.	ECSA, SEA Europe (European Shipyards and Maritime Equipment Association)	Please see Chapter 5 of the TLP, for the EIB's priorities in inland waterways and maritime transport

Question 4 – Within the European Union, please rank the top five challenges facing the transport sector, as identified by the EIB (see pages 6-20 of the consultation document), that you believe are the most critical to consider.



To the sub-question “If you believe no challenge should be prioritised, please leave the ranking blank and instead check the box indicating “no challenge should be prioritised”, **106 people** responded that no challenge should be prioritized

Ref	Summary of Contributions	Contributor	EIB comment
1.	The biggest challenge is to increase the share of public transport and to make transport more environmentally friendly.	MAV-Volán Group	The EIB supports EU transport policies, covering all transport modes, and EU regional development policies.
2.	The indicated top five challenges can only be met by fundamentally transforming the whole EU transport system and prioritising a shift of travelling behaviour to collective (local) mobility in everyday commuting and travel practices.	International Association of Public Transport UITP	<p>The modal shift of passenger and goods traffic away from roads towards the greenest modes, namely rail and inland waterways, constitutes a central pillar of the EU transport decarbonisation strategy. In fact, the EU's modal shift strategy sets out that rail freight traffic should increase by 50% by 2030 and double by 2050, whereas transport by inland waterways and short sea shipping should increase by 25% by 2030 and by 50% by 2050.</p> <p>The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy also emphasises the role of the transport sector in the EU's broader decarbonisation efforts. The EIB's CBR specifies the types of investments that the Bank considers compatible with the goals of the Paris Agreement and that, therefore, are eligible for EIB support.</p> <p>The EIB supports investments in clean collective transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>As explained in the TLP, investments in collective transport are a priority for the EIB. Please see Chapter 5 of the TLP for the EIB's broader priorities in Urban Mobility.</p>
3.	Most important is funding rolling stock for new entrant rail operators. Second come targeted investments in infrastructure that allows to separate slow and fast traffic flows (passing loops), much rather than blanket application of ERTMS.	European Sleeper Coöperatie U.A.	The EIB supports the development of the railway sector globally, including investments in rail infrastructure, rolling stock, interoperability and digitalisation, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:
4.	A modal shift towards rail should be prioritized in order to meet the criteria of the Paris Agreement and the various EU environmental policies in the shortest amount of time. Railway infrastructure needs to be resilient, in order to make it fit for the future.	European Rail Infrastructure Managers (EIM)	<p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Please see Chapter 5 in the TLP for the EIB's broader priorities in the Rail sector.</p>

Ref	Summary of Contributions	Contributor	EIB comment
5.	Enabling modal shift to rail should be a key issue for the decision makers and national and supranational institutions.	Ferrovie dello Stato Italiane S.p.A	Digitalisation is also a promising area of development of EIB's lending, having the potential to drive behavioural change and lead to a more efficient use of transport assets, improve safety, increase multimodality and foster a shift to greener transport modes" as well as "In line with the objectives of the EU Sustainable and Smart Mobility Strategy the Bank will support research and development and innovation in the transport sector stimulating the faster deployment of connected and automated mobility and the use of data and artificial intelligence (AI) for a more sustainable, multimodal, safer and smarter mobility. Please see Chapter 2 in the TLP for the EIB's priorities in Digitalisation and Automation.
6.	Digitalisation and automation are the key opportunity as well as the key challenge for the European railway sector to remain competitive. Enhancing the European transport sector, the railway system of 2030 will make wider social, economic and environmental contributions and needs respective support. The railways is a complex system that requires a holistic approach.	Community of European Railway and Infrastructure Companies (CER aisbl)	
7.	The reduction of transport demand should be a central goal of the Transport Lending Policy. This is unfortunately not a priority for the EIB at the moment. Therefore, we call on a paradigm shift at the EIB, and the future Transport Lending Policy should clarify that demands' reduction is a priority for the bank and will be mainstreamed under its economic, financial, environmental and social assessments for all its operations in the transport sector.	CEE Bankwatch Network, Counter Balance, Greenpeace	<p>The EIB takes note of your comment to prioritise investments that avoid and shift transport demand and thus are more energy and resource efficient.</p> <p>The priorities to support avoid and shift investments can be found in Chapter 2 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.</p>
8.	The need for traffic has to be reduced.	Hanns Kerschner	<p>The EIB advisory and technical assistance offer to support strategic planning and early project preparation is becoming an increasingly important facet of the added value of EIB participation in projects (e.g. there is an increasing demand for advisory services from the Joint Assistance to Support Projects in European Regions (<a href="#">JASPERS</a>) to support strategic planning of transport investments). Planning is a key stage to develop a sound and sustainable project pipeline aligned with Paris Agreement objectives, in particular:</p> <ol style="list-style-type: none"> <li>1. to decarbonize transport promoting ASI principle (Avoiding unnecessary traffic /reducing need for long-distance travel; Shifting traffic to more environmentally friendly modes and decarbonizing all modes; Improving the remaining traffic – through all means including technology that in turn also includes the change of drive trains from internal combustion engines to electrification of mobility). It is essential that</li> </ol>

Ref	Summary of Contributions	Contributor	EIB comment
			<p>transport planning is coordinated with land/spatial planning to achieve the overall climate mitigation targets.</p> <p>2. to ensure climate resilience of transport infrastructure and services. It requires undertaking customized climate resilience assessments to identify measures that mitigate climate risk to “acceptable levels”,</p>
9.	Every challenge is important	Marc-Olivier Leclercq	<p>A clean, resilient and carbon neutral system that does no significant harm to the environment is indeed highlighted as a pillar of sustainable transport and a priority in the TLP, along with the other sustainability factors.</p>
10.	Everything here is important. Resilient infrastructure is however a higher priority than everything else.	Croatian Chamber of Economy	
11.	Each of the above challenges is very important in isolation. Only in combination, will decarbonisation be achieved — although the financial needs may vary considerably.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
12.	All the challenges are crucial, with the exception of biofuels that must be left out. A hydrogen sector must be developed at European level, particularly for trains, aircraft and ships, ensuring that hydrogen production is clean.	Response 290033127	<p>The EIB supports investments in hydrogen deployment in transport in the EIB’s Climate Bank Roadmap (CBR) and most investments account to the EIB Group climate action and environmental sustainability targets. The priorities for hydrogen deployment can be found in Chapter 5 of the revised TLP.</p> <p>The CBR refrains the EIB from supporting biofuels production that make use of feedstocks that can serve as food or compromise food security. The EIB supports investments in biofuel production only under strict conditions, as specified in the EIB’s CBR, Annex 2, Table E: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p> <p>Annex 2, Table A describes that also the storage and transport of biofuels that demonstrate to be “low-carbon” energy carriers can be supported.</p> <p>Annex 2, Table C describes that mobile assets solely powered by advanced biofuels (biofuels as per Renewable Energy Directive (RED) II with low ILUC (indirect land-use change) risk) can be supported.</p>
13.	BusinessEurope underlines that our members speak for the	BusinessEurope	The EIB points out that its approach is in general technology

Ref	Summary of Contributions	Contributor	EIB comment
	<p>technology- and mode-neutral approach, because no one can pre-define and anticipate innovation that might come in any of these.</p> <p>Transport research financing is of key importance to create necessary conditions for new breakthrough technologies.</p> <p>The infrastructure resilience challenge should be considered when assessing foreign direct investments together with public order and security objectives, in line with the EU legal framework on Foreign Direct Investment screening and existing legal frameworks at national level.</p>		<p>neutral and open to new technological developments and alternative fuels.</p> <p>The priorities to support avoid and shift investments can be found in Chapter 2 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact, including on innovation, efficiency, decarbonisation, resilience, safety and security.</p>
14.	<p>ECSA welcomes the EIB's technology neutral approach. ECSA believes that sufficient transition financing is needed for the shipping industry. Any transition financing tools should be technology and future fuel neutral. The modal shift towards short sea shipping as a more sustainable transport mode will be crucial to help the EU reach its decarbonisation targets.</p> <p>In the greening process, the maritime industry is dependent on other stakeholders. Without resilient infrastructure the transition may be jeopardised.</p> <p>Additionally, ECSA is of the view that safety should not be compromised.</p>	ECSA	<p>The EIB also supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Please see Chapter 5 of the TLP, for the EIB's priorities in inland waterways and maritime transport.</p>
15.	Decarbonization must be promoted wherever a lot of CO2 is emitted.	Response 974008607	<p>The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy emphasise the role of the transport sector, including collective mobility and through digitalization and automation, in the EU's broader decarbonisation efforts. The EIB's CBR specifies the types of investments that the Bank considers compatible with the goals of the Paris Agreement and that, therefore, are eligible for EIB support.</p> <p>Moreover, the EIB approved its first Climate Adaptation Plan in 2021, with the aim to strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure. It describes, among other things, how the EIB will increase its efforts to promote the consideration of physical climate risk in investment decisions.</p> <p>The EIB's Climate Adaptation Plan is available at:</p>
16.	The relevance and importance of adaptation to climate change can be further highlighted in the report.	Everbridge	
17.	In order for decarbonization in land transport to be possible, it is necessary to invest in resources, namely by creating charging stations and vehicles with greater autonomy.	Associação Rodoviária de Transportadores Pesados de Passageiros (ARP)	
18.	Challenges facing the transport sector can be solved only within the societal context, ensuring development, employment, safety, prosperity.	Ralph-Uwe Dietrich	
19.	As the main challenge to decarbonize in the transport sector is the availability of zero emission alternative drive trains, renewable energy, electro mobility and a hydrogen-based economy are essential. Digitalisation as well as automated driving will be game changers in the transition. In addition,	Ministry of Infrastructure and water Management	

Ref	Summary of Contributions	Contributor	EIB comment
	sustainable cities - including spatial planning tools - will allow development of policies that support a modal shift and more use of active mobility. At city level, actors can opt for zero emission or environmental zoning. Finally, because of climate change accelerating the transition to a resilient (climate adaptive) infrastructure is a key priority.		<a href="https://www.eib.org/en/publications/the-eib-climate-adaptation-plan">https://www.eib.org/en/publications/the-eib-climate-adaptation-plan</a>  The priorities to support investments can be found in Chapters 2 and 5 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact, including on accessibility, innovation, efficiency, decarbonisation, resilience, safety and security.  Moreover, the EIB's Environmental and Social Standards highlight, amongst others, the importance of an integrated approach to environmental and social impact assessment and risk management (Standard 1), stakeholder engagement (Standard 2), the rights of vulnerable groups (Standard 7), labour rights (Standard 8), health, safety and security, including of workers (Standard 9) and resource efficiency and pollution prevention (Standard 3). The EIB's Environmental and Social Standards are available at: <a href="https://www.eib.org/attachments/publications/eib_environmental_and_social_standards_en.pdf">https://www.eib.org/attachments/publications/eib_environmental_and_social_standards_en.pdf</a>
20.	Specific challenges need to be prioritized, compared to others, for instance if we do not address today's challenges, we will not be able to reach the 2030/2050 milestones.	Ministry of Transport and Infrastructure	
21.	There must be a prioritisation, which does not mean that the other challenges are of non-importance at all. Resource efficiency covers some of the other challenges.	Federation of Belgian Enterprises FEB-VBO	
22.	<p>The social cost of any investment must be thoroughly understood before any investments are considered. Social Impact Assessments must be made, and must engage in a substantive and equal manner with workers and trade unions. Investment cannot be made if it fuels a race to the bottom in wages, conditions and rights of workers.</p> <p>Accessibility of transport holds huge benefits to disadvantaged communities and groups.</p> <p>The Safety and Security of Workers must be considered in any and all initiatives, particularly regarding psycho-social effects as a result of increasing digitalisation and automation. Surveillance of workers cannot be allowed, and negotiations with workers and their unions must be done first before introducing any new technologies in the workplace.</p>	European Transport Workers' Federation	
23.	Without clear modal shift, EU greenhouse gas emissions will continue to rise and undermine EU strategic climate policy objectives. The EIB needs to send a strong and clear signal about the urgent need for the EU to prioritise sustainable low carbon solutions in order to reverse transport emission trends in line with EU climate targets.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
24.	Destination 2050 outlines a Roadmap towards decarbonisation.	Aerospace and Defence Industries Association of Europe (ASD)	
25.	The cross-cutting (horizontal) challenges should be addressed	Airlines for Europe	

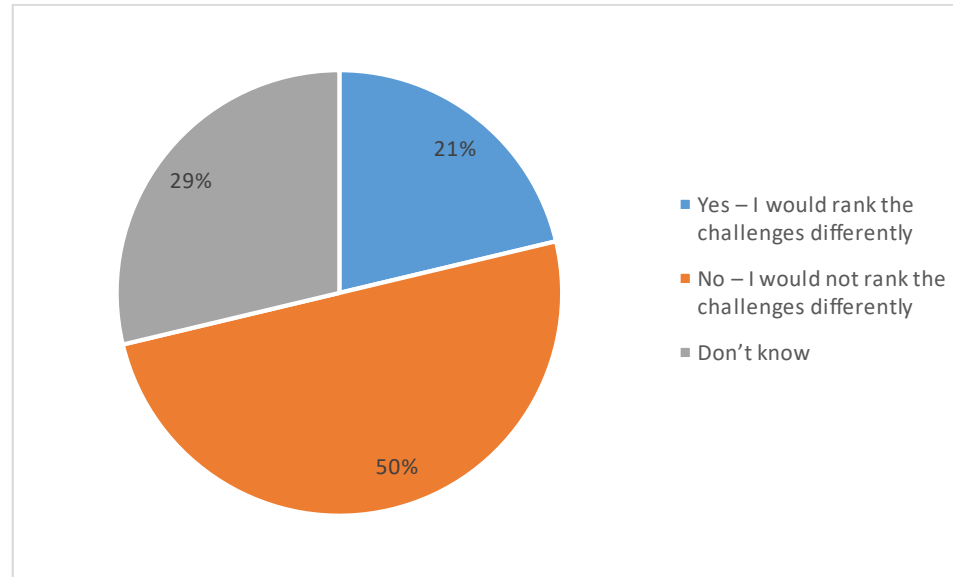


Ref	Summary of Contributions	Contributor	EIB comment
	as a priority to create the right business environment in the transport sector	A4E, BusinessEurope	
26.	The EU Sustainability Taxonomy is a new instrument in its early stages of development. There is concern that it may be regarded as mandatory criterion for EIB lending. Such a restrictive approach does not only go beyond the present EU law but also may backfire by slowing down the financing that is necessary for smooth green transition across the transport modes.	Airlines for Europe A4E, BusinessEurope	<p>The EIB's Climate Bank Roadmap (CBR) specifies the types of investments that the Bank considers as aligned with the Paris Agreement and that are therefore eligible for EIB support. The alignment of EIB support and the EU Taxonomy of Sustainable Activities is described in the CBR.</p> <p>The Transport Lending Policy, in turn, specifies the priorities of the EIB's support to the transport sector, within the eligibilities specified in the CBR. The TLP confirms the EIB's neutrality to different clean transport technologies.</p>
27.	Enabling a reduction of motorised transport and modal shifts in the light of sufficiency principles is key. Sustainable cities encompass multidimensional challenges.	ECTRI	A clean, resilient and carbon neutral system that does no significant harm to the environment is indeed highlighted as a pillar of sustainable transport and a priority in the TLP. The EIB notes that multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions.
28.	Doing no significant harm is a fundamental prerequisite for the sustainability of an activity. Modal shift is essential to transform the transport system into one which prioritises shared, low-carbon modes of transport. The EIB Policy should make these priorities central, alongside electrification of transport.	WWF EPO	Reducing conventional transport demand, expanding multimodality and increasing modal shift is normally addressed and coordinated at the level of strategies and plans. Through its advisory and technical assistance offer, the EIB is increasingly able to provide help and advice to its clients and stakeholders on the establishment and assessment of investment programmes and individual projects, including to enhance their cohesion, social and broader sustainability impacts.
29.	<p>The European Commission wants to achieve 30 million zero-emission vehicles on European roads by 2030. This goal requires massive investment in the EV charging infrastructure to grow demand. We believe the scale of the investment is a big challenge for the EIB and the EU, but that this can be overcome by the contribution of private investment if the right regulatory frameworks and incentives are put in place.</p> <p>Likewise, there is a big challenge with hydrogen. The path to having green hydrogen at scale will be a considerable challenge, and we believe the EIB could play a big role in helping investors achieve clarity on returns in the long term and crowd-in private capital.</p>	Global Infrastructure Investor Association	<p>The EIB acknowledges that development of solutions to various transport challenges necessitates supportive public policies and rapid technological development, but it also requires the support, establishment and nourishment of new business models in the private sector.</p> <p>The EIB supports investments in hydrogen vehicles and vessels and its supporting infrastructure, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p> <p>Most investments into hydrogen transport qualify as</p>

Ref	Summary of Contributions	Contributor	EIB comment
	Additionally, investment in the decarbonization of transport should happen in parallel to investment in other areas, such as digitalization, signalling, energy, smart cities, etc. The pathway to net-zero is profoundly interconnected across sectors, and when legislating, policymakers should be very conscious of the effects that legislation in one of the sectors can have in all the others. We believe that investment (public when there is high risk and private when there's a competitive market) should happen homogeneously across the main infrastructure sectors to ensure we have a realistic and efficient transition to net zero.		<p>"substantial contribution" under the first delegated act of the EU Taxonomy and, in line with EIB's Climate Bank Roadmap, account to the EIB Group climate action and environmental sustainability targets.</p> <p>The priorities for hydrogen deployment can be found in Chapter 5 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.</p> <p>The transport sector also benefits to some extent from EIB support through separate but related policies and guidance – notably covering indirect support (to SMEs for example) and through its support for research and innovation, including in support of the EU's decarbonization targets.</p>
30.	The use of alternative fuels is essential to reach decarbonization targets, but it is of the utmost importance that the process is realistic and takes into account the economic needs of transport SMEs.	European Road Haulers Association (UETR)	
31.	Airbus believes aviation can make a positive contribution to the connectivity challenge due to its limited infrastructure requirements and minimal impact on biodiversity compared to other ground based transport, travel time and lack of available alternatives.	AIRBUS	<p>Although the EIB Group Climate Bank Roadmap (CBR) currently refrains the EIB from supporting conventionally fueled aircraft and airport capacity expansions, aviation still provides vital connectivity on a national, regional and international scale and is increasingly difficult to substitute as travel distance increases. For that reason, the EIB monitors closely regulatory and technology developments that will eventually allow the sector to decarbonize in alignment with the Paris Agreement.</p> <p>Please see Chapter 5 of the TLP for the EIB's approach to Aviation, including its priorities in decarbonisation and operational resilience.</p>
32.	<p>It is important that the EIB will view these challenges as deeply interconnected and only solvable through a coherent approach. Ensuring the protection of natural habitats and biodiversity, closely linked to do-no-significant harm to the environment is the absolute baseline for any transport project financed.</p> <p>While aspects like the hydrogen-based economy (and to some extent biofuels) will definitely play a key role in the decarbonizing aviation and maritime, as well as some aspects of freight transport, the immediate transformation challenge has to focus on expanded support for public transport and</p>	E3G	<p>A clean, resilient and carbon neutral system that does no significant harm to the environment is indeed highlighted as a pillar of sustainable transport and a priority in the TLP. The EIB notes that multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions.</p> <p>The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy emphasise the role of the transport sector, including collective mobility and electromobility, in the EU's broader decarbonisation efforts. The EIB's CBR specifies the types of investments that the Bank considers compatible with</p>

Ref	Summary of Contributions	Contributor	EIB comment
	<p>railroads, as well as building up the infrastructure for electro mobility.</p> <p>Aspects like resilience, resource efficiency (in particular to spatial planning and land-use), safety and security are aspects that will need to be taken continuously into account.</p> <p>The notion of technology neutrality should not open the door for inefficient transport solutions (in particular in relation to hydrogen and biofuels) that do not present the most resource and cost-efficient approach for the transition to a climate neutral transport system.</p>		<p>the goals of the Paris Agreement and that, therefore, are eligible for EIB support.</p> <p>The priorities to support such investments can be found in Chapters 2 and 5 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact, including on accessibility, innovation, efficiency, decarbonisation, resilience, safety and security.</p> <p>The EIB's Environmental and Social Standards also recognises that protecting and conserving biodiversity and ecosystems and maintaining the ecological functions and processes of such ecosystems are fundamental to environmental and social sustainability (Standard 4, available at: <a href="https://www.eib.org/attachments/publications/eib_environmental_and_social_standards_en.pdf">https://www.eib.org/attachments/publications/eib_environmental_and_social_standards_en.pdf</a>)</p> <p>Moreover, the EIB is working on a methodology to integrate biodiversity and ecosystem externalities into its economic appraisal.</p>
33.	Decarbonizing the transport sector requires deployment of electromobility.	Bank Information Center	

Question 5 – Outside the European Union, would you rank these challenges differently?



Ref	Summary of Contributions	Contributor	EIB comment
1.	As decarbonisation is global, the ranking must also be global.	Response 1039141480	The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed emphasise the role of the transport sector in the EU's broader decarbonisation efforts, both inside and outside the EU.
2.	Decarbonisation must also be promoted outside the EU where a lot of CO2 is emitted.	Response 974008607	
3.	There is no difference between EU and non-EU	Croatian motorways Ltd, Marc-Olivier Leclercq, Miguel de Ortuzar, Ministry of Infrastructure and water Management, Pro Bahn	

Ref	Summary of Contributions	Contributor	EIB comment
4.	The benefits of decarbonising rail, and creating a modal shift for railways, are equally applicable to all countries and continents.	European Rail Infrastructure Managers (EIM)	<p>The EIB supports the development of the railway sector both inside and outside the EU, including investments in rail infrastructure, rolling stock, interoperability and digitalisation, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Support for collective transport will also continue to be a priority of the EIB's contribution to sustainable urban mobility inside and outside the EU. Such schemes include suburban railways, metro and light rail systems, including tramways. Please see Chapter 5 of the TLP for the EIB's approach to both urban rail (under Urban Mobility) and extra-urban rail, as well as Chapter 2 of the TLP on Sustainable Cities.</p>
5.	Aviation is a truly global industry that requires harmonisation of approaches and standards, to ensure emissions are addressed worldwide.	Aerospace and Defence Industries Association of Europe (ASD), AIRBUS	<p>Please see Chapter 5 of the TLP for the EIB's approach to Aviation, including its priorities in decarbonisation and operational resilience.</p> <p>Please also refer to the EIB's responses to stakeholders' comments on Aviation, in Chapter 8 of this issues matrix.</p>
6.	No different ranking as the challenges are the same. Only in rapidly growing societies/cities I rank spatial planning with public transport highest.	Antje Willnow	Please also see Chapter 2 of the TLP on Sustainable Cities and Chapter 5, on Urban Mobility.
7.	The transport sector faces similar challenges worldwide and investment criteria should be universal while still taking into account the local context such as transport needs or available infrastructure.	Joint contribution made by NewClimate Institute and Germanwatch	Taking into account various transport and mobility needs and contexts, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap.
8.	The ranking also depends on the economic, societal and/or ecological structure, which might differ outside the EU	Budapest Airport Zrt., Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie,	<p>Please also see Chapter 2 of the TLP, on Connectivity, Equal Accessibility and Development</p> <p>The TLP does indeed consider safety, accessibility and efficiency as critical dimensions of transport systems, alongside climate and environmental sustainability.</p>

Ref	Summary of Contributions	Contributor	EIB comment
		ECTRI, European Union Agency for Railways, Ministry of Transport and Infrastructure, Município de Faro, Ralph-Uwe Dietrich, Response 832108188, Road Safety Foundation, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The EIB also recognises the importance of a robust planning framework in the transport sector. Through its advisory and technical assistance offer, the EIB is increasingly able to provide help and advice to its clients and stakeholders on the establishment and assessment of strategies and plans, investment programmes and individual projects, including to enhance their cohesion, social and broader sustainability impacts.
9.	We would increase the priority of spatial planning since congestion, reflecting the lack of such planning, is even more severe in developing urban areas.	Bank Information Center	
10.	The prioritization should be case by case and depend on local circumstances. It is crucial that countries have created national system/put in place required governance which would allow for specific investment to bring the expected result.	UNECE	
11.	The EIB should avoid any double standards within and outside of the EU, in particular as regards to the impacts of its operations on the climate, environment and biodiversity.	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace, WWF EPO	
12.	Priorities for other advanced/post industrial economies outside Europe would be broadly similar. Priorities for transition and developing economies should also include sustainable cities, safety and security, as well as equal access.	Arthur D. Little	
13.	There will be regions outside the European Union where decarbonisation is not the primary objective. Challenges related to decarbonisation are not considered urgent.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
14.	Most of these challenges are of global nature. The EIB should act as the "World's first Climate Bank "by improving the	SEA Europe (European	Both inside and outside of the EU, the EIB shall, inter-alia, support the improvement of the environmental performance

Ref	Summary of Contributions	Contributor	EIB comment
	environmental performance of shipping beyond European territorial waters and hence not preclude financing for ships that may operate also outside Europe if these have their full (manufacturing) value chain in the Europe.	Shipyards and Maritime Equipment Association)	<p>and the decarbonisation of the maritime shipping fleet through the financing of new-builds as well as the retrofitting of existing vessels.</p> <p>Please see Chapter 5 of the TLP for the EIB's approach to inland waterways and maritime transport</p>

Question 6– What types of electromobility projects, if any, should the EIB prioritise and why?

Ref	Summary of Contributions	Contributor	EIB comment
1.	<b>Rail projects.</b> The focus on roads should come to an end.	Jori Milbradt	<p>The EIB supports the development of the railway sector, including investments in rail infrastructure and rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The revised Transport Lending Policy (chapter 5) confirms that investments in collective transport are a priority for the EIB.</p>
2.	Rail electrification.	Response 1039141480, Response 511707695, Response 974008607, Response 832108188	
3.	All kind of rail projects	OTIF, Hanns Kerschner	
4.	Anything related to heavy rail.	European Sleeper Coöperatie U.A.	
5.	As the railway is the cleanest mode of transport, promoting modal shift towards rail will support the reduction of emissions. But this is not enough, so rail will need to implement new technical solutions for non-electrified lines and further increase its energy efficiency.	Community of European Railway and Infrastructure Companies (CER aisbl)	The Transport Lending Policy (chapter 5) recognizes and emphasises the importance of the deployment of new technologies in Transport.
6.	Rail is a fully electrified mode of transport. This should be the backbone of all freight transport within the EU.	Správa železnic	The European Commission's Smart and Sustainable Mobility Strategy emphasizes the sustainability of rail transport, targeting a doubling of traffic on high-speed rail by 2030 (tripling by 2050) as well as the doubling of rail freight traffic by 2050.
7.	The EIB should prioritise projects regarding the electrification of rail networks including the TEN-T as well as urban and sub-urban networks. Priority electromobility projects should include those that enable the lowest emissions per passenger carried. The success of rail in reducing GHG emissions relies on, among other things, the electrification of infrastructure.	UNIFE	TEN-T projects are indeed priorities for the EIB, as mentioned in the Transport Lending Policy. Annex 2 of the Climate Bank Roadmap (CBR) contains detailed information about the emission standards applied to the different transport modes supported by the EIB support.
8.	The electrification of rail lines and diesel-powered railway lines and operations with battery-powered rolling stock should be prioritised and included in the scope of electromobility. Currently, in the EIB consultation document only the road sector is considered for electromobility projects.	European Union Agency for Railways	The EIB supports the development of the railway sector, including investments in rail infrastructure electrification and zero emission rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>



Ref	Summary of Contributions	Contributor	EIB comment
9.	Train because it remains the most environmentally friendly means of transport and allows intermodality with soft mobility.	Response 981558580	<p>Thank you for your contribution. The EIB supports the development of the railway sector, including investments in rail infrastructure electrification and zero emission rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The revised Transport Lending Policy (chapter 5) confirms that investments in rail and into urban transport are priorities for the EIB. It recognizes as well the importance of multimodal and active and shared mobility projects.</p>
10.	The EIB should prioritise investments to continue electrification of the grid and deploy alternatives to fossil fuels in the rail sector where electrification of the network is too costly. It will be equally important to give priority to multimodal projects. In addition, the acquisition of clean rolling stock for rail freight transport should be supported to promote modal shift.	SNCF	<p>The EIB supports the development of the railway sector, including investments in rail infrastructure and rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The revised Transport Lending Policy (chapter 5) recognises the importance of multimodal projects.</p> <p>While over 80 % of passenger and freight performance on rail in the EU is already produced by electric trains, advancing the electrification of rail transport further and increasing rail capacities to accommodate modal shift are important elements of the decarbonisation of the transport sector.</p> <p>The revised TLP continues to prioritise investments into new and upgraded electrified rail infrastructure, and prioritises zero-emission rolling stock using catenary power, batteries or hydrogen.</p> <p>Catenary electrifications may not always be economically viable, however Investments in non-electrified rail infrastructure are prioritised only in certain cases, such as rural lines, other lines with credible plans for future electrification, or provided that rail traffic on the infrastructure will predominantly make use of zero direct emission rolling stock</p>
11.	EIB should invest in the electrification of railways. With	European Rail	The EIB supports the development of the electrification of the

Ref	Summary of Contributions	Contributor	EIB comment
	investment in electric vehicle charging places at trains stations, making them truly multimodal hubs.	Infrastructure Managers (EIM)	railway sector and the road charging infrastructure for electric vehicles, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
12.	To ensure the EU Mobility strategy goals will be achieved by avoiding the congestion of the rail network or increasing compactness and density in cities, it is equally important to prioritize multimodal projects.	Community of European Railway and Infrastructure Companies (CER), The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	Thank you for your contribution. The revised Transport Lending Policy (chapter 5) recognises indeed the importance of multimodal projects.
13.	EIB should prioritise investments in further electrifying the rail network, in modern zero emission fleet and deploying alternative fuels in the rail sector when the electrification of the network is too costly. Rail system should not only be zero emission but become smarter and resilient.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways	<p>Thank you for your contribution. The EIB supports the development of the railway sector, including investments in rail infrastructure electrification and zero emission rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>In addition, the EIB approved its first Climate Adaptation Plan in 2021, with the aim to strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure. It describes, among other things, how the EIB will increase its efforts to promote the consideration of physical climate risk in investment decisions.</p> <p>The EIB's Climate Adaptation Plan is available at: <a href="https://www.eib.org/en/publications/the-eib-climate-adaptation-plan">https://www.eib.org/en/publications/the-eib-climate-adaptation-plan</a></p> <p>Finally, the Transport Lending Policy (Chapter 5) confirms that digitalization is a priority for EIB support in all transport modes for a smarter and more efficient transport network, fully aligned with the European Commission's Smart and Sustainable Mobility Strategy.</p>
14.	<b>Public transport</b> , best to improve air quality in urban cities	Response	The EIB supports investments in clean collective transport, as

Ref	Summary of Contributions	Contributor	EIB comment
	and help to showcase e-mobility to a broader public.	244811294	specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:
15.	All electric public transport.	Metropolitano de Lisboa	<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
16.	Avoid supporting private cars electromobility. Focus on public transport, and on goods mass transportation.	STIB-MIVB	As explained in the Transport Lending Policy (chapter 5), investments in electric buses are a priority for the EIB.
17.	Collective mobility.	European Transport Workers' Federation	The EIB supports investments in clean collective transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:
18.	Buses, trains	urgewald	<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
19.	Support large-scale implementation of electric buses.	Arthur D. Little, CIMBAL - Comunidade Intermunicipal do Baixo Alentejo	As explained in the Transport Lending Policy (chapter 5), investments in electric buses and rolling stocks are a priority for the EIB.
20.	Electromobility in <b>urban public transport</b> contributing to modal shift	Institute for European Cooperation	The EIB supports investments in electric collective transport and its associated infrastructure, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:
21.	Urban public transport, extra-urban rail has the greatest impact on GHG emissions in European transport.	Ralph-Uwe Dietrich	<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
22.	Adaptation of urban public transport fleets and company facilities, as well as the energy supply network and adequate training of personnel to operate correctly with this type of vehicles.	Confederación Española de Transporte en Autobús - CONFEBUS	As explained in the Transport Lending Policy (chapter 5), investments in electric buses and rolling stocks and the associated infrastructure are a priority for the EIB.  Grid infrastructure are also a priority for the EIB, as detailed in the latest published EIB Energy Lending Policy (2019) (paragraph 41, p25). <a href="https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf">https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf</a>
23.	Urban transport should be completely electric as fast as possible, as there are no technological issues for this. Harbours should be electrified to perform cold ironing also.	NEOLINE Développement	The EIB supports investments in clean urban transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:

Ref	Summary of Contributions	Contributor	EIB comment
			<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  As explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure for urban mobility services or city logistics operations are a priority for the EIB. On the harbours side, the Transport Lending Policy prioritises investments for on shore power supply and alternative fuels infrastructure.
24.	The development and modernisation of the urban public transport by metro, as an environmentally friendly and green transport mean.	METROREXS.A. Bucharest	The EIB supports investments in clean collective transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  As explained in the Transport Lending Policy (chapter 5), investments in collective transport, including metro, remain a priority for the EIB.
25.	In the recent decade, there has been a profound uptake in the electric mobility in cities, both in terms of individual and collective transport modes. As cities strive to become carbon neutral, they require a coherence and consistency in policies, and the availability of external financing for investment and maintenance. This is where EIB financing has a critical role to play. Electric bus implementation is a complex system that entails several components and requires careful analysis before deployment. Not all systems would succeed in all places.	International Association of Public Transport UITP	Thank you for your contribution. The EIB supports investments in clean collective transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  As explained in the Transport Lending Policy (chapter 5), investments in zero emission buses included electric buses are a priority for the EIB. The EIB takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be, Paris-aligned.
26.	Accelerated conversion from diesel to hybrid or fully electric vehicle propulsion, hydrogen as next step beyond electric transition.	Budapest Airport Zrt.	Thank you for your contribution. In the revised Transport Lending Policy, the EIB confirms it takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be, Paris-aligned.
27.	Projects of proven utilization of renewable electricity.	Antje Willnow	Electrification indeed paves the way for decarbonisation in parallel to the shift of the sources of power generation from

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	<p>Last mile applications where local zero emission is important for reasons of occupational health of drivers, population and customers as well.</p> <p>Public transport vehicles with shared advantages of local zero emission for customers and public.</p>		<p>fossil fuels to renewable sources. The EIB Energy Lending Policy (<a href="https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf">https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf</a>) covers the EIB contribution to greening the electricity generation.</p> <p>Furthermore, in November 2019, the EIB Board of Directors decided to increase the level of climate and environment commitment for the EIB Group. The Climate Bank Roadmap (<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>) sets out how the EIB Group intends to meet this expectation.</p> <p>As per the EC's long-term strategy, all power generation should be fully decarbonised by 2050.</p> <p>Finally, as explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure for urban shared mobility services or city logistics operations are a priority for the EIB.</p>
28.	Scaling investment in battery-electric vehicles, and the network of recharging and refueling infrastructure to fully enable the widespread uptake of low and zero-emission vehicles in all transport modes.	Global Infrastructure Investor Association	<p>The EIB supports investments in zero direct emissions vehicles and the associated charging and refuelling infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>As explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure are a priority for the EIB.</p>
29.	In road transport one of the greatest challenges is electromobility for heavy good vehicles because they are responsible for a large part of GHG emissions. And electromobility comes along with batteries, charging systems in metropolitan areas and extra urban areas, and driving range or autonomy, all in all, robustness of the electromobility cycle. Maritime sector and aviation also need to improve GHG emissions, but for those heavier transport systems maybe hydrogen based technology can play an important role. Prioritization should be based on efficiency of the investment	Miguel de Ortazar	<p>The revised Transport Lending Policy recognises the adoption of zero-emission transport technologies as a priority, including electric and hydrogen based technology, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Besides, the EIB does carry out a comprehensive cost-benefit analysis. Its approach is described in the document "The Economic Appraisal of Investment Projects at the EIB"</p>

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	and reduction of GHG emissions, and if possible fostering cooperation between public and private players. Electromobility must be based on renewable energy otherwise the 2050 objectives will remain far from attainable.		( <a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a> ), which is currently under revision.
30.	An efficient charging infrastructure for all targets groups and users profiles.	Traxio	<p>The EIB supports investments in electric vehicles for road freight transport and its associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Besides, as explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure for urban shared mobility services or city logistics operations are a priority for the EIB.</p>
31.	Priority electromobility projects should be the ones that enable the lowest emissions per passenger carried. rail electrification, battery trains, urban rail including tram and Metro.	Alstom	<p>The EIB supports investments in clean collective transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>As explained in the Transport Lending Policy (chapter 5), investments in collective transport, including metro, remain a priority for the EIB.</p>
32.	Available charging infrastructure for road freight transport and fleet renewal for freight transport operators.	TLN	<p>The EIB supports investments in electric vehicles for road freight transport and its associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Besides, as explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure for urban shared mobility services or city logistics operations are a priority for the EIB.</p>
33.	Electromobility should and will play the central role in decarbonising road transport, including passenger cars, vans, trucks and buses. Direct electrification based on batteries is the most cost-effective, energy-efficient and fastest way to	European Federation for Transport & Environment	<p>The EIB supports investments in electric vehicles and its associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate">https://www.eib.org/attachments/thematic/eib_group_climate</a></p>

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	reduce transport emissions quickly and reach zero emissions by mid-century.		<a href="#">_bank_roadmap_en.pdf</a> The revised Transport Lending Policy recognises the adoption of zero-emission road transport technologies as a priority, including electric vehicles.
34.	Policy to encourage electric vehicles	Municipio de Paredes	The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy, including in the ambition to support the deployment of electric vehicles.
35.	Fast charging infrastructure for passenger cars, light commercial vehicles and trucks. Hydrogen infrastructure, primarily for trucks, light commercials vehicles and if needed, passenger cars. Grid infrastructure, sufficient power to be delivered to enterprises and transport corridors for the development of fast-charging infrastructure projects.	FEBIAC	The EIB supports investments in zero direct emissions vehicles and the associated charging and refuelling infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a> As explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure are a priority for the EIB. Grid infrastructure are also a priority for the EIB, as detailed in the latest published EIB Energy Lending Policy (2019) (paragraph 41, p25). <a href="https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf">https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf</a>
36.	Smart charging and charging for heavy duty vehicles.	Ministry of Infrastructure and water Management	The EIB supports investments in zero direct emissions heavy duty vehicles and the associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a> As explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure are a priority for the EIB.
37.	Electro mobility projects that look at the entire electric mobility ecosystem. Like with other solutions the priority should be on the most cost-effective solutions, those with low emissions per passenger-kilometer and tonne- kilometer and also improve the use of our space.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	As explained in the Transport Lending Policy (chapter 5), investments in electric vehicles and associated charging infrastructure, remain a priority for the EIB. The EIB does indeed carry out a comprehensive cost-benefit



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			analysis. Its approach is described in the document “The Economic Appraisal of Investment Projects at the EIB” ( <a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a> ), which is currently under revision.
38.	Electromobility is most interesting for avoiding local emissions, but gives no guarantee on climate neutrality. In any case, first the electricity sector should be convincing on the supply of green energy. This is still not possible without classic fuel or nuclear energy.	Federation of Belgian Enterprises FEB-VBO	Electrification indeed paves the way for decarbonisation in parallel to the shift of the sources of power generation from fossil fuels to renewable sources. The EIB Energy Lending Policy ( <a href="https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf">https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf</a> ) covers the EIB contribution to greening the electricity generation.
39.	Projects in which electricity is produced from renewable energy sources.	Croatian motorways Ltd	Furthermore, in November 2019, the EIB Board of Directors decided to increase the level of climate and environment commitment for the EIB Group. The Climate Bank Roadmap ( <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a> ) sets out how the EIB Group intends to meet this expectation.  As per the EC's long-term strategy, all power generation should be fully decarbonised by 2050.
40.	Electromobility will play a central role in decarbonising road transport, including passenger cars, vans, trucks and buses. However, the EIB should go beyond single projects: for example, it should only support carmakers developing fully electric vehicles. Furthermore, given the issues in EV supply chains, the EIB should focus on financing public transport and new business models that increase shared alternatives.	WWF EPO	As explained in the Transport Lending Policy (chapter 5), investments in electric vehicles and associated charging infrastructure remain a priority for the EIB, including investments related to new urban shared mobility services.  In addition, under the Paris Alignment for Counterparties framework, the EIB is the first multilateral bank to consider not just the climate impact of the projects it finances, but also the wider activity of borrowers.  <a href="#">The EIB Group PATH Framework</a>
41.	It's a pitfall to focus on electrification when all other negative side effects are still there.	Back on Track Belgium vzw-asbl	In the revised Transport Lending Policy, the EIB confirms it takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be, Paris-aligned.



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			In addition, the EIB does carry out a comprehensive cost-benefit analysis. Its approach is described in the document "The Economic Appraisal of Investment Projects at the EIB" ( <a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a> ), which is currently under revision.
42.	Electromobility is a very promising avenue to promote and to financially support, especially for short-sea shipping and inland waterways. However, it should not be considered as a "silver bullet" for all waterborne transport applications which, given the diversity of ship types and ship trades, necessarily require a broader, technology open and life-cycle based approach.	SEA Europe (European Shipyards and Maritime Equipment Association)	In the revised Transport Lending Policy, the EIB confirms it takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be, Paris-aligned.
43.	Electric cars are important for rural areas and cities! It will be difficult without them.	Railway Signalling Automation Telecommunication And Industry Association	The EIB supports investments in zero direct emissions vehicles and the associated charging and refuelling infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
44.	More EV's (cars and trucks) should be introduced at a faster pace. Prioritize building charging infrastructure with sufficient and robust capacity for the future without forgetting rural areas. More green energy from e.g. windmills and solar power plants.	Response 552589262	As explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure are a priority for the EIB.
45.	Development of charging infrastructure, including for buses and financing of electric buses	Stadtwerke München GmbH	The EIB supports investments in clean collective transport and their associated infrastructure, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  As explained in the Transport Lending Policy (chapter 5), investments in collective transport, including electric buses and the associated charging infrastructure, remain a priority for the EIB.
46.	The EIB should prioritise electromobility project regarding public transport or that guarantees a high rate of filling of the vehicles.	ECOV, Response 704118868	
47.	Shared electromobility solutions, innovative business models, including micromobility combined with electric public transport for first-mile/last-mile trip coverage. Use of renewable energy in transport. Electromobility projects shall not compromise or discourage other active modes and, hence, integrated transport planning approaches shall be a condition for funding.	ECTRI	As explained in the Transport Lending Policy (chapter 5), investments in electric vehicles and associated charging infrastructure remain a priority for the EIB, including investments related to new urban shared and active mobility services. Besides, the revised TLP recognises the importance of urban planning as a critical enabler for urban development. EIB's lending to urban mobility already requires promoters to have robust strategies in place for sustainable urban transport

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			and development oriented, among others, to limit urban sprawl.
48.	<p>The EIB's priority should go towards 100 % electricity for public transport — and the development of suitable charging infrastructure. In an urban context, the development of electric micromobility (bicycles, scooters, etc.) can offer mobility solutions.</p> <p>The car fleet needs to become electrified quickly, while at the same time focusing on the development of smaller, lighter and safer cars. Furthermore, in electricity generation fuelling electromobility, the EIB should give priority to renewable sources — but, above all, ban the production of electricity from a fossil source.</p>	Service Public Fédéral Mobilité et Transports	As explained in the Transport Lending Policy (chapter 5), investments in electric vehicles, including collective transport such as buses and railways, as well as new urban shared and active mobility services remain a priority for the EIB.
49.	<p>The EIB should prioritise the electrification of public transport fleets and railway infrastructure (including night trains) and any investments that promote a shift from private transport modes (such as private cars) to more public modes of transportation, to maximize on the Avoid-Shift-Improve principles.</p> <p>The EIB should not directly invest in private passenger and freight road vehicles, but rather invest in the required electric charging infrastructure needed to enable a rapid shift to electric mobility and focus on investments in the scale-up of public transport and shared alternatives.</p>	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace, Joint contribution made by NewClimate Institute and Germanwatch	<p>As explained in the Transport Lending Policy (chapter 5), investments in clean collective transport services remain a priority for the EIB. The Transport Lending Policy also recognizes the importance of supporting charging infrastructure projects, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
50.	Production processes for electric vehicles (EVs) need to ensure to be of minimal harm to the environment and be in compliance with human rights. The EIB should consider early on the life cycle for batteries, including questions on recycling facilities and re-use of battery storage.	Counter Balance, E3G	In line with the EIB Environmental and Social Standards ( <a href="https://www.eib.org/attachments/publications/eib_environmental_and_social_standards_en.pdf">https://www.eib.org/attachments/publications/eib_environmental_and_social_standards_en.pdf</a> ) the sustainability of the Li-ion battery supply chain, their planned life cycle and potential recycling and re-use are aspects that the EIB takes into account in the due diligence process to ensure minimal harm to the environment and compliance with human rights.
51.	Electromobility in transport business should be supported, especially in the purchase of electric vehicles both for passengers and freight. Moreover, the EIB should prioritise investments in supporting further electrification of the rail network and deploying alternatives where electrification is not possible for economic or engineering reasons.	Ferrovie dello Stato Italiane S.p.A	In the revised Transport Lending Policy, the EIB confirms it takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be, Paris-aligned. Furthermore, the Transport Lending Policy confirms investment in electric vehicles and railways electrification remain a priority for the EIB.

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52.	1) Provision of electric mobility infrastructure since it is the largest barrier to popular adoption of EVs. 2) Conversion of urban bus fleets to all-electric as a leading sub-sector with available technology ripe for public financing 3) RD&D to improve battery efficiency in resource use, power provision, and duration.	Bank Information Center	<p>As explained in the Transport Lending Policy (chapter 5), investments in electric vehicles, including electric buses, and the associated charging infrastructure remain a priority for the EIB.</p> <p>Besides, the EIB supports investments battery and powertrain RDI as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
53.	In order to kick-start the use of electric vehicles / vessels EIB should also support the purchase of the electric vehicles and vessels.	Ministry of Transport	As explained in the Transport Lending Policy (chapter 5), investments in electric vehicles and vessels remain a priority for the EIB.
54.	In terms of shipping, shore power supply is certainly a point of priority in particular for less accessible peripheral maritime regions (islands) but not only. Technology development for batteries and fuel cells is another key area. The possibility to cover CAPEX and OPEX delta for early movers should ideally be considered as well.	Costa Group	<p>As explained in the Transport Lending Policy (chapter 5), EIB will prioritise the development and deployment of zero direct CO2 emission ships and the associated infrastructure.</p> <p>Besides, the EIB supports investments in battery and powertrain RDI as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
55.	Main projects that concentrate on the integration of mobility and digitalization, such as TEN-T, multi-modal transportation and/or ITS. Increasing mobility and efficiency, concomitantly with monitoring national transportation will increase alongside economic development. Each EU member state will develop further projects in concordance with other domains that need prioritization.	Ministry of Transport and Infrastructure	As explained in the Transport Lending Policy (chapter 5), investments in Intelligent Transport Systems and digital solutions remain a priority for the EIB.
56.	decarbonization: public transport and modal shift	Município de Lousada	<p>The EIB supports investments in clean collective transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>As explained in the Transport Lending Policy (chapter 5), investments in zero emission buses included electric buses</p>

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			are a priority for the EIB.
57.	<p>Work on electric flight and hydrogen fuel cells is part of the technological roadmap for decarbonising aviation. Hybridisation is a necessary intermediate step for smaller aircraft towards a pure electric propulsion system, as well providing advantages to both combustion and electric engines that can be used on larger aircraft to deliver ever more optimised flight.</p> <p>Work on Urban Air Mobility is also needed, as it will accelerate both decarbonisation of aviation and improvement of life in urban areas. The missions within or around cities are well manageable within the constraints of near term electric propulsion technology. Maturing and scaling UAM so that it becomes accessible for larger parts of the population and provides missions of public interest including medical services, will require investment.</p>	AIRBUS	<p>The revised Transport Lending Policy recognizes the challenges posed by Urban Air Mobility and confirms that the EIB will prioritise the development and deployment roll of zero direct CO2 emission aircraft.</p> <p>Aviation sector investments can be supported through the criteria defined in the EIB's Climate Bank Roadmap. The aviation sector is not yet fully covered under the EU Taxonomy and the EIB will assess alignment with any new criteria once adopted by the EU.</p>
58.	Electric and hybrid-electric powered aircraft could have a significant role in powering short haul and regional aircraft, connecting communities and removing the need for the construction of CO2-intensive rail networks. Electromobility of road transport will allow advance biofuel capacity to be directed towards aviation (where mitigation options are more restricted).	International Air Transport Association (IATA)	The revised Transport Lending Policy confirms that the EIB will prioritise the development and deployment roll of zero direct CO2 emission aircraft and confirms it takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be, Paris-aligned.
59.	Work on electric flight and hydrogen fuel cells is part of the technological roadmap for decarbonising aviation. Hybridisation is a necessary intermediate step for smaller aircraft towards a pure electric propulsion system, as well providing advantages to both combustion and electric engines that can be used on larger aircraft to deliver ever more optimised flight.	Aerospace and Defence Industries Association of Europe (ASD)	Aviation sector investments can be supported through the criteria defined in the EIB's Climate Bank Roadmap. The aviation sector is not yet fully covered under the EU Taxonomy and the EIB will assess alignment with any new criteria once adopted by the EU.
60.	In the field of air transport, e-mobility requires an appropriate charging infrastructure at airports and mobility on the front of the airport.	Bundesverband der deutschen Luftverkehrswirtschaft e.V., Flughafenverband ADV	<p>The EIB supports investments in charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>In addition, as explained in the revised Transport Lending Policy (chapter 5), charging infrastructure in airports, including</p>

Ref	Summary of Contributions	Contributor	EIB comment
			for aircraft ground service operations, are a priority for the EIB.
61.	Passenger cars and road transport in general, because they are the responsible for 2/3 of CO2 emissions	Croatian Chamber of Economy	<p>The EIB supports investments in zero direct emissions road transport vehicles and the associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>As explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure are a priority for the EIB.</p>
62.	It is important that the EIB maintains technology openness and evaluates projects according to their objectives and prospects of success, together with a cost-benefit balance.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	<p>In the revised Transport Lending Policy, the EIB confirms it takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be, Paris-aligned.</p> <p>In addition, the EIB does carry out a comprehensive cost-benefit analysis. Its approach is described in the document "The Economic Appraisal of Investment Projects at the EIB" (<a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a>), which is currently under revision.</p>
63.	Development of the clean hydrogen sector. Development of factories capable of constructing batteries, semiconductors and everything needed for electric vehicles in Europe so that the EU is no longer dependent on Asia.	Response 290033127	<p>As explained in the Transport Lending Policy (chapter 5), investments in zero emission vehicles, including fuel cell hydrogen electric vehicles and associated refuelling infrastructure are a priority for the EIB.</p> <p>The Bank will support the production of low-carbon gases, including hydrogen as detailed in the latest published EIB Energy Lending Policy (2019) (paragraph 29, p23).  EIB energy lending policy - Supporting the energy transformation</p> <p>The Bank supports the investments contributing to the digital and green transformation of industrial sectors and in particular the decarbonisation of the automotive and mobility industry in general, consistently with the priorities set by the CBR and the Bank's priorities under its Innovation, Digital and Human Capital public policy goal. This includes also the support to</p>

Ref	Summary of Contributions	Contributor	EIB comment
			investments that contribute to the resilience of the Union and its strategic autonomy (e.g. the scale-up of semiconductor manufacturing, the sustainable supply of critical raw materials for digitalization) and the development, demonstration and first commercial production of breakthrough technologies related to equipment and solutions for sustainable transport and mobility (including lithium-ion batteries and other potentially disruptive battery technologies, along with electric, hydrogen and fuel cell or other carbon-free emission vehicle technologies).
64.	Freight boats, cruise boats, planes, because of the dimension and impact in the environment.	Município de Faro	As explained in the Transport Lending Policy (chapter 5), EIB will prioritise the development and deployment of zero direct CO2 emission ships
65.	<ul style="list-style-type: none"> <li>• Purchase of vehicles + charging systems (Borns, pantograph, supervision system, other);</li> <li>• Substation financing + connection to distribution networks</li> <li>• Funding of feasibility studies;</li> <li>• Depository/Infrastructure standards</li> <li>• Training of staff in new technologies (maintenance, operation, etc.)</li> </ul>	UTP (Union des Transports Publics et ferroviaires)	<p>The EIB supports investments in electric vehicles including electric collective transport, and their associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>As explained in the Transport Lending Policy (chapter 5), investments in public transport electrification is a priority for the EIB.</p>
66.	On-shore power supply in ports will be an important tool to reduce shipping emissions at berth.	European Sea Ports Organisation	As explained in the Transport Lending Policy (chapter 5), EIB will prioritise the development and deployment of zero direct CO2 emission ships and the associated charging infrastructure.
67.	<p>We believe EIB should prioritise</p> <ul style="list-style-type: none"> <li>- railway electrification, and bi-mode railway vehicles electro-mobility projects</li> <li>- procurement of new railway rolling stock, more energy efficient technologies, renewable energy sources;</li> <li>- the procurement of urban and suburban electric buses and service infrastructure. The full life-cycle cost (or TOC) of these devices is not yet competitive with traditional solutions.</li> </ul>	MAV-Volán Group	<p>The EIB supports investments in electric collective transport including buses and rail rolling stock, and their associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>As explained in the Transport Lending Policy (chapter 5), investments in electric buses, locally zero-emission rail rolling stock are a priority for the EIB. In addition to catenary-powered electric rolling stock, an increasing share of new fleets to</p>

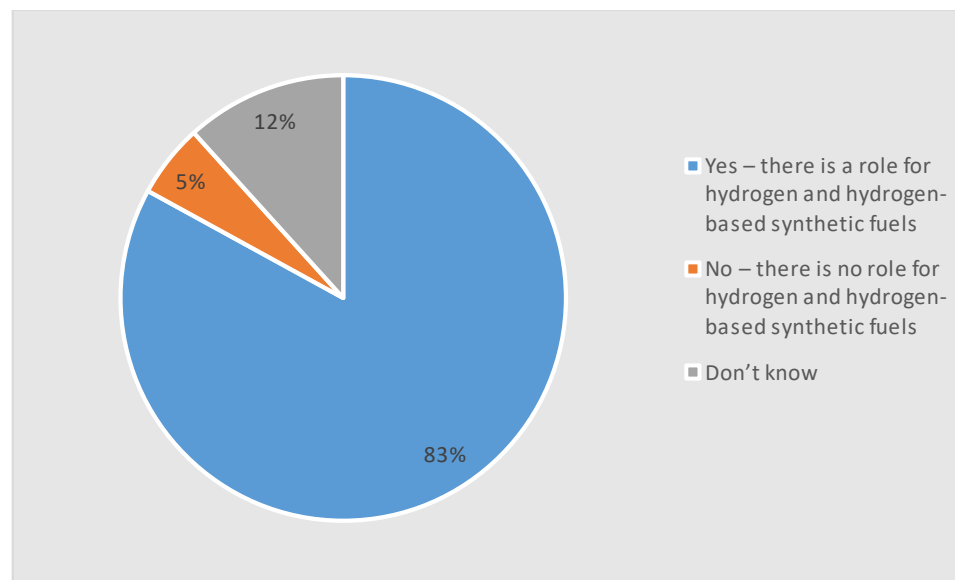
Ref	Summary of Contributions	Contributor	EIB comment
			replace diesel trains for lines carrying lighter traffic will be battery-electric, hydrogen powered or bi-mode rolling stock, and these will also be a priority for EIB support.
68.	Adaptation of urban public transport fleets and company facilities. Improvement of the energy supply network. Adequate training of personnel to operate the new vehicles. Fostering the generation of electricity from renewable sources. Recharging infrastructure projects.	CEOE	<p>The EIB supports investments in electric vehicles for road freight transport and its associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Besides, as explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure for city logistics operations are a priority for the EIB.</p> <p>Grid infrastructure, renewable power generation and power storage are also a priority for the EIB, as detailed in the latest published EIB Energy Lending Policy (2019) (paragraph 41, p25).  EIB energy lending policy - Supporting the energy transformation</p>
69.	<p>For road freight transport, focus should be on urban distribution with light vehicles. Market needs to rely on long distances transportation by heavy duty vehicles for which electromobility is not at present a viable solution. Technology and infrastructure are not there yet and there are still concerns on the environmental impact caused by batteries. Recent rise in energy prices is also another challenge. Focus in the future should be also on the development of synthetic fuels with high efficiency and low impact on environment, as well as allowing a higher implementation on hydrogen-based solutions for those transport activities more suitable for its use.</p> <p>Finally, no matter what fuel solution is used or adopted now and in the future, a modernized and high capacity infrastructural network is essential– hand in hand with harmonized policy in all EU Member States to guarantee Green Corridors fully equipped with secure parking areas, adequate connectivity and necessary infrastructure of</p>	European Road Haulers Association (UETR)	<p>The EIB supports investments in electric vehicles for road freight transport and its associated charging infrastructure as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Besides, as explained in the Transport Lending Policy (chapter 5), investments in fleets of zero-emission vehicles and associated charging infrastructure for city logistics operations are a priority for the EIB.</p> <p>For road freight transports, the transition requires other technological solutions (e.g. hydrogen, or synthetic fuels, etc.). In the revised Transport Lending Policy, the EIB confirms it takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be, Paris-aligned.</p>



Ref	Summary of Contributions	Contributor	EIB comment
	charging/refuelling stations.		Grid infrastructure, renewable power generation and power storage are also a priority for the EIB, as detailed in the latest published EIB Energy Lending Policy (2019) (paragraph 41, p25). <a href="#">EIB energy lending policy - Supporting the energy transformation</a>
70.	To ensure the EU Mobility strategy goals will be achieved by avoiding the congestion of the rail network or increasing compactness and density in cities, it is equally important to prioritize multimodal projects.	Community of European Railway and Infrastructure Companies (CER), The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The revised Transport Lending Policy (chapter 5) recognises indeed the importance of multimodal projects.
71.	Ensuring accessibility of electromobility projects for people with disabilities: Accessible places, ergonomic systems. Ensuring accessibility of public spaces when deploying as electric cables are real barriers to accessibility for people with disabilities who encounter obstacles on the pavement.	Ministère de la Transition écologique	Thank you for your contribution.
72.	The EIB should support direct electrification over electrofuels when it comes to road transportation.	Counter Balance, E3G	
73.	Research/data/analysis of electromobility projects for paratransit modes, specifically minibuses.	WhereIsMyTransport	



Question 7– Is there a role for hydrogen and hydrogen-based synthetic fuels as an alternative fuel for transport applications?



Ref	Summary of Contributions	Contributor	EIB comment
	<b>Hydrogen applications in transport (general)</b>		
1.	Hydrogen mobility is foreseen as one of the main pillars of the clean mobility	Ministry of Transport	<p>The EIB supports investments in hydrogen vehicles and vessels and its supporting infrastructure, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p> <p>Most investments into hydrogen fuelled transport qualify as “substantial contribution” under the first delegated act of the EU Taxonomy and, in line with EIB's Climate Bank Roadmap, account to the EIB Group climate action and environmental sustainability targets.</p>
2.	The introduction of alternatives, especially eco-friendlier transportation, will increase environment protection, efficiency and will stimulate pollution control in crowded <b>cities</b> .	Ministry of Transport and Infrastructure	
3.	There are also limitations with regard to electromobility. This alternative does not emit CO2 and hardly produces <b>air pollution</b> .	Município de Paredes	
4.	From a transport policy perspective, this is clearly to be answered in the affirmative. Hydrogen and hydrogen-based synthetic fuels can contribute to decarbonisation. Should the energy balance and ultimately the cost of producing hydrogen	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	

Ref	Summary of Contributions	Contributor	EIB comment
	and hydrogen-based synthetic fuels be too high, this will anyway be regulated by the market.		The prioritisation for hydrogen deployment in transport is part of the decarbonisation efforts to make transport greener. Zero emission transport vehicles and vessels are prioritised (Executive summary of the revised Transport Lending Policy).
5.	Hydrogen based mobility is a necessary tool for risk diversification.	Miguel de Ortuzar	
6.	Very important, the combustion product is pure water	Budapest Airport Zrt.	These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.
7.	As noted in the EIB Public consultation document, the decarbonization pathway for each transport mode and for different transport applications may be (indeed) different and (...) <b>various mixed-fuel solutions</b> are the most likely way forward.	Miguel de Ortuzar, Município de Faro, Správa železnic, UTP (Union des Transports Publics et ferroviaires),	As described in the entry above, criteria to support certain investments and which account to the EIB Group climate action and environmental sustainability targets have been defined in the EIB's Climate Bank Roadmap and the further prioritisations can be found in the revised Transport Lending Policy for the different transport modes and transport applications.
<b>Hydrogen applications in transport (avoid and modal shift)</b>			
8.	The priority should be given to <b>avoiding, shifting</b> to more sustainable modes and improving vehicle load factors and design. Improving fuels is just one element of the solution.	Counter Balance, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	Contributing to efficient transport is one of the principles that will underpin the EIB's support to the transport sector. The EIB recognizes the importance of a robust planning framework in which measures to avoid and shift transport are included and prioritises investments for instance in collective and shared mobility schemes as these are more resource efficient (Chapter 5 of the revised Transport Lending Policy). These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.
9.	Hydrogen has a role to play as an energy carrier in some cases. However, it must be borne in mind that its use involves <b>energy losses</b> due to transformations, which are never perfectly efficient. Costs, both economic and environmental, may outweigh the benefits. As with electromobility, this masks the real problem of widespread very long distance mobility due to aircraft.	Response 704118868	
10.	Particularly in Aviation and maritime transport - all journeys, even within Europe, cannot be shifted to another transport mode easily without significant <b>social cost</b> .	European Transport Workers' Federation	Thank you for your contribution.
<b>Hydrogen for certain applications</b>			
11.	<b>Aviation, shipping and railways</b> will benefit the most from this technology until the idea of everything electrical can be	Croatian Chamber of Economy	As described under the first point above, the EIB supports investments in hydrogen deployment in transport in the EIB's

Ref	Summary of Contributions	Contributor	EIB comment
	achieved. It can be done quickly in area of infrastructure and we already have developed vehicles for usage of hydrogen and hydrogen-based synthetic fuels.		<p>Climate Bank Roadmap and most investments account to the EIB Group climate action and environmental sustainability targets. The further prioritisations can be found in the revised Transport Lending Policy as described in the entries above. There is only limited formal prioritisation for certain applications, although physics, industrial developments, economics and supportive measures for certain applications will impact where hydrogen solutions are more likely.</p> <p>The criteria for production of hydrogen based synthetic fuels are as well described in the Climate Bank Roadmap, but under the Energy section. Further information can be found in the <a href="#">EIB's Energy Lending Policy</a>.</p>
12.	E-fuels is the only viable option for long-distance <b>shipping and aviation</b> ; this could be powered by green hydrogen or nuclear.	Van Oord	
13.	There is a role for renewable hydrogen in <b>maritime</b> shipping and, potentially, in <b>aviation</b> . Renewable hydrogen may also play a niche role in <b>heavy-duty road</b> transport.	European Federation for Transport & Environment Stadtwerke München GmbH, WWF EPO	
14.	There is a role for hydrogen and/or hydrogen-based synthetic fuels as an alternative fuel across the transport sector, notably in <b>aviation, road freight transport, public transport, rail, and maritime transport</b> .	Arthur D. Little	
15.	There is a role for hydrogen in transport applications where direct electrification is technically infeasible.	Counter Balance, Global Infrastructure Investor Association, Greenpeace, Joint contribution made by NewClimate Institute and Germanwatch, Service Public Fédéral Mobilité et Transports, Response 244811294	
16.	Hydrogen has a role to play as an energy carrier in some cases. However, it must be borne in mind that its use involves <b>energy losses</b> due to transformations, which are never perfectly efficient. Costs, both economic and environmental, may outweigh the benefits. As with electromobility, this masks	Response 704118868	

Ref	Summary of Contributions	Contributor	EIB comment
	the real problem of widespread very long distance mobility due to aircraft.		See response to points above.
17.	E-fuels should not be used in road transport.	European Federation for Transport & Environment	
18.	As for all processes which include a shift in energy carrier, there will be <b>losses</b> , meaning that synthetic fuels will always be more energy-intensive compared to using electricity directly in a vehicle. Electric vehicles should therefore be the preferred choice where possible.	Joint contribution made by NewClimate Institute and Germanwatch	
19.	Hydrogen can play a role in transport, however it might not be a central role.	Back on Track Belgium vzw-asbl, NEOLINE Développement	
20.	The role should be strictly limited to specific sub-sectors that have limited other viable decarbonization options, where hydrogen presents the best, most cost- and resource efficient option.  It will be useful to have further research on comparative assessment studies using a Life-Cycle Analysis perspective to have a broader perspective.	Alstom, E3G, ECTRI, Ferrovie dello Stato Italiane S.p.A, Ministry of Infrastructure and water Management, Ralph-Uwe Dietrich, UNIFE	
21.	There will be much demand for green hydrogen so it should be prioritised for areas which can't be used by electrification. Hydrogen is more effective in industrial processes. The conversion losses in hydrogen based mobility are too high.	Response 1039141480, urgewald	
	<b>Hydrogen - R&amp;D</b>		
22.	The right infrastructure and sufficient <b>support for R&amp;D</b> will be key. EIB investment in this area is key to speed up mass deployment of H2 transport applications.	Alstom, Aerospace and Defence Industries Association of Europe (ASD), Community of European Railway	The EIB supports research and innovation investments in hydrogen transport applications, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>

Ref	Summary of Contributions	Contributor	EIB comment
		and Infrastructure Companies (CER aisbl), SNCF, UNIFE	In addition, most of these investments account to the EIB Group climate action and environmental sustainability targets. The Transport Lending Policy does not cover the support to R&D needed for supply and distribution of hydrogen. The Climate Bank Roadmap, Annex 2 table B and <a href="#">the Digital &amp; Human Capital (IDHC) Orientation 2021-2027</a> describe that projects are supported which enable the development of hydrogen fuel cell solutions for passenger and commercial vehicles, that cover the entire drivetrain (fuel cell stacks, components, electronics storage systems etc.).
23.	For <b>freight</b> , the application of hydrogen/battery powered trains is not yet feasible in view of the traction energy required to operate a freight train. Rail freight decarbonisation requires low carbon energy. Research and innovation are necessary.	Community of European Railway and Infrastructure Companies (CER aisbl), International Union of Railways, SNCF	
<b>Hydrogen production</b>			
24.	Currently, about 98% of the hydrogen produced today is derived from carbon-intensive processes, so a new approach to manufacturing is required if it is to be credible as a low carbon energy source.	Global Infrastructure Investor Association, Service Public Fédéral Mobilité et Transports	The production and distribution of hydrogen are covered under the <a href="#">Energy Lending Policy</a> . This policy includes the requirement for compliance with the sustainability and GHG emission savings criteria of relevant EU directives. Further, such projects need also to demonstrate an acceptable energy conversion efficiency.
25.	Hydrogen should only be supported when it is produced from renewable energy.	AIRBUS, Bank Information Center, Counter Balance, E3G, Federation of Belgian Enterprises FEB-VBO, Joint contribution made by NewClimate Institute and Germanwatch, METROREXS.A. Bucharest,	The Climate Bank Roadmap requires – through carbon intensity thresholds defined by EU climate mitigation policies - for hydrogen projects to be eligible for EIB financing that the hydrogen is manufactured through either electricity (electrolysis) using additional renewable energy capacity or through fossil-fuels (mainly natural gas, steam methane reforming) with carbon capture (use) and storage. EIB financings, which intend to support investments for the use of hydrogen would be eligible for EIB funding, if such investments use hydrogen which is manufactured according to the EU climate mitigation policy criteria.
26.	The EIB should exclude any financing of “grey” and “blue” hydrogen produced from fossil fuels in order to stick to the spirit of its Energy Lending Policy.	Bank Information Center, Counter Balance, E3G, Greenpeace	

Ref	Summary of Contributions	Contributor	EIB comment
27.	Pairing electrification with alternative low-carbon fuels such as green hydrogen and green hydrogen-based synthetic fuels has the potential to decarbonise all modes of transport.	Joint contribution made by NewClimate Institute and Germanwatch, Response 290033127	
<b>Other remarks on hydrogen use in transport</b>			
28.	Hydrogen and hydrogen-based fuel are very different in terms of applications, infrastructure and occupational <b>safety</b> . There only is a small niche for hydrogen and a bigger niche for synthetic fuels.	Antje Willnow	The EIB requires that investments respect relevant international and national rules, regulations and standards. These include rules and regulations in relation to hydrogen safety in transport applications.
29.	Because of the high pressures and the needed <b>safety</b> distances.	Response 832108188	
30.	Since efforts are required in all areas to make the entire transport sector emission-free, a possible focus could be on those projects that contribute to the <b>decarbonization of several modes of transport at the same time</b> . This could comprise infrastructure projects that provide publicly accessible charging stations or hydrogen filling stations.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	Combining of hydrogen infrastructure for several modes can be supported through the criteria defined in the EIB's Climate Bank Roadmap.
31.	Only as a bridge technology, as long as there is a significant share of traditional motorized traffic.	Hanns Kerschner	As pure hydrogen cannot be used in "traditional motorised traffic", EIB assumes that here the blending of hydrogen in conventional fuels is suggested. The Transport Lending Policy does not cover investments to support this blending.
32.	We regret the lack of technological neutrality. The political world should remain open to new technological developments and alternative fuels that could provide efficient solutions. All forms of clean energies should be used to solve the problem.	Traxio	The EIB's approach is in general technology neutral and open to new technological developments including those in the domain of alternative fuels. The EIB approach has been based on the work of the EU Technical Expert Group and the EU Taxonomy to develop technical screening criteria.
33.	Hydrogen only makes sense, if the roll-out of FCV's will ramp up immediately.	Ralph-Uwe Dietrich	Projects to be financed by EIB, need to be technical feasible, financially viable and economically justified. Hence, financial viability requires sufficient, stable demand (e.g. fuel cell vehicles - FCVs) to trigger and/or justify investments into the production and supply of hydrogen. Details about the economic appraisal of investment projects at the EIB are

Ref	Summary of Contributions	Contributor	EIB comment
			explained in this document: <a href="#">economic appraisal of investment projects_en.pdf (eib.org)</a>
34.	Whilst being less effective, hydrogen can play an important role in <b>less dense regions</b> with less traffic and less abilities of charging up BEMU's.	Jori Milbradt	Thank you for your comments.
35.	Declining costs for renewable <b>energy</b> could significantly drive down the cost of hydrogen as early as 2030. This will make hydrogen increasingly cost-competitive with existing options.	AIRBUS	
36.	Yes, although its development is still incipient, there are uncertainties and they involve heavy and <b>very risky investments</b> for companies.	Confederación Española de Transporte en Autobús - CONFEBUS	
37.	In order for the existence of synthetic fuels to be possible, an enormous investment by companies is necessary, which will necessarily have to be supported. This is a path that must be taken gradually and after finding the appropriate solutions given the type of transport in question.	ARP - Associação Rodoviária de Transportadores Pesados de Passageiros	
38.	Some major low-carbon fuel options are available, all with different levels of advancement in terms of technical and economical maturity. Substantial advancements in research, development and deployment are needed for such advancements to take place.	Joint contribution made by NewClimate Institute and Germanwatch	
	<b>Hydrogen applications in rail</b>		
39.	Hydrogen-powered <b>trains</b> can be a credible alternative to diesel traction, especially on those parts of the network where electrification of a line would not be economically sound.	Community of European Railway and Infrastructure Companies (CER aisbl), European Union Agency for Railways, OTIF	As described under the first point above, the EIB supports investments in hydrogen deployment in transport in the EIB's Climate Bank Roadmap and most investments account to the EIB Group climate action and environmental sustainability targets. This includes deployment in the rail sector.
40.	Regarding <b>rail</b> , hydrogen used in a fuel cell is currently one of the only solutions available, along with battery-powered trains, to eliminate local and global emissions from trains running on non-electrified lines. However, the infrastructure for the mass	Alstom, UNIFE	The further prioritisations can be found in the revised Transport Lending Policy as described in the entries above.

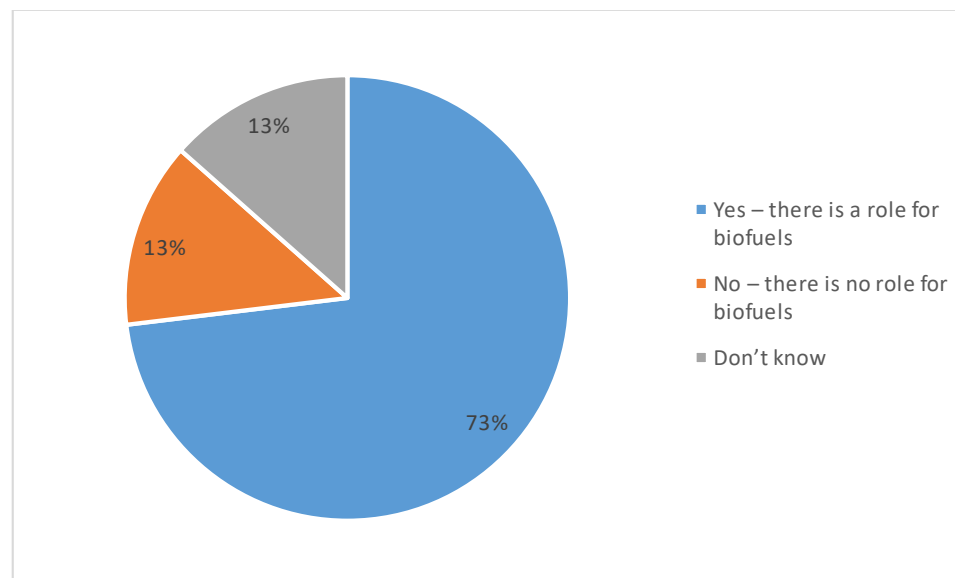
Ref	Summary of Contributions	Contributor	EIB comment
	deployment of this technology as a replacement for diesel is not yet ready and is therefore a barrier to its mass adoption.		
	<b>Hydrogen applications in heavy duty road transport</b>		
41.	Automobile manufacturers expect a significant market share for H2 <b>heavy duty vehicles</b> at the horizon 2030.	FEBIAC	As described under the first point above the EIB supports investments in hydrogen deployment in transport in the EIB's Climate Bank Roadmap and most investments account to the EIB Group climate action and environmental sustainability targets. This includes deployment in the heavy duty road transport sector. The further prioritisations can be found in the revised Transport Lending Policy as described in the entries above.
42.	Hydrogen and hydrogen-based synthetic fuels as alternative fuels play a role in <b>truck traffic</b> .	Pro Bahn, Response 974008607, Response 552589262	
43.	EU road haulage market is mainly made of SMEs and independent workers with small financial capacity. Under these circumstances, hydrogen and hydrogen-based synthetic fuels are theoretically greatly viable options for transportation, but it is still a long way to go in terms of market ready technology, costs and infrastructure capacity and deployment.	European Road Haulers Association (UETR)	SME lending for vehicles and associated investments is being promoted through the use of intermediated operations by the EIB. An example to support increasing investments that comply with climate action and environmental sustainability criteria is the <a href="#">Green Eligibility Checker</a> .
	<b>Hydrogen applications in shipping</b>		
44.	Yes, green hydrogen is an important and promising element of the fuel & technology mix.... whether in its pure form ...or as a hydrogen-derived fuel. Hydrogen should not be seen, however, as the only solution... EIB financing should finally not prevent the scale-up of climate neutral e-fuels (e.g. methanol) .... not be penalized by the application of a "tailpipe emissions" approach to ship emissions - see SEA Europe comments on the EU Taxonomy Climate Criteria & Tailpipe approach. For the same reason, albeit not in scope of the consultation, SEA Europe also recommends the EIB to refrain from importing the aforementioned Taxonomy (tailpipe-based) criteria into its Lending Policy until such criteria are adequately revised (based on a LCA approach, in line with the Fuel EU	SEA Europe (European Shipyards and Maritime Equipment Association)	Above EIB has described which types of investments in hydrogen (production and deployment) are supported both for shipping and other sectors. The EIB Group, as the EU climate bank, will align its tracking methodology for climate action and environmental sustainability ("green") finance with the framework defined by the EU Taxonomy Regulation, as this develops over time.  The <a href="#">list of climate action-eligible activities</a> is available on the EIB website.



Ref	Summary of Contributions	Contributor	EIB comment
	Maritime Proposal), tested in practice and adjusted to the right purposes.		
45.	Hydrogen does not seem adequate for maritime transport in the long term, due to the required space onboard and the need to liquify it.	CEOE, Costa Group	Thank you for your comment.
	<b>Hydrogen applications in aviation</b>		
46.	Hydrogen could have a significant role in powering short and medium haul <b>aircraft</b> . Hydrogen-based synthetic kerosene (power-to-liquid) could make a significant contribution to decarbonizing aviation.	Aerospace and Defence Industries Association of Europe (ASD), International Air Transport Association (IATA)	<p>The Climate Bank Roadmap outlines that the EIB refrains from supporting conventionally fueled aircraft and airport capacity expansions. For the moment, the EIB has as a priority investing in research development and innovation for disruptive technologies in the sector and zero direct emission aircraft and those fueled by verifiable zero net emission fuels.</p> <p>There is a wide consensus amongst industry players and regulators that Sustainable Aviation Fuels (SAFs) will play an important role in the decarbonisation of aviation, at least until disruptive propulsion technologies are developed at scale.</p> <p>Above EIB has described which types of investments in hydrogen (production and deployment) are supported both for aviation and other sectors.</p>
47.	Destination 2050 shows that, amongst others, decarbonisation of <b>aviation</b> requires an aggressive and parallel development of various low-carbon energy pathways, including hydrogen, together with massive energy efficiency improvements of future aircraft generation.	Aerospace and Defence Industries Association of Europe (ASD)	
48.	Hydrogen-based synthetic fuels are particularly important in <b>aviation</b> due to the lack of short-term alternatives to enable decarbonisation.	Bundesverband der deutschen Luftverkehrswirtschaft e.V.	
49.	As per the Destination 2050 Roadmap the introduction of a hydrogen-powered single-aisle <b>aircraft</b> on intra-European routes in 2035 would significantly support the decarbonisation of the industry, whilst paving the way for the development of the technology for long-haul flights where alternatives to liquid fuel will not be available. Hydrogen-based synthetic fuels are seen as a possible robust solution and need support to be further developed.	AIRBUS, Airlines for Europe A4E, International Air Transport Association (IATA)	
50.	In the <b>aviation</b> sector, hydrogen-based synthetic fuels can be used in both aircraft and vehicles on the apron.	Flughafenverband ADV	
51.	Synthetic fuels produced from renewable electricity, hydrogen and direct air-capture (DAC) will need to play an exclusive role	European Federation for	

Ref	Summary of Contributions	Contributor	EIB comment
	in the <b>aviation sector</b> where it will be required as e-kerosene for conventional airplanes.	Transport & Environment	
	<b>Hydrogen buses</b>		
52.	Although Fuel Cell <b>buses</b> produce no tailpipe emissions and have a longer range due to the high energy density, they currently still have a higher TCO than Euro VI diesel buses or BEBs. There are also supply chain challenges regarding handling hydrogen. Once these issues are solved they can become a strong contender with BEB for future mass adoption. Commercialization projects are currently helping for large scale roll-out, reducing high CAPEX costs and making the technology a complementary solution along BEBs for future full zero tailpipe bus networks.	International Association of Public Transport UITP	The EIB takes a technology-neutral approach to its support for the deployment of alternative fuel technologies, provided that they comply with the EIB's CBR. The EIB supports already the roll-out of cleaner bus fleets and of alternative fuels infrastructure and will continue, provided that they comply with the EIB's CBR.

Question 8– Is there a role for biofuels in decarbonisation of the transport sector?



Ref	Summary of Contributions	Contributor	EIB comment
	<b>Biofuels applications in transport (general)</b>		
1.	<p><b>All forms</b> of clean energies should be used to solve the problem. The political world should remain <b>open to new technological developments</b> and alternative fuels that could provide efficient solutions.</p> <p>The generic development of technologies with the potential to provide viable alternatives to diesel and the adaptation to the specificities of the transport sectors needs to be considered.</p>	<p>CEOE, Community of European Railway and Infrastructure Companies (CER aisbl), Confederación Española de Transporte en Autobús – CONFEBUS, European Road Haulers Association</p>	<p>The EIB takes a technology-neutral approach to its support for the deployment of alternative fuel technologies, provided that they comply with the EIB's CBR.</p> <p>The EIB supports investments in advanced biofuel production under strict conditions, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table E: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p> <p>Annex 2, Table A describes that also the storage and transport of biofuels that demonstrate to be “low-carbon” energy carriers can be supported.</p>

Ref	Summary of Contributions	Contributor	EIB comment
		(UETR), Município de Faro, Response Traxio	Annex 2, Table C describes that mobile assets solely powered by advanced biofuels (biofuels as per Renewable Energy Directive (RED) II with low ILUC (indirect land-use change) risk) can be supported.
2.	If hydrogen and electricity are not an ideal solution, and it is clear that we cannot provide green electricity to cover a growing demand, we should leave <b>all technologies the chance to improve</b> their performances. I believe strongly in the race to be the best in order to boost creativity and innovation.	Federation of Belgian Enterprises FEB-VBO	The requirements include safeguards to limit support to advanced biofuels that are deemed sustainable (see next EIB comment below).
3.	Biofuels should be reserved for transport solution that <b>cannot rely on hydrogen or electromobility</b> .	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie, Bundesverband der deutschen Luftverkehrswirtschaft e.V., EuroRAP, Flughafenverband ADV, METROREX S.A. Bucharest, Response 511707695, Road Safety Foundation, Service Public Fédéral Mobilité et Transports	Some investments into advanced biofuel production qualify as “substantial contribution” under the first delegated act of the EU Taxonomy and, in line with EIB’s Climate Bank Roadmap, account to the EIB Group climate action and environmental sustainability targets.  Deployment in transport (through investments in infrastructure or mobile assets) of biofuels does not qualify as “substantial contribution” (whereas many e-mobility solutions can) in line with the EU Taxonomy first Delegated Act. .
4.	Biofuels are required <b>wherever electromobility fails</b> , if sustainability is ensured – no crop based fuels, but <b>2nd and 3rd generation fuels</b> should be promoted.	Ralph-Uwe Dietrich	
5.	In <b>specific cases</b> , there is a scope for efficient use of biofuels.	Ministry of Transport	
6.	Biofuels have a <b>positive effect</b> on CO2 emissions, especially <b>advanced biofuels</b> .	MAV-Volán Group	

Ref	Summary of Contributions	Contributor	EIB comment
7.	Investments in further greening of bio-fuels are necessary.	Ministry of Infrastructure and water Management	
8.	While there are ongoing studies regarding biofuels with their <b>advantages and disadvantages</b> , however, consumers have a significant interest in eco-friendly alternatives.	Ministry of Transport and Infrastructure	
9.	We believe there are <b>better alternatives</b> to decarbonize transport, such as hydrogen and electrification.	Global Infrastructure Investor Association	As described in the entry above, safeguards have been developed to limit support to certain investments (included in the Climate Bank Roadmap).
10.	Biofuels <b>can contribute</b> to decarbonisation. However, the <b>externalities</b> (including their socio-economic and environmental impact) should also be taken into account.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr, METROREXS.A. Bucharest	Amongst those criteria there is the exclusion of feedstocks that can serve as food or compromise food security or investments that may be associated with unsustainable expansion into land that had the status of high carbon stock and high biodiversity areas. For instance, first generation biofuels are therefore excluded.
11.	There is a role for biofuels IF these are associated to zero environmental damage/zero biodiversity <b>external costs</b> . Hence, EU Directives and Member States legislation shall be subject to ex ante impact assessment.	ECTRI	
12.	The <b>move to synthetic renewable fuels</b> , produced with 100 percent renewable electricity, should be considered in the long term, taking into account the energy efficiency of the overall system and the resulting costs.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	
13.	<b>Synthetic and paraffinic fuels</b> (HVO) if produced using renewable sources (i.e. E-fuels) could substitute diesel in some cases where it is not readily electrified	International Union of Railways	
14.	Most variations have carbon dioxide as a by-product, takes away arable land from food production, but may not contain other pollutants (solid and NOx). Biofuel should be based on <b>recycled bio components</b> . Another opportunity would be to develop a scalable solution for producing <b>hydrogen based sustainable fuel</b> .	Budapest Airport Zrt.	
15.	Biofuels are only an evolution of fuels for thermal engines. While reducing GHG emissions, they confiscate agricultural	Response 290033127	

Ref	Summary of Contributions	Contributor	EIB comment
	land, cause water and pesticides in the fields to improve production and still pollute and therefore do not represent a viable alternative in the long term. <b>Support for this sector needs to be stopped altogether.</b>		See response to points above.
16.	They need <b>too many resources</b> and the energy losses when being used or produced are too big.	Jori Milbradt	
17.	<b>Too many negative effects</b> of biofuels on biodiversity, social issues, human rights and depending of how and where the relevant biomass is being grown there is no tangible effect on saving greenhouse gases.	Counter Balance, urgewald	
18.	Biofuels are an <b>ecological nightmare</b> .	Hanns Kerschner	
19.	Conventional, <b>first-generation biofuels</b> , e.g. food- and/or energy-based, should not be promoted and <b>phased out</b> .	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), WWF EPO	
20.	Increased demand for food-based biofuels leads to an increased use of agricultural land for energy. Since most agricultural land is already being used to produce food, new areas have to be found to meet the ever-increasing demand. This leads to <b>deforestation and draining of rich ecosystems, releasing tonnes of greenhouse gases</b> . As for biodiesel from forestry residues, it leads to a significant LUC emission value of 17 gCO <sub>2</sub> e/MJ biofuel consumed, as a result of lower build-up of soil organic carbon, which otherwise would be a significant carbon sink.	Bank Information Center	
21.	It is more important to use soil and agriculture for the <b>production of food</b> .	Response 1039141480	
	<b>Biofuels applications in transport (avoid and modal shift)</b>		
22.	The possibility of longer-term biofuel technology solutions should not distract from the priorities to take action to AVOID,	The SLOCAT Partnership on Sustainable, Low	Contributing to efficient transport is one of the principles that underpins the EIB's support to the transport sector. The EIB recognizes the importance of a robust planning framework in

Ref	Summary of Contributions	Contributor	EIB comment
	SHIFT and IMPROVE transport in the short term using known and proven solutions.	Carbon Transport (SLOCAT)	which measures to avoid and shift transport are included and EIB prioritises investments for instance in collective and shared mobility schemes as these are more resource efficient (Chapter 5 of the revised Transport Lending Policy).  These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.
23.	In the wake of electricity and hydrogen, biofuels pose the same problem: they focus our attention on the source of energy and not on the use of that energy. Biofuels are not sustainable at the scale of current mobility needs, as their production requires arable land and energy to be used in food production. The real challenge is to reduce mobility.	Response 704118868	
	Transitional or niche role of biofuels applications in transport		
24.	Biofuels are interesting as energy in the <b>short and medium</b> term (ie B100, HVO, (bio) NGV)	International Union of Railways, SNCF	As indicated above, based on the Climate Bank Roadmap EIB can support some types of investments when indicated safeguards are met, however there is no specific prioritisation foreseen for deployment in transport, only to support the production of sustainable biobased energy carriers.
25.	As a <b>transition</b> to hydrogen and electricity technologies to be perfected in future.	Croatian Chamber of Economy, Ministry of Infrastructure and water Management, Van Oord	
26.	There is a role for biofuels in the development of transport applications, but limited to a <b>transitional phase</b> until the electrification of the sector concerned.	Service Public Fédéral Mobilité et Transports, UNIFE	
27.	Yes - subject to strict sustainability criteria. Only sustainable biofuels produced from advanced feedstock i.e. wastes and residues, can help reduce transport emissions. Their availability at affordable production costs is limited and thus can only play a <b>niche role</b> .	Counter Balance, EPO, European Federation for Transport & Environment, European Transport Workers' Federation, Service Public Fédéral Mobilité et Transports, The SLOCAT Partnership on Sustainable, Low	EIB notes the risk to long-term competitiveness. The EIB performs an economic assessment of projects in order to ensure that it finances investments that are economically justified.

Ref	Summary of Contributions	Contributor	EIB comment
		Carbon Transport (SLOCAT), WWF	
28.	The potential for more sustainable forms of biofuels from waste and residues is very limited and should therefore only be used for <b>hard to abate sectors</b> .	Greenpeace	
29.	There is, but this can't be the target, but a <b>only a secondary target</b>	Back on Track Belgium vzw-asbl	
30.	The following criteria should be considered for investing in sustainable bioenergy production. Bioenergy sources should: <ul style="list-style-type: none"><li>• Not result induce land use change where forest cover is lost</li><li>• Not compete with food crops to avoid increases in food prices</li><li>• Not compete with food and fibre crops for land, water and fertiliser resources</li></ul> This said, biofuels may have a <b>very limited role in decarbonising transport in exceptional circumstances</b> . Considering the limited availability of sustainable feedstock (such as agricultural and food waste), it must not be seen as an alternative for any mode of transport that it is possible to electrify. Even in the long term, third generation biofuels may not be competitive with synthetic hydrogen-based fuels.	Joint contribution made by NewClimate Institute and Germanwatch	
31.	Biofuels will play a role for the decarbonisation of the aviation and maritime industry. For the railway industry, hydrogen is the alternative fuel that will replace diesel locomotives over time.	European Rail Infrastructure Managers (EIM)	
	<b>Other remarks on biofuel use in transport</b>		
32.	Biofuels might be a good way to decarbonize transports in <b>country-side</b> , but not as a general solution. If we want to limit problems of land-use competition, biofuels supply should <b>remain local</b> , so local waste/"feedstock" are locally valued in biofuels for local use. Therefore, biofuels will probably <b>not solve international transport issues</b> .	NEOLINE Development	In line with what has been set out in the Climate Bank Roadmap and the EU Taxonomy, no restrictions are foreseen on where to produce and deploy biofuels. However, localisation has an impact on the Life Cycle Analysis and thus on financial and economic assessments of projects that EIB undertakes in order to ensure that it finances investments that are economically justified.
33.	In terms of categorisation, no ambiguity should be allowed about the possibility for biofuels to drive forward transport decarbonisation since they are <b>not the solution</b> and can leave the open door to <b>potential greenwashing</b> .	UNIFE	The EIB has a well-established, robust tracking system for climate action, based on clear definitions of substantial contributions to both climate change mitigation and adaptation. These definitions follow the MDB-IDFC Common Principles, to which the EIB contributed from the very early stages and which



Ref	Summary of Contributions	Contributor	EIB comment
			form a key part of the EIB Climate Strategy. The EIB Group, as the EU climate bank, will align its tracking methodology for climate action and environmental sustainability (“green”) finance with the framework defined by the EU Taxonomy Regulation, as this develops over time. The <a href="#">list of climate action-eligible activities</a> is available on the EIB website.
	<b>Biofuel applications in (heavy duty) road transport</b>		
34.	Automobile manufacturers expect the use of biofuels for specific use-cases of <b>heavy duty vehicles</b> (off-road etc).	FEBIAC	Above, under point 1 of this question, EIB has described which types of investments in biofuels (production and deployment) are supported and that there are safeguards in place, these cover as well the deployment of biofuels in (heavy duty) road transport.
35.	With regard to sustainable biofuels only, I see a rising role in huge <b>haulage</b> transport.	Antje Willnow	
36.	Hydrogen and hydrogen-based synthetic fuels as alternative fuels play a role in <b>truck traffic</b> .	Response 974008607	
37.	Maybe for the existing cars to reach their end-of-life.	Response 832108188	This includes which types of investments are supported to contribute to the sustainable production of biofuels.
38.	Your questionnaire does not include CNG, BioCNG or Biogaz, which also play a very important role in the decarbonisation of transport. Biofuels can be an alternative for heavy-duty modes requiring a high degree of autonomy.	UTP (Union des Transports Publics et ferroviaires)	EIB sees BioCNG and Biogas as part of Biofuels. CNG, a fossil fuel, is indeed not included as part of the questionnaire.
39.	The EIB should end any investment in biofuels. It should also not invest in advanced biofuels for road transportation.	Counter Balance, Greenpeace	As described in above, safeguards have been developed to limit support to certain investments (as included in the Climate Bank Roadmap), but the termination of support is not foreseen. As for the deployment of advanced biofuels for road transportation through the financing of dedicated infrastructure or vehicles (as described in the Climate Bank Roadmap), this is not a priority and only supported under strict safeguards.
	<b>Biofuel applications in aviation</b>		
40.	<b>Sustainable aviation fuel (SAF)</b> made from a variety of biobased feedstock represents the single largest opportunity to decarbonization of aviation, prior to the eventual shift to power-to-liquid (PtL) fuels made from recycled or directly-captured CO2 and low carbon electricity.	International Air Transport Association (IATA)	There is a wide consensus amongst industry players and regulators that Sustainable Aviation Fuels (SAFs) will play an important role in the decarbonisation of aviation, at least until disruptive propulsion technologies are developed at scale. We note your point on the higher production costs.

Ref	Summary of Contributions	Contributor	EIB comment
41.	Destination 2050 clearly shows that the use of Sustainable aviation Fuels (SAF) on one hand, and the development of low-carbon aircraft technologies on the other hand, are the levers that will bring the most effective CO2 emissions reduction.	Aerospace and Defence Industries Association of Europe (ASD), AIRBUS, Airlines for Europe A4E, Airports Council International EUROPE	Above EIB has described which types of investments in biofuels (production and deployment) are supported and that there are safeguards in place.  Regarding the point on higher production costs of SAFs; the <a href="#">EIB Energy Lending Policy</a> (ELP) defines the Bank's approach for renewable technologies at an early stage of deployment in Chapter 4, Paragraph 24 and in Annex II. For the production of fuels from low-carbon energy sources, the Bank will assume that the long-term economic case can justify higher initial costs under certain conditions on a case-by-case basis.
42.	As a result of higher production costs, SAFs are, in absence of an orchestrated support strategy, not an economically viable substitute to conventional jet fuel. For ASTM approved fuels projects, the support should come via low-cost loans from governments, development banks, loan guarantees or insurance packages. Besides financial support, local governments can also facilitate non-financial support such as through permits or to build new or refurbished production locations and logistics infrastructure around the production location.	Airlines for Europe A4E	
<b>Biofuel applications in shipping</b>			
43.	Sustainable biofuels and synthetic (drop-in) fuels offer a significant reduction potential and can be used with minimal or moderate retrofitting of <b>ships</b> , at least as a transitional mid-term option. SEA Europe is also of the opinion that current existing energy converters, such as internal combustion engines, will play a significant role in the decarbonization of waterborne transport, if utilized with climate neutral synthetic fuels.	SEA Europe (European Shipyards and Maritime Equipment Association)	As for aviation, there is a wide consensus amongst industry players and regulators that sustainable fuels will play as well an important role in the decarbonisation of longer distance shipping in complement to other developments to decarbonise shipping.  Above EIB has described which types of investments in biofuels (production and deployment) are supported and that there are safeguards in place.
44.	Biofuels are an important pathway to shipping decarbonization. In the context of gas and liquid gas, biofuels could play a critical role with blending (ex: Bio LNG) while securing future technology progress with fuel cells for instance.	Costa Group	

Question 9 – What kind of investments in increasing the climate resilience of transport infrastructure can, at the same time, support the objective of decarbonising and depolluting transport?

Ref	Summary of Contributions	Contributor	EIB comment
	<b>Urban Public Transport &amp; Urban Mobility Planning</b>		
1.	The extension and development of the <b>urban</b> public transport network by metro.	METROREXS.A. Bucharest	<p>Urban public transport infrastructure and fleets, in particular trams, metros and suburban rails, are already at the core of EIB's financing.</p> <p>The Bank will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including shared mobility, active modes and any other investments supporting collective transport and multimodality. This also includes intermodal and logistics, combining IT and logistic platforms to improve the efficiency of urban freight and reduce its environmental impacts.</p> <p>The deployment of E-buses, taxis and automated shuttles and the related charging infrastructure, as well as other clean vehicles, will also be a particular focus for the EIB.</p> <p>Safety will also be one of the main pillars underpinning EIB transport sustainable support; ITS, digitalisation and innovation will be key basis to increase efficiency and safety of users.</p> <p>Public transport projects financed by the EIB are implemented according to best international practices, including accessibility for persons with reduced mobility.</p> <p>EIB financing of above referred investments is subject of compliance with the EIB Climate Bank Roadmap. It includes ensuring that all operations are aligned with the principles of Paris Agreement, and therefore, including that those are adapted to current weather variability and future climate</p>
2.	Mixed structures (work and life and recreation) with short distances encourage 1) walking and the use of 2) public transport. It is important to reduce the need for mobility and for mileage especially in daily mobility.	Response 1039141480, Response 511707695	
3.	Less cars in the cities	Marc-Olivier Leclercq	
4.	Electric buses	CIMBAL - Comunidade Intermunicipal do Baixo Alentejo	
5.	Strengthening the supply of public transport systems. Expansion of their networks and their multimodal integration. Promote the installation of recharging points in buildings and encourage the purchase of private clean vehicles.	Município de Paredes	
6.	Basic development of LPT, extension of metro, tram and electric bus routes and conservation measures of existing transport infrastructure (LPT); Construction/refurbishment and refurbishment of local public transport units.	Stadtwerke München GmbH	
7.	Spatial planning, the re-organisation of public space and transformation from land-use separation to mixed-use local centres enabling accessibility to destinations by non-motorised transport is essential for reducing motorised transport and increase fair accessibility.	ECTRI	

Ref	Summary of Contributions	Contributor	EIB comment
8.	Support the development of metrics for functionality and damage of transport infrastructure resilience and its measurement, with an aim of integrating resilience criteria into urban mobility decision-making through the development of (the collection of) quality data and analytical tools available for transport authorities.	International Association of Public Transport UITP	<p>change. The EIB uses the Climate Risk Assessment System (CRA) as cornerstone to ensure climate resilience by systematically assessing physical climate risk in direct lending operations.</p> <p>The EIB advisory and technical assistance offer to support strategic planning and early project preparation is becoming an increasingly important facet of the added value of EIB participation in projects (e.g. there is an increasing demand for advisory services from the Joint Assistance to Support Projects in European Regions (<a href="#">JASPERS</a>) to support strategic planning of transport investments). Planning is a key stage to develop a project pipeline aligned with Paris Agreement objectives, in particular:</p> <ol style="list-style-type: none"> <li>1. to decarbonize transport promoting ASI principle (Avoiding unnecessary traffic /reducing need for long-distance travel; Shifting traffic to more environmentally friendly modes and decarbonizing all modes; Improving the remaining traffic – through all means including technology that in turn also includes the change of drive trains from internal combustion engines to electrification of mobility). It is essential that transport planning is coordinated with land/spatial planning to achieve the overall climate mitigation targets.</li> <li>2. to ensure climate resilience of transport infrastructure and services. It requires undertaking customized climate resilience assessments to identify measures that mitigate climate risk to “acceptable levels”.</li> </ol> <p>As per the <a href="#">EIB Climate Adaptation Plan</a>, the EIB aims to work with public and private sector clients to develop further their capacity and approaches to climate resilience. Increasing the impact of climate adaptation is one of the main targets of the Plan. The EIB will launch the Climate Adaptation Investment</p>
9.	Pedestrian and cycling infrastructures, which contribute to the reduction of private vehicles, and to decarbonization and if connected with multimodal infrastructures better.	Miguel de Ortuzar	
10.	The type of projects that promote Eco-friendly transportation depend on the particularities of the city. Every city has a specific issue or encounters a general challenge.	Ministry of Transport and Infrastructure	
11.	For motorised trips which cannot be avoided, multimodal passenger transport and <b>cross-modal infrastructures</b> where cycling and walking are fully included; Investment in urban and peri-urban structures that support local supply in line with these infrastructures. Public and shared transport infrastructure options that are accessible to all people. Investment in smart urban and peri-urban logistics infrastructure such as intermodal urban logistics terminals and hubs. Multimodal transport and cross-modal infrastructures where cycling and walking are fully included; Transport infrastructure options that are accessible to all people in urban, rural and remote areas.  More research is required for assessing and modelling resilience of transport systems.	ECTRI	
12.	All investments that can contribute to encourage "multimodality" (mainly infrastructures) and to decrease the sinistrality rates on the public spaces to tend to a "0 incident" mobility.	Traxio	
13.	One of the most obvious climate resilience investment strategies towards the infrastructure network is to control and	International Association of	

Ref	Summary of Contributions	Contributor	EIB comment
	reduce energy consumptions, offset GHG emissions, as well as promote energy efficiency of transport services. All of this can be successfully achieved by shifting single car occupancy habits towards collective and shared modes of local transport.	Public Transport UITP	<p>Advisory platform (ADAPT) to provide technical and financial advice to clients in the EU. ADAPT can support a full range of adaptation investment activities, particularly those in line with the policy windows of the InvestEU programme and with the Joint Assistance to Support Projects in European Regions (<a href="#">JASPERS</a>) objectives and areas of operation.</p> <p>The EIB will enhance its approach to better capture the effectiveness of adaptation finance (i.e. climate resilience metrics) across a wide range of financing operations, which in turn will inform the Bank's financing strategy, and products and services development.</p> <p>Please also refer to “Chapter 3-Urban Mobility”.</p>
14.	Investment in integration between formal and informal modes. E.g. at BRT stations, how can better infrastructure be developed to seamlessly connect commuters from BRTs to autorickshaws/minivans etc.	WhereIsMyTransport	
15.	Making sure urban nodes and transshipment terminals are well equipped and modernised to make sure freight can be moved in an optimal combination of different modes and types of vehicles.	TLN	
16.	One of the EIB's primary objectives in this area should be to help reduce vulnerability to pandemic crises. This requires better investment and planning in transport.	Alstom, UNIFE	
	<b>Railway</b>		
17.	Night <b>Trains</b> and Direct trains throughout Europe with stops every 100km.	Response 1039141480	EIB has and will continue to finance railway infrastructure projects provided that they comply with EIB criteria, including those described in the EIB Climate Bank Roadmap.
18.	Rail transport	Alstom, Antje Willnow, Croatian Chamber of Economy, Hanns Kerschner, OTIF, Railway Signalling Automation Telecommunication And Industry Association, Ralph-Uwe Dietrich, Response 974008607,	<p>The EIB will continue to prioritize investments into new and upgraded electrified rail infrastructure and rolling stock, particularly on the TEN-T network; as well as investments for digitalisation and automation (e.g. ERTMS).</p> <p>As mentioned in the section above, Climate Risk Assessments (CRA) for all EIB operations will ensure that those are climate resilient and, therefore, that adequate measures are foreseen to mitigate climate risks related to extreme weather.</p> <p>As referred in the <a href="#">EIB Climate Adaptation Plan</a>, the new EU Strategy on Adaptation to Climate Change (EC, 2021) calls for</p>

Ref	Summary of Contributions	Contributor	EIB comment
		Response 832108188	<p>more systemic adaptation which requires looking beyond individual projects. To be effective, projects that contribute to adaptation must be in line with broader, long-term climate resilience and sustainable development goals. To this end, the EIB will increase its upstream dialogue with clients to support the elaboration of strategic policies and the development of climate adaptation and resilience investment programmes. As referred in the Plan, the EIB will launch the Climate Adaptation Investment Advisory platform (ADAPT) to provide technical and financial advice to clients in the EU. ADAPT can support a full range of adaptation investment activities, particularly those in line with the policy windows of the InvestEU programme and with the Joint Assistance to Support Projects in European Regions (<a href="#">JASPERS</a>) objectives and areas of operation. In transport, the EIB might provide advisory and financial support on climate change vulnerability and risk assessments of transport networks and cross-sector analyses to enable more systemic adaptation, i.e.: informing transport planning and the development of climate resilient investments and programs.</p> <p>Please also refer to section above “Question 9 - Urban Public Transport and Urban Transport Planning” and “Chapter 4 – Extra-urban Rail”.</p>
19.	<p>Electrification of railways/deployment of alternatives to fossil energy where electrification of railways is too costly.</p> <p>Modernisation and improvement of the rail network to increase its capacity and thus encourage modal shift towards the train. Acquisition of hybrid solutions/equipment for passenger and freight traffic.</p> <ul style="list-style-type: none"> <li>— Investments in the energy renovation of stations</li> <li>— Automatic coupling for freight wagons</li> </ul>	SNCF	
20.	Investing in upgraded railway lines almost always leads to a higher standard of climate resilience of that line. When upgrading a line, the climate resilience of that line is inspected and additional measures are taken if necessary.	European Rail Infrastructure Managers (EIM)	
21.	Investments in decreasing climate vulnerabilities of railway sector. Investment decisions for achieving resilience should be based on systematic methodologies that help optimally improve resilience taking into consideration future uncertainties. Investment is required to prepare and achieve the necessary uptake of the methodologies.	UNECE	
22.	Investing in resilient rail infrastructure will help decarbonisation of transport. The environmental regulations differ according to the priorities and functioning of each country. For this, important steps should be taken and researchers should be encouraged with the necessary incentives and investments should be done by governments. Reporting and analysis should be made more transparent for all transport modes and comparison tables should be prepared.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways	
23.	Investments in the completion of the Trans-European Transport Network (TEN-T) and The European Rail Traffic	Správa železnic	

Ref	Summary of Contributions	Contributor	EIB comment
	Management System (ERTMS) together with investment to the new rolling stock.		
24.	Protection of railway paths against extreme weather conditions, in particular floods, heavy rain and snow paths.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
25.	Improving the stability of track beds, where instability is caused by heavy traffic, higher speeds and extreme weather.	European Sleeper Coöperatie U.A.	
26.	Investments in infrastructures and projects to enable the use of less polluting means of transport (i.e. railway infrastructure and rolling stock)	Ferrovie dello Stato Italiane S.p.A	
	Aviation		
27.	Destination 2050 estimates that improvements in air traffic management (ATM) can be reached through modernisation of ground infrastructure. Deployment of infrastructure adapted to the <b>aviation</b> transition to hydrogen is critical.	Bundesverband der deutschen Luftverkehrswirtschaft e.V., Flughafenverband ADV, Airlines for Europe, A4E, Aerospace and Defence Industries, Association of Europe (ASD), AIRBUS	The EIB will prioritise the financing of projects related to aviation sector that will overcome existing operational efficiency constraints and explicit decarbonisation measures such as the greening of ground service fleets, energy efficiency programs and enabling infrastructure to service Sustainable Aviation Fuels (SAFs) and low emission aircraft.  Please also refer to “Chapter 8 – Aviation”.
28.	Investments in vehicles (apron)	Flughafenverband ADV	
	Maritime		
29.	Long-distance <b>ferries</b> instead of short distance flights	Response 1039141480	The EIB will continue to prioritise the development of TEN-T ports in the EU and Neighbourhood.



Ref	Summary of Contributions	Contributor	EIB comment
30.	LNG, biofuels and hydrogen derived fuels related infrastructures to bunker ships would of course support the decarbonizing objectives, aside the shore power plants	Costa Group	<p>The EIB will also prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain.</p> <p>The EIB will continue to develop joint initiatives and specific projects that support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet. This includes the deployment of commercially available technologies and alternative fuels with an objective to reach a significant impact on reducing pollutant emissions.</p> <p>The <a href="#">EIB Climate Adaptation Plan</a> illustrates the EIB increased ambition in climate adaptation financing as well as the Bank's objective to increase the impact of its adaptation support.</p> <p>The Climate Risk Assessments (CRA) for all EIB operations will assess if investments are climate resilient and, therefore, that adequate measures are foreseen to mitigate climate risks related to extreme weather.</p> <p>Please also refer to "Chapter 7 – Maritime transport".</p>
31.	In order to encourage the transition, it is important to ensure that subsidies, public and private investments are available, since cleaner vessels require new technologies. New technologies are financially riskier assets and hence can only be financed on the private markets with higher cost of capital. Additionally, there is a significant difference in prices of current and new fuels.	ECSA	
32.	The availability of infrastructure and the ability of the European port and waterway authorities to provide zero-emission and climate-resilient infrastructure will be essential to enable the introduction of zero-emission seagoing ships and inland vessels, to tackle the issue of reconciling emission reduction targets with a predicted increase in European ports traffic and to stimulate the modal shift.	SEA Europe (European Shipyards and Maritime Equipment Association)	
33.	European ports should be prioritised in climate resilience and adaptation efforts. European seaports are first in line to be hit by the consequences of climate change, including rising sea levels and extreme weather.	European Sea Ports Organisation	
34.	Climate resilience in terms of coastal defense.	Van Oord	
<b>Inland waterways</b>			
35.	Measures to ensure the navigability of IWW.	Ministry of Transport	Inland waterway transport (IWT) remains relatively underused as a mode, especially when it comes to the hinterland connection of seaports and the supply of important industrial centres and urban agglomerations, as well as for passenger transport. IWT infrastructure is particularly vulnerable to climate change effects, specifically to the variation of water levels in the waterways. EU regulations require rivers, canals and lakes, and their associated infrastructure, to be



Ref	Summary of Contributions	Contributor	EIB comment
			<p>maintained so as to preserve good navigation status, while respecting the applicable environmental law. IWT represents a relatively efficient means to transport freight, particularly bulk freight, and is therefore considered to be a sustainable alternative to the transport of freight by road. The EIB will therefore prioritise economically justified investments in the IWT sector and complying with the EIB's CBR.</p> <p>The Bank is aware of the particular vulnerability of the sector to the effects of climate change as well as the environmental restrictions that exist when it comes to implement new IWT projects, particularly greenfield investments.</p> <p>The <a href="#">EIB Climate Adaptation Plan</a> illustrates the EIB increased ambition on investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure.</p> <p>The EIB will significantly increase</p> <ul style="list-style-type: none"> <li>• adaptation financing to support the European Union</li> <li>• adaptation Strategy for smarter, more systemic and faster</li> <li>• adaptation, both across Europe and globally.</li> </ul> <p>It is also noted that the environmental compliance of these projects as well as a sound preparedness of the projects for the likely effects of climate change are requirements under the Bank's Environmental and Social Standards which are applicable to all the projects it finances.</p> <p>Please also refer to "Chapter 5 – Inland waterway transport".</p>
	<b>Intermodal infrastructure</b>		
36.	Promoting intermodality	Confederación Española de	The Bank will continue supporting and prioritise projects that promote modal shift away from private cars such as rail based

Ref	Summary of Contributions	Contributor	EIB comment
		Transporte en Autobús - CONFEBUS	infrastructure investments as well as other investments in collective transport and multimodality.  The EIB recognises the importance of intermodal transport in the freight sector, and wider transport systems.
37.	All investments that favour modal shift from road and aviation to more sustainable transport modes. It does not need to rely on alternative fuels, electromobility or other types of innovations which, although promising, face the technological transition risk and the sourcing risk for raw materials.	European Union Agency for Railways	EIB financing is subject of compliance with the EIB Climate Bank Roadmap. It includes ensuring that all operations are aligned with the principles of the Paris Agreement, i.e. with the low-carbon and climate-resilient goals.
38.	Investments should focus on the change of use in transport.  Indeed, without this, technological developments could be negatively offset by a rebound effect. Increasing occupancy rate leads to multiple social, economic and environmental benefits. This requires systemic innovation.	ECOV	Please also refer to section above “Question 9 - Urban public transport & Urban Mobility Planning”.
39.	Multimodal infrastructures, that is to say, infrastructures which can be used by different modes in large and small scale. Invest in only on infrastructure that can be shared by different modes, and that implies a robust transport and spatial planning.	Miguel de Ortazar	
40.	Investment in multimodal logistic nodes and promotion of intermodality (bus-rail-aviation).	CEOE	
41.	Investments in multi-modal logistic nodes.	Confederación Nacional de la Construcción (CNC)	
42.	Break down the partitions between modes. The complexity of changing between modes is too big today. It means we need multimodal platforms but also technical and administrative integration of the modes.	Federation of Belgian Enterprises FEB-VBO	
43.	Investments that prioritize <b>short and local supply chains</b> are as well climate resilient and supporting decarbonisation.	NEOLINE Développement	

Ref	Summary of Contributions	Contributor	EIB comment
	<b>Electrification and alternative fuels</b>		
44.	Some infrastructure should even be <b>electrified</b> , when only being used less frequently as a resilient evade route. If they create new ways of transporting goods without trucks, it may be worth it in the long run.	Jori Milbradt	<p>The EIB will continue to support both the development of new technology in the transport sector, and its roll out at scale and in compliance with the EIB Climate Bank Roadmap (CBR). It is already the case for investment needs related to electrification in the road sector. As mentioned in the “Urban Public Transport &amp; Transport Planning” section above, the deployment of E-buses, taxis and automated shuttles and the related charging infrastructure, as well as other clean vehicles, will be a particular focus for the EIB. In other transport sectors, the transition requires other technological solutions (e.g. hydrogen, or bio-fuels or synthetic fuels for aviation, or from bio-based to synthetic energy carriers in case of shipping, etc.). As always, the EIB will remain technology-neutral in its investments, acknowledging that the spillovers from research have wider benefits, and that viable solutions can emerge from unlikely starting points.</p> <p>As per the <a href="#">EIB Climate Adaptation Plan</a>, supporting implementation of information measures (e.g. intelligent transport systems and other measures that can provide early warning and user response) will increase climate resilience on transport.</p> <p>The alignment of EIB support and the EU Taxonomy of Sustainable Activities is described in the EIB CBR.</p> <p>The EIB’s framework for assessing the added value and impact of projects and its own intervention is described in the <a href="#">Additionality and Impact Measurement (AIM) framework</a>.</p> <p>EIB support to energy infrastructure is described in the <a href="#">EIB Energy Lending Policy</a> and the EIB CBR.</p>
45.	Subsidized urban public transport, accelerated generation change to hybrid or fully electric systems, CO2-neutral alternative sources to avoid increased electricity demand by burning fossil fuels, use of geothermal and solar / wind energy. Solutions of filtering Co2 from the air, fusion energy (ITER) on long term. Scaling up the sustainable fuel solutions for aviation and maritime.	Budapest Airport Zrt.	
46.	In addition, investment in sustainable transport (H2 / Battery / electrification) will participate both in mitigating climate change and increasing resilience of transport infrastructure	Alstom, UNIFE	
47.	Cost-beneficial investments to improve the service level in all transport modes and shift to non-polluting energy.	Finnish Transport Infrastructure Agency	
48.	Battery powered transport may play a significant role as a bridge technology or occupy some nichés.	Hanns Kerschner	
49.	Production sites of advanced and sustainable biofuels also contribute to immediate resilience, depollution and defossilisation.	Antje Willnow	
50.	EIB should take into account the European Taxonomy criteria and also the recent developments on the decarbonisation of the energy used (green hydrogen, etc.) by transport, when considering investments opportunities.	Alstom, UNIFE	
51.	Further electrification of networks including new urban / sub-urban rail networks increase the climate resilience of transport	UNIFE	

Ref	Summary of Contributions	Contributor	EIB comment
	infrastructure while supporting the decarbonisation of transport at the same time.  ICT related solutions will also contribute to infrastructure resilience and decarbonisation.		
52.	Investments in decentralised electricity production, smart grids and electricity grid infrastructure development, and fast-charging/H2 infrastructure will make zero emission vehicles more attractive and more accessible in rural and periferial regions in Europe.	FEBIAC	
53.	Investing in curbing carbon emission vehicles	Mutakwa Samuel Sikazwe	
54.	Financing of a GNV, bioGNV or Biogaz system => purchase of vehicles, fuelling and distribution system, etc.	UTP (Union des Transports Publics et ferroviaires)	
55.	The EIB should be looking at de-risking any nascent technologies that could help decarbonize and depollute transport, while at the same time investing in scaling the technologies and infrastructure that has proven efficient. Therefore, investment by the EIB should be made to provide additionality within the market.	Global Infrastructure Investor Association	
56.	Supporting the development of less impacting transport modes	Back on Track Belgium vzw-asbl	
57.	Investments in infrastructure related to the production of green energy.	SNCF	
58.	New rolling stock, use of solar energy, alternate cooling system, develop of the heating system. Supporting the development of battery technologies, chargers and the expansion of electrical networks.	MÁV-Volán Group	
	Rehabilitation of existing infrastructure		

Ref	Summary of Contributions	Contributor	EIB comment
59.	Regarding resilience to climate change, the dimensioning must be different according to the zones considered. There is a strong need for work on rapid <b>repair and maintenance</b> modules in order to respond quickly after a climate event.	Alstom, UNIFE	EIB financing will continue to prioritize asset preservation and climate resilience through the rehabilitation and upgrading of existing transport networks as signalled in the Transport Lending Policy (TLP).
60.	Maintenance of existing infrastructure.	Ministère de la Transition écologique	<p>It is also mentioned in the TLP, that in common with other sectors, the current take-make-use-dispose approach of the transport sector will have to change rapidly to a circular-economy-based approach aiming at extending the useful life of products, materials and resources for as long as possible.</p> <p>As referred in the <a href="#">EIB Climate Adaptation Plan</a>, the EIB will seek to ensure resilience of transport infrastructure, in particular, by promoting the use of asset management systems as a basis for efficient and resilient transport systems and/or system-wide, network approaches for climate vulnerability assessments. It also emphasizes the aim to support climate resilient rehabilitation of ageing transport infrastructure (e.g. road rehabilitation programs) together with other key upgrades (e.g. deployment of alternative fuel infrastructure).</p> <p>Other climate change adaptation measures for transport systems refer to information support measures (such as intelligent transport systems) that can provide early warning and user response measures for weather-related events. The Plan also refers to supporting new transport infrastructure that responds to future climate and socio-economic needs. As mentioned in the Plan, the EIB will launch the Climate Adaptation Investment Advisory platform (ADAPT), building on the complementary resources of the Invest EU Advisory Hub and the <a href="#">Joint Assistance to Support Projects in European Regions (JASPERS)</a>, to provide technical and financial advice to clients in the EU. The objective of ADAPT is to provide</p>
61.	Use of recycled extended-life materials in road construction, using better insulation for buildings in purpose for transport, better asphalt which reduces noise and fuel consumption, drainage system improvement.	Croatian motorways Ltd, Município de Faro	
62.	When investing in climate resilient transport infrastructure, good asset management and maintenance of transport infrastructure should be taken into account, as it supports decarbonizing and depolluting transport.	Ministry of Infrastructure and water Management	
63.	Investments on adequate maintenance and renewal. Development of new materials for essential infrastructures.	European Road Haulers Association (UETR)	
64.	Investments should focus not only on bringing new transport infrastructure which is resilient and carbon neutral but also on maintaining and optimising the use of existing ones. There is a strong need for work on the rapid repair and maintenance of transport systems in order to respond quickly after a climate-related event or other shocks.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
65.	Investments in maintenance and upgrading roads.	Confederación Nacional de la Construcción (CNC)	

Ref	Summary of Contributions	Contributor	EIB comment
66.	In a medium- to long-term, designing new and more resilient infrastructure assets, as well as protecting and retrofitting existing networks and assets is also key.	International Association of Public Transport UITP	advisory services that have the potential to strengthen climate resilience for vulnerable activities, including transport networks.
	<b>Various</b>		
67.	Night trains, inland waterway transport, sailing transport, etc.  Research into zeppelin... the nuclear car, soft mobility, more or less electrified bike mobility, etc.	Response 981558580	Please refer to sections above “Question 9 – Railways” and “Question 9 - Inland waterways”.  And many thanks for other suggestions provided.
68.	Rail Waterways - Both should be also better connected to industries dependent on good transportation	STIB-MIVB	
69.	<p>Priority of investment should be in infrastructure of sustainable transport modes. It is necessary to integrate urban spatial planning and urban mobility planning that is accessible, affordable, gender sensitive and respective of conditions, wages and security of workers. This means introducing a strong democratic element infrastructure investment, engaging society and most of all workers and their representatives.</p> <p>Occupational health and safety as well as security considerations should be made when investing in renewable energy infrastructure for professional road transport, in ports or airports. This requires investment in skills development to ensure that job creation is prioritised for workers handling sustainable fuels.</p> <p>Resilient infrastructure must include needs of transport workers, namely; access to sanitation, proper sanitation in stations (metro and rail), safe parking areas for professional drivers.</p>	European Transport Workers' Federation	<p>EIB recognizes that people's socioeconomic status or gender can have impact on what transport means are accessible to them, how, when and why they travel (see section 4 of the Transport Lending Policy). Moreover, the EIB recognizes that ensuring that women (as leaders, consumers, employees, entrepreneurs) benefit equally from investments in transport system is likely to significantly enhance investment impact.</p> <p>As per EIB's 2016 Gender Strategy (<a href="#">The EIB Group Strategy on Gender Equality and Women's Economic Empowerment</a>) and EIBG Gender Action Plan 2021-24 gender equality is an EIBG priority.</p> <p>Aspects related to accessibility, affordability and considering needs of various transport users in relation to their transport patterns, schedules, accessibility to sanitary facilities are taken into consideration in the EIB's due diligence process.</p> <p><a href="#">The EIB Group Environmental and Social Sustainability Framework (ESSF)</a> refers to the set of Environmental and Social Standards (including standards related to labour rights,</p>

Ref	Summary of Contributions	Contributor	EIB comment
			health and safety, etc.) which are part of the due diligence and monitoring carried out for all EIB financed projects.
70.	Infrastructures that effectively facilitate the transition to sustainable mobility.	Confederación Española de Transporte en Autobús - CONFEBUS	The principles of sustainable and inclusive transport underpins EIB support in the transport sector.
71.	Any investment promoting climate resilience of infrastructure dedicated to transport modes considered to be more sustainable contributes indirectly to the objective of decarbonising transport.	Fédération nationale des Travaux Publics (FNTP), Service Public Fédéral Mobilité et Transports, UTP (Union des Transports Publics et ferroviaires)	All EIB operations are to be Paris Agreement Aligned, i.e. consistent with a pathway towards low greenhouse gas emissions and climate resilient.
72.	C-ITS support (eg congestion management)	Município de Lousada	The EIB will also support Intelligent Transport Systems and other digital solutions, in particular when aiming at optimal (i.e. minimization of congestion) and safer use of existing transport infrastructure; provided their compliance with the EIB Climate Bank Roadmap.
73.	It would be crucial to consider including public warning as a necessary component of its transport lending policy. From a climate change perspective Public warning is an extremely efficient way to reduce loss and damage, a climate adaptation tool, as well as a mitigating factor (avoiding replacement costs).	Everbridge	<p>The EIB Climate Adaptation Plan refers to some possible examples of investments and advisory services aiming at climate resilient transport infrastructure and services.</p> <p>For example, information support measures including, inter alia, intelligent transport systems that can provide early warning and user response measures for weather-related events while aiming at optimal and safe use of infrastructure.</p>
74.	Efficient traffic management in case of disruption due to extreme weather can help to reduce CO2 emissions.	Ministry of Infrastructure and water Management	

Ref	Summary of Contributions	Contributor	EIB comment
75.	The EIB should support work on efficient air conditioning as this could have knock on impacts for decarbonizing transport whilst also providing better resilience to heat.	E3G	
76.	Investing in the innovative tools of financing such as FoFs schemes mobilizing private investment in the sustainable transport.	Institute for European Cooperation	The EIB will seek to develop innovative financing facilities in sustainable transport such as modernisation, digitalisation and automation of railway rolling stock.
77.	One element is choosing investments that properly incorporate the cost of non-resilience. Proactively accounting for climate risks, including the likelihood of physical destruction of infrastructure and economic disruption can promote the flow of capital toward climate-aligned investments and away from high-carbon investments. Investments that use elements of nature—natural climate or nature-based solutions—are also ideally suited to achieve both goals.	Bank Information Center	<p>The EIB Climate Risk Assessment (CRA) is a customised process to assess physical climate risk in the Bank's direct lending operations.</p> <p>The EIB approach includes promoting nature-based solutions that benefit environmental sustainability, and activities that benefit climate change mitigation and adaptation across sectors.</p>
78.	An investment must be made in the roads, in the vehicles' autonomy capacity, and support must be given to companies so that they can gradually renew their fleet, meeting the established objectives.	ARP - Associação Rodoviária de Transportadores Pesados de Passageiros	EIB will support new vehicles that meet the requirements of the EU Green Taxonomy as per the EIB Climate Bank Roadmap.
79.	Investment in digitalization. Connectivity between ports. Upgrading and maintenance of roads. Modernization of terminals (freight/passengers) and bus stations.	CEOE	Please refer to sections above "Question 9 - Maritime" and "Question 9 - Rehabilitation of existing infrastructure".
80.	Linking transport infrastructure construction with tree planting and other green spaces (include plants in transport infrastructure, avoid soil sealing)	Response 511707695	The Transport Lending Policy applies alongside other EIB policies, principles, standards and guidelines, <a href="#">the EIB Group Environmental &amp; Social Sustainability Framework (ESSF)</a> where protecting, preserving, restoring and valuing biodiversity and ecosystem services is part of key areas of action.
81.	The best effect will be obtained by <b>not investing</b> in transport infrastructure that locks-in fossil use and high greenhouse gas emissions, like aviation, motorways and LNG terminals.	urgewald	The EIB Climate Bank Roadmap (CBR) foresees continued support to the road sector, but makes investments in road capacity expansion projects subject to compliance with a



Ref	Summary of Contributions	Contributor	EIB comment
			stricter economic test, which, inter alia, ensures that capacity expansion projects which rely on high short term (i.e. not yet decarbonized) vehicles are not supported. As per EIB's CBR, all EIB activities need to be aligned with the Paris Agreement temperature and adaptation goals, and "consistent with pathways towards low-carbon and climate-resilient development".
82.	The EIB could help the decarbonisation of transport by no longer financing motorway and highway expansion.	Response 1039141480, WWF EPO,	
83.	Ambitious measures are needed to prevent the worst outcomes of climate change. This is why the EIB must above all avoid any further lock-ins in carbon intensive infrastructure including motorways, highways and LNG terminals.	Counter Balance, Greenpeace	In particular, the eligibilities for EIB lending in transport are specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
84.	The EIB must above all avoid any further lock-ins in carbon intensive infrastructure including motorways, highways and LNG terminals.	E3G	Additionally, EIB support to energy infrastructure is described in the <a href="#">EIB Energy Lending Policy</a>  Please also refer to "Chapter 5 – Extra-urban Roads".
85.	Funding the deconstruction of road infrastructure (Renaturation of unnecessary road infrastructure).	Response 511707695	Many thanks for your comment.

Question 10– Given the imperative to decarbonise transport, what transport investments should the EIB support that can contribute to the balanced development of different regions and Member States of the European Union?

#### EIB's comments

The EIB would like to thank all the participants for their contributions. The EIB has carefully reviewed them one by one and identified key topics that they were addressing, which are summarized in the table below along with EIB's comments. The EIB's priorities for urban mobility are addressed in the new Transport Lending Policy, chapter 5.

Topic	Reference	EIB's comments
Sustainable transport and multimodality with greener modes	A	The EIB will continue supporting investments in sustainable transport, promoting a shift towards greener modes of transport, including investments in the renewal or brand new zero emission infrastructure and rolling stock and supporting TEN-T, collective transport, multimodality and, in urban areas, active modes and shared mobility.
Climate change	B	As the EU Climate Bank, mitigation and adaptation to climate change are the heart of EIB's lending as outlined in the EIB's Climate Bank Roadmap.
EU policy objectives	C	Investments in sustainable transport assets need to be implemented now in order to meet the ambitious objectives set in the EU Green Deal and the EC Smart and Sustainable Mobility Strategy.
Operating costs	D	The EIB's financing targets capital expenditures, not operating expenditures.
Road safety	E	EIB's lending on road safety will be prioritized, including traffic calming measures and low speed zones, in particular in urban areas where accidents are mainly concentrated. The EIB is highly committed to support road safety investments. In 2020, the EIB and nine other multilateral development banks (MDBs) signed a high-level joint statement on road safety. The statement highlights the MDBs' aim to provide further access to safe, affordable and sustainable transport systems for all and to improve road safety, with special attention to the needs of vulnerable road users.
Urban sprawl/integrated land-use and transport policies	F	EIB's lending to urban mobility already requires promoters to have robust strategies in place for sustainable urban transport and development oriented, among others, to limit urban sprawl.  The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift

		demand to more sustainable modes of transport and improve transport efficiency and reduce environmental and climate externalities.
Cross-border/missing links	G	Cross-border demand and missing link on the supply side are already considered in EIB's lending.
Informal transport outside the EU	H	The EIB's lending outside the EU is based on specific external mandates and eligibilities .
Economic justification of projects	I	Projects need to be well justified. The choice of the transport mode shall be based on a sound assessments of needs, ensuring an efficient use of existing and any newly created capacity.
Technology	J	The EIB takes a technology-neutral approach to its support for the deployment of alternative fuel technologies, provided that they comply with the EIB's CBR. The EIB will finance technologies that contribute to achieving the goals of the Paris Agreement and have a potential to drive modal shift towards more sustainable transport modes and to lead to a more efficient management and use of transport assets in particular in congested urban areas.
Clean fleets/alternative fuels	K	The EIB supports already the roll-out of cleaner fleets and of alternative fuels infrastructure and will continue provided that they comply with the EIB's CBR. The EIB support to fleets is limited to productive investments made by public and private organisations, excluding therefore acquisitions by households for their exclusive use as consumables in the form of sale/lease/rent.
Logistics/supply chain	L	Zero/low emission logistics is a promising area of development for EIB's lending.

Ref	Summary of Contributions	Contributor	EIB comment
1.	Building the missing infrastructure links and increasing inter-connectivity and capacities across <b>all modes of transport</b> are key. Enhancing the role of multi-modal terminals in the governance of the core network corridors would be of great importance and allow regions to adapt.	BusinessEurope	A
2.	Cost-beneficial investments to improve the service level in <b>all transport modes</b> and shift to non-polluting energy.	Finnish Transport Infrastructure Agency	A
3.	Public transport road and rail, planes and boats.	Município de Faro	A
4.	Investment in development of <b>modal shift facilities</b> between the urban and suburban transport network (i.e. metro - railway).	METROREX S.A. Bucharest	A
5.	Best investments to decarbonise transport are those that contribute to a <b>modal shift</b> from road towards rail, shipping and active mobility.	Ministry of Infrastructure and water Management	A
6.	Decarbonize <b>transport hubs</b> (harbors, intersections) and the connection between them.	Ralph-Uwe Dietrich	A/B
7.	More money for <b>TEN</b> .	Jori Milbradt	A
8.	Support of completion of the TEN-T network for all transport modes. Supporting fully interoperable TEN-T.	Ministry of Transport	A
9.	The completion of the TENT network, including the development of very high-speed lines will have a structuring role in connecting regions.	Alstom, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	A

Ref	Summary of Contributions	Contributor	EIB comment
10.	The completion and electrification of the TEN-T rail network should be a priority to drive decarbonisation and help balance out transport access among Member States.	Joint contribution made by NewClimate Institute and Germanwatch	A
11.	TEN T core network with rail transport as priority with simultaneous investments in multimodal hubs (every EU country should have at least 1 multimodal hub for cargo and also for passengers).	Croatian Chamber of Economy	A
12.	Investments that contribute to the modal shift towards rail. Aiming for the completion of the Trans-European Transport Network (TEN-T) should have priority. Investments in more local railway lines should have a high priority in the regions with a lower than EU average railway connections density.	European Rail Infrastructure Managers (EIM)	A
13.	As part of the connectivity strategy of the EU, as well as the work under the TEN-T legislation, the EIB should work to ensure that these EU policy goals are financed in harmony with the goals of the EU Green Deal.	E3G	A/C
14.	IEB should focus on <b>existing mobility system</b> to improve it. Current mobility is firstly driven by "road system" but is largely under optimised. Road system is not operated like the "rail system" or any public transportation system is. Waste of capacities is the main source of wealth and innovation for coming decades, able to change all European citizens' life at short term.	ECOV	A
15.	Maintenance of existing infrastructure	Ministère de la Transition écologique	D
16.	Due to the high relevance of Intra-EU infrastructure, as well as the increase of EU economic development, further investments in highways and railways <b>infrastructure</b> remain a high priority.	Ministry of Transport and Infrastructure	A
17.	Infrastructure for waterway transport and rail transport	Response 511707695	A
18.	Rail and electric buses.	Metropolitano de Lisboa	A

Ref	Summary of Contributions	Contributor	EIB comment
19.	Countries, especially in the East of Europe, face challenges when it comes to the realization of transport infrastructure like rail, river basin infrastructure and road. For them this is their priority.	Ministry of Infrastructure and water Management	A
20.	<b>Public transport.</b> Connections with smaller non-urban areas (elimination of social exclusion)	Community of European Railway and Infrastructure Companies (CER), International Union of Railways, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	A
21.	Securing the financing of public transport in the long term is necessary to achieve climate change objectives.	Stadtwerke München GmbH	B
22.	Increased investment in safe active travel facilities and low carbon public transport.	Road Safety Foundation	B/E
23.	Support renewal of public transport fleets towards zero emissions vehicles, especially to promote joint tenders of various cities across Europe	Greenpeace	A
24.	Public transport	Comunidade Intermunicipal do Cávado	A
25.	Dispersion of inhabitants implies greater mobility demands and higher transport needs for the quality of life of people. In this ecosystem, projects related to <b>bus transport</b> have been playing a key role in territorial structuring and social cohesion.	CEOE, Confederación Española de Transporte en	F

Ref	Summary of Contributions	Contributor	EIB comment
		Autobús – CONFEBUS	
26.	Electric buses	CIMBAL - Comunidade Intermunicipal do Baixo Alentejo	A
27.	Collective modes of passenger transport. This would result in fair and equitable socio-economic development and avoid the two-tier system where rich can be green, poor cannot afford to be green, as is the case today.	European Transport Workers' Federation	A
28.	In this regard, the investment support towards well-developed local cross-border transport services is crucial to (re-)develop European regions and provide local populations possibility to move, work or study in other EU countries and border regions. It is crucial that EIB financing keeps on investing in missing rail and bus links along the borders. A focus is sometimes made on highspeed rail service, yet it only represents around 5% of all cross-border transit. Specificities of local public transport should be always taken into account and treated by relevant local stakeholders and authorities involved. Achieving a public transport-oriented modal split is essential to facilitate sustainable, efficient but also climate friendly local passenger transport between regional borders.	International Association of Public Transport UITP	A/G
29.	Transport investment shall contribute to decarbonize transport but shall also contribute to other societal objectives such as <b>equitable accessibility</b> to multi-functional destinations in local centres by non-motorised modes as a first priority, and by public transport as second priority (e.g., high population density versus low population density regions; high income regions versus low-income regions). A stronger focus on investments in social sustainability is needed to ensure economic and environmental sustainability.	ECTRI	A/F
30.	Clean <b>urban mobility</b> projects should be promoted by EIB to support balanced development.	Alstom	A
31.	Strong, effective land use planning to avoid car-friendly sprawled structures	Response 1039141480	F
32.	Pedestrian and Bicycle paths	Response 1039141480	A
33.	Ensuring that European cities are efficient, clean and safe places to work is key to the sustainable development of the EU.	The SLOCAT Partnership on	A

Ref	Summary of Contributions	Contributor	EIB comment
		Sustainable, Low Carbon Transport (SLOCAT)	
34.	Data collection around informal transport networks, to be able to model levels of GHG emissions across the city's full transport network and the location of high-polluting transport corridors and ultimately understand cost of retrofitting / replacing paratransit fleets, which serve the majority of the population in getting around cities.	WhereIsMyTransport	B/H
35.	Poorer Member States will need extra support in developing urban sustainable transport.	Joint contribution made by NewClimate Institute and Germanwatch	H
36.	Investments in the <b>railroad</b>	Marc Olivier Leclercq, Response 974008607, Response 1039141480, Response 832108188	A
37.	A reasonable network of freight-carrying railways, which also allows rail transport at a smaller spatial scale than today.	Hanns Kerschner	A
38.	Significant improvement in rural rail transport.	Pro Bahn	A/I
39.	Cross-border rail. Connecting cities together. Rail passenger and freight transport.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways, The	A/G



Ref	Summary of Contributions	Contributor	EIB comment
		SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
40.	Intermodal terminals and support for necessary rail freight infrastructure is key to efficiency.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	A
41.	Give a special European view on investment, e.g. cross border rail infrastructure projects	OTIF	G
42.	To make rail an attractive and reliable green alternative, the EIB should focus its support on projects aimed at completing missing links, enhancing capacity, improving multimodality, enhancing cross-border rail connections with a European perspective and upgrading the conventional rail network especially in Central and Eastern Europe.	European Union Agency for Railways	A/G
43.	Development of railway networks to connect all the regions into the EU transport network, multimodal platforms and connecting points.	Ministry of Infrastructure	A
44.	High quality rail connections across borders for freight transport and modal shift from road to rail, based on existing shared technical standards + extra focus on noise reduction and further innovative tracking devices.	Antje Willnow	A
45.	Investments in high speed rail lines that can connect to regions. Encourage the development and implementation of flexible transport management platforms.	Município de Paredes	A
46.	EIB should significantly invest in the railway infrastructure to increase a modal share of rail both in passenger and goods transport. Investments should focus mainly on high-speed connections and daily regional suburban lines.	Správa železnic	A
47.	- modernisation and maintenance of the rail network to increase its capacity, particularly cross-border, and thus to encourage modal shift to the train Deployment of ERTMS Electrification of tracks/deployment of alternatives to fossil energy where electrification of railways is too costly Development of public transport — noise reduction	SNCF	A/D

Ref	Summary of Contributions	Contributor	EIB comment
48.	Targeted investments in infrastructure that allows to separate slow and fast traffic flows (passing loops), much rather than blanket application of ERTMS. But in a coordinated manner, not only initiated by the member states.	European Sleeper Coöperatie U.A.	A
49.	Rail transport is a key contributor to Europe's economic recovery and as an enabler to a clean mobility system. The decarbonisation of the transport sector should mean, above all, more rail-based transportation solutions including public ones and further electrification of the system.  EIB supporting measures such as public sector guarantees to limit risks to leasing companies or co-financing programmes for cross border rolling stock would help to set up an accessible rolling stock market for Operators.	UNIFE	A/B
50.	Investments in electrified railway infrastructure and rolling stock	Ferrovie dello Stato Italiane S.p.A	A
51.	The EIB should support the renewal and electrification of rolling stock for rail passengers transport, including night trains	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace, Urgewald, WWF EPO	A
52.	Investment in rail sector for rail to become borderless, flexible, seamless, faster and easier. The investment should be prioritized for projects which are convincing that the investment will lead to an increase use of rail.	UNECE	A/G
53.	Cross-border rail. Connecting cities together. Rail passenger and freight transport. Public transport. Connections with smaller non-urban areas (elimination of social exclusion).	Community of European Railway and Infrastructure Companies (CER)	A/G
54.	Investments in high-speed rail lines that may bring connectivity to regions.	Confederación Nacional de la	A

Ref	Summary of Contributions	Contributor	EIB comment
		Construcción (CNC)	
55.	High speed rail lines connecting the main nodes and every region.	CEOE	A
56.	Aid for the purchase of unconditionally rolling stock and refuelling and connection systems to the general network. Development of urban and extra-urban collective transport services. Development of rail links (passengers and freight) between European countries.	UTP (Union des Transports Publics et ferroviaires)	A
57.	The EIB should give priority to rail transport — both passenger and freight — in order to ensure balanced economic development while decarbonising the transport sector. Greater mobility of workers — through a European network of efficient and attractive trains — can also contribute to the decarbonised and balanced development of the various regions of the EU.	Service Public Fédéral Mobilité et Transports	A/B
58.	Investing heavily in rail. Electrify local railway lines or drive trains with hydrogen.	Response 290033127	A
59.	Public cross-border on long-distance, but also just cross-border, connections are essential for Europeans to meet on a sustainable basis. EIB should support public companies so banks can give them loans at a better rate because they have the security that the EIB gives warranty.	Back on Track Belgium vzw-asbl	A/G
60.	Development of railway infrastructure and electrification of the existing network. It is also important to introduce the European Train Safety System (ETCS) across the board.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	A
61.	Financial support for industrial parks if they wish to be linked by rail.	Jori Milbradt	Industrial parks are outside the scope of the EIB's Transport Lending Policy
62.	Investments alongside TEN-T is important but to avoid discrimination and finding a balance for less accessible peripheral <b>maritime</b> regions (islands), latter should not be forgotten. In particular for shore power and alternative fuels infrastructure and supply.	Costa Group	The revised EIB Transport Lending Policy prioritises investments for

Ref	Summary of Contributions	Contributor	EIB comment
			on shore power supply and alternative fuels infrastructure.
63.	Motorways of the Sea and Short Sea Shipping		A
64.	The EIB should be looking at de-risking any nascent new <b>technologies</b> that could help decarbonize and depollute transport (such as hydrogen), while at the same time investing in scaling the technologies and infrastructure that has proven efficient (such as EV chargers). Therefore, investment by the EIB should be made to provide additionally within the market.	Global Infrastructure Investor Association	J
65.	Support and scale up financing for <b>zero-carbon</b> transport infrastructure, new mobility concepts, active mobility, urban electric public transport and rail electrification, and zero-emission multimodal transport services.	Greenpeace	A/B
66.	Fleet decarbonization and ITS support	Município de Lousada	A/B/K
67.	Low carbon supply chains	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	L
68.	Accelerated generation change to hybrid or fully electric systems, a more even distribution of traffic routes bypassing cities to avoid peak pollution, electric train / metro or tram system in cities instead of car traffic, restriction on <b>fuel</b> tankering of airplanes, introduction of synthetic sustainable jet fuel.	Budapest Airport Zrt.	A/K
69.	EIB should focus on investments on infrastructure, technology, and equipment to end reliance on fossil fuels, particularly by switching support from internal combustion to electric vehicles.	Bank Information Center	A/B
70.	For first few years the availability of affordable <b>biofuels</b> all around the world until E-fuels can take over.	Van Oord	J
71.	<div> <div>• Investment in SAF and in building a robust European <b>sustainable aviation fuels</b> Value chain across Europe maximizing on each Member States assets is urgent. The use of</div> <div>Aerospace and Defence Industries</div> </div>	SAF and Hydrogen production infrastructure is outside the scope	

Ref	Summary of Contributions		Contributor	EIB comment
	local feedstock will also represent economic opportunity for these member states. One lever for action is to drastically increase production in Europe and worldwide in an attempt to bring prices down.  • Investments in the development of general <b>hydrogen</b> infrastructure around and in airports will also be key in order to ensure that future hydrogen aircraft will be able to operate in all MS of European Union.	Association of Europe (ASD)		of the revised Transport Lending Policy. The EIB supports investments in SAF and Hydrogen in line with criteria set in the Climate Bank Roadmap and the EIB Energy Lending Policy. The revised Transport Lending Policy prioritises investments of alternative fuel infrastructure for airports.
72.	Investment in regional sustainable aviation fuel (SAF) production facilities based on local feedstock (agricultural, industrial and municipal wastes) can bring multiple financial and environmental benefits to regions. The drop-in nature of SAF means no investment in infrastructure is required with SAF being produced at the point of use.	International Air Transport Association (IATA)		
73.	Investments in an energy network for sustainable fuel and the availability of alternative fuel along the European network of roads and waterways are needed for zero emission transport		Ministry of Infrastructure and water Management	Energy networks are outside the scope of the EIB's Transport Lending Policy
74.	Investments in decentralised electricity production, smart grids and electricity grid infrastructure development, and fast-charging/H2 infrastructure will make zero emission vehicles more attractive and more accessible in rural and periferial regions in Europe.		FEBIAC	K
75.	The development of charging infrastructure and stations with cleaner fuels, for all modes. We see too much entrepreneurs postponing an investment in new material because we have a vicious circle: new material is not bought because there are no fueling stations, fueling stations are not coming because there are no trucks, barges... using the new fuel. Somewhere the circle must be broken.		Federation of Belgian Enterprises FEB-VBO	K
76.	New rolling stock that uses less energy, more efficient and higher-level service. EIB financing can make the new technology cheaper, like cross-border rail, or connecting cities together. Support for the procurement of electric and fuel cell vehicles and their charging and maintenance		MÁV-Volán Group	G/J/K
77.	Limiting support for <b>air traffic</b> with high GHG emissions.	Response 290033127	The CBR agrees that continued support to aviation infrastructure, whether ATM or airports, is necessary. The focus is on investments ensuring the resilience, safety and security of	
78.	Air transport, like other modes of transport, contributes to the mobility needs of a region. This concerns both tourism and the international connectivity of the (export-oriented) economy. In addition to investment in vehicles and buildings, investments in alternative aviation fuels, airport infrastructure and charging infrastructure should also be mentioned.	Flughafenverband ADV		

Ref	Summary of Contributions		Contributor	EIB comment
		Bundesverband der deutschen Luftverkehrswirtschaft e.V.	operations, as well as, in time, enable the distribution of sustainable fuels. In regions that are highly dependent on air transport, such investments should display particularly high economic returns. Once the covid crisis recedes, and in the context of the planned 2025 revision to the CBR, the case for supporting capacity expansion can be revisited.	
79.	Deployment for alternative fuels infrastructure in airports other than for electricity supply to stationary aircraft, in particular for hydrogen and electric recharging for aircrafts.	Airlines for Europe A4E		
80.	In ATM, closing the gap between R&D and deployment, especially for SESAR solutions, requires infrastructure modernization synchronized across Europe. The EIB can support this endeavour for airports & ANSPs to make full use of aircraft navigation & communication technologies in their procedures.	Aerospace and Defence Industries Association of Europe (ASD), AIRBUS		
81.	Airports play a critical role in the economic development and the connectivity of their regions and communities. European regions rely on aviation for their connections to the rest of Europe and the world.	Airports Council International EUROPE		
82.	<b>Freight transport</b> should be a priority, and investment in a shift away must engage with the social impact of this shift as a 22% of European transport workers work in road haulage - therefore, this needs to be matched with significant investment in reskilling.	European Transport Workers' Federation	The EIB already sees a shift of investments towards less polluting modes of transport. At the same time, decarbonisation of long haul road freight transport remains a challenge in a short term. The EIB policy has been to avoid supporting a particular technology on the account of alternatives. Moreover, it is currently still not certain, which technology will become the leading solution in freight transport decarbonisation. While it is up to EU and Member States' policy makers to develop appropriate policies and supporting measures, the EIB stands ready to finance fleet investment programmes by the haulers.	

Ref	Summary of Contributions	Contributor	EIB comment
83.	In some cases, due to bottlenecks in other modes, it is <b>road</b> transport the most efficient system in the short term but in those cases a conditioned support to implement GHG emissions reduction measures in the medium term is essential.	Miguel de Ortuzar	The EIB sees the upcoming Regulation on the deployment of alternative fuels infrastructure (repealing Alternative Fuels Directive) as instrumental in driving the effort in Member States to provide with necessary infrastructure to support alternative fuels transport.
84.	Given the disparity of investments on infrastructure among different EU Member States, what is crucial is level playing field in financial support; facilitate the access of transport companies to targeted funds for the renewal/conversion of the fleet. As for road transport, investment on vehicles is still necessary. Nowadays there is no real alternative in general, for heavy vehicles to use "alternative" fuels non fossil based specially for long - medium distances.	European Road Haulers Association (UETR)	Ensuring a level playing in development of transport infrastructure and support for new technologies and fleets is largely a responsibility of the EC. The EIB sees the future demand for the interurban road transport in the EU to be mainly driven by EU energy, transport and fiscal policies, which impact costs and thus individual choices. There are early indications that climate policies may lead to increased transport costs, at least in the transitional phase. Under the TLP, the EIB will notably prioritise support for fleets of zero-emission vehicles and associated charging infrastructure.
85.	Nights trains, inland waterway transport, sailing transport... zeppelin research... the nuclear car, more or less electrified soft bike mobility...		Response 981558580 A
86.	Noise reduction investments, replacement of existing lighting fixtures with efficient LED lamps, replacement of the existing toll system with a new one that allows toll collection without stopping the vehicle.	Croatian motorways Ltd	The EIB will continue to support robust projects designed to improve existing traffic flows, rehabilitation projects, or projects with strong safety elements. (EIB CBR 4.35). Noise externalities, road operating costs and efficiency are part of the economic appraisal of the project

Ref	Summary of Contributions		Contributor	EIB comment
				and the EIB will pay close attention to those aspects in the future road projects.
87.	An incentive should be created for companies to renew their fleet and thus contribute to the reduction of private vehicles and to increase awareness of the importance of decarbonisation.	Associação Rodoviária de Transportadores Pesados de Passageiros (ARP)		Companies' fleets are outside the scope of the EIB's Transport Lending Policy, unless such companies operates in the transport and logistics sector.
88.	The first criterium should be <b>efficiency of resources</b> , if we understand by efficiency indicators that allow us to accomplish 2050 goals. To be more specific I would start by improving transborder connection by public transport between different regions, to expand labor and goods market and improve education. A sound public transport connection is essential and if those investment projects are supported by all the regions, the results would be better.		Miguel de Ortuzar	A/G
89.	It is important that where possible investments are encouraged with the aim of modal shift from roads and air to ferries and short sea shipping so as to reduce external costs.  It should be also noted that the eligibility criteria are too narrow for investments which will prevent the balanced development of different EU regions and Members States. For example the eligibility criteria are not suitable to cover ships in the tramp sector. For instance, the "European interest" of beneficiaries is interpreted as having frequent calls annually at EU ports or be listed in stock exchanges. However, ships in the tramp sector may not have EU port calls and the vast majority are not listed in stock exchanges. In this regard, alternative criteria (as a non-exhaustive list) could be considered to demonstrate a "European interest" of ships in the tramp sector.		ECSA	A
90.	In order to balance development, it is advisable that local circuits are prioritized and developed, as explained before. It is also advisable, on the maritime transport side, to shift from "hub organization" to "spoke to spoke" organization.		NEOLINE Développement	Thank you for your comment.
91.	It is vital to ensure that EIB financial support focuses only on projects of real European added value to ultimately favor European-grown maritime technology development and thereby contribute to boost Europe's long-term industrial growth, competitiveness, and strategic autonomy. In this respect, it is essential that the new EIB lending policy fully incorporates a key recommendation from the recent DG MOVE Study which argues that in the context of access to green finance priority should be given for those ship projects for which the full value chain is fully developed in Europe.  Finally, considering the aging ferry fleet and the fundamental role of ferries in ensuring Europe's economic social and territorial cohesion, connectivity and local mobility, a strong financing support from the EIB will be of paramount importance to stimulate a climate optimized ferry fleet renewal in Europe and at the same time to		SEA Europe (European Shipyards and Maritime Equipment Association)	



Ref	Summary of Contributions	Contributor	EIB comment
	foster the highly innovative maritime manufacturing capabilities of European shipyards and maritime equipment producers, thereby promoting regional economic growth and employment.		

Question 11– Given the imperative to decarbonise transport, what transport investments are needed to contribute to more equal access to mobility taking into consideration, for example, people’s location, socioeconomic status, and gender?

Ref	Summary of Contributions	Contributor	EIB comment
	<b>Transport for rural areas</b>		
1.	<b>Rural</b> public transport	Response 832108188	<p>Investments in rural public transport / transport in less developed regions, as well as in public transport in general contribute to more equal access to mobility and hence accessibility to jobs, education or healthcare. EIB will continue to take into consideration accessibility of rural areas / less developed regions when prioritizing investments.</p> <p>Support to cohesion regions remains among the policy objectives of the EIB.</p> <p>See Chapter 3 of the EIB Group Climate Roadmap, for more details about ensuring just transition for all in the context of the climate investments.</p>
2.	Developments not only in the capitals but also in the countryside,	Budapest Airport Zrt.	
3.	Connecting rural and less developed areas, developing public transport	Croatian motorways Ltd	
4.	More investment is needed in rural and peri-urban areas.	Response 704118868	
5.	Access to public transport network in rural regions	CIMBAL - Comunidade Intermunicipal do Baixo Alentejo	
6.	Investments in projects that enhance bus services and combine transport between densely populated cities and less densely populated areas and ensure the connectivity of low population density areas in the most cost efficient way possible.	Confederación Española de Transporte en Autobús - CONFEBUS	
7.	Dense <b>public transport</b> networks also in lesser developed areas.	Hanns Kerschner	
8.	Improving access to the hinterland to strengthen economic development”	Município de Paredes	
9.	Investments and incentives to maintain unprofitable lines in rural areas and to keep people from mass relocations to cities.	Croatian Chamber of Economy	As the EIB considers economic profitability of projects, projects that are not financially profitable on their own, and require regular support from the public sector, remain eligible.

Ref	Summary of Contributions	Contributor	EIB comment
10.	Develop regional trains and coaches in rural areas where frequencies are too low, networks are not accessible to PRMs and tariff integration between networks is too complex or non-existent.	Response 290033127	Projects to be financed by EIB, need to be economically justified and hence there must be sufficient demand to justify large investments for example in rail, what may lead to prioritizing modes with smaller capacities such as buses in areas with low demand. Details about the economic appraisal of investment projects at the EIB are explained in this document: <a href="#">economic appraisal of investment projects en.pdf (eib.org)</a>
<b>Investments in public transport</b>			
11.	Investment in improving the public transport and its related infrastructures. Bus services and combination of transport between densely populated areas and low populated areas, which will stop or even reduce the depopulation process.	CEOE	<p>The EIB takes note of the strong support to investments in public transport, which contribute to more equal access to mobility and at the same time to decarbonisation of the sector, and which will remain key area of intervention for EIB in the transport sector.</p> <p>EIB's 2016 Gender Strategy (<a href="#">The EIB Group Strategy on Gender Equality and Women's Economic Empowerment</a>) and EIBG Gender Action Plan 2021-24 confirm EIBG commitment to gender as a priority. In addition, under the new <a href="#">EIB Environmental and Social Standards</a>, Standard 7 emphasizes the importance of inclusiveness in all our operations (including public transport ones) and reinforces due diligence requirements on matters related to vulnerability based on a range of criteria which include gender/gender identity.</p> <p>The EIB supports the development of public transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Investments in public transport are among the priorities for EIB support as outlined in Chapter 5 of the revised Transport Lending Policy.</p>
12.	Metropolitan areas need to be supported to promote the basic development of LPT. Construction/refurbishment and refurbishment of local public transport units. Development of urban/rural connections (LPT). This will require more networks and staff.	Stadtwerke München GmbH	
13.	Ensuring equitable access to quality and sustainable public transport should be one of key objectives of the EIB Transport Policy. In addition to the climate and environmental benefits, prioritising investments in public transport over private cars is also a means of contributing to more equal access to mobility.	CEE Bankwatch Network, Greenpeace	
14.	Easily accessible public transport	urgewald	
15.	Special attention should also be paid to women's access to public transport.	Service Public Fédéral Mobilité et Transports	
16.	Ensuring equitable access to quality and sustainable public transport should be the key objective of the EIB Transport Policy.	Counter Balance, E3G	

Ref	Summary of Contributions	Contributor	EIB comment
17.	Public transport, decarbonized delivery services (even taxi).	Ralph-Uwe Dietrich	Please also see the EIB's responses to stakeholders' comments of the Urban mobility matrix.
18.	Collective modes of passenger transport can significantly assist with transport poverty and ensuing socio-economic effects. Development of networks is key to this.	European Transport Workers' Federation	
19.	UNIFE advocates for promoting more investment in public transport with light rail, metro and tram systems, as well as commuter and intercity rail as the backbone of sustainable and clean urban transport mobility.	UNIFE	
20.	Highly frequent public transport in urban environments and public transport offers "on demand" in rural environments.	Antje Willnow	
21.	Increasing the development of rail and public transport as a whole	Pro Bahn, STIB-MIVB	
22.	Improving the availability of public transport to provide alternatives to cars and aircraft.	SNCF	
23.	Encourage modal shift towards collective transport modes.	UTP (Union des Transports Publics et ferroviaires)	
24.	Investments in rail and urban mobility infrastructure and related projects.	Ferrovie dello Stato Italiane S.p.A	
	<b>Multimodality</b>		
25.	An integrated public transport: different modes (train, tram, bus...) must communicate with each other and have a complementary offer from big axes to a fine-meshed network. It seems also important that these modes are good equipped to welcome disabled people and they are inclusive. The collective network should be performant, fast, affordable and safe (not only technologically but also regarding the intra humans).	Federation of Belgian Enterprises FEB-VBO	EIB notes strong support to public transport, including multi modal public transport and availability of transport on the "last mile", which indeed contribute to more equal access to mobility and hence accessibility to jobs, education or healthcare, as well as better accessibility of remote regions. EIB will take into consideration the need for efficient multimodality as well as transport on the last mile when prioritizing investments.
26.	All public transport operation should be much more efficient in terms of intermodality	Metropolitano de Lisboa	The EIB supports the development of public transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:

Ref	Summary of Contributions	Contributor	EIB comment
27.	New digital and multi-modal solutions can help to connect people living in remote areas to rail stations thus improving ridership of trains in low density population areas where rail lines are often at risk of closure due to low demand. Rail is part of public transport solutions and improving quality and frequency of regional/commuter trains can help the mobility of low-income people and therefore their employment possibilities.	European Union Agency for Railways	<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  Investments in public transport are among the priorities for EIB support as outlined in Chapter 5 of the revised Transport Lending Policy.
28.	The EIB should facilitate transport investment enabling better connectivity between transport modes, such as better train access to airports. It should also facilitate multimodal choices of passengers to support the most efficient journeys across an integrated transport system. This can include multimodal ticketing and distribution.	Aerospace and Defence Industries, Airlines for Europe A4E Association of Europe (ASD)	
29.	Projects aiming to solve “the last mile problem” (e.g. local systems based on zero-carbon buses, shared electric bicycles etc.) should be financed.	European Rail Infrastructure Managers (EIM)	
30.	The EIB should facilitate transport investment enabling better connectivity between transport modes, such as better train access to airports, etc. It should also facilitate multimodal choices of passengers to support the most efficient journeys across an integrated transport system. This can include multimodal ticketing and distribution.	AIRBUS	
31.	Investments in efficient <b>multimodal infrastructures</b> for all targets groups and users profiles.	Traxio	
32.	Intermodal infrastructures, cheapest fare.	Município de Faro	
	<b>Decarbonising public transport</b>		
33.	Clean <b>urban mobility</b> projects should be promoted by EIB to support balanced development.	Alstom	The EIB takes note of the strong support to investments in public transport and its decarbonisation. Indeed such

Ref	Summary of Contributions	Contributor	EIB comment
34.	Investments in greening public transport modes should have priority as they ensure good accessibility for all users regardless of income, status and gender.	Ministry of Infrastructure and water Management	investments contribute to more equal access to mobility and hence accessibility to jobs, education or healthcare. Such investments will remain key area of intervention for EIB in the transport sector.
35.	Decarbonising urban transport is a critical step towards taking decisive action to address both climate change as well as a range of other socioeconomic and environmental outcomes. There is growing consensus that climate action in the (urban) transport sector also facilitates achieving many of the Sustainable Development Goals (SDGs).	Joint contribution made by NewClimate Institute and Germanwatch	The EIB supports the development of public transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
36.	Cost-beneficial investments to improve the service level in all transport modes and <b>shift to non-polluting energy</b> .	Finnish Transport Infrastructure Agency	As per EIB's CBR, all EIB activities need to be aligned with the Paris Agreement temperature and adaptation goals, and "consistent with pathways towards low-carbon and climate-resilient development".  Investments in public transport are among the priorities for EIB support as outlined in Chapter 5 of the revised Transport Lending Policy.
<b>Prioritizing rail</b>			
37.	Short haul aviation to <b>rail</b> .	Community of European Railway and Infrastructure Companies (CER), International Union of Railways	The EIB takes note of the strong support to investments in the rail sector, as an accessible and sustainable transport mode. Rail investments will remain key area of intervention for EIB in the transport sector.  The EIB supports the development of the railway sector, including investments in rail infrastructure and rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
38.	A better connection of airports to rail transport could improve people's equal access to mobility.	Flughafenverband ADV	
39.	Improved Railways, new railways	Response 1039141480	
40.	Investments in the railroad	Response 974008607	

Ref	Summary of Contributions	Contributor	EIB comment
41.	night trains,	Response 981558580	Investments in rail transport are among the priorities for EIB support as outlined in Chapter 5 of the revised Transport Lending Policy.
42.	Access to close by (long distance and cross-border) rail. This transport mode starts and ends in the cities hearts so close by the people (sometimes in needs)	Back on Track Belgium vzw-asbl	
43.	Increased supply of rail transport.	Município de Paredes	
44.	Investments in <b>infrastructure</b> and modern fleet (purchase and modernisation).	International Union of Railways, Community of European Railway and Infrastructure Companies (CER)	
45.	Rolling stock for new entrant operators, especially sleeper train rolling stock, as competition on rail will grow the number of services offered, increase quality and drive consumer prices down. Sleepers because sleeper trains can enlarge the radius in which the train is an attractive mode of transport.	European Sleeper Coöperatie U.A.	<p>The EIB supports the development of the railway sector, including investments in rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Investments in rail transport are among the priorities for EIB support as outlined in Chapter 5 of the revised Transport Lending Policy.</p> <p>EIB financing is available to various counterparts, both incumbent operators and new entrants. EIB notes the support to increasing competition in the rail sector which could lead to improving quality of services and sleepers trains which can lead to increasing competitiveness of transport on long distance connections.</p>
	<b>Soft mobility</b>		
46.	Bicycles	Budapest Airport Zrt.	EIB notes the strong support for soft mobility, which indeed is contributing to accessibility and affordability of transport.

Ref	Summary of Contributions	Contributor	EIB comment
47.	Funding infrastructure for <b>walking and bicycle</b> use	Response 511707695, Response 1039141480, UNECE	Shared mobility and active modes, including infrastructure for walking and biking, as well as bike sharing are already supported by the EIB and are a promising area of development for its lending.
48.	Besides being close to emission-free, walking and cycling are affordable and easily accessible mobility options, especially important for low-income communities. Active mobility has low individual and societal costs, and, in combination with public transport, can cover almost all mobility needs.	Ministry of Infrastructure and water Management	
49.	Soft mobility, more or less electrified bike mobility, etc.	Response 981558580	
	<b>Innovation</b>		
50.	Innovation is to be encouraged in order to find sustainable and context-friendly mobility models.	Response 704118868	The EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
51.	Investment in the establishment of databases describing the <b>accessibility</b> of transport and roads to enable people with disabilities to build the accessible route.	Ministère de la Transition écologique	
52.	Innovation is to be encouraged in order to find sustainable and context-friendly mobility models.	Response 290033127	
	<b>Accessibility and Affordability</b>		
53.	Fair ticketing prices, expansion of interrail, more free offers for young europeans wanting to explore all of the EU.	Jori Milbradt	EIB recognizes that people's socioeconomic status or gender can have an impact on what transport means are accessible to them, how, when and why they travel (see sections 2 on "Equal accessibility" and 4 on "Accessible Transport"). Moreover, we recognize that ensuring that women (as leaders, consumers, employees, entrepreneurs) benefit equally from our investments in transport system is likely to significantly enhance our investment impact.
54.	Good and affordable access to public transport systems. Good equilibrium between "user pays" and "tax payer pays".	OTIF	
55.	Urban mobility should be free of charge for citizens. Train mobility should be helped and ticket prices should be adjusted in consideration of socioeconomic status.	NEOLINE Développement	



Ref	Summary of Contributions	Contributor	EIB comment
56.	Improve physical and cost accessibility – social tariffs for rail, investment for step free access to public transport and improved information systems	International Union of Railways	As per EIB's 2016 Gender Strategy ( <a href="#">The EIB Group Strategy on Gender Equality and Women's Economic Empowerment</a> ) and EIBG Gender Action Plan 2021-24 gender is EIBG priority.
57.	More equal access to mobility can be achieved through promoting public transit that offers universal accessibility, recognizing that customers with disabilities have the right to use transit, as part of all public transport programs. Transit investments must also provide equal access to economically disadvantaged areas, and provide accommodations, including restrooms, to serve all genders in safety. Directly address transport poverty and gender inequalities by increasing access to transit and transport services and employment in areas of disadvantaged, marginalized, and mobility impaired peoples.	Bank Information Center	Gender inequalities in society at large translate into women's and men's, boys' and girls' different access to, use of, and benefit from transport related services and employment opportunities. For example, women's and single parent's high reliance on public and non-motorized transport combined with their caring responsibilities add to their time poverty. The perceived and actual risks of sexual harassment and abuse that women (and men) can face in public spaces (including in transport facilities) impact their mobility. Women are largely underrepresented in the transport workforce with only around 20% women in the EU's transport sector.
58.	Investments to improve transport accessibility are important.	SNCF	Similarly, people with limited resources may not be able to afford certain transport options, and people with reduced mobility and / or disabilities may not be able to access certain transport options because of their cost or physical accessibility constraints.
59.	<p>Financing sustainable infrastructure also means the need to ensure projects meet the highest standards – both with respect to the technology used and to human well-being. Increased service prices, including public transportation, put financial pressure on already struggling households, and if projects are done without public consultation, citizens can feel negatively about paying taxes, fees, and price increases.</p> <p>Affordability for poor and vulnerable households needs a separate attention, as does the quality of the services and increased safety (for women and girls) and accessibility (for disabled people). Involuntary resettlement in such processes can also result in the lack of rights afforded to relocated persons, and the impact of needing to find a new home. This exacerbates the current problem of evictions and uncertain property rights in many former Socialist countries and developing countries. EIB should more seriously consider the rights of communities, and especially the rights of the most vulnerable and marginalised people to healthy, safe places to</p>	CEE Bankwatch Network	<p>Aspects related to accessibility, affordability and considering needs of various transport users in relation to their transport patterns, schedules, accessibility to sanitary facilities as part of EIB appraisal process and are considered when selecting projects for financing.</p> <p>Furthermore, the projects financed by EIB need to comply with applicable regulations related to accessibility, such as COMMISSION REGULATION (EU) No 1300/2014 on the technical specifications for interoperability relating to accessibility of the Union's rail in relation to rail projects for example.</p> <p>Furthermore, the 2022 EIB Group Environmental &amp; Social Sustainability Framework (ESSF) defines the Group's vision to 2030, which is to actively contribute to new sustainable</p>

Ref	Summary of Contributions	Contributor	EIB comment
	live, their investments will contribute to the very effects of ameliorated urbanization.		development and inclusive growth in all sectors, including Transport. It is the Group's response to the global environmental and social challenges and opportunities of our time.
60.	Improve <b>accessibility</b> .	Community of European Railway and Infrastructure Companies (CER)	The Environmental & Social Standards are also part of the new ESSF and continue to apply to all EIB operations, including transport projects. They include provisions to assess a broad spectrum of social and environmental impacts on project-affected communities, especially vulnerable and marginalized people.
61.	Investment in equipment able to provide an <b>increased mobility</b> : escalators, elevators, platforms etc.	METROREXS.A. Bucharest	
62.	Investments in the development of transport networks must be designed to address the disadvantaged communities' basic needs to access city centres in a more integrated way. A more integrated and easy transport network, will increase women's safety and reduce their exposure to harassment episodes. Improving physical and cost accessibility can be done through mechanisms such as social tariffs for public transport.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The Standards have been reviewed to clarify the counterparties' requirements with respect to the identification, assessment, management and monitoring of environmental, climate and social impacts and risks associated with their projects through the application of the mitigation hierarchy and good international practice. The Standards have also been restructured to clarify the requirements that apply to projects depending on their location (inside and outside the EU).
63.	Cheapest fare	Município de Faro	
64.	The EIB should make its investments in the transport sector conditional on accessibility to the highest number — valid or less valid. For example, in the purchase of rolling stock by railway operators, the EIB should ensure that it is compatible with the height of the platforms to facilitate the boarding of the train.	Service Public Fédéral Mobilité et Transports	
65.	New rolling stock with low deck. Extension and development of railway system towards newly inhabited areas. Demand-driven transport systems, solutions.	MÁV-Volán Group	
66.	The railway sector is continuously working on improving the access to rail for passengers with reduced mobility (PRM).	European Rail Infrastructure Managers (EIM)	
67.	Rail stations in the EU are largely not adapted to the needs of persons with reduced mobility, investments in better accessibility will help equality.	European Union Agency for Railways	

Ref	Summary of Contributions	Contributor	EIB comment
68.	Investment in accessibility of stations/stations/stops and rolling stock.	Ministère de la Transition écologique	See response to points above.
69.	Promoting and expanding affordable, safe, accessible and reliable public transport that meet the diverse range of needs required by various populations at different socio-economic levels should be strongly taken into regard during the TLP revision process.	International Association of Public Transport UITP	
70.	Investment in accessibility of stations/stations/stops and rolling stock.	Ministère de la Transition écologique	
71.	Local public transport is the means of enabling mobility for all. Mobility is a basic need and must be ensured. This also includes affordability.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
72.	Public services must be provided independently from profitability to reach the objective of a real sustainable society and a decarbonized transport. A system of compensation within the public transport system has to be designed in order to allow and grant people's mobility. There are groups of economically disadvantaged people, living in rural/remote areas, with poor access to public transport services, with no other option than using their own means of transport (usually aged cars- polluting). Public administration must commit and assume the cost of a lower profitability of services to be provided to all citizens.	European Road Haulers Association (UETR)	
73.	Ideally it is public transport or extra urban railway systems the best option. But this is not always possible, and the result will be the transport poverty for certain areas. In certain situations, road transport infrastructures may set the ground to connect public transport facilities with remote areas. In these cases the connection may be based on electro buses, or eventually foster less pollutant vehicles. Equal access to mobility is a barrier to territorial balance and public authorities	Miguel de Ortuzar	

Ref	Summary of Contributions	Contributor	EIB comment
	should ensure equal opportunities. This special situations, should be monitored, and issues like affordability, children and young people access to education, medical centers accessibility, and elderly people situation, are critical. To solve this specific circumstance quickly is a priority that is a bit ahead of 2050 goals at this moment because the GHG emissions produced are minimal, the cornerstone of the environmental problem is in metropolitan areas.		See response to points above.
	<b>Security</b>		
74.	Increasing representation of marginalised and underrepresented groups as transport workers will make transport safer overall - this inevitably requires transport workers to be present on the mode of transport and therefore Driver-Only Operations should not be considered.	European Transport Workers' Federation	Security issues including threat of sexual harassment are points of particular concern to women, young men, LGBTIQ people or people from minorities, thus limiting their travel options. Security and prevention of harassment during travel and on the way to travel are important consideration related to accessibility to transport that are considered during appraisal of transport projects.  See sections 2 on "Safety and Security" and 4 on "Safe and Secure Transport" of the revised Transport Lending Policy for EIB approach to this topic.
75.	Using charging points as anchor loads to provide increased lightning in rural/unsafe areas for example	WhereIsMyTransport	
	<b>Research</b>		
76.	Changing behavior goes at a slow pace in comparison to technology developments so there is a significant market risk that is likely to increase if other disruptive events happen in the future. More <b>research</b> shall be funded for the co-creation/co-development/co-implementation of solutions aimed at sustainability goals in each context. Behavioral changes require a package of solutions to be accessible and affordable. Affordability requires social equity to account for in pricing policies.	ECTRI	The EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
77.	Research into zeppelin - the nuclear car	Response 981558580	

Ref	Summary of Contributions	Contributor	EIB comment
78.	We believe that there is an important role for the EIB to play in ensuring that the transition towards cleaner transport doesn't leave anyone behind. For that reason, nascent technologies must be developed and tested through EIB investment, to make sure that those that work can be scaled up and their price reduced.	Global Infrastructure Investor Association	
79.	Investment in real-time <b>research</b> around usage of paratransit modes, socioeconomic status and gender.	WhereIsMyTransport	The EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  Furthermore, we recognize and promote among our clients the need to collect and analyse sex disaggregated user data to better understand and respond to needs of various users.
80.	Investments towards disaggregated <b>data collection</b> methods as well as towards research on barriers to, and the cost/gains of, accessibility, safety and inclusion are key. Also, the support for research on the effects that mobility and transportation infrastructure have on the access of marginalised groups to services, and other opportunities, like employment, is essential.	International Association of Public Transport UITP	
	<b>Car / ride sharing</b>		
81.	To address these issues, EIB can seek to develop carpooling as a means of providing transportation to underserved areas. Indeed, carpooling, practiced on routes connected to the transport network, can help to open up isolated areas. It is also based on solidarity, and therefore can help develop social links through mutual aid in a territory.	ECOV	Shared mobility and digital solutions for transport are already supported by the EIB and are a promising area of development for its lending.  Investments in public transport, including active and shared mobility, are among the priorities for EIB support as outlined in Chapter 5 of the revised Transport Lending Policy.
82.	Encourage the development and implementation of flexible transport management platforms.	Município de Paredes	
83.	Supporting shared transport options.	Ralph-Uwe Dietrich	
	<b>Transport infrastructure and networks</b>		

Ref	Summary of Contributions	Contributor	EIB comment
84.	Investing in the TEN-T network as well as in more local lines in areas with underdeveloped railway system allows inhabitants of peripheral and rural regions of Europe to be connected to rail.	European Rail Infrastructure Managers (EIM)	The EIB supports the development of the transport infrastructure and TEN-T networks, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  See Chapter 5 of the revised Transport Lending Policy for the EIB's priorities in relation to the transport infrastructure.
85.	Completion of the TENT network, including the development of very high-speed lines will have a structuring role in connecting regions.	Alstom	
86.	More balanced development of <b>transport networks</b> to ensure connectivity across the the EU to reduce the transport exclusion, incl. MaaS.	Ministry of Infrastructure	
	<b>Water and maritime transport</b>		
87.	Inland waterway transport, sailing transport, etc.	Response 981558580	The EIB takes note of the support to water and maritime transport and its contribution to accessibility of remote regions.
88.	A strong financing support from the EIB will be of paramount importance to stimulate a climate optimized ferry fleet renewal in Europe and at the same time foster the highly innovative <b>maritime</b> manufacturing capabilities of European shipyards and maritime equipment producers, thereby promoting regional economic growth and employment.	SEA Europe (European Shipyards and Maritime Equipment Association)	The EIB supports sustainable investments in waterborne transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  The priorities for the sector can be found in Chapter 5 of the revised Transport Lending Policy. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.
89.	Improving access to ports by all transport modes. Foster the use of ships for inter-island journeys.	CEOE	
90.	The European shipping industry's competitiveness ensures that affordable services for passengers and EU citizens are continued which is of great importance to EU's connectivity and cohesion.	ECSA	
	<b>Aviation</b>		
90.	Electric and hybrid-electric powered <b>aircraft</b> could have a significant role in powering short haul and regional aircraft, connecting remote communities, facilitating medical, cultural	International Air Transport Association (IATA)	In its Climate Bank Roadmap, the EIB specifies the types of aviation investments that the Bank considers as aligned with

Ref	Summary of Contributions	Contributor	EIB comment
	and educational exchange, keeping families connected and allowing income to be generated from working outside of the local region.		the Paris Agreement and hence eligible for its support. (The EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a> ).  The EIB will continue to monitor developments in the aviation sector closely. EIB-eligibilities in the aviation sector, like in all other sectors, will be reviewed in the context of the review process specified for the Climate Bank Roadmap.
91.	Aviation is part of the overall European transport network that needs to comply with the objectives of the European Green Deal. In particular, it provides connection to peripheral regions of Europe, or areas that cannot be easily nor rapidly connected by ground transportation, therefore strengthening the geographical integration and mobility equality of EU.	Aerospace and Defence Industries, Airlines for Europe A4E Association of Europe (ASD)	
92.	Aviation is part of the overall European transport network that needs to comply with the objectives of the European Green Deal.	AIRBUS	
	Other		
93.	Strong, effective land use planning to avoid car-friendly sprawled structures, especially in rural areas!	Response 1039141480	EIB's lending for transport projects and in particular to urban mobility already requires promoters to have robust strategies in place for sustainable development oriented, among others, to limit urban sprawl.  The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift demand to more sustainable modes of transport and improve transport efficiency and reduce environmental and climate externalities.
94.	We do not feel that the issue is gender dependent.	Budapest Airport Zrt.	Gender and socioeconomic factors impact on how and when people travel and what transport means they can afford. Thus these factors impact accessibility to jobs, education or healthcare. Therefore, EIB appraisal considers social aspects of the investments in order to ensure that the EIB financed projects are affordable, accessible and inclusive. Moreover, women are more likely than men to accompany children and elderly people, as a result of which a lack of inclusive transport system has additional gender-dimensions.
95.	This is secondary to technology and economic factors	Van Oord	
96.	Road infrastructure investments for passenger cars and freight as well as investments in the expansion of aviation should be	Joint contribution made by	The eligibilities for EIB lending are specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:



Ref	Summary of Contributions	Contributor	EIB comment
	<b>excluded</b> including with consideration of counterparties and financial intermediaries.	NewClimate Institute and Germanwatch	<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  In relation to roads, the adapted economic test introduced under the EIB Climate Bank Roadmap has been used by the Bank to appraise new road capacity enhancement projects.  EIB support to the aviation sector will be in line with the EIB CBR. In general, EIB support will follow EC policy priorities including the greening of airports, fleets and related services; safety; security; and digitalization, including the improvement and digitalization of the Air Traffic Management system.
97.	Investments in decentralised <b>electricity production</b> , smart grids and electricity grid infrastructure development, and fast-charging/H2 infrastructure will make zero emission vehicles more attractive and more accessible in rural and peripheral regions in Europe.	FEBIAC	The EIB CBR foresees support for both electric charging and hydrogen infrastructure.  The electricity production is covered by the Energy Lending Policy (ELP).
98.	Decarbonized transportation should always be concentrated on main or big cities, as well as the linkage between them, by developing the infrastructure, thus connecting firstly main corridors, and afterwards other alternative corridors. By default, every person should have the same mobility or the same openness towards socio-economic developments.	Ministry of Transport and Infrastructure	Thank you for your comment.
99.	Medium and long distance rail transport, short electric cars. Long distance planes.	Railway Signalling Automation Telecommunication And Industry Association	
100.	Telework	Marc-Olivier Leclercq	



Question 12– Taking into account the EIB’s mandate to support the European Union’s integration into the global economy, what kind of transport investments should the EIB prioritise? Please write your answer here:

Ref	Summary of Contributions	Contributor	EIB comment
1.	Investments in the <b>railroad</b>	Marc-Olivier Leclercq, Município de Paredes, Ralph-Uwe Dietrich, Response 974008607, Response 290033127, Správa železnic, urgewald	As a collective transit mode, railways are the land transport mode consuming least energy and generating the least external cost per transport unit.  The achievement of a substantially larger modal share of rail both in passenger and goods transports is foreseen in order to meet the decarbonisation path for the transport sector set out by the European Commission. This will require significant investments in the railway system.
2.	Rolling stock for new entrant operators, as more rolling stock production capabilities in Europe will enhance the competitiveness of European rolling stock sector in the world.	European Sleeper Coöperatie U.A.	The EIB supports the development of the railway sector, including investments in rail infrastructure and rolling stock, as specified in the EIB’s Climate Bank Roadmap, Annex 2, Table C and further prioritised in the TLP:
3.	Improvements in freight rail transport.	CEOE, Confederación Nacional de la Construcción (CNC)	<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  In addition, please note that the EIB’s Transport Lending Policy is fully aligned with the European Commission’s Smart and Sustainable Mobility Strategy.
4.	Investments in environmentally friendly railway rolling stock and rail electrification.	MÁV-Volán Group	The EC priorities for rail include increasing rail passengers and freight by supporting further investments in the infrastructure (trackside and on-board), rolling stock, intermodal interfaces and digital tools supporting core planning, operational and commercial processes. This goes hand in hand with a need to also increase the interoperability of the network, as well as further efforts towards digitalisation, in particular the deployment of ERTMS. Finally, the electrification of the rail network for those sections not yet electrified and the research, demonstration and deployment of hydrogen fuel-cell trains and the deployment of relevant refuelling and renewable electricity
5.	Pan-European, international rail projects. Cross financing over modes is indispensable.	OTIF	
6.	Upgrading and building of railway lines within TEN-T and other railway infrastructure Modern rail fleet Interoperability between transport modes. Interoperability of railway networks. Digitalisation (ATO, Advanced distributions systems, ERTMs) Rail electrification / alternative fuels. Hydrogen for rail	International Union of Railways	

Ref	Summary of Contributions	Contributor	EIB comment
	Supporting innovative activities to be a good and health neighbour in addition to mitigating climate change by quieter rolling stock and infrastructure, protecting soil and water quality and better air quality.		generation infrastructure are necessary elements in the shift to zero-emission mobility in rail transport.  The EIB actively supports the rail market opening and implementation of the EU 4th railway package.
7.	Rail electrification / alternative fuels.  Hydrogen economy – railway is a best practice.  Interoperability between transport modes.  Interoperability of railway networks.  Modern fleet.  ERTMS  Upgrading and building of railway lines within TEN-T and other railway infrastructure.  Supporting innovative activities to be a good and health neighbour in addition to mitigating climate change by quieter rolling stock and infrastructure, protecting soil and water quality and better air quality.	Community of European Railway and Infrastructure Companies (CER)	The revised TLP continues to prioritise investments into electrification, digitalisation (ERTMS) and automation of rail infrastructure and rolling stock.  Please refer to chapter 5 of the revised TLP for the EIB's approach to the railway sector and to chapter 4 of this matrix with stakeholder views and further comments specifically on rail.
8.	Modernisation and improvement of the <b>rail</b> network to improve its capacity and thus encourage modal shift towards the train  Investments to complete the completion of the TEN-T network — Automatic coupling  Digitalisation of data exchange platforms (digital platforms) — rail-road compatibility and interoperability between modes of transport  Electrification of tracks/deployment of alternatives to fossil fuels.	SNCF	

Ref	Summary of Contributions	Contributor	EIB comment
9.	Rail infrastructure/electrification. Renewal of fleets (both trains and buses). Security of railways infrastructures. Cross border railway lines.	Ferrovie dello Stato Italiane S.p.A	
10.	Rail as a factor of exporting knowledge and trains.	Jori Milbradt	
11.	EU should prioritize the <b>standardization of rules</b> for infrastructure use, technical conditions and requirements, signalling, etc. especially necessary in rail transport, but also useful in road transport.	Response 511707695	
12.	The EIB should prioritise rail transport investments prioritizing European developed technology and standards. Standardisation is key in enabling the technological developments subject to current and future European research and innovation programmes and the implementation of advancing global trends in digitalisation, automation, and material science. Their application shall further increase the levels of safety, security, and passenger comfort in rail transport, while reducing costs, and improving the overall quality and competitiveness of the European railway sector vis a vis other international players.	UNIFE	<p>The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy, and indeed considers safety, accessibility and efficiency as critical dimensions of transport systems, alongside their climate and environmental sustainability.</p> <p>EIB financing of infrastructure investments for digitalisation and automation will continue to be prioritised as a means of optimising the use of rail resources and capacities and improving safety and interoperability, as well improving the integration and connectivity between the different modes in the transport system.</p> <p>Please refer to chapter 5 of the revised TLP for the EIB's approach to the railway sector.</p>
13.	The completion of the TENT network, including the development of very high-speed lines will have a structuring role in connecting region	Alstom	<p>The completion and efficient functioning of the EU internal market is critically dependent on the connectivity of the logistic chains that support it, and therefore on the infrastructure and technology that enable these logistics chains.</p> <p>The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy, including the development of a fully operational, multimodal Trans-European Transport Network (TEN-T) for sustainable and smart transport with high speed connectivity.</p>

Ref	Summary of Contributions	Contributor	EIB comment
14.	Trade and technological innovations are the key elements of the EU integration into the global economy. The EIB should prioritise investments to improve the connectivity of the EU rail network with the CIS/Russian/Asian networks to promote EU standards while enhancing the growing potential of rail freight in trade with Central Asia and the Far East. The rail supply industry has a leading role in the production of rolling stock and especially of digital signalling systems such as the ERTMS. The EIB should prioritise transactions that can increase the demand for products and services provided by the EU industry and increase the possibility of applying EU technical standards at global level. This can foster the EU export potential and improve the investment arm of the EU external action.	European Union Agency for Railways	<p>Please note responses above.</p> <p>Cross border accessibility lies at the heart of the European Union and its single market, and completion of the TEN-T network to facilitate cross-border flows between member states and with the EU's neighbourhood still requires major investment.</p> <p>Connectivity concerns the integration of the EU into the global economy. In enabling trade between Europe and other parts of the world, rail plays a key role.</p> <p>The EIB supports the development of the railway sector, including investments in rail infrastructure and rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:</p>
15.	The EIB should prioritise investments in railway lines that connect Europe with third countries. Long-distance railway freight lines between Europe and other continents can help to create a modal shift from cargo-ships to railways. Other projects aiming to make railway systems to be able to offer mass, seamless, fast and cost-effective freight transport on distances above 200-300 km. This could include investments in dense network of logistic centres, upgrading and electrification of necessary railway lines stretches...	European Investment Bank Rail Infrastructure Managers (EIM)	<p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
16.	<b>Railway and water</b> transport are not used enough.	Croatian Chamber of Economy	<p>Connectivity concerns the integration of the EU into the global economy. In enabling trade between Europe and other parts of the world, rail and maritime transport play a key role.</p> <p>The EIB's Climate Bank Roadmap, Annex 2, Table C, confirms that investments in rail and waterborne transport are eligible for EIB support:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
17.	Railroads and waterways (with electric drive!)	Response 832108188	
18.	Sustainable goods and people transportation across Europe (rail and waterways).	STIB-MIVB	

Ref	Summary of Contributions	Contributor	EIB comment
19.	For intercontinental transport we need investment in more resource efficient and environmental sound <b>ships</b> .	Antje Willnow	The EIB supports the maritime sector, including investments in infrastructure and ships as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:
20.	Maritime transport based on non-fossil fuels or at least based on natural gas as a propellant.	Hanns Kerschner	<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  EIB will prioritise the development and deployment of zero direct CO2 emission ships via pilot and demonstration projects.
21.	In order to improve integration into the global economy, investments in secondary harbors should be prioritized, as well as exemplary shipping companies of ships.	NEOLINE Développement	Please note the response above.  The EIB's Climate Bank Roadmap affirms the Bank's support to port and inland waterway infrastructure and related facilities (with the exception of facilities dedicated to the transport and storage of fossil fuels), and the transition of marine and inland waterway fleets towards a low- and zero-carbon trajectory with the financing of both new builds and the retrofitting of existing vessels.  The EIB will continue to prioritise the development of TEN-T ports in the EU and Neighbourhood, including their infrastructure, associated equipment, access enabling works and equipment, hinterland access infrastructure and related intermodal facilities.  Support to other ports both inside and outside the EU will be considered a priority if the project is assessed to have a clear contribution to climate or environmental goals contributing to a more sustainable transport system.
22.	In relation to global markets, capacity infrastructure to major ports, including logistics facilities, should be supported.	Správa železnic	Please note the response above.  Indeed, seaports and intermodal logistics play a key role in an integrated and sustainable global supply chain system.  The EIB will continue to prioritise the development of TEN-T ports in the EU and Neighbourhood, including their

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			infrastructure, associated equipment, access enabling works and equipment, hinterland access infrastructure and related intermodal facilities.
23.	Maritime transport is the cornerstone of international trade and one of the least polluting modes of transport in terms of tkm. Therefore, it is crucial, that the EIB continues to priorities port infrastructure investments to accommodate these trade flows, both in terms of upgrading existing infrastructure or new infrastructure.	European Sea Ports Organisation	<p>Maritime transport is central both to facilitating international trade and to the transport of passengers and goods within the EU.</p> <p>The EIB will continue to prioritise the development of TEN-T ports in the EU and Neighbourhood, including their infrastructure, associated equipment, access enabling works and equipment, hinterland access infrastructure and related intermodal facilities.</p>
24.	By enabling the international transport of goods and people, and hence the EU's integration into the global economy, shipping (and hence shipbuilding) projects should be prioritized amongst the transport investments. Besides, reducing ship emissions is a global challenge, going beyond European territorial waters. The EIB should act as World's first Climate Bank by improving the environmental performance beyond EU territorial waters and hence not preclude financing for ships that may operate outside EU waters or that may fly under other (non) EU flags if such vessels are manufactured in Europe and if such projects can contribute to safeguarding and fostering Europe's global maritime technology position and vessel manufacturing capabilities.	SEA Europe (European Shipyards and Maritime Equipment Association)	<p>The priorities identified in the new TLP will be subject to and consistent with the role of the EIB as the EU's Climate Bank, together with other EIB policies, principles, standards and guidelines applicable.</p> <p>Projects supported by the Bank are considered to benefit a wide range of European stakeholders including suppliers, shipyards, constructors, owners, operators and users. It is therefore envisaged to focus on projects with high European value added.</p> <p>Indeed, due to the inherent characteristics of shipping operations and while the climate and environmental challenges facing the sector are global, it is anticipated that vessels supported by the Bank will also operate beyond European territorial waters. However, these will still be expected to call at EU ports and, unless duly justified by the particular features of a project, EIB will finance only ships operating under an EU flag to ensure compliance with European safety, operating and environmental norms.</p> <p>As a strict minimum, all shipping projects financed by the EIB will adhere to all EU and IMO safety and environmental rules</p>

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			<p>and regulations with regard to the construction and operation of vessels.</p> <p>Outside the EU, the EIB will continue to support maritime projects in line with its mandates in the respective countries and regions.</p>
25.	<p>Transport investment in <b>shipping</b> should focus both on financing innovation as well as transitional technologies. In addition, it is key that all shipping segments are adequately supported to ensure that they can effectively contribute to decarbonisation. Investments should be available for both deep sea shipping and short sea shipping. Investment possibilities should facilitate transition for different operational models as well: both liner and tramp shipping. Finally, it should be highlighted that investments in transition are crucial both for large companies and SMEs.</p>	ECSA	<p>Please note the responses above.</p> <p>The EIB supports the transition of shipping towards a low- and zero-carbon trajectory with the financing of both new builds and the retrofitting of existing vessels in line with the EIB's Climate Bank Roadmap. The CBR details the criteria for investments, both in maritime vessels and in infrastructure, to be considered Paris-aligned, and therefore eligible for EIB support, and includes criteria for both innovation as well as transitional technologies.</p> <p>It is indeed recognized that investment needs span across different size companies. In this respect the EIB Group, through the European Investment Fund (EIF), also supports Europe's SMEs by improving their access to finance through a wide range of selected financial intermediaries and thematic financial instruments.</p>
26.	<p>Short Sea Shipping with third countries and alternative fuels infrastructure outside Europe.</p>	CEOE	<p>Short Sea Shipping can strongly contribute to greening freight transport by supporting the shift from more carbon intensive transport modes. The targets set in the European Commission's Smart and Sustainable Mobility Strategy of increasing Short Sea Shipping by 25% by 2030, and by 50% by 2050, are in this respect a strong pathway towards a more sustainable European transport system.</p> <p>EIB supports the decarbonisation and depollution of the European shipping sector, including Short Sea Shipping.</p>

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27.	Clean urban mobility projects should be promoted by EIB to support balanced development, in order to contribute to the attractiveness and quality of life of all major European cities.	Alstom	The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.
28.	<p>One of the top investment priorities of EIB in the area of transport should be centred around <b>local public transport</b> assets and infrastructure, primarily to support the increase of the level of service provision (capacity), to welcome higher numbers of passengers as well as to accelerate the transition towards low and zero emission mobility in cities across Europe. Only by doing so can Europe become the first climate neutral continent, setting the example for the rest of the globalized world.</p> <p>The forthcoming EIB transport lending policy will have to prioritize not only new local mobility investments, but also the maintenance and upgrade of current transport infrastructures – this will help to optimize the value and resilience of existing networks.</p>	International Association of Public Transport UITP	<p>EIB's lending intends to support investments on sustainable urban mobility based on a long-term vision, which promotes a shift towards greener modes of transport and affordable transport solution for all, including zero emission public transport, shared mobility and active modes. Urban public transport infrastructure and fleets, in particular trams, metros and suburban rails, are already at the core of EIB's financing.</p> <p>The EIB's Climate Bank Roadmap, Chapter 4, further clarifies the EIB approach to sustainable financing of public transport. Annex 2, Table C, lists investments that are Paris aligned and therefore eligible for EIB support across all transport modes:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Only capital expenditures are eligible to EIB's financing.</p>
29.	Public transport	Comunidade Intermunicipal do Cávado urgewald	
30.	The EIB should promote all types of transport alternative to the private vehicle used individually.	UTP (Union des Transports Publics et ferroviaires)	
31.	The extension and development of the <b>urban public transport</b> network by metro.	METROREX S.A. Bucharest	



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32.	Investment in paratransit electrification/retrofitting should be the priority in <b>urban public transport</b> .	Where's My Transport	
33.	Strengthening the supply of public transport systems.	Município de Paredes	
34.	Access to public transport network in rural regions.	CIMBAL – Comunidade Intermunicipal do Baixo Alentejo	<p>The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.</p> <p>Projects need to be well justified. The choice of the transport mode shall be based on a sound assessments of needs, ensuring an efficient use of existing and any newly created capacity.</p>
35.	EIB should prioritise investments supporting the decarbonisation of the aviation sector as aviation is key for connecting and integrating people and territories from the European Union into the global economy.	Aerospace and Defence Industries Association of Europe (ASD)  AIRBUS  International Air Transport Association (IATA)	<p>Aviation provides vital connectivity on a national, regional and international scale and is increasingly difficult to substitute as travel distance increases. Air transport fosters territorial cohesion and grants accessibility to remote regions or islands where it is usually the only viable means of mobility. It also plays an essential role in logistic chains of high value added products.</p> <p>The decarbonisation of the sector is possible, but requires significant investments and institutional support. The EC strategic long-term vision 'A Clean Planet for all'<sup>14</sup> and the Sustainable and Smart Mobility Strategy identify a possible decarbonisation pathway for the sector based on the combined effect of an acknowledged basket of measures.</p>
36.	Global warming is a global issue that needs global solutions and the investments needed to decarbonise aviation will not be possible without a level playing field allowing the new technologies, new infrastructures, new fuels and new sources of energy to be deployed at large scale, worldwide. This approach entails increased cooperation and full alignment between the aviation sector and policy makers and regulators in Europe but also in ICAO who is the UN organisation in	Aerospace and Defence Industries Association of Europe (ASD)  AIRBUS	<p>The EC policy priorities in aviation include the the greening of airports, fleets and related services in general; safety; security;</p>

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	charge of international aviation policy related to Climate change.		and digitalization, including the improvement and digitalization of the Air Traffic Management system.
37.	<p>Only air transport provides a high level of connectivity between the EU and the world's economic regions. This includes passenger transport but also air freight transport. It needs strong European companies that are not harmed by unilateral climate change instruments in competition.</p> <p>International and global transport cannot be substituted by surface transport. It is therefore essential for the position of the European Union in the world economy to decarbonise air transport and not to reduce it.</p>	<p>Bundesverband der deutschen Luftverkehrswirtschaft e.V.</p> <p>Flughafenverband ADV</p>	<p>The EIB's Climate Bank Roadmap, Chapter 4, specifies the EIB approach to financing aviation. Annex 2, Table C, lists investments eligible for EIB support across all transport modes:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The EIB will prioritise the financing of projects that will overcome existing efficiency constraints and explicit decarbonisation measures such as the greening of ground service fleets, energy efficiency programs and enabling infrastructure to service Sustainable Aviation Fuels (SAFs) and low emission aircraft. Airport connections to the TEN-T railway network and investments aimed at encouraging multi-modality and increased use of public transport to access the terminals will also be supported as a priority.</p>
38.	<b>Airports</b> are a key interface between a wide range of aviation and non-aviation stakeholders - providing essential connectivity services to their communities.	Airports Council International EUROPE	
39.	Investment in sustainable aviation fuel (SAF) and synthetic hydrogen fuel (PtL) production, electric and hydrogen powered aircraft will decarbonize aviation and ensure that Europe remains directly connected to the global economy.	International Air Transport Association (IATA)	<p>The EIB's Climate Bank Roadmap, Chapter 4, specifies the EIB approach to financing aviation. Annex 2, Table C, lists investments eligible for EIB support across all transport modes:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The EIB will prioritise the development and deployment roll of zero direct CO2 emission aircraft via pilot and demonstration projects.</p> <p>Moreover, the EIB will consider supporting the deployment of commercially available technologies and alternative fuels compatible with the EU Sustainable Finance taxonomy, once this has been finalised.</p>

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40.	Those fulfilling social criteria, particularly <b>social benefit</b> , and job creation and maintenance.	European Transport Workers' Federation	Equal accessibility and disparities in people's ability to use transport to access work, goods and services, and human contact depending on where they live, how wealthy they are, or what specific socio-biological characteristics they may have, are some of the main challenges facing the transport sector today.
41.	Transport investments that does not discriminate people: mobility and holidays should be accessible to all.	Costa Group	
42.	Investments in inclusive mobility/transport. For people with low-income, for disabled, for women (safety of women in transport) and children.	Ministry of Infrastructure and water Management	<p>The social dimension of transport poverty is related to this in that people from disadvantaged groups tend to have worse access to transport and the life opportunities that depend on it, in particular quality jobs and education. Low income groups depend heavily on subsidised transport services, but even when these are available, they do not necessarily address the locational needs. Gender inequalities in society at large translate into inferior access to, use of, and benefit from transport-related services and employment opportunities. Women's and single parents' high reliance on public and non-motorized transport, combined with their caring responsibilities, add to their relative transport poverty.</p> <p>The risks of gender based violence that in particular women and girls, young men and LGBTIQ people face on their way to and during their use of transport facilities also impact their mobility. Disabled access to transport services remains a persistent issue despite benefiting from a strong legislative support.</p> <p>Prioritising an affordable and accessible network available to all who can benefit from the opportunities it provides and promoting social inclusion, diversity &amp; wellbeing, are key principles of sustainable transport that underpin the support of the EIB to the transport sector. Please refer to Chapter 4 of the TLP that describes the EIB approach to addressing these challenges.</p> <p>It is moreover noted that the Transport Lending Policy applies alongside other EIB policies, principles, standards and</p>

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			guidelines, including the EIB's environmental and social standards.
43.	Improvement of safety and traffic levels.	Município de Paredes	EIB financing of infrastructure investments for digitalisation and automation will continue to be prioritised as a means of optimising the use and capacities of the various transport modes and improving safety and interoperability, as well improving the integration and connectivity between the different modes in the transport system.
44.	Investments in <b>sustainable</b> transport modes and infrastructure in cities.	Ministry of Infrastructure and water Management	The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.
45.	The EU should have the ambition to become world leader in <b>zero-emission</b> vehicle alternative fuels infrastructure and smart technology. This will allow European industry to export technologies and experience.	FEBIAC	<p>The decarbonisation challenge in the transport sector is particularly large, and success in decarbonising transport will be crucial for the decarbonisation of the economy more broadly. In contrast to nearly all other sectors, GHG emissions from the transport sector continue to rise, as growing mobility demand outstrips emission reductions from efficiency gains.</p> <p>Decarbonisation, environmental protection, resilience and resource efficiency concern the negative climate and environmental impacts that mobility causes as its by-product.</p>
46.	Green investments, investments in transport connections and infrastructure, aiming at decarbonization of transport. Investments in green international connectivity and interoperability (international train-connections, green/sustainable airports, green/sustainable ports	Ministry of Infrastructure and water Management	
47.	Transport mode(s) with the least environmental and health impact.	Back on Track Belgium vzw-asbl	
48.	EIB should prioritise investments where the biggest CO2 emission decrease impact can be achieved.	Budapest Airport Zrt.	
49.	Investments in smart mobility and transport infrastructure, that will bring more efficient mobility and transport and make it possible to choose the best transport mode.	Ministry of Infrastructure and water Management	The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy, and indeed considers safety, accessibility and

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			efficiency as critical dimensions of transport systems, alongside their climate and environmental sustainability.
50.	Investments in resilient transport infrastructure.	Ministry of Infrastructure and water Management	<p>Transport must become more climate neutral as well as resilient to future changes.</p> <p>Some level of climate change is now inevitable and much of our transport infrastructure will therefore need to be made resilient and adaptive to increasing frequency and severity of climate events. Safeguarding the climate resilience of transport assets will be an important driver of investment in the sector, especially in infrastructure.</p> <p>The EIB has recently published the EIB Climate Adaptation Plan (<a href="https://www.eib.org/en/publications/the-eib-climate-adaptation-plan">https://www.eib.org/en/publications/the-eib-climate-adaptation-plan</a>), aiming to strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure.</p>
51.	The EU needs to have zero carbon transport systems to enable European companies to be part of zero-carbon supply chains of the future. The EIB should support industrial development in line with the local and circular economy principles that reduce resource use and the length of supply chains. Key transport sub-sectors in freight such as rail and heavy-duty vehicles should be improved through electrification and modern fleets.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	<p>The decarbonisation challenge in the transport sector is particularly large, and success in decarbonising transport will be crucial for the decarbonisation of the economy more broadly. In contrast to nearly all other sectors, GHG emissions from the transport sector continue to rise, as growing mobility demand outstrips emission reductions from efficiency gains.</p> <p>The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy that highlights the need for boosting the uptake of zero-emission vehicles and related infrastructure, creating zero-emission airports and ports, increasing uptake of more sustainable transport modes both in urban and inter-urban contexts, greening freight transport, pricing carbon and providing better incentives for users.</p>

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52.	A correct vision of an integrated European mobility policy should consider all transport modes in a joint and balanced manner as well as a geographically differentiated approach.	Confederación Española de Transporte en Autobús - CONFEBUS	<p>The priorities for the EIB's support to the transport sector identified in the TLP include inter- and multimodal transport.</p> <p>Multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions. Investments in safe and green modes need to be made in a multimodal context to harness their maximum potential, incorporating also last mile considerations into investment decisions concerning transport between hubs.</p> <p>Supporting investments in digitalisation are also needed for efficient multimodality, both in freight and in passenger transport. As transport will be increasingly multimodal and international, the efficiency of door-to-door journeys of peoples and goods will be more and more dependent on seamless connections between different transport modes and between countries, in particular within the Single Market of the European Union.</p>
53.	Cost-beneficial investments to improve the service level in all transport modes and shift to non-polluting energy.	Finnish Transport Infrastructure Agency	
54.	Investments in efficient <b>multimodal</b> infrastructures for all targets groups and users profiles.	Traxio	
55.	Promotion of intermodality (bus-rail-aviation) and modernization of terminals and transport stations.	CEOE	
56.	Cooperation between different transport sectors	MÁV-Volán Group	
57.	<ul style="list-style-type: none"> <li>- Transport infrastructure.</li> <li>- Intermodal infrastructure</li> <li>- Connectivity among different Transport Networks (road, maritime/river)</li> </ul>	European Road Haulers Association (UETR)	<p>The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy.</p> <p>For transport to become sustainable the Strategy highlights boosting the uptake of zero-emission vehicles and related infrastructure, creating zero-emission airports and ports, increasing uptake of more sustainable transport modes both in urban and inter-urban contexts, greening freight transport, pricing carbon and providing better incentives for users.</p> <p>On smart transport, the Strategy focuses on making connected and automated mobility a reality and boosting innovation and the use of data and artificial intelligence (AI) for smarter mobility. In relation to a more resilient transport system, the Strategy identifies reinforcement of the single market,</p>
58.	<p>At global level, the European Union can become a model for the decarbonisation of transport. In order to do so, the EIB needs to invest in the transport sector in two ways.</p> <p>1 - incorporate its transport lending policy into a modal shift from polluting means of transport (air and maritime transport) to decarbonised means of transport (trains).</p> <p>2 - encourage investment in technologies to decarbonise the transport sector — such as (green) hydrogen, alternative fuels, etc.</p>	Service Public Fédéral Mobilité et Transports	

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			particularly through the TEN-T network, making mobility fair to all and stepping up transport safety and security across all modes.
59.	To achieve the EU's integration, there must be regulatory stability across the Union, that allows not only EIB's investment but also private investment. Therefore, to enable the investment required, an overarching strategic delivery plan should be developed providing legal clarity on the path towards this goal.	Global Infrastructure Investor Association	<p>The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy.</p> <p>Influenced by the European Green Deal, the Paris Agreement on climate change, and building upon the previous White Paper for Transport, the strategy lays the foundation for how the EU transport system can achieve its green and digital transformation and become more resilient to future crises.</p>
60.	The EIB's external transport lending policy should be guided by the revised EU <b>Connectivity</b> Strategy. In this regard, the EU and Member States need to coordinate their relevant policies more closely to ensure a true Team Europe approach to connectivity. In this way, the connectivity strategy should be flanked by a more coherent foreign economic diplomacy on EU and Member State level.	BusinessEurope	<p>The European Commission and the EU High Representative have set out the Global Gateway, a new European strategy to boost smart, clean and secure links in digital, energy and transport sectors and to strengthen health, education and research systems across the world.</p> <p>The EIB is the lending arm of the European Union and as such will support in line with the Bank's eligibilities the Global Gateway initiative.</p>
61.	EU-funded connectivity projects should not be open to companies and entities from countries that do not grant reciprocal access to their connectivity-related projects to EU operators and the EIB and its implementing partners need to have measures in place to address abnormally low bids.		<p>The EIB's Climate Bank Roadmap, Chapter 4, specifies the EIB approach to financing transport projects. Annex 2, Table C, lists investments eligible for EIB support across all transport modes:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
62.	The EU should address China's Belt and Road Initiative (BRI) on its TEN-T Corridor Studies and collaborate with China to conduct studies to determine priority corridors to prevent possible bottlenecks and transport constraints.		
63.	Take the rail projects of the Chinese New Silk Route as an example for all continental transport.	Antje Willnow	

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64.	Investment policies should consider new categories of investment necessitated by the constantly evolving connections with third countries. <b>Border crossing points</b> as a category of infrastructure must appear on the TEN-T network development and the EIB lending plans. The inclusion of border crossing points as transport investment category is very relevant for two main reasons: developing the crisis resilience (smoother supplies and balancing the crisis impact) and fighting against smuggling and illegal migration.	Airlines for Europe A4E  BusinessEurope	<p>Since the 1990s, the Trans-European Networks for Transport (TEN-T) has been the infrastructure backbone of the Single Market, covering roads, railways, inland waterways, ports and airports. TEN-T also plays an important role for the cohesion of the EU, aiming to provide efficient connections between central and peripheral regions of the EU, and therefore contributing to a balanced development across the Union.</p> <p>The TEN-T investment challenge is significant and the networks are far from complete, most notably in some Member States in Central and Eastern Europe, but also in many Western European countries. Many existing links now require to be upgraded and updated, and the cross-border connections of the network have proved particularly intractable.</p> <p>The priorities for the EIB's support to the transport sector identified in the TLP include Completion of networks in all transport sectors, with particular focus on TEN-T and cross-border connections.</p>
65.	When we take a look at the global economy, we should not forget labor market, goods market, sound supply chain and logistics, and in general <b>guarantee competitiveness of European firms and of course safety and security of individuals</b> . In this regard, public transport, extra urban railway systems, maritime transport, multimodal connectivity to transport hubs, and in case of lack of other connection road transport access to other transport modes.	Miguel de Ortuzar	The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy, and indeed considers safety, accessibility and efficiency as critical dimensions of transport systems, alongside their climate and environmental sustainability.
66.	Investments in infrastructure, according to the climatic conditions in the respective country.	Railway Signalling Automation Telecommunication And Industry Association	Transport must become more climate neutral as well as resilient to future changes. One of the most important transformations the transport sector will face in the coming decades will be decarbonisation, and the scope and speed of decarbonisation will differ between regions and countries, depending on affordability and also on the viability of alternative fuel options.



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			Safeguarding the climate resilience of transport assets will be an important driver of investment in the sector, especially in infrastructure and is a key principle of sustainable transport that underpins the support of the EIB to the transport sector. Please refer to Chapter 4 of the TLP that describes the EIB approach to addressing these challenges.
67.	In accordance with the National Development Strategy of the Republic of Croatia until 2030, strategic goal 10. Sustainable mobility.	Croatian motorways Ltd	<p>The move towards a more sustainable world is led by the United Nations' 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs). Sustainable transport and mobility is fundamental in achieving many of the SDGs, so transforming transportation means finding a balance between all these aspects.</p> <p>In line with these, please refer to Chapter 4 of the TLP that describes the principles of sustainable transport that underpin the support of the EIB to the transport sector, providing a value framework within which to help tackle the many pressing problems it faces and prioritize EIB's support.</p>
68.	Stimulate multilateral banks around the world to match investments in infrastructure as shipping and aviation are global.	Van Oord	<p>Thank you for your contribution. Indeed global supply chains and the global nature of certain transport sectors require global partnerships.</p> <p>The EIB is already working with the European Commission and other Multilateral Development Banks to this end, and will continue to do so in order to support investments that contribute to transforming transportation into a more sustainable system, making transport systems safer, more accessible, greener and more efficient.</p>
69.	Taking into consideration each extremity, hence each border, EIB should prioritize: Maritime transportation, Airway transportation, and Railway transportation. Far distance trade infrastructure should focus mainly on maritime and airway, and neighborhood trade infrastructure should focus on railway transportation.	Ministry of Transport and Infrastructure	<p>Annex 2, Table C of the EIB's Climate Bank Roadmap, confirms that investments in maritime, aviation and railways are eligible for EIB support:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>

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			Please note the more elaborate responses above on the Bank's TLP approach to each of these sectors.
70.	More efficient planes and boat transports.	Município de Faro	Please note the more elaborate responses above on the Bank's approach to aviation and shipping.
71.	The EU must absolutely keep the strategic transport infrastructure in own hands: maritime ports and aviation ports in the first place also road infrastructure	Federation of Belgian Enterprises FEB-VBO	The scope of the TLP is limited to EIB support to the roll-out of new technologies and to investment in mature Paris-aligned technologies in the transport sector and the provision of mobility services.
72.	<b>Security</b> of airports and intermodal hubs;	ECTRI	<p>There is a growing need in the modern and interconnected world to carefully consider the safety of users and freight from an increasingly wide set of security threats.</p> <p>Transport security is about the protection of passengers, staff, the public, and the infrastructure, vehicles and cargo against attacks, crime and intentional harm. This includes cybercrime and terrorist attacks on the transport system, which have become increasingly widespread, and extends to the security of freight, both from theft and damage, but also as a means of enabling and suppling other crimes.</p> <p>Transport Security also includes physical aggression, sexual harassment or other forms of unwelcome behaviour, which are a particularly problem for women and girls, young men, LGBTIQ people, elderly and certain other groups depending on the context on public transport.</p> <p>The development of a safe and secure transport system that prevents unnecessary loss of life, and protects users from attack, discrimination or harassment is a key principle of sustainable transport that underpins the support of the EIB to the transport sector. Please refer to Chapter 4 of the TLP that describes the EIB approach to addressing these challenges.</p>
73.	EIB taking a leadership role in <b>electrification</b> , including in transport, supporting policies and planning that underpin this transition and supporting cross-border integration of transport	Bank Information Center	The EIB's Climate Bank Roadmap, Chapter 4, specifies the EIB approach to financing transport projects. Annex 2, Table

Ref	Summary of Contributions	Contributor	EIB comment
	networks and standards. Such standards must aim for upward harmonization, so that EU is rightly perceived as a leader in these areas.		<p>C, lists investments eligible for EIB support across all transport modes:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The Climate Bank Roadmap clearly prioritizes the financing of sustainable infrastructure, the electrification of the transport sector and the use of other sustainable fuels.</p>
74.	<b>Digital</b> connectivity and automation.	ECTRI	<p>The disruptive changes being brought about by digitalisation are being felt primarily in urban and road passenger transport, but the digitalisation and automation of transport concern all modes, with the European Rail Traffic Management System (ERTMS) and the Single European Sky (SESAR) being prime examples from other sectors addressing safety, congestion and competitiveness challenges. Moreover, digitalisation and automation equally concern freight transport and logistics as much as passenger transport.</p> <p>The EC Sustainable and Smart Mobility Strategy is the current EU roadmap for the sector, laying the foundation for how the EU transport system can achieve its green and digital transformation.</p> <p>The EIB's Climate Bank Roadmap, Annex 2, Table C, confirms that investments in digital connectivity and automation are eligible for EIB support and the TLP prioritises such investments for EIB support across all transport modes.</p>
75.	<b>Research</b> on how digitalization needs to be used to contribute to reductions of emissions of the transport system in a considerable way, taking into account the emissions caused by digitalization itself (LCA)	ECTRI	<p>The scope of the TLP is limited to EIB support to the roll-out of new technologies and to investment in mature Paris-aligned technologies in the transport sector and the provision of mobility services.</p> <p>However, indeed, the transport sector also benefits to some extent from EIB support through separate but related policies</p>

Ref	Summary of Contributions	Contributor	EIB comment
			and guidance – notably covering indirect support (to SMEs for example) and through its support for research and innovation.
76.	Efficiency and Resilience in Global Supply Chain	ECTRI	<p>Efficiency and resilience in global supply chains are key challenges for the coming decades, notably to make current and future transport systems resilient to climate change.</p> <p>Due to the complex supply chains and interdependencies between the single market and markets in developing partner countries, investment in resilient and quality infrastructure in partner countries is critical.</p> <p>As the EU economy is increasingly dependent on efficient infrastructure in third countries, disruption of such infrastructure will undoubtedly lead to disruption of the global supply chains and have a corresponding negative effect on the European economy. Investment in the transport networks of partnership and mandate countries outside the EU will therefore play an important role in the activities of the new EIB development branch.</p>
77.	It would be ideal to reduce these global transport, in particular by relocating production and reducing consumption. Global tourism transport needs to be limited, notably through awareness raising and investment in tourism transport at national and European level.	Response 704118868	The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy, which considers climate and environmental sustainability, alongside safety, accessibility and efficiency as critical dimensions of the EU transport systems.
78.	Innovation in the accessibility of cableway transport, creation of European rules on the accessibility of cableway transport, raising the excellence of European manufacturers.	Ministère de la Transition écologique	<p>The EIB's Climate Bank Roadmap, Chapter 4, specifies the EIB approach to financing transport projects. Annex 2, Table C, lists investments eligible for EIB support across all transport modes: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>All eligible transport investments are potentially suitable for EIB support, but given the limited availability of resources, these are prioritised as detailed in the TLP (see chapter 5), and</p>
79.	Night trains, inland waterway transport, sailing transport, etc. research into zeppelin... the nuclear car, soft mobility, more or less electrified bike mobility, etc.	Response 981558580	
80.	Creating "carpooling lines networks" is the base for future road system with connected and autonomous vehicles.	ECOV	

Ref	Summary of Contributions	Contributor	EIB comment
81.	It is just important to avoid any further investment in new road infrastructure (despite Pedestrian and Bicycle paths)	Response 1039141480	in full alignment with all other relevant EIB policies and guidelines.
82.	- Decarbonization: public transport -modal shift	Município de Lousada	Please note the more elaborate responses above on the Bank's approach to decarbonisation and to public transport and modal shift.

Question 13– How can the EIB foster partnerships between the public and private sectors to respond to the challenges facing the transport sector?

Ref	Summary of Contributions	Contributor	EIB comment
1.	By supporting <b>innovative financing schemes</b> such as FoFs which mobilize private investment in the sustainable transport alongside public funding.	Institute for European Cooperation	The TLP recognises the role and importance of private sector involvement in the financing and delivery of transport infrastructure. Many EIB operations in the transport sector also include public and private support at differing levels.
2.	- Further opening up investments to promote more private sector engagement for innovative market set-ups and business models. - Prioritisation should also cover the financing structure under the loan with a specific focus on direct payment rights, sustainable terms of payment and if when relevant rating monitoring on bank guarantee.	UNIFE	The EIB has supported and will continue to support PPP/concession-type projects in the transport sector when demonstrated to be the appropriate way forward – including in terms of value for money.  The transport sector also benefits to some extent from EIB support through separate but related policies and guidance – notably covering indirect support (to SMEs for example) and through its support for research and innovation.
3.	By offering loans at favorable conditions, providing guarantees and advisory services (for PPP, Joint Venture financial models etc). The EIB should also offer ready-made Joint Ventures models to Member States, private and public institutions	Správa železnic	For example, the EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
4.	Blending schemes adapted to the transport sector, advisory services	Ministry of Infrastructure	
5.	Public-private partnerships are not yet a very common financing instrument for railway infrastructure and the EIB could continue to help the application of project financing solutions by fostering its <b>advisory services</b> . Moreover, the railway industry needs transformation and modernisation through digitalization and new technologies that can increase rail attractiveness and competitiveness. The EIB could foster public and private sector involvement by being a catalyst for funding gaps in the early stages of large transformation railway projects. Supporting early-stage technologies R&D as venture capitalist and the roll-out of mature solutions through blending operations and investments platforms, with corporate banks to	European Union Agency for Railways	The EIB will also continue to support innovative financing schemes where appropriate. For example, the EIB will seek to develop innovative financing facilities enabling modernisation, retrofitting, digitalisation and automation of railway rolling stock, train and locomotive fleets – all priorities for EIB support. Please see Chapter 5 of the TLP, on the EIB's priorities in rail.  EIB advisory and technical assistance offer is becoming an increasingly important facet of the added value of EIB participation in projects. The EIB offers a wide range of

Ref	Summary of Contributions	Contributor	EIB comment
	pool small-size transactions, can accelerate the uptake of new technologies in the rail sector. Thanks to its advisory teams, the EIB is a privileged position in the banking industry to assess the potential of rail-related projects and the setup of public-private solutions.		advisory services and project-related technical assistance facilities to contribute to improving the quality of lending operations throughout the project cycle and enhancing their development impact. In co-operation and in dialogue with the European Commission and EU Member States as applicable, the EIB will continue to provide and is expanding its advisory and technical assistance related services at all stages of the project cycle, including strategic and market development as well as upstream project preparation and project implementation. This is the case, for example, of the <a href="#">Joint Assistance to Support Projects in European Regions (JASPERS)</a> , which supports the preparation of top quality projects for EU co-financing, including technical support and advisory services for strategic planning of transport investments; and EPIC, the newly set up Facility for Eastern Partnership Investment in Connectivity (EPIC), which offers Armenia, Azerbaijan, Georgia, the Republic of Moldova and Ukraine free advisory services and technical assistance to improve TEN-T transport connections.
6.	EIB can seek to encourage innovation of general interest, whether it emerges from the public or private sector. Indeed, it is essential that this innovation be accompanied by the public sector, in order to free it from the constraints of short-term profitability, and to ensure the large-scale deployment of innovations that prove conclusive.  EIB should play a role of Venture Capitalist dedicated for innovative firms that develop public innovation like "carpooling line".	ECOV	
7.	Ensure security of investments in renewable transport. Support regulatory framework towards investment stimulation	Ralph-Uwe Dietrich	The EC policy priorities to enhance sustainability of transport include the uptake of zero-emission vehicles, renewable fuels and deployment of related zero-emission infrastructure.  The TLP outlines the EIB's contribution to such investments in Chapter 2 and 5. EIB-supported projects are subject to requirements in line with relevant EU legislation and regulatory frameworks, and supplemented by EIB standards where applicable.
8.	The public sector should offer sufficient opportunities for freight and passenger transport on the one hand, but should also put limits to the private sector, if it is not compatible with <b>greenhouse gas emission</b> scenarios.	Hanns Kerschner	The Bank will continue supporting public and private investments in sustainable mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments supporting collective passenger

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9.	Public and Private should be very close and make much more efficient one another. The ultimate goal is the mobility efficiency and intermodality between all of the operators.	Metropolitano de Lisboa	transport and multimodality. This also includes intermodal and logistics, combining IT and logistic platforms to improve the efficiency of urban freight and reduce its environmental impacts.
10.	Take public rail infrastructure and private rail&road freight-terminals as an example. Take public ports and private terminals as an example. These existing partnerships need support for upscaling modal shift for the near future. A future logistic hub based on public investment only allows environmental sound transport.	Antje Willnow	
11.	Support in both the public and private sectors! Both are important for the development of a balanced transport system.	Railway Signalling Automation Telecommunication And Industry Association	<p>The Bank will indeed continue to support eligible public and private sector transport operations with financial and/or advisory support.</p> <p>The Bank is demand-driven and neutral to the preferred financing method, given a sound business and economic case.</p> <p>The EIB does encourage private sector engagement and support. The Bank also finances operations with both private and public sector engagement, and there have been instances, where the Bank has financed both the private concessionaire as well as (part of) the public sector contribution for the same project, bearing in mind that the EIB generally finances up to 50% of the total project cost, ensuring the mobilization of additional funding from the private and/or public sector.</p> <p>The EIB has also supported and will continue to support appropriate PPP projects in the transport sector, through investments and/or technical assistance (e.g. through the EPEC, the European PPP Expertise Centre, based in the Advisory Services Department of the EIB or through grant resources). Such support can also cover multimodal projects and broader programme-based lending operations, such as those in support of strategies, SUMP, as well as RDI and the roll-out of new technologies. That said, experience shows that</p>
12.	Improve capacity and awareness in <b>PPP</b> process and opportunities particular for public officials.	International Union of Railways	
13.	Encouraging to use PPP-model.	Finnish Transport Infrastructure Agency	
14.	PPPs can be promoted by providing financing to both the public authorities and the private infra-operator. Currently EIB is under an “informal instruction” to only lend to either a public party or a private entity. In practice, combined EIB-operations with loans to both public and private parties are contraire to the instruction to EIB to only finance de-risked projects at cost coverage basis. Combined loans increase risks and costs of managing the EIB-operations as two separate EIB-divisions would have to cooperate on ad-hoc basis. For EU-operations the ERF and other EU-funding could address this risk & cost coverage issue. For outside EU (OEU) the EFSD+ setting provides a basis to address this.	Ministry of Infrastructure and water Management	



Ref	Summary of Contributions	Contributor	EIB comment
	<p>On the equity-side, the transportation challenges can be addressed partly by investment funds targeted at the exploitation of new technologies. EIB has a role as anchor-investor in impact investment funds in EU and OEU. PPPs can be set up in partnership with such investment funds. Again, the issue of combined EIB-operations may emerge.</p> <p>In view of the need (i) to develop better and more sustainable infrastructure; (ii) to maximise revenue-generating potential of infrastructure in connection to new technologies; (iii) minimise the burden on the public budget especially of OEU governments:</p> <ul style="list-style-type: none"> <li>•Can EIB point out how combined loans could be supported, especially for OEU operations? Could cooperation with bilateral donors be part of this effort? Is EIB interested to follow-up on this via working level dialogues?</li> <li>•Does EIB observe certain tendencies among infra-investors? Is there a market OEU, e.g. for toll-roads/bridges applying modern technology? Is there interest in sustainable ports; sustainable public urban-transport operations; etc.?). Which de-risking instruments are relevant for EIB to become an anchor-investor in such infra-investors for OEU?</li> </ul> <p>The NL funded a PPP module on climate resilient infrastructure that could help the EIB structure and foster invest programs that incorporate climate resiliency into infrastructure PPPs. The PPP module is developed by the Global Centre on Adaptation and the World Bank Group and aims to drive private sector participation in the US\$1 trillion infrastructure market.</p>		<p>PPPs, even when supported with technical assistance and/or grants, typically require more in terms of project preparation and thus institutional expertise, notably on the side of public promoters.</p> <p>Please refer to Chapters 4 and 5 of the TLP for the EIB's priorities and approaches to the mentioned challenges and sectors, respectively.</p>
15.	<p>For public-private partnerships in transport, it is important to emphasize the following points:</p> <ul style="list-style-type: none"> <li>- Permitting to leverage financially the EIB investment in those projects.</li> <li>- The distribution of risks between the public sector and the</li> </ul>	<p>Alstom</p> <p>UNIFE</p>	

Ref	Summary of Contributions	Contributor	EIB comment
	<p>private partners allocating to the party best able to avoid, control or minimize the consequences permit to make the best use of the private sector expertise. The project structured as a PPP has a better net present value balance for the public authority when taking into account the transfer of risks than if it were contracted and financed in a more conventional way.</p> <ul style="list-style-type: none"> <li>- The public authority retains its prerogatives regarding elements external to the project itself, such as future land use or urban development adjacent to the project and probably also tariff policy.</li> <li>- The public authority must choose its main strategic target/objective in a PPP procurement.</li> </ul>		Please see response to points above.
16.	Launch calls where both the public and private sectors need to be associated to apply for funding.	ECTRI	
17.	Public-private-partnerships (PPPs), in particular in infrastructure investment and public (transport) services, are not in and of themselves effective regarding investment, and should not be presented as value neutral. It is the position of the ETF that PPPs are avoided. PPPs in research and development such as the Shift2Rail Joint Undertaking, are possible, but they must be publicly accountable, include the social and gender dimension and contingency. And as in any public investment, only companies respecting social dialogue and collective bargaining agreements should be part of the partnership.	European Transport Workers' Federation	
18.	While participation of the private sector can be needed, the claim that the private sector is more efficient and better placed to deliver public services like transport has been repeatedly debunked. The EIB should especially be cautious over the use of public-private partnerships as the negative effects of such models on hidden debt and public services are becoming increasingly clearer. A recent report from the European Court of Auditors covering inter alia the transport sector warns for instance that Public Private Partnerships (PPPs) benefiting	Counter Balance	

Ref	Summary of Contributions	Contributor	EIB comment
	from EU public financing “suffer from widespread shortcomings and limited benefits”.		Please see response to points above.
19.	Improve capacity and awareness in PPP processes, creating and communicating opportunities for public officials.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
20.	Encouraging cooperation between the public and private sectors in the establishment of new transport processes in all modes of transport and autonomous mobility systems. <ul style="list-style-type: none"> <li>• encouraging the development of smart solutions in the transport system</li> <li>• promoting zero-emission transport of pollutants</li> <li>• investments in projects that contribute to reducing greenhouse gas emissions</li> <li>• increasing road safety and addressing seasonal and periodic peak loads.</li> </ul>	Croatian motorways Ltd	
21.	The EIB should finance not only « ships », or « infrastructures », but « ecosystems », that would be able to solve the chicken-and-egg problem, for decarbonization as well as for automated vehicles. In this regard, support for public-private partnerships in the maritime sector will be welcome.	SEA Europe (European Shipyards and Maritime Equipment Association)	
22.	The EIB support towards piloting the development of integrated mobility platforms could be envisaged as important. A number of cities have decided to shift towards more collaborative approaches with more PPP for services. Likewise, public transport authorities need to become multimodal transport authorities that manage all players by setting rules that will optimise the overall traffic situation and the use of urban space. Many private operators and service providers need to work with cities to consolidate their business- models, while cities will seek to ensure the	International Association of Public Transport UITP	

Ref	Summary of Contributions	Contributor	EIB comment
	availability and continuity of the service, particularly for the first and last mile provision. Therefore, the collaboration in the public-private partnership framework will grow in importance, also meaning that eg. procurement models will become more complex.		Please see response to points above.
23.	The EIB must foster partnerships with the private sector. To do so, there are a few areas where the EIB should focus if it were to attract private capital. Those include: allowing foreign direct investment, ensuring regulatory and policy stability in the long term, elimination of any retroactive change in policy and regulation, visibility of an investment pipeline for private investors and prioritizing PPPs as a funding model.	Global Infrastructure Investor Association	
24.	The EIB plays a crucial role in bridging public <b>research</b> and the uptake of new technologies by private actors: the EIB could therefore invest in pilot projects with public research institutions and private sector actors for example in the development of re-fuelling infrastructure in the context of green port strategies. The EIB should support the development of public transport concepts for urban, suburban and, where applicable, rural areas to offer an alternative to private cars, taking into account just transition aspects. The development of sustainable urban mobility plans (SUMP) provides an opportunity to develop public-private partnerships from the early stages of transport planning and infrastructure investment, but should not be a box ticking exercise. Public bodies should coordinate and manage all transport related activities, with transparent procurement processes for tenders and public-private partnerships, and an overarching development strategy encompassing short, medium and long-term solutions according to developed SUMP.	Joint contribution made by NewClimate Institute and Germanwatch	
25.	Inclusion of investment in rail in <b>carbon compensation</b> schemes.	International Union of Railways	

Ref	Summary of Contributions	Contributor	EIB comment
26.	Give only credits for built projects the really encourage <b>modal shift</b> from road to rail, cycle or walk.	Response 1039141480	The EIB prioritises investments in rail, as well as in collective, active and shared mobility schemes, as highlighted in Chapter 5 of the TLP.
27.	Expansion of <b>public transport</b>	Response 974008607	
28.	The partnerships already exist in the transport sector	Pro Bahn	The EIB will continue to work with partners and stakeholders through both existing and new partnerships.
29.	Higher tolls on <b>roads</b>	Response 832108188	<p>Aspects related to sustainability, accessibility, affordability and considering needs of various transport users, are part of EIB appraisal process and are considered when selecting projects for financing.</p> <p>The EIB also notes that decisions on aspects such as toll rates are typically policy and commercial decisions of the respective public sector authority and/or operator.</p>
30.	Respect the different responsibilities: Infrastructure main ownership = State; Transport = private Apply strictly user pays/polluter pays system; set the right incentives for investment in the system Avoid negative consequences for the public: e.g. the “just in time principle”, which uses the public infrastructures as a warehouse	OTIF	<p>The TLP recognises and emphasises the importance of both public and private sector involvement in the planning, financing and delivery of transport infrastructure.</p> <p>The EIB supports projects that are in line with EU policies, including emission targets, and its own Climate Bank Roadmap (CBR). Annex 2 of the CBR contains detailed information about the emission standards applied to the different sectors of EIB support.</p>
31.	<ul style="list-style-type: none"> <li>- Promote modal shift, urban mobility and sustainable public transport accessible to all</li> <li>- Participation of transport in the economic development both with social and environmental benefits</li> </ul>	Alstom	The priorities to support avoid and shift investments can be found in Chapter 2 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact, including with respect to social and environmental benefits.
32.	Financing projects in all transport sector areas that aim <b>decarbonisation</b> .	Budapest Airport Zrt.	The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy emphasise the role of the transport sector in

Ref	Summary of Contributions	Contributor	EIB comment
33.	Support large AND smaller scale investments in <b>decarbonisation</b>	Van Oord	the EU's broader decarbonisation efforts. The EIB's CBR specifies the various types of investments that the Bank considers compatible with the goals of the Paris Agreement and that are therefore eligible for EIB support.
34.	The EIB can encourage the private transport sector in the development of <b>decarbonised</b> technologies, such as (green) hydrogen. Given the uncertainty of these future technologies, the public sector can act as a signal and incentive for private sector investment.	Service Public Fédéral Mobilité et Transports	<p>The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed emphasise the role of the transport sector in the EU's broader decarbonisation efforts, both inside and outside the EU, including through its support for research and innovation as highlighted in Chapter 2 of the TLP.</p> <p>The EIB indeed supports investments in hydrogen vehicles and vessels and its supporting infrastructure, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p> <p>Most investments into hydrogen transport qualify as "substantial contribution" under the first delegated act of the EU Taxonomy and, in line with EIB's Climate Bank Roadmap, account to the EIB Group climate action and environmental sustainability targets.</p>
35.	All partnerships that provide added values to the citizens (infrastructures, accessibility, affordability, ...)	Traxio	<p>In terms of the EIB's added value, the EIB's framework for assessing the additionality and impact of projects and its own intervention is described in: <a href="https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality">https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality</a>.</p> <p>The AIM assessment applies to every project financed by the EIB. It seeks to show how the EIB delivers additionality and impact, including social and environmental impacts.</p>
36.	By promoting who and how to participate in grants and tenders through public events organized with EIB and partner organization or company in each EU member country. Lots of	Croatian Chamber of Economy	The EIB's advisory and technical assistance offer is becoming an increasingly important facet of the added value of EIB participation in projects. In co-operation and in dialogue with the European Commission, EU Member States and (other)

Ref	Summary of Contributions	Contributor	EIB comment
	small and medium enterprises need help to apply for grants and tenders.		public and private sector partners, the EIB's advisory services support capacity building and all stages of the project cycle, and are available to both public and private promoters.
37.	Promote more the passing of information from the private sector to the public sector and the public sector to the private sector through workshops and meetings led by each of these sectors to the other sector, in order to promote the comprehension of the problems, solutions and define a joint strategy.	Município de Faro	<p>The EIB also recognises the importance of a robust planning framework in the transport sector and the role of its advisory services in supporting its clients and stakeholders on the establishment and assessment of investment programmes and individual projects, including to address challenges in a comprehensive manner and to enhance cohesion, social and broader sustainability impacts.</p> <p>The transport sector also benefits to some extent from EIB support through separate but related policies and guidance, notably providing a suite of products as appropriate, and covering indirect support to SMEs.</p> <p>Please see Chapter 5 of the TLP for the priorities for EIB support in each (sub-)sector.</p>
38.	Deliver warranties and organise meetings between both parties	Back on Track Belgium vzw-asbl	
39.	By adopting a staged/milestone achievements from the private sectors. For instance, if within a public-private partnership project the private actors reach at some point a milestone, the next stage they will receive an increased reward. This strategy benefits both sides and the private sector holds a significant flexibility in this regard.	Ministry of Transport and Infrastructure	
40.	New entrant operators need to have equal access to financing, for the acquisition of rolling stock. Private financing will be much more easily available if guarantees by member states or EIB can be granted.	European Sleeper Coöperatie U.A.	
41.	Sound finance and funding planning and migration planning as basis for any deployment planning	Community of European Railway and Infrastructure Companies (CER aisbl)	
42.	Accessibility can be the bridge between the public and private sectors.	Ministère de la Transition écologique	Aspects related to accessibility, affordability and considering needs of various transport users in relation to their transport patterns and schedules, are part of EIB appraisal process and are considered when selecting projects for financing.

Ref	Summary of Contributions	Contributor	EIB comment
43.	Night trains, inland waterway transport, sailing transport, etc. Research into zeppelin... the nuclear car, soft mobility, more or less electrified bike mobility, etc.	Response 981558580	The EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap. The Transport Lending Policy, in turn, specifies the priorities of the EIB's support to the transport sector, within the eligibilities specified in the CBR. Please see Chapter 5 of the TLP for the priorities for EIB support in each (sub-)sector.
44.	The EIB should request that Public Administrations define the projects well with balanced risk-sharing and reasonable economic return.	Confederación Nacional de la Construcción (CNC)	<p>The EIB requires a well-defined project, also in terms of the (appropriate) risk profile, as part of its due diligence process.</p> <p>The EIB can provide financing to programmes of projects, or where individual projects may not yet be fully defined at the outset for example through programme or framework loans. The individual projects must fully defined and implemented by the end of the programme.</p> <p>The EIB carries out a comprehensive cost-benefit analysis to ascertain the expected return. Its approach is described in the document "The Economic Appraisal of Investment Projects at the EIB" (<a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a>), which is currently under revision.</p>
45.	Partnerships with Metropolitan Areas and MIF.	Município de Paredes	<p>The EIB will continue to foster and develop its partnerships with various sub-national bodies, entities and agencies, notably in the urban sphere, given added complexities of density, multiple stakeholders and multi-modal transport needs.</p> <p>Please also refer to EIB comments under "Urban Public Transport &amp; Urban Mobility Planning".</p>
46.	Make the public sector aware of the technological possibilities. We see too often investments in old fashioned ways. Eg. electric cargo bikes are smaller than cars, bigger than bikes and do not easily find a place to operate in a safe way.	Federation of Belgian Enterprises FEB-VBO	The EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:



Ref	Summary of Contributions	Contributor	EIB comment
			<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  The EIB's advisory services may also provide advice on technological innovation and development in the transport sector.
47.	Amend investment lending criteria to incentivize SAF and synthetic hydrogen fuel (PtL) production including feedstock availability (agricultural, industrial and municipal wastes).	International Air Transport Association (IATA)	EIB support to the aviation sector will be in line with the EIB CBR.  Please see Chapter 5 of the TLP for the EIB's approach to Aviation, including its priorities in decarbonisation and operational resilience.
48.	<ul style="list-style-type: none"> <li>•By implementing financial incentive instruments and financings that could stimulate and accelerate the first investments in production facilities of advanced biofuel or synthetic fuel but also reduce the costs for customers.</li> <li>•The EIB should be involved and be aware of all platforms and alliances gathering the relevant stakeholders to better understand the economics and business models of the aviation sector. These platforms could help the EIB identify potential projects to support and accelerate the green transition of the aviation sector. This involvement can strongly help to coordinate public and private partners with the wider industry eco-system to accelerate investments and create the right market and regulatory conditions to successfully scale zero emission technologies and SAF.</li> </ul>	Aerospace and Defence Industries Association of Europe (ASD), AIRBUS, Airlines for Europe A4E	The EIB also supports investments in alternative fuels, as well as in hydrogen vehicles and vessels and its supporting infrastructure, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a> .
49.	Support for charging infrastructure (passenger and public transport).	Stadtwerke München GmbH	The EIB will indeed prioritise support for fleets of zero-emission vehicles and associated charging infrastructure as highlighted in Chapter 5 of the TLP.
50.	By participating in the introduction of vertigo Moebius programme type energy savings certificates.	UTP (Union des Transports Publics et ferroviaires)	The EIB supports research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
51.	Increase public budgets to be able to contract out to expert transport data collection companies.	WhereIsMyTransport	

Ref	Summary of Contributions	Contributor	EIB comment
52.	Innovative financing solutions, green loans. EIB could also finance R&D projects.	MAV-Volán Group	The EIB will also continue to support innovative financing schemes where appropriate.
53.	The key factor is to identify attractive projects that can be socially, environmental and economically sound and have a committed Public Authority body and Governance and a legal certainty for private investors.	Miguel de Ortuzar	The EIB's due diligence process takes into consideration social, environmental and economic impacts of projects, as well as the capacity and commitment of both public and private project promoters.
54.	Providing technical advice and identifying possible synergies between investors and administration. EIB should demand Public administration to better define projects with a balanced risk-sharing and reasonable economic return.	CEOE	The EIB also recognises the importance of a robust planning framework in the transport sector and the role of its advisory services in supporting its clients and stakeholders on the establishment and assessment of investment programmes and individual projects,
55.	Granting funds to genuine transport operators (performing transport activities mostly with their vehicles- and not intermediaries) while maintaining a strict control on the effectively performed activities, projects and implementation of the objectives of the funded projects.	European Road Haulers Association (UETR)	<p>The EIB will continue to support transport projects, as per the eligible types of transport investment specified in its Climate Bank Roadmap.</p> <p>The EIB will continue to monitor its for alignment with its standards, safeguards and objectives. The EIB's framework for assessing the additionality and impact of projects and its own intervention is described in: <a href="https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make.alternatives%20is%20defined%20as%20additionality">https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make.alternatives%20is%20defined%20as%20additionality</a>.</p>
56.	Increasing cheapest conditions of financing for more sustainable projects.	Ferrovie dello Stato Italiane S.p.A	The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed prioritise sustainable projects in the sector for the EIB's advantageous funding and project support, and emphasise the role of the transport sector in the EU's broader decarbonisation efforts.
57.	EIB can foster partnerships between the public and private sectors to respond to the challenges facing the transport sector by supporting policies that put a predictable, rising price on transport-generated externalities (GHG emissions, other air pollution, noise, congestion) and that deploy revenues to support research, development, and deployment of accessible electromobility.	Bank Information Center	To name an example, in line with the EIB Climate Bank Roadmap, large road capacity expansion projects with an investment size of EUR 25 million or greater will be subject to an adapted cost benefit test incorporating carbon prices and traffic profiles compatible with full decarbonisation by 2050.

Ref	Summary of Contributions	Contributor	EIB comment
			<p>The EIB's methodologies for carbon footprinting of projects in described in the document "EIB Project Carbon Footprinting Methodologies", available at: <a href="https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf">https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf</a></p> <p>That document explains the scope, metrics used, calculation methodologies and common assumptions underlying the carbon footprinting of projects.</p> <p>The Transport Lending Policy recognises the role and importance of private sector involvement in the financing and delivery of transport infrastructure. Many EIB operations in the transport sector also include public and private support at differing levels.</p> <p>The EIB has supported and will continue to support PPP/concession-type projects in the transport sector when demonstrated to be the appropriate way forward – including in terms of value for money.</p>

## Additional comments

Ref	Summary of Contributions	Contributor	EIB comment
1.	Unfortunately, the EU is not pursuing any significant transport policy measures to actually shift transport from road to rail. That is why the environmental pollution caused by road transit, for example on the Brenner, to the detriment of the local population is increasing from year to year!	Response 974008607	<p>The EIB Group supports all modes of transport, as specified in its Climate Bank Roadmap. In some modes certain types of investments are excluded from EIB support, as they are not considered as aligned with the EU's climate objectives and the Paris Agreement. Such exclusions are identified in the EIB Group's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p>
2.	Please try to convince the people that the only real electric drive is a train with a copper wire on top! Everything else is nearly same energy wasting as today's technology. The real change can just happen, if the majority of people goes with real-electric-trains.	Response 832108188	<p>The EIB supports rail transport, as specified in the Climate Bank Roadmap (Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>).</p> <p>The EIB's support can be extended to investments in rail infrastructure and mobile assets; the latter must have either zero direct emissions, or else fulfill the "significant contribution" criteria under the EU Taxonomy. Excluded from EIB support are infrastructure and mobile assets dedicated to the transport and storage of fossil fuels (e.g., dedicated railcars).</p> <p>Priorities for the EIB among rail sector investments are identified in section 5 of the TLP. They include electric rolling stock.</p>
3.	There is no need for EIB to demonize any transport modes	Finnish Transport Infrastructure Agency	<p>The EIB Group supports all modes of transport, as specified in its Climate Bank Roadmap. In some modes certain types of investments are excluded from EIB support, as they are not considered Paris-aligned. Such exclusions are identified in the Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>).</p>

Ref	Summary of Contributions	Contributor	EIB comment
4.	Raising prices of transport are inevitable for all transport sectors when meeting green transport requirements. Knowing about this, GHG-avoidance costs should be taken as the guiding principle for financial support.	Antje Willnow	<p>The EIB's approach to economic appraisal of projects, including the shadow cost of carbon, is described in:</p> <p><a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a></p> <p>and in Annex 5 of the Climate Bank Roadmap:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>.</p>
5.	Generally speaking, all the initiatives and investments should be user-centric.	Traxio	<p>Benefits of EIB-supported investments to users, alongside other beneficiaries, are identified and quantified in the economic appraisal of each project. The EIB's approach to economic appraisal is described in:</p> <p><a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a></p>
6.	It is essential for the EU, including through indirect management of funds, to ensure that European companies (and especially European train manufacturers and rail suppliers) can operate on a level-playing field both in Europe and abroad.	UNIFE	As the EU Bank, the EIB intends to keep its approach to lending inside and outside the EU coherent with the EU procurement and trade policy, as explained in Section 5 of the TLP.
7.	Night trains, inland waterway transport, sailing transport, etc. Research into zeppelin... the nuclear car, soft mobility, more or less electrified bike mobility, etc.	Response 981558580	<p>In its Climate Bank Roadmap, the EIB specifies the types of transport investments that the Bank considers as aligned with the Paris Agreement and hence eligible for its support. (The EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>).</p>
8.	It is important to identify clearly what generates externalities: most of the externalities come from the vehicles and not from the infrastructure itself. If there is an effective policy to promote the shift to zero emission vehicles, transport modes that	CEOE, Confederación Nacional de la Construcción (CNC)	<p>The EIB's approach to economic appraisal of projects, including the inclusion of environmental externalities, is described in:</p> <p><a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a></p>

Ref	Summary of Contributions	Contributor	EIB comment
	currently are considered polluting may be green in some years.		
9.	A4E calls for a substantive increase in support to the EU aviation sector, particularly in its efforts to reduce its environmental footprint and reach its decarbonisation targets. Public infrastructure financing policies should neither distort the European single market for air transport, nor overlook necessities of intervention without which social and regional implications could be significant.	Airlines for Europe A4E	<p>In its Climate Bank Roadmap, the EIB specifies the types of transport investments, including in the aviation sector, that the Bank considers as aligned with the Paris Agreement and hence eligible for its support. (The EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>).</p> <p>The TLP identifies priorities for EIB support of aviation in section 5.</p>
10.	EIB could contribute to financing refurbishment projects, e.g. applying digital technologies in vehicles and infrastructure. Modernization of existing assets and making them more appealing to passengers are key elements of facilitating modal shift from private vehicles to public transport.	MÁV-Volán Group	<p>In its Climate Bank Roadmap, the EIB specifies the types of transport investments, including in collective transport, that the Bank considers as aligned with the Paris Agreement and hence eligible for its support. (The EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>).</p> <p>The TLP identifies priorities for EIB support of collective transport in section 5.</p>
11.	Local public transport has a critical environmental role to play in the coming years and decades. Objectives of the Green Deal will never be met if the EU, together with the EIB, does not put the financing focus on daily collective mobility networks in urban, suburban and rural areas in order to tackle the increasing pollution and congestion. The fastest and most cost-efficient way to decarbonise people's daily mobility and reduce the carbon footprint of their mobility choices is to promote the use of local passenger transport. The sector needs to be financially supported in order to be able to survive the crisis and to meet future sustainability expectations.	International Association of Public Transport UITP	<p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>).</p> <p>The TLP identifies priorities for EIB support of collective transport in section 5.</p>
12.	We would like to challenge the framing of the public consultation as put forward by the EIB. Indeed, it is indicated in the preface of the Public Consultation Document that: "Considering the decisions taken by the EIB Group recently, especially with regard to its commitments to the Paris alignment in the context of its Climate Bank Roadmap, the	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace	The eligibility of investments for EIB support will be reviewed in the context of the Climate Bank Roadmap process, as explained in that document. This Transport Lending Policy takes eligibilities in the Climate Bank Roadmap as given, and identifies priorities among such eligible transport investments.

Ref	Summary of Contributions	Contributor	EIB comment
	<p>future Transport Lending Policy will no longer address the eligibility criteria for transport sector projects. The eligibility criteria are now enshrined in the Climate Bank Roadmap. The EIB will therefore not consider any comments on the eligibility of projects in the transport sector as part of this public consultation. The Transport Lending Policy will focus on setting the priorities for the EIB's support to the transport sector, within the eligibilities approved as part of the Climate Bank Roadmap".</p> <p>First of all, this approach contradicts the fact that many questions present in this questionnaire directly touch upon the topic of decarbonisation and therefore directly relate to the eligibility of certain investments. Secondly, our analysis is that while the EIB Climate Bank Roadmap (CBR) is a step forward in placing the EIB in the field of climate, it is still far from sufficient to truly transform the EIB into a "Climate Bank". The Roadmap commits the EIB to align all its sectoral policies and portfolio with the objectives of the Paris Agreement, but neither its Transport Lending nor its transport portfolio are yet Paris-Aligned. Our analysis is that the transport-related elements in the CBR are not sufficient to guarantee this alignment, despite commendable progress regarding eligibility criteria, starting from the ban on expansion capacity for airports. Still, we consider that several types of operations eligible for EIB financing are still at odds with a decarbonised future.</p> <p>Therefore, we invite the EIB to further define its eligibility criteria for transport projects in this review process. This would not run counter to the objective of better defining its priorities in the sector for the next decade.</p>		
13.	<p>The EIB has highlighted that it remains a project taker and is depending on what projects are submitted. However, through technical assistance programmes, such as JASPER, the EIB can provide consultation services on project designs. We strongly encourage EIB to actively support its clients from an early stage in the long-term planning of transport systems and</p>	E3G	<p>All EIB Group activities, including its advisory support, are subject to the Paris Alignment criteria specified in the Group's Climate Bank Roadmap.</p>

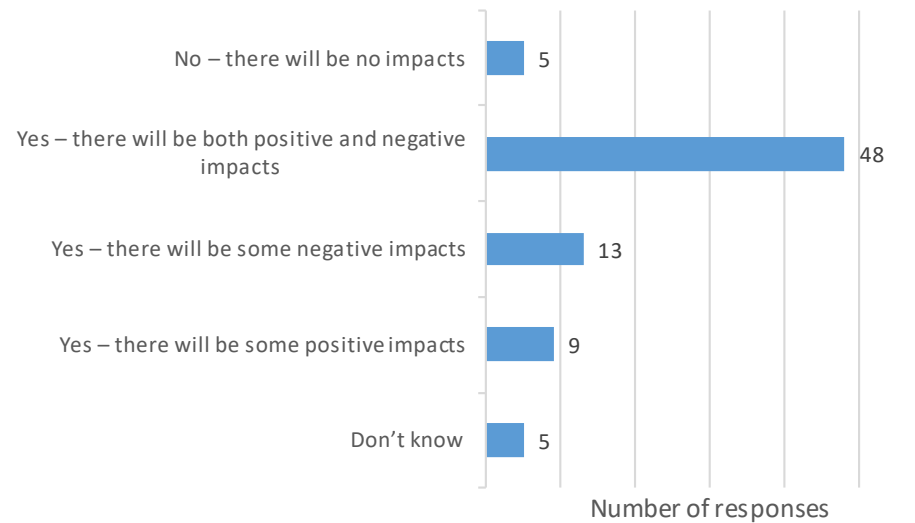
Ref	Summary of Contributions	Contributor	EIB comment
	in designing transport projects in the most sustainable, and climate friendly manner, in the spirit of the Climate Bank Roadmap.		
14.	EIB must make achieving a significant reduction in overall GHG emissions compared to the most likely business as usual scenario, and complementary resource efficiency and pollution prevention policies, such as vehicle maintenance inspection, central to the design and a criterion for approval and success of every road transport project. This criterion, and related policies such as internal combustion vehicle exclusions, must be applied to the entire project, not just to the portion financed by the Bank. For promoting fuel efficiency and reducing the GHG footprint of a project to be meaningful, goals ideally should be expressed as an absolute (vs. relative) reduction, with a firm, time-bound commitment (as a legal covenant of the loan agreement)..	Bank Information Center	<p>The EIB's approach to economic appraisal of projects, including the inclusion of environmental externalities and the construction of the counterfactual scenario, is described in:</p> <p><a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a></p> <p>The EIB's approach to carbon footprinting of projects is described in:</p> <p><a href="https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf">https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf</a></p>
15.	EIB should have a time-bound commitment to phase out purchases of internal combustion vehicles for all its projects and for its own operations. This should be done at the earliest feasible date, e.g. 2023, with carve-out for FCV or LIC countries without broad electricity access.		<p>As specified in the EIB's Climate Bank Roadmap, the EIB does not support RDI in Internal combustion engine (ICE) passenger vehicles, ICE powertrains for passenger cars and dedicated components (Annex 2, Table B). Nor does the EIB support the acquisition of vehicles that do not meet the "Significant Contribution" criterion under the EU taxonomy, with two exemptions for the EIB's intermediated and SME support (Annex 2, Table C).</p> <p>The EIB's Carbon Footprint Report (latest one available at <a href="https://www.eib.org/attachments/publications/carbon_footprint_report_2020_en.pdf">https://www.eib.org/attachments/publications/carbon_footprint_report_2020_en.pdf</a>) contains information about the EIB Group's own mobility-related emissions.</p>
16.	<p>The EIB is currently not delivering on its ambition to become the 'EU Climate Bank' and on commitment to align all its operations with the goals of the Paris Agreement.</p> <p>The paper being currently consulted revealed inconsistencies with the EIB's plan to become the EU Climate bank. It suggests</p>	Greenpeace	In its Climate Bank Roadmap, the EIB specifies the types of transport investments that the Bank considers as aligned with the Paris Agreement and hence eligible for its support. (The EIB's Climate Bank Roadmap, Annex 2, Table C:



Ref	Summary of Contributions	Contributor	EIB comment
	<p>in particular that lending for road expansion could continue. From 2016 to 2020, the EIB invested close to €20 billion in carbon-intensive and polluting transport modes - €4 billion a year on average (€4 billion for the expansion of airports, €12,6 billion to roads, highways and motorways and almost €3 billion in polluting investments for the maritime sector). There are still significant steps that the EIB needs to take if it is to become fully Paris-aligned. Having in mind the above numbers and the fact that transport is - along-side power generation - the largest source of GHG emissions in the EU the review of the EIB Transport Lending Policy (TLP) is crucial. It is crucial not only for the EIB to become a true climate bank but also to secure our safe future – especially in the light of the new report of the IPPC (WG3) which underlines the climate urgency and new scenarios like 'Net Zero Emissions' scenario produced by the International Energy Agency (IEA) and released in the World Energy Outlook (WEO) 2021. If re-directed towards climate-proof and transformative projects, EIB investments could help the EU transform its mobility system, decarbonize its transport sector and achieve the objectives of the Paris Agreement.</p>		<p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>).</p> <p>The eligibility of investments for EIB support will be reviewed in the context of the Climate Bank Roadmap. This Transport Lending Policy takes eligibilities in the Climate Bank Roadmap as given, and identifies priorities among such eligible transport investments.</p>

## Chapter 3 – Urban Mobility

Question 1 – Do you believe that there will be any permanent impacts on the development of this sector following the COVID-19 pandemic?



### EIB's comments

The EIB would like to thank all the participants for their contributions. The EIB has carefully reviewed them one by one and identified key topics that they were addressing, which are summarized in the table below along with EIB's comments. The EIB's priorities for urban mobility are addressed in the new Transport Lending Policy, chapter 5.

Topic	Reference	EIB's comments
Impact of pandemic/telework on public transport demand	A	<p>The EIB is aware of such trends triggered by the pandemic. Urban mobility may decrease in the short term, particularly in concomitance of pandemic waves.</p> <p>However, the EIB's lending intends to support investments on sustainable urban mobility based on a long-term vision, which promotes a shift towards greener modes of transport and affordable transport solution for all, including zero emission public transport, shared mobility and active modes.</p> <p>Urban public transport infrastructure and fleets, in particular trams, metros and suburban rails, are already at the core of EIB's financing. Their implementation requires years and their social, environmental and economic benefits last for decades.</p> <p>They are strategic assets that need to be implemented now in order to meet the ambitious objectives set in the EU Green Deal and the EC Smart and Sustainable Mobility Strategy therefore they will continue to be priorities in the revised TLP.</p>
Road congestion	B	Modal shift from private cars to public transport, shared mobility and active modes is already, and will remain, a priority for the EIB in the revised TLP.
Active modes	C	Shared mobility and active modes, including bike sharing, bike lanes and pedestrian areas, are already supported by the EIB. They are a promising area of development for its lending therefore they will remain a priority in the revised TLP.
Road safety	D	<p>EIB's lending on road safety will be prioritized in the TLP, including traffic calming measures and low speed zones, in particular in urban areas where accidents are mainly concentrated.</p> <p>The EIB is highly committed to support road safety investments. In 2020, the EIB and nine other multilateral development banks (MDBs) signed a high-level joint statement on road safety. The statement highlights the MDBs' aim to provide further access to safe, affordable and sustainable transport systems for all and to improve road safety, with special attention to the needs of vulnerable road users.</p>
Urban sprawl/integration of land-use and transport policies	E	<p>EIB's lending to urban mobility already requires promoters to have robust strategies in place for sustainable urban transport and development oriented, among others, to limit urban sprawl.</p> <p>The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift demand to more sustainable modes of transport and improve transport efficiency and reduce environmental and climate externalities.</p>
Economic justification of projects	F	Urban public transport will remain at the heart of the EIB's lending. Urban public transport is currently largely subsidized in the EU and its financial viability in the long term depends already on the public budget.
City logistics	G	Zero/low emission city logistics is a promising area of development for EIB's lending.
Service quality	H	Quality services are essential to foster the attractiveness of urban and suburban public transport.

Ref	Summary of Contributions	Contributor	EIB comment
1.	<p>A <b>shift from public to individual transport</b> has taken place during the pandemic.</p> <p>Due to fear of transmission, people will be <b>more cautious</b> about using shared services where interaction with other members of the public is most likely.</p> <p>Traffic will decrease overall due to the increased <b>teleworking</b>.</p>	Alstom, Antje Willnow, Arthur D. Little, Back on Track Belgium vzw-asbl, Bayerisches Staatsministerium für Wohnen, Bau und Verkehr, Budapest Airport Zrt., Community of European Railway and Infrastructure Companies (CER), European Federation for Transport & Environment, ECTRI, EuroRAP, Ferrovie dello Stato Italiane S.p.A, Institute for European Cooperation, International Union of Railways, IRAP, Joint contribution made by NewClimate Institute and Germanwatch, MÁV-Volán Group, Marc-Olivier Leclercq, Ministère de la Transition écologique, OTIF, Response 832108188, Response 552589262, Response 704118868, Road Safety Foundation, Service Public Fédéral Mobilité et Transports, SNCF, Stadtwerke München GmbH, Stelios Efsthadiadis, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), Traxio, urgewald, WhereIsMyTransport	A
2.	With the fear of contamination, private cars remain popular, which will not solve the problems of traffic congestion in cities.	Service Public Fédéral Mobilité et Transports	B
3.	The negative impact is the increased use of private vehicles with the existing fossil fuel engines - even if the fleet could be electrified, there still remain non-climate related externalities including congestion.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways	A/B
4.	Two-wheel transport mode will be used more.	IRAP, Traxio	C
5.	A safe management of motorcycle use, including through the reallocation of space, will also be a priority. In many places, reduced traffic flows have led to higher speed and increased risk.	IRAP	D

Ref	Summary of Contributions	Contributor	EIB comment
6.	The higher shares in individual mobility such as driving, may prevail even after the pandemic. It will bring to the focus the safety of VRU (Vulnerable Road Users) in urban space. Safety standards for VRU will have to be increased. If the new facilities are not safe, the problem of increased FSI in cities will become an immediate negative impact. Increased speed as a negative impact of reduced traffic flows will need to be properly managed.	European Institute for Road Assessment – EuroRAP	D
7.	While some population groups will adopt new transport modes, it will be caused by fear of transmission through public transport and this will represent a small proportion.	WhereIsMyTransport	A/B
8.	The development of teleworking and the increase in urban sprawl can lead to a reconfiguration of major transport routes.	ECOV	E
9.	Negative impacts include a potential urban sprawl as people may want to move to city borders for more space and only occasionally commute to work.	Joint contribution made by NewClimate Institute and Germanwatch	A/B/E
10.	The pandemic has accelerated some shifts in behaviour such as lower traffic in peak hours as a result of flex-office development. In the context of more working from home, origin-destination patterns may change post-Covid as a reflection of new localization strategies for households and businesses.	Arthur D. Little, UTP (Union des Transports Publics et ferroviaires)	A/B/E
11.	Due to new teleworking patterns, travelling and commuting outside rush hours will be more possible. This will require a more efficient public transport and demand responsive operations where rail, as the greenest mass transportation system, can play a key role contributing to the decarbonisation of the economy.	UNIFE	A/B/E
12.	Teleworking from home does not necessarily reduce the number of trips, but commuter trips are often replaced by leisure trips. Rebound effects need to be carefully studied and included in impact assessment models.	ECTRI	A/B/E
13.	Specific route-lines at the entrance and exit of each transportation vehicle were introduced at the beginning of the pandemic. By now most citizens know how to behave within public transportation.	Ministry of Transport and Infrastructure	A
14.	A change in the travellers' habits has taken place.	Ministère de la Transition écologique	A
15.	A possible positive impact is the obligation to wear masks on busy transport. This habit developed during the pandemic can help prevent the spread of disease.	Response 704118868	A

Ref	Summary of Contributions	Contributor	EIB comment
16.	COVID-19 has affected travel behaviour, such as commuting patterns in urban areas. It has significantly reduced the flows of goods and people due to movement restrictions.	European Transport Workers' Federation,  The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	A
17.	The pandemic has accelerated some shifts in behaviour that can be seen as positive for Urban Mobility: - More flexibility in commuting times - Lower traffic in peak hours (related to the above and flex-office development) - More multimodal behaviour and adoption of MaaS solutions.	Arthur D. Little	A
18.	As households move out of large cities either to their suburbs or to smaller cities and towns, these destinations will start facing growth-related problems, and will need to provide mobility infrastructure and services at a scale and within a time horizon they had not anticipated.	Global Infrastructure Investor Association	A/B/E
19.	Demand for properties outside the city will increase and more people will want to work from home, which will reduce traffic demand in the cities.	EuroRAP	A
20.	Teleworking and online meetings have highly increased thus the mobility has dropped for medium and long trips.  This trend will probably last for long and a more rational time management will remain.	Miguel de Ortazar	A
21.	Predictions around remote working will be short-term, with office workers already going back into offices across the world, both in HICs and LICs.	Where's My Transport	A
22.	Working from home will affect the daily amount of traffic in urban areas, but it will most likely not be a significant factor in the long term.	Global Infrastructure Investor Association	A
23.	The pandemic has advanced digitalisation, especially in professional life, creating opportunities for mobile working.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	A
24.	Effects the pandemic had on the public transport sector include internal digitalisation of companies due to teleworking requirements.	International Association of Public Transport UITP	A
25.	Some major cities have extensively developed <b>cycling</b> opportunities during the pandemic.	ECOV	A/C

Ref	Summary of Contributions	Contributor	EIB comment
26.	There will be demand for better bike lanes and pavements as people have become used to not travelling on public transport.	EuroRAP, Global Infrastructure Investor Association	A/C
27.	Many cities moved quickly to accommodate more active modes of transport with new bicycle and pedestrian facilities and slower speeds. If these facilities are retained after the pandemic has ended they will continue to encourage active transport.	IRAP	A/C
28.	The positive impact will include new mobility services such as permanent walking and cycling infrastructure, as well as awareness of the need to address climate change.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	F
29.	Walking and cycling have been favoured during the pandemic, as have electric scooters.	Response 290033127, UTP (Union des Transports Publics et ferroviaires), IRAP	A/C
30.	The pandemic has led to less use of public transport and more individual transport such as walking, cycling.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr, Institute for European Cooperation, Joint contribution made by NewClimate Institute and Germanwatch, Miguel de Ortuzar, WhereIsMyTransport	A/C
31.	We are still hopeful that some of the active travel habits from the periods of lockdown will have lasted, which would be a positive result with a lower vehicular travel.	Road Safety Foundation	A
32.	The pandemic has led to a surge in activity and support for cycling and walking leading to a vision of urban mobility away from the current car-centred transport system, reallocating urban space towards active forms of travel and public transport, essential for creating liveable, accessible and healthy cities. However, once the pandemic slows down, it is questionable whether cities and governments will be able to keep this positive trend up.	Ministry of Infrastructure and water Management	A/C
33.	The negative effects on the use of public transport are mainly short-term. Some people give up taking public transport for fear of crowding. This may lead to a higher preference for active modes.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways, Response 704118868	A/C
34.	The pandemic has developed new mobility habits - such as cycling - which have a positive influence on mobility, health (air quality) and reductions in greenhouse gas emissions.	Service Public Fédéral Mobilité et Transports	A/C

Ref	Summary of Contributions	Contributor	EIB comment
35.	Increased remote working arrangements for office workers risk affecting public transport occupancy rates, hampering the financial viability of public transport operations from the operator's perspective. This has the potential to negatively affect urban public transport workers, particularly where there are weak social dialogue systems and traditions (specifically Central and Eastern European Countries), and where collective agreements are not strictly protected.	European Transport Workers' Federation, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	G
36.	The negative impacts will include financial sustainability of transport operation.	ECTRI, Global Infrastructure Investor Association	A/G
37.	Lower demand will have a negative impact on transport companies and the whole system of transport resulting in a lower income and in fewer implementations of more sustainable mobility measures if they are more costly.	Município de Faro	A/G
38.	There will be lower numbers of passengers, which means lower revenues.	Bank Information Center, Správa železnic	A/G
39.	There is also the problem of higher prices per trip in public transport when working from home several days of the month, because a monthly commuter travel card gets too expensive per trip.	Response 552589262	A
40.	<p>The COVID19 pandemic has demonstrated huge benefits of local public services. The passenger transport sector will continue to be heavily affected. This impacts local public transport authorities, operators, subcontractors, new mobility providers, the construction industry, the IT industry and the supply industry alike.</p> <p>The main problem is a dramatic decrease in fare box revenues. As municipal budgets remain under stress, the public financing to local passenger transport needs to be reassessed and supported. These contributions are often based on various taxation systems at national or regional level, which are themselves impacted by the crisis.</p> <p>Other effects the pandemic had on the public transport sector include:</p> <ul style="list-style-type: none"> <li>- Reduced income from other activities (advertising, retail fees in stations, etc.);</li> </ul> <p>project costs;</p> <ul style="list-style-type: none"> <li>- Additional costs for hygienic measures;</li> </ul>	International Association of Public Transport UITP	A/B/G



Ref	Summary of Contributions	Contributor	EIB comment
41.	Public transport will initially suffer from the situation, but changes in sustainable development and car constraints will enable public transport to gradually recover.	Miguel de Ortuzar, Response 290033127	A/B
42.	There will be a short-term impact, but we are already seeing a bounce back in public transport passenger numbers.  There may be a short interruption in private vehicle commutes from home to work, and a drop in public transport ridership, but with restrictions easing, people will go back to their pre-covid transport routines. We are humans of habit.	WherelsMyTransport	A
43.	More people use cars now than before Covid. This will however, gradually change to the benefit of public transport.	Response 1039141480	A
44.	It will take time to reverse the situation of lower use of public transport and increased use of individual cars.	Ministry of Transport, Município de Paredes	A
45.	More people will probably continue to avoid public transport due to the fact that they have invested in a car.	Response 552589262	A
46.	In order to achieve the climate protection goals, the use of public transport must be stimulated again by expanding public transport.	Joint contribution made by NewClimate Institute and Germanwatch, Stadtwerke München GmbH	A/B/F
47.	The pandemic has shown an increase of demand due to lockdowns and restrictions of mobility imposed to citizens. In a post-COVID scenario, normal habits will probably return though not with the same volumes.	European Road Haulers Association (UETR)	A
48.	Less than 20% of pre-Covid traffic in public transport is observed. More than 2 years will be needed to return to the nominal situation.	UTP (Union des Transports Publics et ferroviaires)	A
49.	COVID-19 has significantly reduced the flows of goods and people due to movement restrictions, and limited this transport sector's operations by reducing its capacity, resulting in job losses for informal transport workers and has had severe repercussions on users as well.	European Transport Workers' Federation, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	A/G
50.	There is a better awareness about climate change.	Município de Paredes	F
51.	Consumer and businesses seek more flexibility. New technologies will emerge, however many of which are structurally not profitable.	FEBIAC	A/G

Ref	Summary of Contributions	Contributor	EIB comment
52.	The positive impacts include awareness of the importance of public transport and quality of service standards.	ECTRI	A
53.	There is a huge increase in online shopping and, as a result, delivery has skyrocketed, and this effect will last.	Miguel de Ortuzar	H
54.	The positive impacts include digitalisation and innovation, progress in urban logistics. The negative - necessary re-skilling.	SNCF	A/H
55.	As a trend of undoubtedly cyclical impact but with possible structural effects, COVID-19 crisis has had important effects particularly on bus and coach transport.	CEOE	A
56.	In positive terms, the pandemic will have facilitated changes in passenger transport; this could create an opportunity to implement changes to a cleaner energy.	Município de Faro	A/F
57.	In the longer term, efficient and not overcrowded vehicles will represent one of the critical investment objectives in terms of renewal and expansion of the vehicle fleet.	Ferrovie dello Stato Italiane S.p.A	I
58.	The existing capacity of transport assets will not only have to be adequately maintained but selectively increased to cater for a greater demand.	UNIFE	A
59.	Internet has made interconnectivity possible. This trend will continue, resulting in enhanced city logistics, mostly with the use of medium to large LCV (Vans). For business this is a positive development, for climate it might have an adverse effect.	Ministry of Infrastructure and water Management	A/G
60.	Although city centres are not so lucrative anymore, people still move to cities.	Finnish Transport Infrastructure Agency	A
61.	Effects the pandemic had on the public transport sector include: - Drastic and lasting reduction of passenger numbers, entailing a change of modal split; - Delays in specific projects, often resulting in increased project costs.	International Association of Public Transport UITP	A
62.	In terms of urban freight, the post pandemic period shows a higher demand for last mile deliveries, more next-hour same day deliveries, and more flexible employment contracts (gig economy).	ECTRI	A/G

Ref	Summary of Contributions		Contributor	EIB comment
63.	Aviation is projected to grow and require pricing measures to encourage a switch to sustainable travel.	International Union of Railways		Efficient pricing of transport services, including external costs, is essential for meeting future transport needs sustainably. Both the Green Deal and the A Clean Planet for All communication allow for a certain growth in the air transport system that can still be compatible with the objective of climate neutrality by 2050.
64.	On the positive side, there will be less flying due to fewer in-person meetings on the positive side.	urgewald		It is recognized that videoconferencing will play a greater role in the future. It remains to be seen if the immediate effects of the COVID-19 crisis will result in discernible changes in travel behaviour over the longer term.

Question 2 – Given the imperative of decarbonising and depolluting transport, what types of investment would be most effective in supporting the use of zero-tailpipe transport?

#### EIB's comments

The EIB would like to thank all the participants for their contributions. The EIB has carefully reviewed them one by one and identified key topics that they were addressing, which are summarized in the table below along with EIB's comments. The EIB's priorities for urban mobility are addressed in the new Transport Lending Policy, chapter 5.

Topic	Reference	EIB's comments
Sustainable urban transport	A	Through the revised TLP, the EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.
Modal shift	B	The EIB will continue supporting projects promoting modal shift away from private cars such as railway investments.
Digitisation	C	Digitalisation is a promising area of development of EIB's lending, having the potential to drive behavioural change and lead to a more efficient use of transport assets and a shift to greener transport modes.
Economic justification of projects	D	Projects to be financed by the EIB need to be well justified. The choice of the transport mode shall be based on a sound assessments of needs, ensuring an efficient use of existing and any newly created capacity.
Technology	E	The EIB takes a technology-neutral approach to its support for the deployment of alternative fuel technologies, provided that they comply with the EIB's CBR. The EIB will finance technologies that contribute to achieving the goals of the Paris Agreement and have a potential to drive modal shift towards more sustainable transport modes and to lead to a more efficient management and use of transport assets in particular in congested urban areas.
Parking facilities	F	The EIB supports already parking facilities as multimodal solutions favouring greener transport modes (park and ride).
City logistics	G	Zero/low emission city logistics is a promising area of development for EIB's lending.
Shared mobility/active modes	H	Shared mobility and active modes, including bike sharing, bike lanes and pedestrian areas, are already supported by the EIB and are a promising area of development for its lending.
Road safety	I	EIB's lending on road safety will be prioritized in the revised TLP, including traffic calming measures and low speed zones, in particular in urban areas where accidents are mainly concentrated.  The EIB is highly committed to support road safety investments. In 2020, the EIB and nine other multilateral development banks (MDBs) signed a high-level joint statement on road safety. The statement highlights the

		<p>MDBs' aim to provide further access to safe, affordable and sustainable transport systems for all and to improve road safety, with special attention to the needs of vulnerable road users.</p> <p>The CBR also explicitly highlights the EIB's continued support for rehabilitation and safety projects.</p>
Clean fleets/alternative fuels	J	<p>The EIB supports already the roll-out of cleaner fleets and of alternative fuels infrastructure and will continue provided that they comply with the EIB's CBR.</p> <p>The EIB support to fleets is limited to productive investments made by public and private organisations, excluding therefore acquisitions by households for their exclusive use as consumables in the form of sale/lease/rent.</p>
Private capitals	K	The EIB stimulates and catalyses private capital investments through different initiatives and products, including those jointly developed with the EC.
Upstream emissions	L	The EIB through its Energy Lending Policy is favouring investments in renewable energy therefore contributing to improve well-to-wheel carbon footprint of alternative fuels.
Research/development	M	The EIB will continue and will increase its support to R&D investments in greening the vehicles manufacturing sector, including the alternative fuels power train developments as well as circular economy investments.
Urban sprawl/integration of land-use and transport policies	N	<p>EIB's lending to urban mobility already requires promoters to have robust strategies in place for sustainable urban transport and development oriented, among others, to limit urban sprawl.</p> <p>The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift demand to more sustainable modes of transport and improve transport efficiency and reduce environmental and climate externalities.</p>
Policy support/advice	O	The EIB supports already the development of sustainable policies through its advisory services, including JASPERS, and will continue to do so.
On-demand services	P	On-demand transport is a promising area of development for EIB's lending as it will allow public transport authorities to provide more efficient and affordable door-to-door services thus increasing public transport attractiveness

Ref	Summary of Contributions	Contributor	EIB comment
1.	Increased rail freight and passenger traffic.	Município de Paredes	The EIB under the new TLP will continue supporting investments in sustainable mobility, promoting a shift towards rail as a green mode of transport and affordable transport solution for all, resulting in increased rail freight and passenger traffic.
2.	Electrification of every main route, more (fast) train tracks between European metropolises.	Jori Milbradt	EIB finances economically viable railway projects and focuses on electrification.
3.	Electrification of railways and a denser network of railways for both freight and passenger transport.	Hanns Kerschner	
4.	Investment in the railways (subways, suburban trains, metros light rails, trams and trolley busses)	Response 974008607, Response 832108188, Ministry of Infrastructure	A
5.	Investments in rail through network expansion and <b>digitalisation</b> of railways.	UNIFE	B/C
6.	Development of urban public transport will be of key importance; in particular, rail based urban transport, which presents more benefits than road-based public transport.	UNIFE	D
7.	Metro and subway.	Finnish Transport Infrastructure Agency	A
8.	For the railway - a priority of the city railway over other projects.	Railway Signalling Automation Telecommunication And Industry Association	A
9.	Investment in procurement of rolling stock (new metro trains).	METROREXS.A. Bucharest	A

Ref	Summary of Contributions	Contributor	EIB comment
10.	Support for rolling stock development (trains, trams) with new stations at city centres, tram-train systems, intermodality, park and ride solutions.	MÁV-Volán Group	A
11.	Electrification and extension of urban, suburban and regional passenger railway networks and the renewal of existing local/regional rolling stock.	International Association of Public Transport UITP	A
12.	Investments into public transport infrastructure ( <b>electric</b> trains) to reach even the last mile by emission-free means of transport.	Správa železnic	A/D
13.	In the absence of hydrogen-powered systems and CO2-absorbing charges, there should at least be a reduction of urban peak pollution with electrical systems.	Budapest Airport Zrt.	E
14.	Car usage should be reduced and, where not possible, directly electrified to eliminate GHG. Projects that encourage shift from private cars/vehicles to public transport and rail through enhancing customer experience and connectivity to rail.	European Transport Workers' Federation, European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	A/B
15.	P+R parking spaces.	Ministry of Transport	F
16.	A good railway transport system is necessary, as well as adequate parking areas.	European Road Haulers Association (UETR)	A/F
17.	Public transport including suburban railways and P+R parking spaces.	Ministry of Transport	A/F
18.	Urban mobility - train, metro, people mover systems are ideal for passenger mobility. For the transport of goods in urban areas, there are some challenges ahead of how to reach last mile accessibility with zero emissions vehicles. As to passenger mobility, there is the question of profitability versus equal accessibility in metropolitan areas.	Miguel de Ortuzar	A/G
19.	Investments into <b>walking, cycling</b> and public transport should be prioritised to incentivise a modal shift to more environmentally friendly transport modes.	CEE Bankwatch Network, European Federation for Transport & Environment, European Transport Workers' Federation, Greenpeace, Response 981558580, The SLOCAT Partnership on	A/H

Ref	Summary of Contributions	Contributor	EIB comment
		Sustainable, Low Carbon Transport (SLOCAT), WWF EPO	
20.	Walking as the human body is still the most efficient machine.	Response 1039141480	H
21.	Ensuring that roads are rated 3-stars or better for vulnerable road users, and have facilities to particularly accommodate walking and cycling that are accessible to all different road user types, and that are safe to use providing segregation from motorised traffic moving faster than 30km/h. Prioritisation of walking and cycling in urban spaces over vehicular traffic.	iRAP, Road Safety Foundation, European Institute for Road Assessment – EuroRAP	I
22.	Investments in infrastructure for non-private cars usage such as bikeways, pedestrian areas and sidewalks.	EuroRAP, International Association of Public Transport UITP, Ministry of Infrastructure, Stelios Efstathiadis	H
23.	Support financially the development of cycling facilities throughout Europe (good quality tracks, bike and scooter rental and sharing systems, bike and scooter parking, storage rooms and racks in trains, companies and buildings.	Response 290033127	H
24.	Support the development of cycling, both in dense cities and for longer journeys in less urban areas. This involves infrastructure, attention to the continuity of routes and education/awareness-raising about cycling at all ages.  Support the development of pleasant and accessible public spaces to encourage walking (and other active modes) by all regardless of disability or age.	Response 704118868	H
25.	Support of green individual transport and development of bike lanes and infrastructure.	Arthur D. Little	A/H/J
26.	Investments to support electromobility	Community of European Railway and Infrastructure Companies (CER), Ferrovie dello Stato Italiane S.p.A, International Union of Railways, Response 981558580, SNCF	J
27.	Only direct electrification of road transportation should be supported. The use of renewable and sustainably sourced hydrogen and advanced biofuels should only be used	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace, WWF EPO	A/B/J



Ref	Summary of Contributions	Contributor	EIB comment
	<p>in transport sectors where the direct use of electricity is not feasible, keeping in mind the need to reduce demand for such carbon-intensive transport modes.</p> <p>Electric vehicles are themselves associated with problems regarding their supply chain, with increased demand for mining minerals bearing serious risks for the environment and human rights.</p>		
28.	<p>Investment in paratransit electrification/retrofitting should be the priority in urban public transport.</p> <p><b>Research</b> of electromobility projects for paratransit modes is needed specifically on minibuses with attention paid to 2-3 wheeler electrification in LICs. The question is whether it is better to replace or retrofit existing minibus fleets in LICs (and other vehicles which are not 2 or 3 wheelers). There is a need for funding to collect this data, and analyse it.</p>	WhereIsMyTransport	J
29.	Supporting research.	Back on Track Belgium vzw-asbl	M
30.	Fleet renewal based on carbon-free propulsion systems including accompanying (charging) infrastructure and publicly accessible charging points.	International Association of Public Transport UITP	J
31.	Electrified and human-powered two- and three-wheelers are reducing urban freight emissions, and corporate actions are driving low-carbon solutions that leapfrog local and national policies	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	G/J/K
32.	Support of the transition of the car fleet towards electric propulsion with financial incentives and constraints.	Arthur D. Little	J
33.	Investments into public transport infrastructure in combination with support services at stations such as charging infrastructure to reach even the last mile by emission-free means of transport.	Stadtwerke München GmbH, Správa železnic	A/J
34.	The electromobility cycle (charging systems, batteries, etc.) and extending electrification to public transport aiming at 100 % electromobility is of key importance.	Miguel de Ortuzar	J
35.	For road transport - charging stations.	Railway Signalling Automation Telecommunication And Industry Association	J

Ref	Summary of Contributions	Contributor	EIB comment
36.	Substantial roll-out of charging stations both in public and private spaces.	Arthur D. Little	J
37.	For light duty vehicles (LDVs), only the rollout of electric vehicles (EVs) should be supported. For EVs, the EIB could invest in public charging infrastructure (this investment priority would overlap with lending to the building sector). Such infrastructure can support electric and efficient freight logistics in urban centres. Increasingly electric solutions are also viable for heavier duty vehicles in which case support for hydrogen should be withdrawn considering the high levels of energy loss and much lower efficiency.	Joint contribution made by NewClimate Institute and Germanwatch	J/K
38.	Development of electric buses with new stations in city centres. Support for charging network development.	MÁV-Volán Group	J
39.	Urban mobility is one of the sub-sectors where investment in infrastructure will be the biggest. There is an opportunity for electric vehicles in the process of decarbonizing urban mobility.  Given the size of the investment needed in urban mobility, it is unlikely that there will be sufficient public capital supply to build the EV infrastructure. It is necessary to unlock the private capital needed to ensure that the goals of the Sustainable Mobility Strategy are feasible.	Global Infrastructure Investor Association	A/J
40.	More investment in the development of decarbonised public transport and the necessary charging infrastructure. Green hydrogen can play a role here. Investments in electric cars should be geared towards the development of smaller and lighter cars.	Service Public Fédéral Mobilité et Transports	E/J
41.	The development of public zero emission vehicle-charging infrastructure is key in urban areas, where citizens and businesses may not have access to private infrastructure. It is unlikely for consumers and businesses to stop using vehicles in urban areas. Cities are more likely to experience a demographic shift with the middle class settling outside. Public charging infrastructure is key for cities to remain attractive for citizens and businesses.	FEBIAC, MÁV-Volán Group	J
42.	Bridging the difference in investments in regular trucks (Euro 6) and BEV's and charging or refuelling infrastructure, which is a necessary precondition to invest in cleaner vehicles.	TLN	J
43.	Investments in sufficient and robust smart charging infrastructure on a national scale are needed. For light duty vans, the technological possibilities to make them zero emission are here; however, these technologies must be scaled-up and rolled-out, together with a sufficient infrastructure for alternative fuels and smart charging.	Ministry of Infrastructure and water Management	K

Ref	Summary of Contributions	Contributor	EIB comment
44.	Investment in planning, design, and deployment of infrastructure (physical and virtual) and technologies for access to and use of zero-tailpipe transport. In developing economies, this may include electric three-wheeled vehicles.	Bank Information Center	A/C/E/J
45.	<b>Multimodality</b> and shared infrastructures for different modes is essential.	Miguel de Ortuzar, Ministry of Infrastructure	A/B
46.	Multimodal, public transport along with its combination with walking, cycling and other micromobility modes.	ECTRI	A/B/H
47.	Investments into public transport infrastructure in combination with support services at stations such as bicycle storage to reach even the last mile by emission-free means of transport.	Správa železnic	A/H
48.	Focus should also be given to multimodal transport hubs	International Association of Public Transport UITP	A/B
49.	There is an urgent need to rethink car mobility and move beyond private car ownership. This means paying close attention to emerging problems and financing projects that can transform mobility systems and models.	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace, WWF EPO	A/B/H/J
50.	Private passenger transport vehicles should not be supported and an emphasis should be placed on shared electric mobility.	Joint contribution made by NewClimate Institute and Germanwatch	A/B/H/J
51.	Promotion (and subsidy) of car sharing / car-pooling solutions	Arthur D. Little	A
52.	Shared car schemes at the multimodal passenger hubs.	Ministry of Infrastructure	A
53.	Support should only be focused on the development of fully electric vehicles. Support for hybrid vehicles should be stopped as they have higher climate costs than expected. There are flawed assumptions regarding the use of electric motorisation, which is not consistent with actual use. Hybrid cars, which do not largely use their electric motorization, end up being more polluting than fossil cars.	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace, WWF EPO	E/J
54.	Hybrid vehicles should not be supported considering the technological maturity and rapid economic competitiveness of pure electric mobility.	Joint contribution made by NewClimate Institute and Germanwatch	E/J

Ref	Summary of Contributions	Contributor	EIB comment
55.	Considering the limited amount of truly renewable and sustainably sourced hydrogen and advanced biofuels, these fuels should only be used for transport activities where the direct use of electricity is not feasible.	WWF EPO	E/J
56.	Investments in urban public transport presenting the best environmental and social benefits in terms of air pollution, safety and accident costs, journey times and congestion costs should be prioritised.	European Transport Workers' Federation, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), International Union of Railways	A/B/D
57.	Investments in public transport.	Comunidade Intermunicipal do Cávado, Stelios Efstathiadis	A
58.	Investing in and expanding clean public transport. The better the public transport service, the more willing are the citizens to use it instead of other means of transport.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	A/B
59.	The EIB should prioritise the electrification of public transport fleets and railway infrastructures (including night trains) to more public modes of transportation.	Greenpeace, CEE Bankwatch Network	A/B
60.	A well-to-wheel approach is the only effective approach to decarbonisation.	European Road Haulers Association (UETR)	L
61.	Substantial investment in widening the transport network beyond cities and urban city centres, as more people relocate away.		N
62.	Investment in helping the vehicle manufacturing industry to achieve their goals sooner.	Croatian Chamber of Economy	M
63.	Achieving the goals against pollution requires the promotion of attractive public transport. Bus transport ensures universal access to safe, affordable, accessible and sustainable transport systems for all and improves road safety by expanding the public transport network and paying special attention to the needs of vulnerable people.	CEOE	A/B
64.	Considering the trend of hydrogen/electric cars production, citizens consider changing their fossil fuel car engine to zero-tailpipe vehicles. Public transportation will also become more eco-friendly. Thus investments should be geared towards alternative energy sources.	Ministry of Transport and Infrastructure	A/E/J
65.	Focus on the use of technologies.	ECOV	C/E/J

Ref	Summary of Contributions	Contributor	EIB comment
66.	Support for countries in adopting policies that incentivise the use of zero-tailpipe transport and that put a predictable, rising price on transport that uses fossil fuels.	Bank Information Center	N
67.	Investment in support for sustainable use and recycling of resources needed for zero-tailpipe transport.		J/L/M
68.	Other mobility services supported by innovative business models.	ECTRI	A/C
69.	Investments to ensure the internalization of external costs of transport. This requires research, information, education and investments in infrastructure, away from a road-focused approach.		A/C
70.	Integrated land use, transport, energy and health planning are important for the sustainable development of zero emissions transport comprising the whole life cycle - Well-to-Wheel, instead of addressing tailpipe emissions only.		O
71.	Transition of bus fleets towards gas, electric and hydrogen propulsion.	Arthur D. Little	E/J
72.	Investments in new technologies.	Stelios Efstathiadis	E/J
73.	Considering the limited amount of truly renewable and sustainably sourced hydrogen and advanced biofuels, they should only be used for transport activities where the direct use of electricity is not feasible, as with shipping and aviation, while aiming to reduce demand for these carbon-intensive transport modes.	CEE Bankwatch Network, Greenpeace, WWF EPO	E/J
74.	Carry out actions and funding to reduce the proportion of car use among modes of transport. Encourage a modal shift from the car to public transport and/or active modes	UTP (Union des Transports Publics et ferroviaires)	A/B
75.	Urban logistics.	ECTRI	J/K
76.	Development of on-demand dynamic transport offering substituting non-effective bus routes in urban areas and serving non-dense areas in order to capture modal share from cars.	Arthur D. Little	A/C/P
77.	Investments should support local transport authorities in implementing planning (SUMP-related tools and processes) and digital mobility management tools, which lead to more use of collective transport modes and which decrease the overall emission levels city-wide.	International Association of Public Transport UITP	C/O
78.	Digital solutions and intelligent transport systems.	Município de Paredes	C

Ref	Summary of Contributions	Contributor	EIB comment
79.	Subsidizing the purchase of vehicles with zero tailpipe emission by individuals and legal entities.	Croatian Chamber of Economy	J
80.	The ZE technologies are developed differently hence a wide range of different financing and consulting services is required. Facilitating access for small and medium-sized companies to the offers of the EIB should be the core focus.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	N
81.	There should be purchase incentives for ZE LCV and Trucks.	Ministry of Infrastructure and water Management	E/J/K
82.	There should be financial incentives in the production of means of decarbonising and depolluting transport to the industry and comercialization.  More incentives to the public sector to create more parking spaces at city entrances and to create a more frequent net of public transport means that would encourage their use, solving the transport problems and more incentives to purchase more sustainable cars.	Município de Faro	J
83.	Support should be provided to companies assisting them in the acquisition of less polluting vehicles.	Associação Rodoviária de Transportadores Pesados de Passageiros (ARP)	N
84.	Tariff reduction.	Município de Paredes	Pricing policies are out of the scope of the EIB's Transport Lending Policy.
85.	- Low or null interest rate; - Extended grace period.	Município de Lousada	Lending conditions are out of the scope of the EIB's Transport Lending Policy.
86.	Night trains, river transport, sailing; research the possibilities of the zeppelin.	Response 981558580	Thank you for your comment.

### Question 3 – Given the particular characteristics of urban space, what kinds of zero-carbon transport investment should be prioritised?

#### EIB's comments

The EIB would like to thank all the participants for their contributions. The EIB has carefully reviewed them one by one and identified key topics that they were addressing, which are summarized in the table below along with EIB's comments. The EIB's priorities for urban mobility are addressed in the new Transport Lending Policy, chapter 5.

Topic	Reference	EIB's comments
Public transport/multimodality with greener modes	A	The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, prioritizing investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.
City logistics	B	Zero/low emission city logistics is a promising area of development for EIB's lending.
Urban sprawl/integration of land-use and transport policies	C	EIB's lending to urban mobility already requires promoters to have robust strategies in place for sustainable urban transport and development oriented, among others, to limit urban sprawl. The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift demand to more sustainable modes of transport, improve transport efficiency and reduce environmental and climate externalities.
Shared mobility/active modes	D	Shared mobility and active modes, including bike sharing, bike lanes and pedestrian areas, are already supported by the EIB and are a promising area of development for its lending.
Clean fleets/alternative fuels	E	The EIB supports already the roll-out of cleaner fleets and of alternative fuels infrastructure and will continue provided that they comply with the EIB's CBR.  The EIB support to fleets is limited to productive investments made by public and private organisations, excluding therefore acquisitions by households for their exclusive use as consumables in the form of sale/lease/rent.
Economic justification of projects	F	Projects to be financed by the EIB need to be well justified. The choice of the transport mode shall be based on a sound assessments of needs, ensuring an efficient use of existing and any newly created capacity.
Road safety	G	EIB's lending on road safety is prioritized in the revised TLP, including traffic calming measures and low speed zones, in particular in urban areas where accidents are mainly concentrated.
Digitisation	H	Digitalisation is a promising area of development of EIB's lending, having the potential to drive behavioural change and lead to a more efficient use of transport assets, improve safety, increase multimodality and foster a shift to greener transport modes
Stakeholders engagement	I	The EIB as part of its environmental and social standards considers stakeholder engagement as a cornerstone of sustainable and inclusive planning and project preparation and implementation.

Ref	Summary of Contributions	Contributor	EIB comment
1.	There may be a slight priority for public transport.	Hanns Kerschner	A
2.	Public transport is the most environmentally friendly form of transport	Response 974008607	A
3.	Mass transport means are the most environmentally friendly	Pro Bahn	A
4.	Strengthening the public transport system and particularly bus services. First measure of all should always be to improve public transport and then apply other measures to encourage greater use of public transport. Investment in transport infrastructure to improve the public transport systems is essential.	Confederación Española de Transporte en Autobús – CONFEBUS, CEOE	A
5.	Public transport has the highest density per surface	Back on Track Belgium vzw-asbl	A
6.	Public transport /privately-operated shared vehicles operating like public transport (Paratransit) still represents the dominant modal form for getting around cities	WherelsMyTransport	A
7.	Public transport is the most efficient.	Miguel de Ortuzar	A
8.	Priority should be given to public transport, which allows a significant number of people to be transported in relatively small spaces.	Service Public Fédéral Mobilité et Transports	A
9.	Local public transport systems are much more efficient than individual motorised mobility in terms of using public space efficiently and the number of passengers carried. It leads to a different distribution of urban space, which benefits pedestrians, cyclists. It is vital in influencing daily mobility in the city and making it more sustainable and safer. Implementing short- and long-term changes at the local level requires a) a vision, knowledge and capacity within local administrations and b) financial resources, some of which could be covered by EIB support.	International Association of Public Transport UITP	A
10.	The priority would be for the public to reduce individual transportation and to increase the use of public transportation.  Delivery and logistics would come as a second step for economic growth as well as for reducing traffic formed by individual transportation (moreover, because of the new public transport investments, citizens will leave individual transportation);	Ministry of Transport and Infrastructure	A/B
11.	Improving public transportation and shared mobility addresses the impacts stemming from the green agenda's push for resource extraction. The EIB should thus prioritise projects in public transportation to encourage reduced resource consumption.	CEE Bankwatch Network, Greenpeace, International Union of Railways	A



Ref	Summary of Contributions	Contributor	EIB comment
12.	All types of transport require appropriate support. Together with freight transport by road, delivery and logistics, public transport should be prioritized being key to urban economy.	European Road Haulers Association (UETR)	A/B
13.	I have chosen both as public transport is for private purpose as well as last mile transport for the distribution of goods.	Antje Willnow	A/B
14.	Public transport must be electric or hydrogen cell based.	Croatian Chamber of Economy	A
15.	Public transport is always greener than individual, but individual micro-mobility is also an option.	MÁV-Volán Group	A
16.	There is the possibility of creating significant investment synergies if the urban space is seen as a whole. Public transport is the most advanced in terms of electric fleet.	Global Infrastructure Investor Association	A/C
17.	Active individual modes of transport should be supported.	ECTRI	D
18.	Individual transport would be the first priority if it referred to just the one by muscle power (no cars, no e-bikes, no e-rollers).	Response 1039141480	D
19.	Firstly, proper pedestrian sidewalks, then cycling infrastructure and then with infrastructure for public transport.	Response 244811294	A/D
20.	Good public transportation relieves city traffic from personal vehicles and reduces the need for parking. Thus, more space can be left for cyclists and pedestrians.	Croatian Chamber of Economy	A/D
21.	Priority should be given to cycling + collective transport + active modes.	Ministère de la Transition écologique	A/D
22.	Public transport, as well as cyclists and pedestrians should be supported and prioritised over cars, even if electrified.	urgewald	A/D
23.	Both public transport and zero-carbon private transport, including soft modes of transport. Up to 30% of total passenger transport in dense urban areas can rely on soft modes of transport, if adequate infrastructure is provided to citizens, in particular cycling lanes fully separated from car lanes.	WWF EPO	A/D
24.	Cycling lanes and pedestrian infrastructure should be a priority alongside modern, affordable, safe and electrified public transport services.	Joint contribution made by NewClimate Institute and Germanwatch	A/D

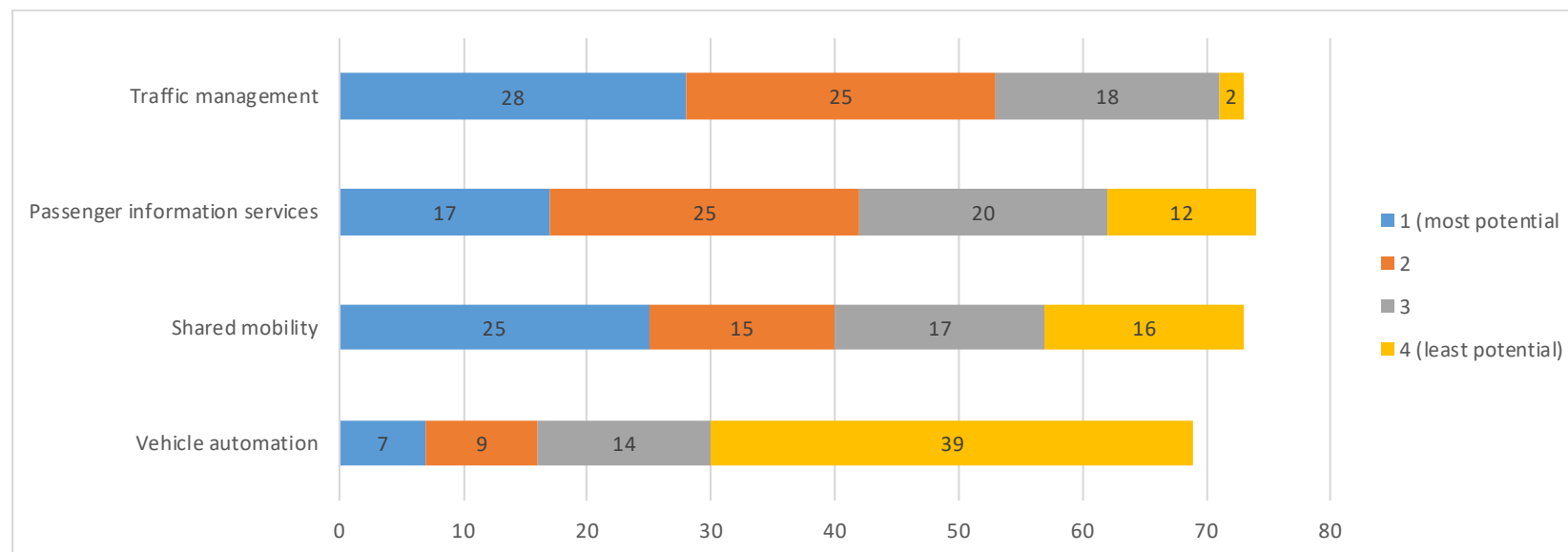
Ref	Summary of Contributions	Contributor	EIB comment
	Individual transport by private car should not be grouped together with cycling and pedestrian traffic as a support category.		
25.	In order to liberate urban space for more sustainable and affordable modes of transport, investments in safe and dedicated cycling and walking infrastructure, public transportation and urban freight are needed.  Investments should also focus on improving the conditions for multimodal shifts, such as active mobility as an access and egress mode for public transportation.	Ministry of Infrastructure and Water Management	A/B/D
26.	The development of the infrastructure needed for EV charges might make it a real possibility for individual transport as well.	Global Infrastructure Investor Association	E
27.	Individual transportation focused on all type of non-combustion transports should also be a priority.	Ministry of Transport and Infrastructure	D/E
28.	Zero-carbon private transport.	WWF EPO	E
29.	<b>Rail</b> vehicles need to be prioritized.	Railway Signalling Automation Telecommunication And Industry Association	A
30.	By prioritising and facilitating the investment in zero-carbon rolling stock fleet, the urban public transport should be more frequently used by passengers.	METROREXS.A. Bucharest	A
31.	Urban rail solutions can drastically decrease all types of emissions, allowing considerable improvement of air quality in metropolitan areas. Rail is the only mode of transport which has reduced its emissions while increasing passenger and freight volumes. Mainline and urban rail combine energy-efficient mobility with fewer emissions. Investments on a project for a new, modern rail-borne public transport system can be seen as an opportunity to redefine goals in terms of urban planning and land use, through the rehabilitation, modernisation or restructuring of the entire urban context. Urban rail projects offer the reorganisation of residential areas, recreational and work zones. Rail can also be a means for reconquering of urban space by the reduction of car pressure and the provision of more space usable by active modes of mobility, as well as the renovation of houses and facades that enhance the area's architecture and urban heritage.	UNIFE	A/C

Ref	Summary of Contributions	Contributor	EIB comment
32.	Parcel shipments are expected to grow more than other commodities in the urban freight commodity mix. Delivery and logistics are important for rail to provide efficient and low emission freight.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways	B
33.	Delivery and logistics are also important for rail. A development by sector of activity is desirable (freight, passengers,...)	SNCF	B
34.	No specific support to electric private cars, banning fossil fuel cars is sufficient.	STIB-MIVB	E
35.	The use of private passenger vehicles, even if they are zero-carbon, still contributes to traffic congestion, space occupation, etc. There is a need to free-up space from private cars within the cities.	Stelios Efstathiadis, UTP (Union des Transports Publics et ferroviaires)	A
36.	Private motorized modes tend to be the main reason for increasing congestion and greenhouse gas emissions across many urban areas. Excessive car use also leads to problems around space consumption in European cities.	Ministry of Infrastructure and Water Management	A/C
37.	Decarbonising and depolluting transport requires first and foremost the reduction of private car use. Private car use is space and resource inefficient, while an increased investment in public transport can have positive knock-on effects economically and socially for urban communities through job creation.	European Transport Workers' Federation	A
38.	Private vehicles including public parking spots should be the least prioritised.	Response 244811294	A
39.	Motorized individual transport shall not be supported if we want to achieve sustainable mobility and sustainability in cities.	ECTRI	A
40.	It is important to decarbonise all modes equally.	Response 832108188	E
41.	Cost-beneficial investments are needed in all modes.	Finnish Transport Infrastructure Agency	F
42.	An efficient transportation net has to be based on a complementarity, not only on one mode as the different modes will be used by the population according to the interests and needs.	Município de Faro	A/C/F
43.	Ultimately, all of the above areas are important. Focusing on one area will not lead to the goal.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	A/C/F

Ref	Summary of Contributions	Contributor	EIB comment
44.	There is no miracle mode of transport. They are all useful and should all be used.	Response 981558580	A/C/F
45.	The support provided must differ depending on the context, but in general I do not think that one of the categories should be favoured.	Response 704118868	A/C/F
46.	All of the levers are applicable and the prioritization of their roll-out will depend on the situation of the urban areas they address. Zero-carbon transport strategy should combine all of those investments. A segmentation of cities/territories may be defined to better prioritize those.	Arthur D. Little	A/C/E/F
47.	To work well, transport must be an integrated system, so it would be a mistake to support only one kind. That said, support for Individual transport or delivery/logistics should be at the systems/design level, whereas support for public transport should include both design and provision.	Bank Information Center	A/B/C/F
48.	Delivery and logistics and individual transport are of similar importance as public transport. Regarding freight transport/urban logistics, zero emission solutions shall be funded.	ECTRI	A/B/E
49.	Delivery and logistics would come as a second step (after public transport) needed for economic growth as well as for reducing traffic created by individual transportation.	Ministry of Transport and Infrastructure	A/B
50.	Safety and security concerns can be a significant factor in hampering the rollout of sustainable modes of transport. People need to feel safe when using these modes of transport, that there is adequate street lighting, no dangerous crossings etc. If people do not feel safe, the uptake will be lower.	EuroRAP	G
51.	People need to feel and be safe while walking and cycling which means there need to be proper segregated facilities if traffic is moving above 30km/h OR a prioritisation of walking and cycling in very low speed environments.	Road Safety Foundation, iRAP	D/G
52.	The entire GHG emissions need to be reduced soon. Prioritise the quick wins with high impact.	Ralph-Uwe Dietrich	A/B
53.	Delivery and logistics are far from 2050 goals. A CBA type analysis is essential, to channel investments. Is a 100 % electrification of Public transport more beneficial than a 30% reduction in delivery and logistics emissions? Or with new pedestrian and cycling infrastructures will we be able to reduce private vehicles mobility?	Miguel de Ortuzar	A/B/D/F

Ref	Summary of Contributions	Contributor	EIB comment
54.	Covid pandemic provided huge opportunities for cities to change by fostering zero-carbon individual transport that not only has great impact on decarbonisation and depollution but also a lot of positive externalities like improved health of the population, growth of economy with new business and creation of new job and also innovation.	European Institute for Road Assessment -- EuroRAP	A/E
55.	In the future, private and public transport will merge: the issue is to transform private vehicles into public ones. Public transport system and technologies need to be applied to existing "road system", which is mainly individual, so that mutualisation and sharing can be massively developed.	ECOV	A/D/H
56.	Sustainable urban mobility plans (SUMP) offer significant low carbon benefits but require more substantial funding to translate plans to action. SUMP have expanded as a strategy to meet urban mobility needs through a collaboration of public and private sector actors, citizens and other key stakeholders. While SUMP focus on mobility in cities, national urban mobility policies (NUMPs) provide enabling frameworks for local-level planning.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	C/I

Question 4 – As regards investment in digitalisation and automation of urban transport, which of the following will have the (1) most potential to (4) least potential, to improve its sustainability and efficiency?



### EIB's comments

The EIB would like to thank all the participants for their contributions. The EIB has carefully reviewed them one by one and identified key topics that they were addressing, which are summarized in the table below along with EIB's comments. The EIB's priorities for urban mobility are addressed in the new Transport Lending Policy, chapter 5.

Topic	Reference	EIB's comments
Shared mobility/active modes	A	Shared mobility and active modes, including bike sharing, bike lanes and pedestrian areas, are already supported by the EIB and are a promising area of development for its lending.
Public transport/multimodality with greener modes	B	The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, prioritizing investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.
Automation/connectivity	C	In line with the objectives of the EU Sustainable and Smart Mobility Strategy the Bank will support research and development and innovation in the transport sector stimulating the faster deployment of connected and automated mobility and the use of data and artificial intelligence (AI) for a more sustainable, multimodal, safer and smarter mobility.
City logistics	D	Zero/low emission city logistics is a promising area of development for EIB's lending.
Digitisation	E	Digitalisation is a promising area of development of EIB's lending, having the potential to drive behavioural change and lead to a more efficient use of transport assets and a shift to greener transport modes.
Economic justification of projects	F	Projects to be financed by the EIB need to be well justified. The choice of the transport mode shall be based on a sound assessments of needs, ensuring an efficient use of existing and any newly created capacity.
Modal shift	G	Modal shift from private cars to public transport, shared mobility and active modes is already, and will remain, a priority for EIB in the revised TLP.
Urban sprawl/integration of land-use and transport policies	H	EIB's lending to urban mobility already requires promoters to have robust strategies in place for sustainable urban transport and development oriented, among others, to limit urban sprawl. The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift demand to more sustainable modes of transport, improve transport efficiency and reduce environmental and climate externalities.
Climate change	I	As the EU Climate Bank, mitigation and adaptation to climate change are the heart of EIB's lending as outlined in the EIB's Climate Bank Roadmap.

Ref	Summary of Contributions	Contributor	EIB comment
1.	Shared mobility is practical just a few days in a year when one needs to transport a passenger and some goods.	Response 1039141480	A
2.	Shared mobility will have a big impact on the use of public transport. In order to offer a full service and if a more global impact in the system is desired, it will be necessary to combine the different means of transport.	Município de Faro	A/B
3.	Shared mobility is an enabler of efficient and sustainable public transit. It also means more space and energy efficiency than individual motorised transport. A modal shift can reduce the energy use per passenger.	UNIFE	A/B
4.	Shared mobility can work well in urban space with demarcated areas.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	A
5.	Shared mobility is very important as it has the potential to reduce congestion and lower GHG emissions.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	A
6.	Shared mobility options can lead to more efficient vehicle and infrastructure use through better matching of supply and demand, and thus reduce the number of cars and the number of rides.	Joint contribution made by NewClimate Institute and Germanwatch	A
7.	Shared mobility has immediate effect of one or more cars less, while vehicle automation just contributes to better efficiency. The latter is better to be achieved by traffic management. Passenger information service is weak in effect but remains a general need for advanced mobility communities.	Antje Willnow	A/C
8.	Efficient use of vehicles and (parking) space in a more urbanized world is one of the best options to make ZE mobility accessible for consumer for personal transport. For Logistics shared mobility is offering the same advantage but it requires more drastic changes in companies operations. By introducing ZE Zones, logistics are not only motivated to operate ZE but also to operate smarter. Shared Mobility and Traffic Management are key solutions.	Ministry of Infrastructure and water Management	A/D
9.	The development of shared mobility and passenger information will be required to develop MaaS solutions that enable any citizen to correctly access the full mobility offering in a single territory (combining planning/booking/payment/ticketing services).	Arthur D. Little	A/E



Ref	Summary of Contributions	Contributor	EIB comment
10.	It is likely that shared mobility and vehicle automation will have the biggest impact in the long term. It has been estimated that Robo-taxis will be ready to use by 2025, but probably not at the scale that is needed.	Global Infrastructure Investor Association	A/C
11.	Shared, on-demand and ride-hailing mobility forms a great opportunity for transport authorities to cover first/last mile travel gaps in an integrated, accessible, reliable and affordable way.	International Association of Public Transport UITP	A
12.	Shared mobility and traffic management are two key elements to decarbonise urban mobility. Good information is a necessary but not a sufficient condition to achieve greater sustainability.	Service Public Fédéral Mobilité et Transports	A/B/E
13.	While we believe in the theoretical potential of shared mobility, we remain sceptical about the business case for operators and the competition with other modes of transport (public and private). We believe that shared mobility will not have a major impact in decarbonising urban transport at the 2030 horizon.	FEBIAC	The EIB takes note.
14.	<p>Even during or after the pandemic, shared mobility will not be of high priority and will not have a high potential, with the exception of the public transportation. The ongoing increase of individual transportation combustion vehicles, as well as the optimization of public transport shows the high potential of traffic management, especially as public transportation will become even more preferred among citizens, reducing transportation time as well as individual transportation. Combustion vehicles will still have an increased potential and value.</p> <p>In respect to vehicle automation, this depends mostly on the domain in which the investments are made.</p>	Ministry of Transport and Infrastructure	B/C/E
15.	Passenger information systems can also contribute to Mobility as a Service (MaaS). Rail has the potential to become the backbone of Maas, providing green, high capacity, safe and reliable urban & suburban transport. But in order to fully succeed with MaaS, it is essential to be able to provide a user-friendly, convenient and seamless passenger experience across the whole journey, including the important first and last miles. In this regard, Research & Innovation plays a key role. Shift2Rail Joint Undertaking's Innovation Programme 4 "IT Solutions for attractive railway services" has been contributing to building a digital ecosystem for MaaS, encompassing all available transport modes.	UNIFE	A/B/E
16.	By grading Passenger Information Systems as (1), I mainly want to emphasize the MaaS and information systems for bus schedules, combination of various transport means, etc.	Stelios Efstathiadis	E

Ref	Summary of Contributions	Contributor	EIB comment
17.	Passenger information services, as well as communication with the citizens in general, represent the second aspect after traffic management. By assisting individuals with efficient passenger information services, traffic will significantly reduce and efficiency will increase. For this reason, passenger information services will have to be developed concomitantly with traffic management projects.	Ministry of Transport and Infrastructure	E
18.	Without information, many passengers cannot use the transport offer. Quality information is crucial for a very large number of travellers, both to attract them and to keep them. Understanding a network and finding one's way around alternatives in the event of incidents are two key elements for public transport.	Ministère de la Transition écologique	E
19.	Passenger information services are also key and, based on the label incentives, should be introduced to switch to low-carbon methods thus reduce emissions per passenger-km.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	E
20.	Information makes use easier.	Back on Track Belgium vzw-asbl, Response 309189139	E
21.	The EIB should focus public transport investments where the digitalisation of passenger information services is key to increase service reliability and inter-modality.	Joint contribution made by NewClimate Institute and Germanwatch	B/E
22.	Traffic management (especially charges for less sustainable mobility, priority for sustainable mobility) followed by accurate and quick information for passengers of collective transport modes can foster sustainable transport.	Response 1039141480, Response 511707695	E
23.	Traffic management allows time savings during transportation. Passenger information is also important in the use of public transport.	Município de Faro	E
24.	Traffic management is key to the safety of walking and cycling.	iRAP, Road Safety Foundation	E
25.	Traffic management and passenger information are essential. It is only with knowledge of the offer and time needed that potential passengers can be attracted. Good transport management across modes creates the foundations for transport as smooth and energy-efficient as possible. Traffic management can also take individual account of framework conditions.	Bayerisches Staatsministerium für Wohnen Bau und Verkehr	E
26.	Traffic management policy and regulation can provide safe environment for VRU to use active mode of transport and users information services (not only passenger but also including cycling and waling information) should follow. For example, it has been	European Institute for Road Assessment -- EuroRAP	E

Ref	Summary of Contributions	Contributor	EIB comment
	demonstrated by several studies in EU countries/cities that cycling is reserved only for very experienced cyclists due to lack of safe facilities and information on services.		
27.	The potential of these measures will differ in time. At present and in the near future, traffic management and passenger information services have the most potential.	Ministry of Transport	E
28.	Traffic management in the sense of restricting individual traffic shifts the modal split in the direction of public transport!	Response 974008607	E
29.	The most important point is traffic management with a focus on reliability.	Hanns Kerschner	E
30.	Traffic management could be a very effective tool if nationwide and distance-based road user charging is introduced with a more dynamic price policy depending on congestion levels and other factors.	Response 552589262	E
31.	Traffic management solutions increase demand for responsive public transit.	UNIFE	E
32.	Concerning traffic management: traffic jams have the advantage of making alternative modes of transport more interesting than car use...	Response 704118868	E
33.	Traffic management helps reduce traffic congestion and related emissions.	Arthur D. Little	E
34.	Traffic management and passenger information will also play a considerable role, although its effects will be more limited.	Global Infrastructure Investor Association	E
35.	<p>Traffic management is the most efficient because the greatest challenge in urban areas is congestion. Traffic management may foster a better use of infrastructure capacity, trip time, offer alternative routes in case of accident or blocked network, etc. Traffic management may also be supported by connected vehicles and infrastructure or, eventually, autonomous vehicles. Other benefits include reduction of injuries and fatalities, as well as time savings.</p> <p>Vehicle automation has also been mentioned for cars - passenger information is the equivalent for public transport.</p>	Miguel de Ortuzar	C/E
36.	Vehicle automation will just encourage more empty cars driving around while waiting for their passengers.	Response 1039141480	B/C/F
37.	Shared mobility and vehicle automation will contribute very little to the reduction of negative transportation impacts.	Response 511707695	A/B/C/F

Ref	Summary of Contributions	Contributor	EIB comment
38.	Vehicle automation is a technological gadget, for the average user it is unimportant how transport is made.	Hanns Kerschner	B/C/F
39.	Vehicle automation or traffic optimization does not help much in in congested cities, habits need to be changed.	Budapest Airport Zrt.	B/C/E/F
40.	For the time being, vehicle automation remains just a prototype or is used at a local level. However, as software and technological advancements develop, vehicle automation will present a significant potential.	Ministry of Transport and Infrastructure	C
41.	I do not see the value of automating vehicles apart from labour force reduction (not safe because maintenance may be complicated). This advantage has to be seen in the light of the complexity involved (more complicated maintenance, electronics requiring rare materials, carbon impact of the internet connection).	Response 704118868	C
42.	Autonomous cars represent a false idea and will not solve mobility problems in any way, in addition to being very energy-intensive.	Service Public Fédéral Mobilité et Transports	F
43.	Vehicle automation is linked to the safety and sense of security of passengers.	Município de Faro	C
44.	Vehicle automation will significantly contribute to autonomous public transport.	UNIFE	C
45.	Vehicle automation for trucks (long haul) is promising. For urban mobility, automation is most likely to be relevant mainly for personal transport.	Ministry of Infrastructure and water Management	C
46.	Vehicle automation shall be focused on publicly accessible transport modes (NOT individual private vehicles) along with passenger information systems.	ECTRI	C/F
47.	Vehicle automation makes motor use more efficient but the strongest benefit relates to the adoption of level-5 automation technology (and the potential roll out of robotaxis) but this is seen as a long-term enabler.	Arthur D. Little	C
48.	Autonomous vehicles have the possibility in the long term to have a very strong impact on our movements by adapting journeys as closely as possible to traffic conditions and user needs.	Response 290033127	C
49.	Ride-hailing or autonomous driving should at least be multi-modal. This needs to be included in a coordinated transport system to improve efficiency and complement existing shared mobility services.	Joint contribution made by NewClimate Institute and Germanwatch	B/C

Ref	Summary of Contributions	Contributor	EIB comment
50.	Automation can support new mobility services in the field of shared mobility, which also require appropriate (multimodal) traffic management and passenger information services.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	C
51.	With respect to vehicle automation, it mostly depends on the domain in which the investments are made.	Ministry of Transport and Infrastructure	C
52.	Digitalisation and automation of urban transport can contribute to climate change mitigation by a) reducing traffic (better organization) or b) shared traffic (public transport, shared mobility)	Ralph-Uwe Dietrich	B/C/E
53.	The complexity of urban traffic management makes it ideal for digitalisation and automation if the IT and related infrastructure is available to support it. Digitizing and automating shared mobility will increase its predictability and reliability, thereby making it more attractive to users. In both cases, such systems require back-up since even temporary failure could be very costly.	Bank Information Center	B/C/E
54.	Digitalisation will not reduce the amount of traffic.	Response 832108188	E
55.	Digitalisation will be key to offer MaaS and door-to-door mobility, making in particular public transport more accessible. In addition, after the covid-19 outbreak, digitalisation will enable compliance with social distancing rule recommendations.  Moreover, digitalisation participates in a better mobility offer (better maintenance, better combined offer taking into account frequency and available seats) but also as a means of redirecting users towards sustainable modes of transport (having digital tools to encourage modal shift).	Alstom, UNIFE	B/E
56.	The most important thing is to make the most efficient use of existing resources and tools through their digitalisation.	MÁV-Volán Group	E
57.	Multimodal traffic management has a strong potential to improve the efficiency of transport systems at the urban level.	Alstom	B/E
58.	The modal shift across European cities will require a profound shift from traffic to mobility management. This will not only support and increase the capacity and attractiveness of local public transport offer and services, but also deny further increase of individual motorized traffic by means of	International Association of Public Transport UITP	B/E/G

Ref	Summary of Contributions	Contributor	EIB comment
	low emission zones, congestion charging, etc. It will constitute the fundament for local transport authorities to create and oversee an overarching mobility offer that will retain the existing passengers (also by providing accurate dynamic passenger information based on reliable data sets) and offer new incentives for current single vehicle occupancy users and the like. The modal shift is strongly correlated with re-defining public transport as multimodal mobility ecosystem with collective passenger modes at the core.		
59.	Intermodal systems are necessary in enabling seamless transport chains and supporting high-quality and reliable transport services. Facilitating inter-modality can be supported with monthly transport passes incorporating all transport services as well as regulations enabling cooperation among different transport operators (public and private companies), which could involve a metropolitan or regional transport authority as an effective central institution. Planning for the shift from passenger cars to public transport vehicles should include ensure affordability, access and safety for all income groups.  The EIB can provide support to develop such intermodal passenger transport systems, both in terms of technical application and building required capacities for such a system.	Joint contribution made by NewClimate Institute and Germanwatch	B/H
60.	Bus transport, as the ultimate exponent of shared mobility, is key to sustainable mobility when it comes to provide collective services in the mobility of the future. Thanks to its capillarity and dense network, it can reach near every location. It is an efficient mean of transport and easy to connect with other transport modes, being essential for certain groups, and highlighting its capacity to move large groups of people at a low cost and fare stability.	Confederación Española de Transporte en Autobús – CONFEBUS, CEOE	B
61.	Apart from bus transport, metro, suburban, commuter and light train modes foster new sustainable mobility for urban and metropolitan areas.	CEOE	B
62.	All of the listed concepts have a very high positive potential and should hence be a very important area of future investment. In the field of digitalization and automation of urban transport there will always be a mix of measures that improve the mobility system.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	C/E
63.	Carbon footprint methodologies harmonised at the EU level are the right step to develop an EU ecolabel for transport services. Based on that label, incentives should be	Community of European Railway and Infrastructure Companies	B/I

Ref	Summary of Contributions	Contributor	EIB comment
	introduced to switch to low-emission mobility and reduce emissions per passenger km. It is important to avoid any greenwashing in communicating such information to passengers.	(CER), International Union of Railways	
64.	Digitalisation and automation in transport may be incredibly socially unsustainable through increased surveillance and stress on transport workers, with little benefits towards efficiency ensuing from this. Investment in digitalisation and automation technologies must ensure strict due diligence and accountability mechanisms for the producers of the technology, and the use and functionality of the technology. All investment in digitalisation and automation must ensure that the introduction of these technologies is based on negotiations with the workers and their representatives.	European Transport Workers' Federation	Thank you for your comment.

Question 5 – In developing countries, the challenge of developing urban transport systems that are climate-friendly, efficient and address transport poverty is particularly large. What solutions do you see to this?

#### EIB's comments

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Topic	Reference	EIB's comments
Public transport/multimodality with greener modes	A	The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.
Financial viability of public transport	B	Urban public transport is currently largely subsidized and its financial viability in the long term depends already on the public budget, though in some countries outside the European Union fare revenues can better cover operating costs.
Climate change	C	As the EU Climate Bank, mitigation and adaptation to climate change are the heart of EIB's lending as outlined in the EIB's Climate Bank Roadmap.
Shared mobility/active modes	D	Shared mobility and active modes, including bike sharing, bike lanes and pedestrian areas, are already supported by the EIB and are a promising area of development for its lending.
Road safety	E	EIB's lending on road safety will be prioritized in the revised TLP, including traffic calming measures and low speed zones, in particular in urban areas where accidents are mainly concentrated.
Urban sprawl/integrated land-use and transport policies	F	EIB's lending to urban mobility already requires promoters to have robust strategies in place for sustainable urban transport and development oriented, among others, to limit urban sprawl.  The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift demand to more sustainable modes of transport and improve transport efficiency and reduce environmental and climate externalities.
Parking facilities	G	The EIB supports already parking facilities as multimodal solutions favouring greener transport modes (park and ride).
Economic justification of projects	H	Projects need to be well justified. The choice of the transport mode shall be based on a sound assessments of needs, ensuring an efficient use of existing and any newly created capacity.
Inclusive transport	I	Public transport projects financed by the EIB are implemented according to best international practices, including accessibility for persons with reduced mobility.



Gender	J	The EIB already considers the gender dimensions as part of its appraisal cycle as part of the environmental and social standards.
Affordable transport	K	Public transport, shared mobility and active modes are supported by the EIB as an affordable transport solution compared to ownership of private vehicles for personal use.
Modal shift	L	Modal shift from private cars to public transport, shared mobility and active modes is already and will remain at the heart of EIB's lending.
Policy support/advice	M	The EIB supports already the development of sustainable policies and projects through its advisory services and ad hoc technical assistance and will continue to do so.
Multilateral finance outside the EU	N	The majority of EIB's projects outside the EU are already co-financed with other IFIs.
Clean fleets/alternative fuels	O	<p>The EIB supports already the roll-out of cleaner fleets and of alternative fuels infrastructure and will continue provided that they comply with the EIB's CBR.</p> <p>The EIB support to fleets is limited to productive investments made by public and private organisations, excluding therefore acquisitions by households for their exclusive use as consumables in the form of sale/lease/rent.</p>
Technology	P	The EIB takes a technology-neutral approach to its support for the deployment of alternative fuel technologies, provided that they comply with the EIB's CBR. The EIB will finance technologies that contribute to achieving the goals of the Paris Agreement and have a potential to drive modal shift towards more sustainable transport modes and to lead to a more efficient management and use of transport assets in particular in congested urban areas.
Small schemes	Q	The EIB has a diversified approach to investments in urban mobility, including specific products as framework loan targeting programme of small-sized schemes.
Digitisation	R	Digitalisation is a promising area of development of EIB's lending, having the potential to drive behavioural change and lead to a more efficient use of transport assets and a shift to greener transport modes.
Private capitals	S	The EIB stimulates and catalyses private capital investments through different initiatives and products, including those jointly developed with the EC.
Concessions	T	The application of the EIB's Guide to Procurement ensures the technical, economic and financial viability of projects financed by the EIB.

Ref	Summary of Contributions	Contributor	EIB comment
1.	Light rail	Jori Milbradt	A
2.	Light rail systems would be ideal, but all kinds of public transport have to be heavily subsidized.	Hanns Kerschner	A/B
3.	Investments in the railways (subways, suburban trains).	Response 974008607, UTP (Union des Transports Publics et ferroviaires)	A
4.	Mainly public railways and inner city trains.	Response 832108188	A
5.	Increase railway, subway, and tram transport.	Ralph Uwe Dietrich	A
6.	Support new effective public mass-mobility trains/metros as public transport backbones.	Antje Willnow	A
7.	State subsidies for further development of climate-friendly urban transport networks by metro.	METROREXS.A. Bucharest	A/B
8.	Public transport in the form of (light) rail is the most sustainable transport mode in urban areas of developing countries. However, rail projects are long-lasting and to prevent global warming reaching 1.5°C, emissions from the transport sector need to be curbed down in a timely manner.	Joint contribution made by NewClimate Institute and Germanwatch	A/C
9.	Streetcars, buses, and subways offer alternative, efficient modes of transport.	Bank Information Center	A
10.	Focus on bike routes.	Jori Milbradt	D
11.	Foster use of bicycles, especially instead of cars.	Response 511707695	D
12.	Walkable cities are the most democratic in terms of transport.	Response 1039141480	D
13.	Developing safer bike lanes & walkways.	EuroRAP	D/E
14.	Infrastructure facilities to support walking and cycling.	Road Safety Foundation, UTP (Union des Transports Publics et ferroviaires)	D
15.	Dedicated bike lanes, separated from road traffic.	FEBIAC	D
16.	Innovative solutions sensitive to each socioeconomic and cultural context centred on clean public transport combined with safe and secure cycling and walking will have a	ECTRI	A/D/F

Ref	Summary of Contributions	Contributor	EIB comment
	positive impact. Spatially separating urban functions should be avoided in order to achieve high accessibility in local centres with non-motorised modes.		
17.	Continued expansion of walkable cities, bike lanes, and increased electric micro-mobility options (shared electric scooters, electric-assist bicycles, and electric mopeds) can improve the quality of life and access to employment in urban areas. Creation & expansion of bike share programs, bike lanes, and bike parking all help.	Bank Information Center	D
18.	Pedestrian and cycling infrastructures could be a solution, along with multimodal infrastructures for cars, trains, pedestrians.	Miguel de Ortuzar	D/G
19.	Infrastructure facilities to support walking, cycling and safe public transport are a priority.	iRAP	A/D/E
20.	Easy-to-understand and easy-to-use public transport systems (few routes, high frequency, simple pricing, high reliability).	Response 511707695	A
21.	Investments in mass public transport with high-energy efficiency! Concession investments and private investments.	Railway Signalling Automation Telecommunication And Industry Association	A
22.	Structural high-capacity public transport lines.	STIB-MIVB	A
23.	Urban public transport presents the advantage of offering high-quality transport services to a large part of the population at an affordable price. In this sense, EIB should seek to prioritise these types of investments having large social benefits.	Alstom, UNIFE	A
24.	More public transport.	Comunidade Intermunicipal do Cávado	A
25.	Access to public transport network in rural regions.	CIMBAL - Comunidade Intermunicipal do Baixo Alentejo	A/H
26.	Infrastructure facilities to support safe public transport.	Road Safety Foundation	A/E
27.	I do not understand why it is difficult to offer efficient urban transport systems and fight poverty. To the contrary, a good urban transport system based on all modes is a good way to fight poverty.	Ministère de la Transition écologique	A
28.	Accessible public transport for people with reduced mobility.	FEBIAC	A/I

Ref	Summary of Contributions	Contributor	EIB comment
29.	Good urban planning will be key to making sure that urban public transport networks suit the users' needs. This requires research on the gender dimension of public transport.	European Transport Workers' Federation	A/D/J
30.	Ensuring appropriate affordability for local citizens.	Ministry of Infrastructure	A/K
31.	Public transport is always the first tool. There are challenges in developing countries: large investments needed, affordability, as well as gender questions.	Miguel de Ortuzar	A/J/K
32.	Cities in developing countries often suffer from too much individual traffic, causing significant health and environmental problems. Switching to electric vehicles will not be enough to solve the chokeholds of traffic. Even more so than within the EU, the EIB's focus in countries outside of the EU has to be on expanding public transport infrastructure and taking vehicles off the road.	E3G	A/L
33.	Subsidies and know-how.	Finnish Transport Infrastructure Agency	B/M
34.	One solution would be for the EIB to combine its efforts with other public financing institutions, setting jointly a dedicated target for development aid in order to support urban mobility/public transport.	AlstomThe SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), UNIFE	A/N
35.	Trust in the current success stories of shared taxis for last mile.	Antje Willnow	D
36.	One of the solutions is the car as a collective transport mode. Offering potential passengers a free seat makes it possible to optimize trips. Such solutions are also less costly for the community, and are therefore deployable in places that are insufficiently dense for other types of public transport to be profitable.	ECOV	D
37.	Investments in cheap personal vehicles that do not pollute nature.	Railway Signalling Automation Telecommunication And Industry Association	O
38.	In developing countries, it is necessary to change the vehicles. People necessarily use more often the public transport than in the developed countries. It is a measure that will have a big impact.	Município de Faro	A/O
39.	Low and zero emission vehicles + charging infrastructure.	FEBIAC	A/O
40.	Invest in zero-emission buses.	Ministry of Infrastructure and water Management	A/O

Ref	Summary of Contributions	Contributor	EIB comment
41.	A Vehicle Scrapping and Recycling Program is one way to get taxi owners to voluntarily turn in outdated, high-polluting vehicles for managed scrapping and recycling in exchange for electric or hybrid vehicles.	Bank Information Center	A/O
42.	Financial support to invest in infrastructure. Mutual interest.	OTIF, Road Safety Foundation	A
43.	The change will take time. The most important thing in developing countries is creating the infrastructure needed to allow some kind of transport system. Once the technology advances and gets cheaper, the systems should be slowly transitioned to climate-friendly ones. It is also important to create multimodal transport infrastructure, which is flexible and can adapt to the ever-evolving decarbonisation of new transportation vehicles/systems.	Global Infrastructure Investor Association	A/G/O
44.	Awareness raising campaigns and promotion of changing needs. In developing countries, public transport is still often equated with poverty. Awareness campaigns can counteract this view — public transport must be attractive; for this, the offer must also be right.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	A/K
45.	Show why it is important to travel as sustainably as possible.	Back on Track Belgium vzw-asbl	A/D
46.	Changing mind-sets, stopping the impression that being the owner of a car is a sign of social success. This applies to all countries, whether developed or developing.	UTP (Union des Transports Publics et ferroviaires)	A/D/L
47.	The key priority should be the development of institutional capabilities, with the creation of metropolitan transport authorities. Such entities are necessary to organize public transport services and ensure the coordination with informal transport services.	Arthur D. Little	A/M
48.	Promotion of urban planning.	UTP (Union des Transports Publics et ferroviaires)	F
49.	Urban areas in developing countries typically face unsustainable urban sprawl. The focus should be at supporting urban mobility plans, including technical assistance. Sustainable long-term urban planning leading to compact spatial and transit-oriented development (TOD), in which neighbourhoods provide a full range of services and better transport management centred on public transport, can counter-act urban sprawl and reduce the need for transport. Measures in this area can be effective if designed to be holistic in their approach in transport planning and encompass sustainable urban mobility plans. Targeted investments and urban planning for high-quality and safe mass-transit systems are necessary to offer a proper alternative to passenger cars.	Joint contribution made by NewClimate Institute and Germanwatch	F/M

Ref	Summary of Contributions	Contributor	EIB comment
50.	Invest in integrated approach of transport and spatial planning, aiming at decarbonisation and inclusiveness.	Ministry of Infrastructure and water Management	F
51.	Spatial planning is vital.	Miguel de Ortuzar	F
52.	Bus Rapid Transport (BRT) running on dedicated bus lanes (and thus not subject to congested traffic) is a promising short to medium term public transport mode.	Joint contribution made by NewClimate Institute and Germanwatch	A
53.	Electric bus rapid transit systems, free or nearly free to use, are proven as a climate-friendly, efficient and address transport poverty.	Bank Information Center	A
54.	Vehicle automation or traffic optimization do not much In congested cities, habits need to be changed.	Budapest Airport Zrt.	L
55.	The benefits of the advanced systems and technologies will be in time available to the developing countries. They can learn from the mistakes of developing countries and choose the most favourable modern solutions, thus approaching the standard of developed countries. Of course, in order to save the planet, the developed countries must make their latest technology available.	Croatian Chamber of Economy	P
56.	Due to travel patterns, as well as education, the beliefs and practices of people in developing countries, measures that FORCE to change travel routines are the most effective and with immediate results. For any project, be it public transport upgrade or road parking spaces management, etc., the general practice is to initially provide alternatives and afterwards to impose measures. Since this would need medium to long term implementation in order to have visible results, it is proposed to have an aggressive policy based on restriction-enforcement measures or through pricing/payment policy.	Stelios Efstathiadis	A/L
57.	Shared transport is widely developed, corruption for the quality of roads needs to be combatted, and safety and environmental standards must be met.	Response 981558580	D/E
58.	Provide financial and logistical support so that they can also have efficient transport. Local training.	Response 290033127	A
59.	Maybe start from what is developing spontaneously? For example in New Delhi (or other cities), include tuk-tuk drivers in the operation of public transport, in particular metro transport, by federating them to ensure decent income and working conditions. Methods	Response 704118868	A/M

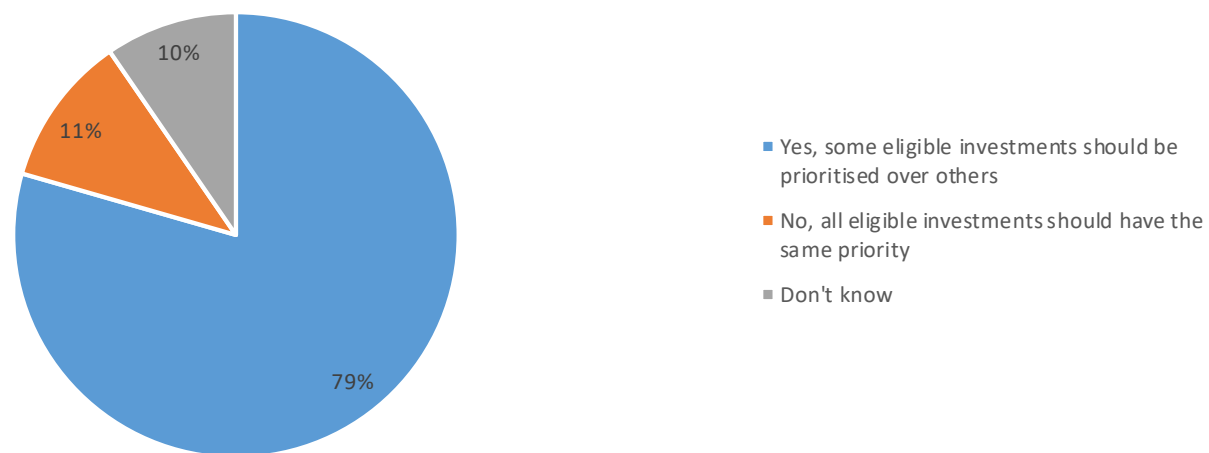
Ref	Summary of Contributions	Contributor	EIB comment
	of governance make it possible not to reduce them to mere employees but to retain a certain degree of autonomy in their work.		
60.	The needs of citizens and businesses are different and vary over time - no single mode of transport can address the needs of urban citizens and commuters. Therefore, focus should be placed on small improvements.	FEBIAC	Q
61.	Investments in smart traffic management systems and digitalisation, allowing for less road space required without causing additional traffic jams. Improve road traffic flows rather than generating congestion.	FEBIAC, Správa železnic	R
62.	Invest in urban areas in transit-oriented development (TOD).	Joint contribution made by NewClimate Institute and Germanwatch, Ministry of Infrastructure and water Management,	A
63.	Invest in active mobility where possible, creating integrated urban places designed to bring people, activities, buildings, and public space together, with easy walking and cycling connection between them and near-excellent transit service to the rest of the city.	Ministry of Infrastructure and water Management, UTP (Union des Transports Publics et ferroviaires)	A/D/F
64.	Invest in transport-hubs, where train, metro, bus, walking and cycling are connected	Ministry of Infrastructure and water Management	A/D/G
65.	If train or metro are not feasible, invest in a bus-transport system, with hubs and with easy and safe cycling (separate cycling paths) and walking connections.		A/D/G
66.	Invest in inclusive mobility/transport. For people with low-income, for disabled, for women (safety of women in transport) and children.		A/D/I/J/K
67.	Focus on investments that leapfrog new green and smart mobility/transport systems, which are smart (efficient) and aimed at improving accessibility and decarbonizing transport. Developing countries should not make the mistakes that the developed countries made in the past.		A/C/D
68.	Invest in projects that combine different functions. Make use of PPPs to finance projects and provide financing to both the public authorities and the private sector that is involved in the PPP.		S

Ref	Summary of Contributions	Contributor	EIB comment
69.	Transport systems should be developed in line with the Global Plan for the Decade of Action for Road Safety and Global Road Safety Performance Targets, encouraging affordable multimodal transport supported by smart land use planning, and ensuring that all roads achieve a 3-star or better rating for all road users. Speed management offers a practical and affordable strategy for creating safe and liveable cities.	iRAP	E/F
70.	Investments in safe, 3star or better, active mode fostering its use by policy and regulatory interventions.	European Institute for Road Assessment – EuroRAP	D/E
71.	It is necessary to increase the use of real-time multimodal information and efficient pricing and deployment of Intelligent Transport Systems.	Správa železnic	R
72.	Planned and integrated transport network that considers the local and regional government's geography and level of economic development in order to create suitable and feasible strategies.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	F
73.	Peer to peer exchange is a relevant tool for introducing innovative green solutions to these countries. European countries can share their knowledge – notably, regional South-South co-operation is essential. Improving access to low carbon transport in Africa will continue to depend on national and private actions, due to a general lack of regional co-operation enabling sustainable planning modes.		M
74.	Greater regional and international co-operation could help promote stricter standards. In Central America and the Caribbean, which have large second-hand vehicle markets, a lack of harmonised standards on imported used vehicles is a significant barrier to decarbonising transport.		M/N
75.	Financing virtuous modes where possible (tram, BHNS, efficient bus network, easier use of cycling). To change behaviour, let us change attitudes.	UTP (Union des Transports Publics et ferroviaires)	A/D/L
76.	It is difficult to give a comprehensive answer to this question, as the situations of cities in developing countries are different. Investments in decarbonised public transport can provide environmental, air quality and road safety solutions. It should also be noted that it is not developing countries that are responsible for climate change — they are precisely the first victims of climate change.	Service Public Fédéral Mobilité et Transports	A/C/D/E
77.	The lack of comprehensive data on the full urban transport coverage of a city further hinders effective evidence-based decision-making around wider transport planning and investment considerations. Moreover, there is little understanding of the challenges	WhereIsMyTransport	I/J/K/R



Ref	Summary of Contributions	Contributor	EIB comment
	certain communities face in accessing public transport and the gendered dynamics of mobility for both public transport users and non-users. Solution: finance transport mapping / data mapping collection projects in LIC cities.		
78.	Involvement of capital-intensive international transport companies in developments with a concession.	MAV-Volán Group	T
79.	Many metropolitan areas in developing countries already have high shares of walking, (potentially also cycling), and public transport, albeit often relying on informal buses networks. Together, these three modes can reach shares as high as 90 per cent of the entire modal split in selected cities. Yet motorised two- and three-wheelers, passenger vehicles and informal minibuses, largely fossil fuel based, continuously gain shares.	Joint contribution made by NewClimate Institute and Germanwatch	A/D
80.	Investments in local public transport, shared mobility modes, zero-emission multimodal transport services and the modal shift in general should become the cornerstone of the new TLP, both Europe-wide and overseas. All three areas of transformation require strong financial engagement that goes beyond a mere continuation of what is available today.	International Association of Public Transport UITP	A/D/G/L
81.	Developing Android Apps to help optimise passenger information services.	EuroRAP	R
82.	A key element in transport investment could be connectivity and digitalization.	Miguel de Ortazar	R
83.	A proper solution could be a win-win trade among EU and the developing countries by using or integrating a distinct part in Free Trade Agreements. This can be done by also integrating a condition to implement either advantageous Eco-friendly projects, such as the lowering of border taxes or other similar costs, or assisting EU companies towards investing in the developing countries.	Ministry of Transport and Infrastructure	EU trade policy is out of the scope of the EIB's Transport Lending Policy.

#### Question 6– Should the EIB prioritise certain eligible urban public transport investments?



#### EIB's comments

The EIB would like to thank all the participants for their contributions. The EIB has carefully reviewed them one by one and identified key topics that they were addressing, which are summarized in the table below along with EIB's comments. The EIB's priorities for urban mobility are addressed in the new Transport Lending Policy, chapter 5.

Topic	Reference	EIB's comments
Climate change	A	As the EU Climate Bank, mitigation and adaptation to climate change are the heart of EIB's lending as outlined in the EIB's Climate Bank Roadmap.
Road safety	B	EIB's lending on road safety will be prioritized in the revised TLP, including traffic calming measures and low speed zones, in particular in urban areas where accidents are mainly concentrated.
Public transport/multimodality with greener modes	C	The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.
Modal shift	D	Modal shift from private cars to public transport, shared mobility and active modes is already and will remain at the heart of EIB's lending.
Shared mobility/active modes	E	Shared mobility and active modes, including bike sharing, bike lanes and pedestrian areas, are already supported by the EIB and are a promising area of development for its lending.
Policy support/advice	F	The EIB supports already the development of sustainable policies and projects through its advisory services and ad hoc technical assistance and will continue to do so.
Clean fleets/alternative fuels	G	<p>The EIB supports already the roll-out of cleaner fleets and of alternative fuels infrastructure and will continue provided that they comply with the EIB's CBR.</p> <p>The EIB support to fleets is limited to productive investments made by public and private organisations, excluding therefore acquisitions by households for their exclusive use as consumables in the form of sale/lease/rent.</p>
City logistics	H	Zero/low emission city logistics is a promising area of development for EIB's lending.
Urban sprawl/integrated land-use and transport policies	I	<p>EIB's lending to urban mobility already requires promoters to have robust strategies in place for sustainable urban transport and development oriented, among others, to limit urban sprawl.</p> <p>The integration of land-use and transport policies within the framework of a comprehensive urban planning process, driven by local democracy and intensive stakeholder engagement, is key to limit unnecessary trips, shift demand to more sustainable modes of transport and improve transport efficiency and reduce environmental and climate externalities.</p>
Affordable transport	J	Public transport, shared mobility and active modes are supported by the EIB as an affordable transport solution compared to ownership of private vehicles for personal use.
Operating costs	K	The EIB's financing targets capital expenditures, not operating expenditures.

Ref.	Summary of Contributions	Contributor	EIB comment
1.	Those with highest impact (GHG emission reduction) at lowest cost.	Ralph-Uwe Dietrich	A
2.	Those with the greatest returns in terms of both decarbonisation, however safety should also be prioritised. Special attention should be paid that decarbonisation and green policy do not lead to neglect of the safety aspect.	iRAP, European Institute for Road Assessment – EuroRAP, Road Safety Foundation	A/B
3.	To the least polluting one.	Back on Track Belgium vzw-asbl	A/C
4.	A prioritisation of the EIB's projects, which have the greatest potential to save CO <sub>2</sub> , is necessary in light of available funding budgets.	Stadtwerke München GmbH	A
5.	Public transport is the most environmentally friendly form of transport.	Response 974008607	C
6.	Public transport can always make a bigger difference than individual vehicles.	Budapest Airport Zrt.	C
7.	Efficient and reliable public transport is key to mobility. Everything else will follow.	Croatian Chamber of Economy	C
8.	It is due to public transport that we will be able to reduce the use of private transport.	Município de Paredes	C/D
9.	Public transport.	urgewald	C
10.	Public transport keeps cities moving, therefore all eligible investments in public transport assets and infrastructure should be prioritized, particularly those increasing the network capacity and passenger numbers.	International Association of Public Transport UITP	C
11.	Support urban electric public transport.	E3G, WWF EPO	C
12.	Prioritise public transport investments that increase the relative attractiveness of public transport compared to car use.	Response 511707695	C/D
13.	Priority should be given to all projects aiming to improve public transport in order to subsequently implement other measures that focus on encouraging greater use of public transport.	CEOE, Confederación Española de Transporte en Autobús - CONFEBUS	C
14.	Eligible investments will increase and develop vulnerable parts of urban public transport, such as maintaining or developing urban public infrastructure transportation. This will increase urban public transport usage, as well as help reduce road traffic, which will in turn stimulate trade, hence economic growth.	Ministry of Transport and Infrastructure	C/D
15.	Any incentive for passengers to choose non-motorized transport or public transport whenever available and possible should be prioritised.	Správa železnic	C/E

Ref.	Summary of Contributions	Contributor	EIB comment
16.	The EIB should prioritise “upstream” urban public transport investments, i.e. in policy and system changes that will incentivize and support the transition to a transport system that no longer relies on fossil fuels for mobility.	Bank Information Center	C/F
17.	Zero emission technology: investments in sustainable rolling stock, e.g. hydrogen trains.	Ministry of Infrastructure and water Management	G
18.	To reduce freight transport in urban spaces, the EIB should support cities to develop (zero-emission) freight transport strategies through the establishment of urban consolidation centres. Freight transport strategies can / should be integrated into SUMP.	Joint contribution made by NewClimate Institute and Germanwatch	H
19.	Support and scale up financing for zero-carbon transport infrastructure, and zero-emission multimodal transport services.	E3G, WWF EPO	A
20.	Green public transport investments.	OTIF	A/C
21.	Investments that contribute to a reduction of greenhouse gas emissions, and that are aligned with the EU Green Deal.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	A
22.	<p>The EIB should continue to prioritise investments in electric public transport, with a focus on rail and light rail followed by electric bus fleets and waterway connections when applicable. More generally, solely electric public transport should be eligible for EIB funding.</p> <p>Hydrogen and biofuel-based transport projects should generally not be eligible for EIB financing for road transport – hydrogen and hydrogen based synthetic fuels should only be considered for support for long-distance transport.</p>	Joint contribution made by NewClimate Institute and Germanwatch	C/G
23.	All the investments that are Paris-aligned and respect the DNSH principle.	Ferrovie dello Stato Italiane S.p.A	A
24.	Carbon-neutral transport solutions (from well to wheel) should be a priority.	MÁV-Volán Group	A
25.	The EIB should prioritise electrification of a) infrastructure, and b) vehicle fleets	Bank Information Center	A/C
26.	Investments in commuting transport infrastructures; investments in maintenance and upgrading of the transport infrastructures.	CEOE, Confederación Nacional de la Construcción (CNC)	C

Ref.	Summary of Contributions	Contributor	EIB comment
27.	In order to promote a real modal shift, EIB loans should be directed at:  - Infrastructure likely to enhance the attractiveness of public transport, such as dedicated lanes and high-speed buses;  - Infrastructure necessary for the development of electromobility (depots and electric recharging equipment);	SNCF	C/E/G
28.	Public (mass) transport > bike and walking infrastructure > everything else.	Jori Milbradt	C/E
29.	Bikes and pedestrians.	urgewald	E
30.	Modal shifts to environmentally friendly transport modes such as walking and cycling are typically space- and cost-efficient and require relatively low infrastructure and capital investment. They also come with several co-benefits, mainly related to health but also to employment and reduced congestion. To promote non-motorised mobility it is crucial to build and adapt urban infrastructure. The EIB should also invest in biking infrastructure, particularly "bike freeways" with minimal crossings, as well as walking infrastructure and greening of urban streets.	Joint contribution made by NewClimate Institute and Germanwatch	D/E
31.	Support soft mobility.	E3G, WWF EPO	D/H
32.	Rail infrastructure has been greatly neglected in favour of private transport.	Pro Bahn	C
33.	It is essential that the EIB prioritises urban mobility with zero greenhouse gas emissions and a small environmental footprint. Public transport by rail is, therefore, the most suitable as it is one of the most efficient modes of transport in terms of climate emissions. It also allows for lower land use, accident rates and air pollution than road-based urban mobility (ie. buses) and helps to reduce congestion costs.	Alstom, UNIFE	A/C
34.	ERTMS: Implementation of the European rail traffic management system increases overall safety, contributes to more efficient use of the railway infrastructure capacity and improves cross-border railway connectivity;	Ministry of Infrastructure and water Management	EIB financing of infrastructure investments for digitalisation and automation – such as ERTMS - will continue to be prioritised.

Ref.	Summary of Contributions	Contributor	EIB comment
35.	<p>The EIB should give priority to the electrification of fossil fuel powered public transport.</p> <p>In cities, suburban rail is a convenient and fast means of transport, which deserves to be further developed.</p> <p>The development of regional rail networks can also offer a credible alternative to the private car in peripheral areas.</p>	Service Public Fédéral Mobilité et Transports	C/G
36.	Support rail direct electrification and stop supporting powertrains relying on gas, biofuels, or oil. Support renewal and electrification of rolling stock for rail passenger's transport (including night trains).	E3G, WWF EPO	C/G
37.	The acquisition of vehicles.	Município de Faro	G.
38.	The purchase of clean vehicles (electric and hydrogen).	SNCF	G
39.	A cost-efficiency analysis and a technical feasibility study should be performed before deciding which investments to prioritize. The frontrunners are currently electric vehicles, but hydrogen fuel-cell vehicles are also a possibility.	Global Infrastructure Investor Association	G
40.	Vehicles powered by renewable energy.	ECTRI	Energy production is out of the scope of the EIB's Transport Lending Policy.
41.	Support renewal of public transport fleets towards zero emissions vehicles, especially to promote joint tenders of various cities across Europe.	E3G, WWF EPO	G
42.	What is an eligible investment?	Ministère de la Transition écologique	Investments are eligible to EIB's financing if they comply with the EIB's Transport Lending Policy.
43.	We need to look at the potential of each technology, its speed of implementation, the state of research, and prioritise investments.	Response 290033127	G

Ref.	Summary of Contributions	Contributor	EIB comment
44.	The EIB should financially support cities and municipalities to develop a Sustainable Urban Mobility Plan (SUMP) to reflect actions to achieve a long-term decarbonised transport system. The EIB should prioritise transport projects in urban areas that have, or are willing to develop, urban mobility plans that account for non-motorised transport.	Joint contribution made by NewClimate Institute and Germanwatch	I
45.	Universal accessibility of public spaces and transport facilities. These are key to enable social inclusion.	ECTRI	IJ
46.	The EIB should develop a segmentation of territories (urban, peri-urban and rural) it will address to develop the most efficient policy and prioritize the levers.	Arthur D. Little	I
47.	In order to ensure long-term financing of public transport and allow for further growth, it is above all necessary to create fund models and new funding. It is essential to develop support instruments also for the financing of operating costs in general LPT.	Stadtwerke München GmbH	K
48.	<p>Yes, some eligible investments should be prioritised over others. As a priority the EIB should:</p> <ul style="list-style-type: none"> <li>- Support and scale up financing for zero-carbon transport infrastructure, new mobility concepts, soft mobility, urban electric public transport and rail electrification, and zero-emission multimodal transport services.</li> <li>- Support renewal of public transport fleets towards zero emissions vehicles, especially to promote joint tenders of various cities across Europe.</li> <li>- Support renewal and electrification of rolling stock for rail passengers transport (including night trains).</li> <li>- Only support direct electrification (instead of electrofuels and advanced biofuels) and stop supporting powertrains relying on gas, biofuels, or oil</li> </ul>	Greenpeace	C/D/E/G
49.	With no information about the selection process, prioritization is a black box. Therefore, it is impossible to make any decisions in this regard (this is to be said as well in the following sectors).	Response 1039141480	Thank you for your comment.
50.	Of course, public money needs to be prioritized.	Response 832108188	
51.	The Bank should concentrate on analysing the financial issues.	Finnish Transport Infrastructure Agency	



## Additional comments

### EIB's comments

The EIB would like to thank all the participants for their contributions. The EIB has carefully reviewed them one by one and listed them in the table below along with EIB's comments. The EIB's priorities for urban mobility are addressed in the new Transport Lending Policy, chapter 5.

Ref.	Summary of Contributions	Contributor	EIB comment
1.	Modernization of existing assets and making them more appealing to passengers are key elements of facilitating the modal shift from private vehicles to public transport.	MÁV-Volán Group	EIB's financing targets already the upgrade, rehabilitation and renewal of existing infrastructure.
2.	EIB should also promote the construction of cities by-passes to avoid long trip drivers entering the town.	CEOE, Confederación Nacional de la Construcción (CNC)	EIB's financing in urban mobility prioritises greener alternatives such as urban public transport, shared mobility, active modes of transport and the deployment of technologies aiming to favour a shift from road transport or a better use of existing assets.
3.	Shadow carbon pricing is not a robust tool to assess the climate impact of roads. Instead, new tools have been developed such as for example the RMI SHIFT Calculator which can support decision-making on roads by highlighting their induced demand impacts and associated emissions.	Joint contribution made by NewClimate Institute and Germanwatch	The EIB is using shadow carbon pricing as one of the elements to assess the impact of roads. Other considerations include inter alia electrification and demand evolution towards decarbonisation. The EIB will continue monitoring developments in traffic and emissions forecasting and update its assessment methodologies in line with the EC mobility strategy and policies.
4.	In urban areas, all EIB-financed road vehicles should be electric. EIB should commit to phase out purchases of internal combustion buses by 2025. Compared to gasoline-powered vehicles, emissions drop by 50 percent if an EV's power comes off the conventional grid. If powered by solar energy, carbon dioxide emissions fall by 95 percent. Additionally, urban mobility can be decarbonized through Walkable Cities, Bicycle Infrastructure, Electric Bicycles, Carpooling, and	Bank Information Center	<p>EIB's financing in urban mobility prioritises greener alternatives such as urban public transport, shared mobility, active modes of transport and the deployment of technologies aiming to favour a shift from road transport or a better use of existing assets.</p> <p>The EIB supports already the roll-out of cleaner fleets and of alternative fuels infrastructure and will continue provided that they comply with the EIB's CBR.</p>

Ref.	Summary of Contributions	Contributor	EIB comment
	Public Transit, including all-electric buses by 2025, as well as demand reduction through Telepresence.		The EIB will finance technologies that contribute to achieving the goals of the Paris Agreement and have a potential to drive modal shift towards more sustainable transport modes and to lead to a more efficient management and use of transport assets in particular in congested urban areas.
5.	Pedestrian and bicycle traffic must be expanded in the cities!	Response 974008607	Shared mobility and active modes, including bike sharing, bike lanes and pedestrian areas, are already supported by the EIB and are a promising area of development for its lending.
6.	Investments have to be supported by appropriate regulation. If we invest in public transport, we will have to support its usage by transfer to an “auto-unfriendly city”.	Ralph-Uwe Dietrich	Regulation is out of the scope of the EIB’s Transport Lending Policy.
7.	A distinction should be made between immediate environmental effects of e-mobility and GHG-effects achieved only in case of renewable energy use.	Antje Willnow	Energy production is out of the scope of the EIB’s Transport Lending Policy.
8.	The resilience of existing infrastructure to climate change must now be a priority because it makes no sense to produce and use zero-emission vehicles if we have to constantly repair transport infrastructure.	Croatian Chamber of Economy	As the EU Climate Bank, mitigation and adaptation to climate change are the heart of EIB’s lending.
9.	The focus should not be on digital (only). When people are trained how to use a system, they know how to find the information or the way.	Back on Track Belgium vzw-asbl	Digitalisation is a promising area of development of EIB’s lending, having the potential to drive behavioural change and lead to a more efficient use of transport assets and a shift to greener transport modes.

## Chapter 4 – Extra-urban Rail

### Question 1 – What do you believe is the technological roadmap for decarbonising long-distance rail transport?

Ref	Summary of Contributions	Contributor	EIB comment
1.	Electrification of rail transport	Back on Track Belgium vzw-asbl, Bayerisches Staatsministerium für Wohnen, Bau und Verkehr, CIMBAL - Comunidade Intermunicipal do Baixo Alentejo, Community of European Railway and Infrastructure Companies (CER), European Rail Infrastructure Managers (EIM), Hanns Kerschner, Joint contribution made by NewClimate Institute and Germanwatch, MÁV-Volán Group, Miguel de Ortuzar, Ministry of Infrastructure and water Management, Ministry of Transport, OTIF, Pro Bahn, Response	<p>While over 80 % of passenger and freight performance on rail in the EU is already produced by electric trains, advancing the electrification of rail transport further and increasing rail capacities to accommodate modal shift are important elements of the decarbonisation of the transport sector.</p> <p>The EIB's priorities for rail are addressed in the new Transport Lending Policy, chapter 5. The revised TLP continues to prioritise investments into new and upgraded electrified rail infrastructure, and prioritises zero-emission rolling stock using catenary power, batteries or hydrogen.</p> <p>Catenary electrifications may not always be economically viable, however investments in non-electrified rail infrastructure are prioritised only in certain cases, such as rural lines, other lines with credible plans for future electrification, or provided that rail traffic on the infrastructure will predominantly make use of zero direct emission rolling stock.</p> <p>Furthermore, EIB is actively supporting the development and deployment of new breakthrough technologies, such as battery storage or green hydrogen.</p>

Ref	Summary of Contributions	Contributor	EIB comment
		974008607, Response 552589262, Response 290033127, SNCF, Správa železnic, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	See response to points above.
2.	For long distance rail transport the key element of the decarbonisation of rail is electrification, in particular by equipping tracks with overhead lines.  For regional lines with less traffic, alternative power supply, mainly combined battery / overhead line driven trains, might be more efficient.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	
3.	Phasing out of diesel and the promotion of <b>zero-emission technologies</b> (direct electrification, battery or H2 trains).	Alstom, European Union Agency for Railways, OTIF, Service Public Fédéral Mobilité et Transports, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), UNIFE	
4.	Rail should be 100% electric (or hydrogen), powered by green electricity	Back on Track Belgium vzw-asbl, STIB-MIVB	

Ref	Summary of Contributions	Contributor	EIB comment
5.	Installing catenary wherever possible, introducing battery powered and hydrogen powered rolling stock where overhead wires are not feasible.	European Sleeper Coöperatie U.A., European Transport Workers' Federation, Service Public Fédéral Mobilité et Transports	See response to points above.
6.	Railways will continue to rely heavily on electricity to decarbonise. High-speed rail network is electrified. Other cross-border and inter-city connections will mostly be electrified. For transport demand reasons alternative propulsion technologies will be preferred. Hydrogen and battery powered trains could represent 10% of long-distance rail transport. Hydrogen technology will also be relevant for rail freight services, in particular connected to seaports.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways, The SLOCAT Partnership on Sustainable, Low Carbon Transport	
7.	A modal shift from carbon-intensive modes to rail is likely the most effective way to decarbonise transport.  New technology, e.g. hydrogen trains, and electrification of the railway infrastructure could contribute to decarbonising long-distance rail transport.	Ministry of Infrastructure and water Management	
8.	Self-propelled cable, hydrogen or hybrid power (electric mode and hydrogen for non-electrified track portions).	UTP (Union des Transports Publics et ferroviaires)	
9.	The European rail network will continue to rely heavily on electrification of tracks, but alternative propulsion systems (battery trains, hydrogen trains) will become increasingly necessary, not least because electrification of tracks may be too costly.	SNCF	

Ref	Summary of Contributions	Contributor	EIB comment
10.	Where electrification is not viable economically, further development of new technologies (batteries, hydrogen-cells etc.) is essential in order to replace diesel engines.	European Rail Infrastructure Managers (EIM), MÁV-Volán Group	
11.	Battery-equipped trains might be an interesting alternative for mostly short-distance passenger services. In a cross-border context, this technology could be of use to overcome small sections of infrastructure on the network that are not electrified yet. Due to the much greater power that freight trains have to generate and the long distances they have to travel, the use of batteries does not seem an option. Instead, hybrid locomotives may be a feasible solution, giving more time to develop the hydrogen technology. Hydrogen seems the most appropriate replacement of the diesel rolling stock in the freight sector. Challenges remain high with alternative fuel options. It is crucial to further investigate energy alternatives coming from renewable sources. Research on renewable energy sources and their impact should therefore be supported.	Service Public Fédéral Mobilité et Transports	
12.	Electrification of the network, replacement of diesel engines with hydrogen, decarbonising hydrogen production for the rail sector.	Response 290033127	
13.	New more efficient electric vehicles and hydrogen could be the solution.	Ferrovie dello Stato Italiane S.p.A	
14.	Electrification of all routes with possible European standard of (25 kV 50 Hz)	Response 832108188	The TEN-T Regulation does not prescribe any specific electrification system. It should be also noted that the designation of 25 kV 50 Hz as “target supply system” has been removed from the Technical Specifications for Interoperability (TSIs). EIB therefore insists on compliance with the applicable TSI, here TSI ENE, permitting electrification with 25kVac/50Hz, 15kVac/16.7Hz, 3kVdc or 1.5kVdc for rail electrification.
15.	Electrification and ramp up of renewable electricity generation.	Ralph-Uwe Dietrich	Electrification indeed paves the way for decarbonisation in parallel to the shift of the sources of power generation from

Ref	Summary of Contributions	Contributor	EIB comment
			fossil fuels to renewable sources. The EIB Energy Lending Policy covers the EIB contribution to greening the electricity generation.
16.	Electrification is the first step to gain competitiveness and encourage passengers to use rail for medium and short trips. Another tool is high speed.	Miguel de Ortazar	<p>Furthermore, in November 2019, the EIB Board of Directors decided to increase the level of climate and environment commitment for the EIB Group. The Climate Bank Roadmap [link] sets out how the EIB Group intends to meet this expectation.</p> <p>As per the EC's long-term strategy, all power generation should be fully decarbonised by 2050.</p>
17.	Railway electrification should prioritize high usage corridors, and be paired with decarbonized electricity. Increasing passenger rail services on electrified tracks (i.e., shared-use corridors), and other efficiency technologies may provide additional financial benefits.	Bank Information Center	
18.	Electrification based on renewable energy.	UNIFE	
19.	Ensuring that the electricity used comes from green sources. Solar and wind energy sources are underrated, and there is a profound opportunity given the decline of their costs of production, specifically with solar.  Another clean energy source is hydrogen.	Global Infrastructure Investor Association	
20.	Rail should be 100% electric (or hydrogen), powered by green electricity	Back on Track Belgium vzw-asbl, STIB-MIVB	
21.	Autonomous and electric fast trains	Metropolitano de Lisboa	Under the revised TLP, EIB financing of rail infrastructure and rolling stock investments for digitalisation and automation – notably ERTMS - will continue to be a focus as a means of optimising the use of rail resources and capacities and improving safety and interoperability, as well improving the integration and connectivity between the different modes in the transport system.

Ref	Summary of Contributions	Contributor	EIB comment
22.	<b>Digitalisation</b> will play a key role in rail decarbonisation (Digital Automatic Coupling), capacity, data exchange, atomisation and autonomous trains.	Community of European Railway and Infrastructure Companies (CER), OTIF, Service Public Fédéral Mobilité et Transports, SNCF, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
23.	- Optimization of asset usage including ERTMS as the backbone of a digital rail system.  - Improving competitive edge by digitization of couplings.	UNIFE	
24.	To enable a functioning European rail network with fluid and fast traffic, the European IT infrastructure needs to be significantly upscaled.	NewClimate Institute and Germanwatch	
25.	Electrified rail network (TEN-T) for speeds of cargo trains in average of 120 km/h. and passengers train of 160 km/h minimum.	Croatian Chamber of Economy	The regulation on Union guidelines for the development of the trans-European transport network, with the revision proposal COM(2021)812final presented on 14/12/2021, define speed requirements for “prevailing minimum operational line speeds” of the Core TEN-T rail network elements, to be achieved over time and subject inter alia to economic viability and environmental context.
26.	Electrification of all TEN-T railway lines until 2030, bimodal technologies at non TEN-T lines to 2035.  Electrification of non TEN-T railway lines which are economical feasible. Decarbonising of extra-urban rail depends on the decarbonising of electric energy production.	MÁV-Volán Group	The regulation on Union guidelines for the development of the trans-European transport network, with the revision proposal COM(2021)812final presented on 14/12/2021, defines electrification requirements for the TEN-T rail network elements. See as well answers to questions 1 and 3.

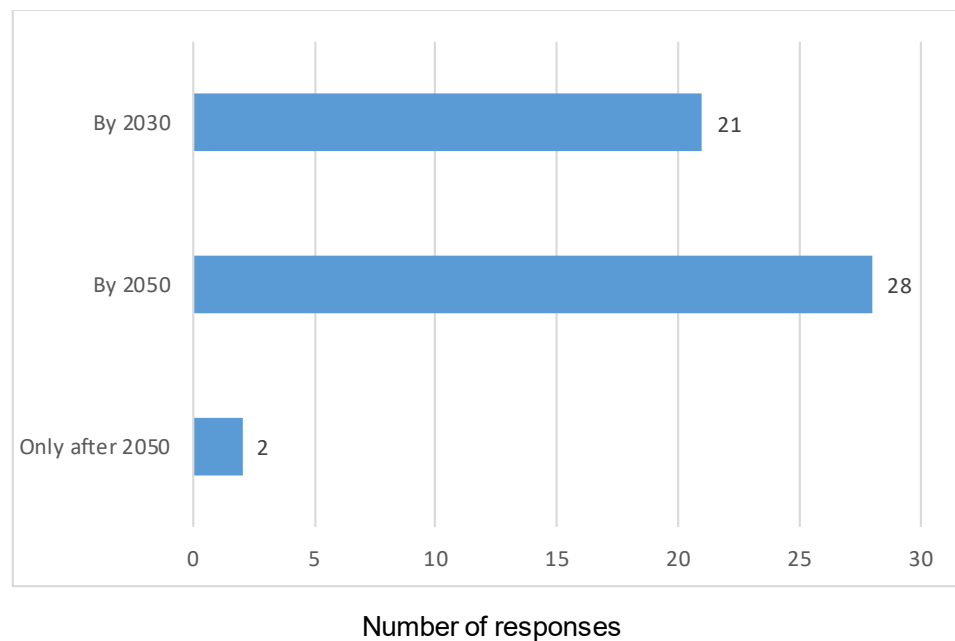


Ref	Summary of Contributions	Contributor	EIB comment
27.	Electrification, transition to AC traction system and ERTMS deployment, including renewal of the rolling stock, should lead to a decarbonised and energy efficient railway system.	Ministry of Transport	The revised TLP continues to prioritise investments into electrification, digitalisation (ERTMS) and automation of rail infrastructure and rolling stock. See as well answer to question 2.
	Electrification and digitalisation of traffic management, high speed rail.	Ministry of Infrastructure	
28.	Trains ought to be fast, electric, with low land consumption and compensatory measures.	Jori Milbradt	EIB finances economically viable railway project and focuses on electrification. For infrastructure projects, compensatory measures are prescribed in the context of a projects environmental impact assessment (EIA) and the applicable environmental legislation.
29.	In addition to the already existing solution. i.e. electrification, the fuel-cell (hydrogen) electric vehicles/new distribution hydrogen network to fuel trains should be supported.	Správa železnic	While this is beyond the remit of the Transport Lending Policy, EIB supports the energy transformation and energy distribution networks under the EIB energy lending policy endorsed in 2019.
30.	The costs are very high and the solutions are very slow to implement. Bigger and faster improvements can be achieved focusing on electrification of <b>road transport</b> .	Response 552589262	All sectors need to be decarbonized. Roads currently account for about 72% of all transport related emissions. In line with the core themes of the EC's long term policies, including the Green Deal, EIB's CBR (para 4.29) outlines a mix of solutions to addressing the urgent decarbonization need in the sector.
31.	Implementing the peak of efficiency within transportation will increase economic growth thus creating monetary capital for further projects. Compared to road trade transportation, rail transportation has a higher trade potential at both the nationally and internationally.	Ministry of Transport and Infrastructure	The completion and efficient functioning of the EU internal market is critically dependent on the connectivity of the logistic chains that support it. The new TLP seeks to support investments in a cleaner and smarter transport system. The achievement of a substantially larger modal share of rail both in passenger and goods transports is foreseen in order to meet the decarbonisation path for the transport sector set out by the European Commission.
32.	ETF accepts new sources of energy as long as the <b>safety</b> of the workers operating and maintaining these trains is safeguarded and they are sufficiently informed before the introduction of new technologies, specifically through their representatives.	European Transport Workers' Federation	High labour, health and safety standards are crucial and covered by a wide body of legislation, however not the subject of the Transport Lending Policy as such.

Ref	Summary of Contributions	Contributor	EIB comment
33.	Trains should be <b>accessible</b> to people with disabilities.	Ministère de la Transition écologique	EIB requires applicable Technical Specifications for Interoperability (TSI) are applied for the projects it finances, including the TSI PRM for accessibility for persons with disabilities and persons with reduced mobility.
34.	First, countries must develop an <b>equal</b> policy for rail transport in order to encourage the use of this means of transport.	Município de Faro	The new TLP builds on policies such as the European Commission's Green Deal and the Smart and Sustainable Mobility Strategy developed by the European Commission and the EU member states, EIB's Climate Bank Roadmap.
35.	European Agreements such as: the European Agreement on Main International Railway Lines (AGC), of 31 May 1985 and (for freight rail transport) the European Agreement on Important International Combined Transport Lines and Related Installations (AGTC), of 1 February 1991 should be parts of the technological roadmaps.	UNECE	While the new TLP does not make explicit reference to AGC and AGTC, these agreements remain highly relevant, alongside other technical specifications specified e.g. in the TEN-T Regulation or the TSIs.
36.	<b>Multimodality</b> could improve long-distance rail transport. Carbon free terminals (with sustainable powered cranes and reachstackers) or Mobility as a Service for passengers are examples of important building blocks for sustainable mobility and should be promoted.	Service Public Fédéral Mobilité et Transports	Multimodal transport solutions and intermodal terminals are prioritised within the TLP, as are Mobility as a Service solutions, under the "Digitalisation and Automation" heading.
37.	Not having to change the transport mode, passengers will more often choose trains being thus making rail competitive to air travel for medium and long term distances.	Município de Faro	The EIB under the new TLP will continue supporting investments in sustainable mobility, promoting a shift towards rail as a green mode of transport and affordable transport solution for all, prioritizing investments in both the renewal or new zero emission public transport infrastructure and rolling stock, supporting the intermodal integration, shared mobility, active modes and any other investments supporting collective transport and multimodality.
38.	There should be many parking spaces for bicycles to enable real intermodality (trains + cycling)	Ministère de la Transition écologique	
39.	Medium Speed direct trains throughout Europe with the possibility to transport passengers and general cargo as well at with speeds up to 160km/h, and stops and at every city ca. >100.000 inhabitants or every 100km.	Response 1039141480	
40.	High reliability for freight transport.  High passenger comfort.	Hanns Kerschner	

Ref	Summary of Contributions	Contributor	EIB comment
	Flexibility of transport.		See response to points above.
41.	Public transport can always make a bigger difference than individual vehicles.	Budapest Airport Zrt.	
42.	The roadmap starts with low-tech applications such as revitalization of former rail tracks, followed by new linkages, facilities and space for modal shift and, finally, new technology achievements.	Antje Willnow	
43.	Commitment to high-speed and long-distance rail transport in order to reduce the carbon intensity of maritime and air transport.	Município de Paredes	
44.	Investigate new solutions such as magnetic levitation train for example.	Minicipio de Lousada	
45.	Slower, long-distance and night transport, supported in comparison to air transport and protected from downward competition from private actors.	Response 981558580	Thank you for your contribution.
46.	Hydrogen based mobility is a possibility that may help reduce technology risk.	Miguel de Ortuzar	

## Question 2 – How fast can long-distance rail transport realistically be decarbonised?



### EIB's comments

The EC strategic long-term vision 'A Clean Planet for all' and the Sustainable and Smart Mobility Strategy identifies a possible decarbonisation pathway for the transport sector based on the combined effect of an acknowledged basket of measures, striving for climate neutrality by 2050. With the publication of its Climate Bank Roadmap (CBR), the Bank committed to aligning all of its lending to the Paris Agreement, including increased ambition to support the decarbonisation of the transport sector. As the EU bank, the EIB is fully aligned with all EU regulations and will be main implementing partner of InvestEU

The EIB supports the development of rail transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C: [https://www.eib.org/attachments/thematic/eib\\_group\\_climate\\_bank\\_roadmap\\_en.pdf](https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf). Investments in rail transport are among the priorities for EIB support as outlined in Chapter 5 of the new Transport Lending Policy.

The EIB takes note of the strong support to investments in decarbonisation of rail and the expectation that progress is made as soon as possible.

Ref	Summary of Contributions	Contributor
1.	This means of transport is needed <b>now</b> . If we have to stop aviation to finance it - all the better.	Response 1039141480
2.	Central Europe is already finished.	Response 832108188
3.	It should be as fast as possible given the climate urgency.	Back on Track Belgium vzw-asbl
4.	In order to facilitate the implementation of the Paris agenda as much as possible, it is necessary to proceed with this process as quickly as possible.	Ferrovie dello Stato Italiane S.p.A
5.	In Austria, electrification of all railway lines is possible by <b>2030!</b>	Response 974008607
6.	Railway lines in the EU are largely electrified and it is realistic to fully decarbonise the few diesel-powered lines for long-distance transport by 2030. The relevant technologies are already available on the market.	European Union Agency for Railways
7.	If we consider the operation of electric trains as decarbonised, then in the Czech Republic a realistic assumption is as early as 2030.	Správa železnic
8.	Rail is already highly decarbonized with a large share of zero tail-pipe emission due to electrification.  Since the share of renewable energy in the energy mix of the Member States is expected to rise sharply, 2030 seems realistic provided the investments are continued.	European Rail Infrastructure Managers (EIM)
9.	Rich countries should decarbonize by 2030 (though huge investment). In poor countries, however, with DMU trickling down from western states to Eastern Europe, the first BEMU's and HMU's may find their way down south-east in the <b>40s</b> . Hybrids with diesel and electric motors may be an appropriate intermediate step.  Investments should be provided in synergy, and taking into account new EU Regulations and the wide range of EU funding programmes and the financial instrument under InvestEU.	Jori Milbradt
10.	2030 is too ambitious, but 2050 is too late. Large part of electrification could be accomplished by 2030 together with the ramp up of renewable electricity generation. The smaller part should be left over for 2040.	Ralph-Uwe Dietrich
11.	Depends on the scope! With only renewable electricity it will take more time. When all focus is on construction, 2035 is possible.	Antje Willnow
12.	In Western and Central Europe 2030 is realistic, in Eastern Europe 2030 is less likely.	MAV-Volán Group

Ref	Summary of Contributions	Contributor
	The technology for decarbonising rail is available, but the replacement of rolling stock takes time. The expected lifetime of new railway vehicles is 30 to 40 years. The capacity of rolling stock industry, financial capability of railway undertakings and technical rationality are limiting the possibilities of speeding up the process. It is also necessary to decarbonise the energy producers.	
13.	<p>Taking into account the existing financial resources and available staff, electrification of the railway lines will only be possible in the medium term.</p> <p>Resources from industry and contracting authorities must also be available. Contracts with railway undertakings tend to have a long duration. This makes the replacement of diesel locomotives with alternatively fuelled vehicles more difficult or very costly.</p>	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr
14.	The recent report by Climact and NewClimate Institute provides a detailed roadmap for decarbonising the EU transport sector by 2040.	Counter Balance, E3G
15.	The main lines (TEN-T core network) should be electrified by 2030. A full electrification of the rail system should be possible before 2050.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie,
16.	<b>2050</b> is the goal but it can only be achieved if concrete measures and investments are put in place in the immediate future to achieve carbon neutrality. There are still about 100.000 km of tracks in the EU that are not electrified today.	Alstom, Community of European Railway and Infrastructure Companies (CER), The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), UNIFE
17.	Electrification and alternative zero emissions fuels can significantly contribute to bridge the gap.	UNIFE
18.	2030 is too close, only 9 years away. Trains run easily 40 years thus it will be necessary to wait until 2050 with genuinely proactive policies to reach this deadline.	Response 290033127
19.	<p>The goal of delivering TEN-T for sustainable and smart transport for the core network is 2030 (comprehensive network by 2050).</p> <p>High speed traffic is to double by 2030.</p> <p>Rail freight is to increase by 50% by 2030.</p> <p>Scheduled collective travel for journeys under 500 km should be carbon neutral by 2030.</p>	Community of European Railway and Infrastructure Companies (CER)

Ref	Summary of Contributions	Contributor
	<p>These goals assume long-distance rail (freight and passenger) to be substantially decarbonised by 2030. This will require EIB's continued support in the next decade.</p> <p>Technological developments and the automation of supply chain operations (for freight) will also be an answer to decarbonisation.</p>	
20.	<p>Technological developments and automation of logistics chain operations will be a response to the objective of decarbonising transport.</p> <p>Although the targets are set for 2030, the current funding will not be sufficient to achieve them and 2050 seems more realistic.</p> <p>To effectively target the 2030 horizon, more support will be needed, in particular for railways facing nodes, bottlenecks or interoperability problems.</p>	SNCF
21.	<p>In rail, the longer journeys tend to be those that are electrified already (over 500km). Shorter journeys made are more likely to be on the sections of the network that have less traffic and therefore more likely to be using diesel only traction. These lines are often used to connect into other busier network where there is a strong business case for overhead line electrification. In order to achieve the carbon neutrality for these shorter journeys, there needs to be a significant investment in alternative propulsion (such as battery and hydrogen) and lineside energy storage infrastructure. This investment is achievable but urgent for a 2030 timescale.</p> <p>Rail is basically between 600% and 900% more efficient than other modes. For transport system decarbonisation, any investment that encourages a shift away from aviation and private road vehicles in favour of rail and other low emission modes will be important.</p> <p>Complete carbon neutrality rail depends on the end of diesel traction, as well as for maintenance equipment, construction techniques and buildings. The UIC believe that the replacement of diesel traction in Europe is possible by 2030 given the right investment and urgent action, providing electricity generation also decarbonises. This will require EIB's continued support to rail projects in the next decade. Technological developments and the automation of supply chain operations (for freight) will also accelerate decarbonisation. With the right financing mechanisms secured, 2030 can be a realistic decarbonisation horizon for traction energy. More funding is needed to get there if the targets are to be met especially for the rail network.</p>	International Union of Railways
22.	<p>The EU green deal foresees to fully decarbonize the long-distance rail sector by 2050. For the electrification of the remaining sections or local infrastructure, massive investment is needed.</p> <p>The massive deployment of alternative fuels will be a reality only with a large support from the industry, the operators, and the creation of an industry standard. The decarbonization of long-distance rail transport depends on</p>	Service Public Fédéral Mobilité et Transports

Ref	Summary of Contributions	Contributor
	the policy effort invested by the member states with the financial support of the EU and support mechanisms to facilitate the modal shift in order to speed up the reduction in our carbon footprint.	
23.	Partial (but not full) decarbonisation of long-distance rail can be achieved by 2050.	ECTRI
24.	Most arteries of rail transport are already electrified. It is more important to provide electricity from non-carbon sources, and this may take some time.	Hanns Kerschner
25.	2030 is too early.	Marc-Olivier Leclercq
26.	Because there will be unexpected events and priorities, there will also be possible delays. Moreover, decarbonizing long-distance rail transportation does not refer only to vehicles, but also to the modernization of the current railway infrastructure. In some regions the modernization process will be difficult, thus requiring more time.	Ministry of Transport and Infrastructure
27.	Although we have the technology, the process of modernizing/ building new railway infrastructure is long. The pandemic opened new problems in supply chains and prices of construction materials are high. This makes it difficult for companies to make predictions about the cost of works.	Croatian Chamber of Economy
28.	The cost of these changes is very high and implies coordination between countries. It is better to spend more time on implementation so that the transition is efficient rather than to force the implementation, not taking into consideration the different stages the different countries are at.	Município de Faro
29.	Distribute the federal funds for transport equally. No preference for road construction.	Pro Bahn
30.	Rapid spread of hydrogen power on such scales is ruled out, a more realistic goal is to have at least a diesel-free electric rail.	Budapest Airport Zrt.
31.	It is essential that wherever electric power supply is available, it is green only (by production, not by certificate).	European Sleeper Coöperatie U.A.
32.	Development of affordable alternative propulsion for non-electrified lines. Holistic energy management approach for railways. Simulation tools and procedures to accurately predict noise emissions and vibrations. Procedures and techniques for recycling vehicles and eliminating polluting substances. Deployment of digitization.	Community of European Railway and Infrastructure Companies (CER aisbl)
33.	The resulting benefits of investment for rail take a long time to take effect. Ambitious public investment plans are needed to speed up this process.	European Transport Workers' Federation
34.	Depending on the power mix of individual countries, depending on the development of renewables	Ministry of Infrastructure



Ref	Summary of Contributions	Contributor
35.	The technology is sound. It should be extended to all lines and countries. The energy supply seems to be the biggest risk if all energy is to be obtained from renewable sources.	Miguel de Ortuzar
36.	Rail transport traditionally receives state aid. In many countries the bigger rail operators are public entities thus having better access to economic support. As for rail the roadmap to decarbonisation is easier and faster than for other transport modes; financial support of the road transport sector is to be prioritized.	European Road Haulers Association (UETR)
37.	<ul style="list-style-type: none"> <li>• Rail is already largely electric</li> <li>• Electrification of rail does not, therefore, pose a technical challenge</li> </ul>	Joint contribution made by NewClimate Institute and Germanwatch
38.	Railway electrification stood at about 37% of the global track length in 2018; this percentage has grown over the last two decades from year to year. If electrification is incentivized through price on GHG emissions reflecting their social cost (US\$100/ton CO <sub>2</sub> e by 2030), conversion of 7% of track/year is feasible.	Bank Information Center

### Question 3 – How do you see the demand for extra-urban rail transport developing in the period up to 2050?

#### **EIB's comments**

The EC, in its Sustainable and Smart Mobility Strategy – putting European transport on track for the future (COM(2020) 789 final), sets out various milestones to show the European transport system's path towards achieving the objectives of a sustainable, smart and resilient mobility:

By 2030:

- at least 30 million zero-emission vehicles will be in operation on European roads.
- 100 European cities will be climate neutral.
- high-speed rail traffic will double.
- scheduled collective travel of under 500 km should be carbon neutral within the EU.
- automated mobility will be deployed at large scale.
- zero-emission vessels will become ready for market

By 2035:

- zero-emission large aircraft will become ready for market.

By 2050:

- nearly all cars, vans, buses as well as new heavy-duty vehicles will be zero-emission.
- rail freight traffic will double.
- high-speed rail traffic will triple.
- the multimodal Trans-European Transport Network (TEN-T) equipped for sustainable and smart transport with high speed connectivity will be operational for the comprehensive network.

A number of scenarios have been developed by the EC. EU wide passenger transport activity is projected to continue growing relative to 2015 (about 18-20% increase by 2030 and 32-34% by 2050) in all policy scenarios. Freight transport activity is expected to grow even faster, increasing by 30-40% between 2015 and 2030, and by 50-60% until 2050. In all scenarios, rail transport activity is projected to grow significantly faster than for road, driven in particular by the assumed completion of the TEN-T core network by 2030 and of the comprehensive network by 2050, supported by the CEF, Cohesion Fund and ERDF funding.

However, given the current high modal share of road transport, this significant growth of rail transport implies only a limited increase in rail modal share. In the baseline scenario, passenger rail activity would go up by 32% between 2015 and 2030 (66% for 2015-2050), increasing its modal share from 7% in 2015 by 1 percentage point by 2030 and an additional percentage point by 2050. Rail freight activity would grow by 40% by 2030 and 81% during 2015-2050, increasing its modal share from 17% to 18% by 2030 and 20% by 2050. Stronger rail growth assumed in other scenarios may add another percentage point of rail modal split by 2050, both for passengers and freight.

The EIB, when assessing projects, uses project specific demand forecasts to the extent possible, putting these into context with regional and national forecasts, regional and national policies supporting intermodality and modal shift, and European policies and forecasts.

Ref.	Summary of Contributions	Contributor
1.	It will <b>remain the same</b> .	Finnish Transport Infrastructure Agency
2.	Transport from/to agglomeration should <b>increase</b> . It is competitive on 200-500km distance. Shorter distance -> car, longer distance -> aviation.	Budapest Airport Zrt.
3.	Positive, optimistic!	Antje Willnow
4.	It will increase.	Comunidade Intermunicipal do Cávado
5.	With a large increase in demand and need to increase supply.	Município de Lousada
6.	It will increase. Small abandoned lines will be reborn and the big lines will be reinforced as they are more in demand.	Response 290033127
7.	The 2030 rail system will interact with other transport modes and with local, regional, national and European economic activities in transformational societal changes and trends. Safe, reliable, comfortable and efficient rail services will influence and benefit many different areas, such as lifestyle, spatial planning, people's everyday experience, health and a better general standard of living.	Community of European Railway and Infrastructure Companies (CER aisbl)
8.	The demand will be increasing since people will want/ need to move more frequently and at longer distances.	Správa železnic
9.	Rail passenger and freight transport will develop significantly. Passenger traffic will increase by 34 % by 2050 compared to 2015. Rail freight is expected to increase by 56 % by 2050.  Due to its carrying capacity and digitisation, the railways will be part of the evolution of transport demand in the future.	SNCF

Ref.	Summary of Contributions	Contributor
	However, the network must be modernized and improved.	
10.	The demand for extra-urban rail transport will rise substantially up to 2050. By that time, approximately 70% of the total European population will live in urban areas which will increase the pressure on rail infrastructure.	European Rail Infrastructure Managers (EIM)
11.	For the freight sector, the increased demand should be supported with an efficient rail network, which allows rail freight operators to compete with road and air transportation.	Service Public Fédéral Mobilité et Transports
12.	The demand will be increasing despite certain risks that may undermine the global economy and mobility. Pandemic-related new trends such as teleworking and online meetings will be offset by general mobility.	Miguel de Ortuzar
13.	The demand is increasing since in various countries life in urban centres has become unaffordable from an economic and even social point of view.	European Road Haulers Association (UETR)
14.	To decarbonise European transport by 2040, rail transport would need to represent at least 7% of all passenger transport demand by 2040 compared to 5% today and 36% of all freight transport by 2040 compared to 15% today.	Joint contribution made by NewClimate Institute and Germanwatch
15.	Demand for extra-urban rail transport up to 2050 should exceed historical growth rates if policies that reflect the social cost of GHG emissions are in place, thus reducing the price of rail relative to other forms of extra-urban transport.	Bank Information Center
16.	If the high speed TEN T network with interoperability is available, then the demand for passenger rail will grow.	Confederación Nacional de la Construcción (CNC), Croatian Chamber of Economy, European Union Agency for Railways Ferrovie dello Stato Italiane S.p.A., Global Infrastructure Investor Association, Service Public Fédéral Mobilité et Transports,
17.	The demand for extra-urban rail transport is set to increase substantially for both passenger and freight. The passenger high-speed rail traffic is to triple and rail freight to double. OECD ITS Transport Outlook statistics predict substantial growth for passenger and freight transport by rail.	European Union Agency for Railways
18.	High-speed rail lines for passengers are deemed to be more in demand. Freight rail transport should have a more important share (in our country).	Confederación Nacional de la Construcción (CNC), CEOE

Ref.	Summary of Contributions	Contributor
19.	It is likely that as high-speed lines become more efficient and the technology cheaper, demand for extra-urban rail transport increases while aviation demand for these routes decreases.	Global Infrastructure Investor Association,
20.	Building large HSR network represents a great opportunity for growth.	Ministry of Transport, Croatian Chamber of Economy, Counter Balance, E3G
21.	High-speed rail lines for passengers are deemed to be more in demand.	CEOE
22.	As more and shorter distance flights are being cancelled, inter-European rail projects should be fostered.	Jori Milbradt
23.	It will grow because air transport will not be attractive as more and more negative external effects are internalized.	Response 511707695
24.	Firstly, rail should replace short distance flights.	Ralph-Uwe Dietrich, Service Public Fédéral Mobilité et Transports
25.	It will grow exponentially, especially if aviation does not start to shift to electric power.	Metropolitano de Lisboa
26.	It will be increasing, in particular to the detriment of short-distance aviation	Ministry of Infrastructure
27.	There should be more night trains, less intra-Europe flights but also a change to slower travel.	Back on Track Belgium vzw-asbl
28.	It is likely that as high-speed lines become more efficient and the technology cheaper, demand for extra-urban rail transport will increase while aviation demand for these routes decrease.	Global Infrastructure Investor Association,
29.	It will grow because road transport will become less attractive as more and more negative external effects are internalized.	Response 511707695
30.	It depends on how road transport is treated. If done properly, the demand will be significantly increasing.	Hanns Kerschner
31.	It will Increase because of road tolls.	Response 832108188
32.	Freight transport has to be transferred from road to rail as much as possible, especially long distance & transit.	Ralph-Uwe Dietrich
33.	Demand will increase when citizens see that the travel time is shorter than by car or other transportation alternatives. Creating corresponding conditions for citizens will also be considered as a demand indicator.	Ministry of Transport and Infrastructure
34.	Growing range of direct trains in EU and EFTA, possibly also from EU neighbouring or nearby states like Russia, Ukraine, Moldavia, Serbia, Turkey, Georgia, Armenia, Morocco.	Response 1039141480

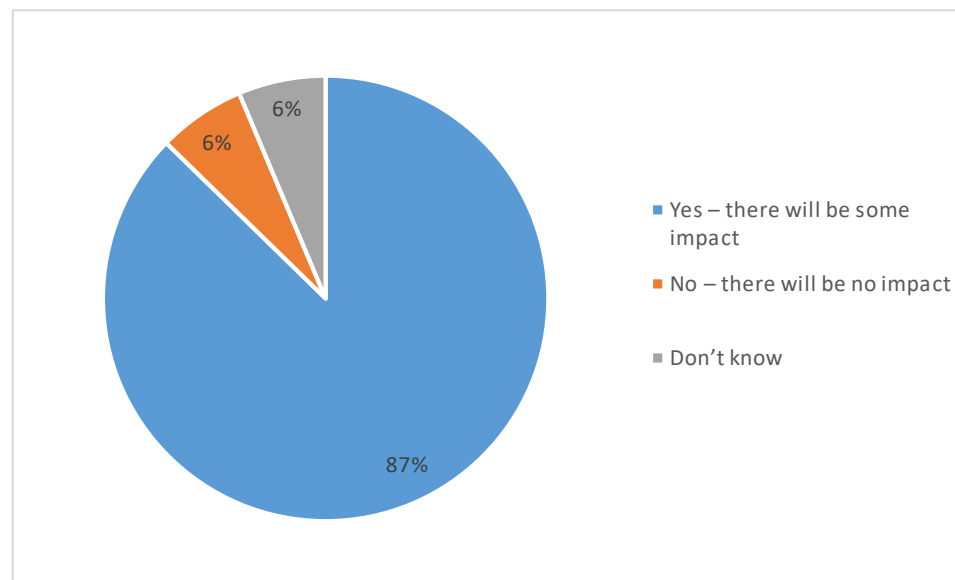
Ref.	Summary of Contributions	Contributor
35.	Due to the good expansion of regional traffic, there will also be an increase in long-distance traffic by 2050	Pro Bahn
36.	Long-distance rail for passengers and goods, as well as suburbs-to-city rail will grow.	STIB-MIVB
37.	Cargo transport will increase with opening new lines China-Europe-China.	Croatian Chamber of Economy
38.	In connection with the other modes, the only solution is to find a balance: possibility to travel with bicycles and provide real multimodal offer (train + car or train + bike + bike rack), allowing travellers to rely on their own means of transport upon arrival.	Ministère de la Transition écologique
39.	Urban and sub-urban connections should be improved and encourage multi modal transport. If the external social costs of other modes of transport are internalized, there is great potential for rail to increase its modal share until 2050. The public attention is there, the public investments and policies just need to follow.	European Transport Workers' Federation
40.	Demand for rail transport is growing with quality of service. It will continue to grow strongly in the coming years for reasons of environmental, safety and time saving if shared mobility solutions at the beginning and end of the journey (especially in sparsely populated areas) are developed.	UTP (Union des Transports Publics et ferroviaires)
41.	To exploit the potential of extra-urban rail transport, it has to become fully interoperable and reliable. Then demand can grow significantly. Building a large HSR network also represents a great opportunity for growth.	Ministry of Transport, Croatian Chamber of Economy, Counter Balance, E3G
42.	The demand will be increasing up to 2050 due to the legally binding decarbonisation objectives. Taking into account recent developments and climate targets & incentives, demand for rail transport is likely to increase. Passenger rail is expected to grow at 6% per year and reach 15% of the passenger market by 2050. For freight, the continuation of the current growth rates is likely to deliver a rail market share of 24% by 2050. However, concerns over safety due to the COVID-19 pandemic could slow these trends.	UNIFE, Alstom, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)
43.	Rail certainly has an important role to play in delivering the EU Green Deal. Passenger traffic (for all modes) will increase by 34% by 2050 compared to 2015. Freight transport activity for inland modes will grow by 56% by 2050. Passenger rail is projected to grow 6% per year and to reach 15% of the passenger market by 2050. For freight, the continuation of the current growth rates is likely to deliver a rail market share of 24% by 2050.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways
44.	UIC believe that growth must be much higher in order to reach the ambitious targets of the Smart and Sustainable Mobility strategy, the 100 carbon neutral cities by 2030 and the Paris Agreement. Train travel must increase by 50% by 2030 and double by 2050. Rail freight must have a 30% share of inland logistics traffic by 2030. Investment is needed to enhance the customer experience and make the shift to rail desirable.	International Union of Railways
45.	Rail transport will have an increasingly important role in reaching climate targets.	MAV-Volán Group

Ref.	Summary of Contributions	Contributor
46.	We expect the demand for long distance trains to increase in the coming years as climate awareness rises, and sustainable travel modes become more important. All forms of transport should pay for their societal and environmental impacts, such as through fuel taxes and congestion charges.	Service Public Fédéral Mobilité et Transports
47.	If real progress on zero-net emissions is to be achieved, the access to extra-urban rail for rural population must be granted, as well as for new extra urban areas mainly chosen by workers of all types.	European Road Haulers Association (UETR)
48.	A shift from road to rail transport is essential to meet climate targets and to keep a stable level of mobility. Thus, an increase of rail transport is essential until 2050. To make it happen, it is not just a question of providing the necessary funds, but also having the planning capacity and acceptance of new projects.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie
49.	Taking into account recent developments (covid-19 outbreak, increase of home working) and climate targets & incentives, demand for rail transport is likely to increase.	Alstom, Service Public Fédéral Mobilité et Transports, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), UNIFE,
50.	It will rise as people are more attentive to the use of these kinds of transport.	Município de Faro
51.	It will increase drastically as for young generations the sustainable travel option is completely self-explanatory.	European Sleeper Coöperatie U.A.
52.	It <b>depends</b> on the regulatory framework (level playing field) and the willingness of the states to invest in rail infrastructure (renewal).	OTIF
53.	It depends on how successful the rail sector is in its transition to become borderless, flexible, seamless, faster and easier.	UNECE
54.	It is likely to increase more than other modes in some segments. However, it will depend on complementary policies (such as pricing, teleworking options).	ECTRI
55.	It will depend on investments into making railways more accessible, integrated, well-connected, and cheaper for customers. It will also depend on the availability of night trains.	European Sleeper Coöperatie U.A., WWF EPO
56.	To support the increased demand for long-distance rail services, a network of long-distance high-speed connections and night trains should allow a modal shift from short-haul flights to alternative trains. To make this shift to rail happen, EU investments and support in the long-distance rail services are much needed to achieve our climate ambitions.	Service Public Fédéral Mobilité et Transports

Ref.	Summary of Contributions	Contributor
57.	There is a growing demand for extra-urban rail transport but this will be contingent on the necessity to provide affordable and well-connected railways (including night trains).	CEE Bankwatch Network, Counter Balance, E3G, Greenpeace
58.	Considering the growing number of users of long distance and high speed services and the increasingly advanced technology underlying these means of transport, demand could be ever greater by 2050 if more incentives and awareness campaigns are implemented.	Ferrovie dello Stato Italiane S.p.A
59.	There will be a <b>descending</b> trend.	METROREX S.A. Bucharest
60.	It depends on the CO2 improvements for shorter travels in aviation. If they come fast, the foundation under the long distance rail transport will slide.	Response 552589262
61.	In the absence of strong measures to support the opening up of the rail market to competition, the acquisition of new or second hand rolling stock by newly incoming railway undertakings, as well as the development of independent digital platforms for the sale of train tickets and multimodal aggregators, demand for extra-urban rail transport will increase little or even stagnate by 2050.	ALLRAIL asbl



Question 4 – Do you believe there will be any impact on the development of this sector as a result of climate policies' increasing cost?



#### EIB's comments

The EC-sponsored study “Sustainable Transport Infrastructure Charging and Internalisation of Transport Externalities”, June 2019, covered direct CO<sub>2</sub> and air pollutant emissions, indirect CO<sub>2</sub> and air pollutant emissions from energy production, air pollution and excessive noise and habitat damage estimates these environment-related external costs amount to EUR 388 billion each year. With rail representing only 0.5% of overall environmental externalities of transport despite a modal share of 7% in passenger transport and 17% in freight transport, an internalisation of the external cost should incentivise modal shift. The EC, in its Sustainable and Smart Mobility Strategy (COM(2020) 789 final), proposes that all external costs of transport within the EU shall be covered by the transport users at the latest by 2050.

The Commission's assessment in “Stepping up Europe's 2030 climate ambition - Investing in a climate-neutral future for the benefit of our people” (COM (2020) 562 final) showed the need for investments at scale and at speed, including substantial public and private investments at national level: the additional investments for 2021-2030 in vehicles (including rolling stock, vessels, and aircraft) and renewable and low carbon fuels infrastructure deployment are estimated

at EUR 130 billion per year, compared to the previous decade. The 'green and digital transformation investment gap' for infrastructure would add an additional EUR 100 billion per year. Just to complete the TEN-T core network and build it as a truly multimodal system, EUR 300 billion is needed over the next 10 years.

The EIB Investment Report 2020/21, Building a smart and green Europe in the COVID-19, Building a smart and green Europe (<https://www.eib.org/en/publications/investment-report-2020.htm>) found that the gap between Europe's climate objectives and realised climate investment is growing. Since 2016, climate change mitigation investment has declined marginally as a percentage of GDP and overall investment, a trend that is likely to continue in 2021. According to the European Commission's latest impact assessment, investments in the continent's energy system would need to rise from an average of 1.3% of GDP per year over the last decade, to 2.8% of GDP over the next decade if the European Union is to meet its goal of cutting greenhouse gas emissions by 55% by 2030. Adding investments in transport brings the total over the next decade up to 3.7% of GDP per year. European investment in climate change mitigation is still insufficient.

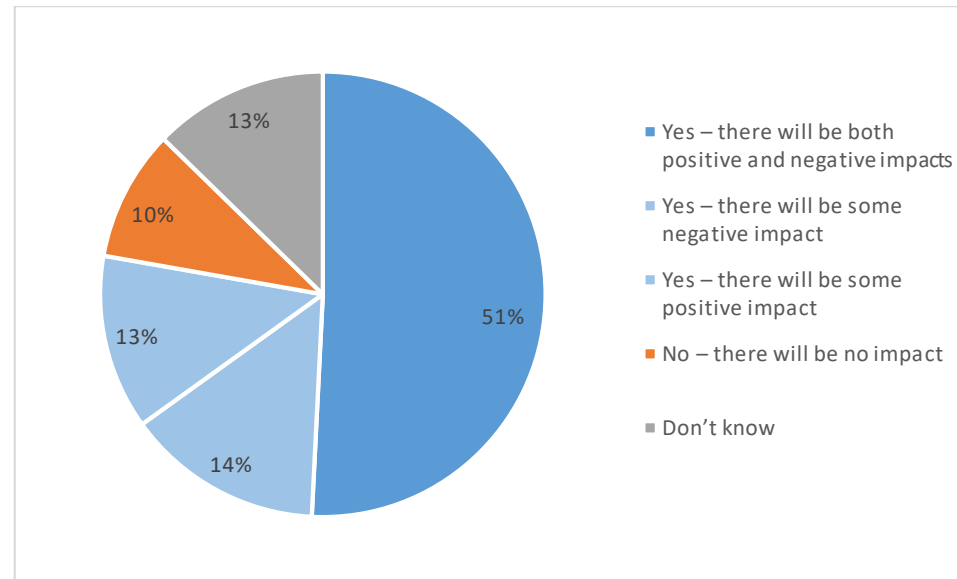
Ref	Summary of Contributions	Contributor
1.	The increasing fuel costs for aviation and cars will encourage rail transport.	Response 1039141480
2.	Rising CO2 costs should actually reduce private transport.	Response 974008607
3.	Rail will gain market share as its climate footprint is generally smaller than air or road transport.	Response 511707695
4.	Due to the advantages of rail in comparison to other modes, rail can benefit from the increasing cost for CO2.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie
5.	If the environmental costs of aviation were to become reflected in the actual cost of air travel then passenger and freight transport would be incentivized to shift from air to rail.  The EIB should make clear that climate policies are only leading to a true cost reflection of environmentally damaging transport modes, like aviation. This implies electrified rail projects to become economically significantly more viable. The application of the EIB's shadow carbon price will be a central element in this regard.	Counter Balance, E3G, Greenpeace
6.	Climate policies will have a positive impact as they will rebalance the current disequilibrium of modal competition, especially with regard to taxation, infrastructure charging and carbon-related surcharges.	European Union Agency for Railways
7.	There will be certain consequences, but not all of them can be quantified for the time being. Climate policies are expected to facilitate the internalization of environmental costs and promote modal shift to rail as one of the cleanest transport modes. In this sense, EU policies based on the polluters pay principle will support a shift to rail.	UNIFE, Alstom

Ref	Summary of Contributions	Contributor
8.	The railway infrastructure managers expect that the current proposals will lead to a fairer level playing field between transport modes. If the policies are correctly implemented, the increasing costs caused by climate policies will be felt more by the more polluting transport modes. In that sense, climate policies will have a positive impact.	European Rail Infrastructure Managers (EIM)
9.	The impact will depend on whether realistic costs (including environmental costs) are applied to road traffic.	Hanns Kerschner
10.	Climate policy may result in extra costs for carbon-intensive modes of transport, which could lead to a modal shift to rail, both freight and passengers transport.	Ministry of Infrastructure and water Management
11.	If a kerosene tax is established in the EU, a part of the externalities from aviation will be reflected in prices, which will reduce demand for flights while stimulating demand for alternatives with lower externalities, such as extra-urban rail.	WWF EPO
12.	Taxing the more polluting options will eventually drive people to less polluting modes UNLESS there is also a better information, comfort and security feeling.	Back on Track Belgium vzw-asbl
13.	As constraints are being posed on more polluting modes of transport, a positive outcome can be expected for the rail sector.	Service Public Fédéral Mobilité et Transports
14.	The impact should be positive, since relative price changes incorporating the cost of GHG emissions should favour rail over other modes of transport. Additionally, health and environmental benefits of transition to rail more than offset the cost of this transition!	Bank Information Center
15.	In some cases there may be cost increases in the short term, however already the total cost of ownership of electric vehicles is often cheaper than that of internal combustion engines. Enabling non-motorised modes of transport can also save private households money as people have to drive less. Improved rail and public transport accessibility also save households' money when private car use cannot be afforded. Climate policies in the transport sector should not be seen as an increasing cost but rather as an investment with rapid returns and significant savings in terms of fuel costs, air pollution, climate mitigation benefits, and improved infrastructure and accessibility / mobility.	Joint contribution made by NewClimate Institute and Germanwatch
16.	It will be increasingly worthwhile to do ECO improvements – it will be a competitive advantage.	Budapest Airport Zrt.
17.	The railway is the cleanest mode of transport, promoting modal shift towards rail will support the reduction of emissions. However, rail will have to implement new technical solutions for non-electrified lines and further increase its energy efficiency. Improving the integration of transport systems in populated areas by reducing noise, vibration and carbon emissions will be essential to increase social acceptance in urban environments and beyond. Indeed, rail systems are contributing to mitigating the climate change challenge.	Community of European Railway and Infrastructure Companies (CER)

Ref	Summary of Contributions	Contributor
18.	There will be no impact as rail is one of the solutions for the environment. It will rather benefit from this money.	Response 290033127
19.	Prices of everything are going up which causes delays. Some companies will go bankrupt and projects will not be finished on time. The pandemic and disruption in the supply chain will change everything. The increasing cost of climate policies will have minimum impact.	Croatian Chamber of Economy
20.	Increasing carbon pricing will lead to higher electricity prices for railway companies. The Fit for 55 package with the revisions of EU Emissions Trading System Directive and the Energy Taxation Directive should guarantee a level playing field between transport modes for carbon pricing to ease a modal shift towards rail.	Community of European Railway and Infrastructure Companies (CER), International Union of Railways, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), SNCF
21.	Most of the rail traffic is electrified. If the prices for electricity rise, the operation of rail transport becomes more expensive. Ultimately, this would have to be passed on to the fare. On the other hand, demand would probably increase if motorized individual transport and air transport recorded higher price increases in relation to rail transport.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr
22.	Electricity becomes more expensive.	Response 832108188
23.	Climate policies will force transport companies to buy new eco-friendly vehicles or to refurbish the old ones, higher electricity prices will also affect the cost level of railway companies. Only increasing number of passengers can alleviate this burden, therefore modal shift is very important.	MÁV-Volán Group
24.	There will be an increased demand for electricity that will have to be compensated by economic resources	Ferrovie dello Stato Italiane S.p.A
25.	There will be an impact on the rail transport that generates energy through coal due to the increase of prices of this material. The Carbon-Border Adjustment Mechanism (CBAM) is likely to present challenges in this area.	Global Infrastructure Investor Association
26.	There are always certain impacts but some measures have been taken in this regard. Railway operators which used to be local are now global and face competition. As a result, the consumer benefits from competitiveness, which will imply better and more efficient technology and probably better prices. The biggest risk would be energy – the energy and gas prices are currently skyrocketing.	Miguel de Ortuzar
27.	The climate policies and their impact on energy availability and prices can have a significant impact on the transport sector.	Ministry of Transport
28.	Maintenance costs of railway infrastructures in face of climate change are expected to increase.	ECTRI

Ref	Summary of Contributions	Contributor
29.	There will be increased production costs of the rolling stock, higher costs of making resilient infrastructure and increased cost due to the lack of qualified workforce and production facilities for rolling stock.	European Sleeper Coöperatie U.A.
30.	Climate change and its subsequent extreme meteorological events exposes railway networks – as other heavy infrastructures – to various risks. In its future lending policy, the EIB should take into account these climate risk and the subsequent climate risk-mitigation strategies implemented by its borrowers.	Service Public Fédéral Mobilité et Transports
31.	It has to contribute to climate change mitigation corresponding to its GHG emission contribution.	Ralph-Uwe Dietrich
32.	New technologies can be costly at the early stage of their development, and there is also a risk of applicability in the long run. Rapid replacement of old technologies can lead to regional development disparities due to lack of funds in the poorer regions. This would prevent fulfilment of the original goal to reach EU-wide modal shift simultaneously.	MÁV-Volán Group
33.	It will be a win win situation.	Pro Bahn
34.	No sector will be left with no cost impact, but the costs can be better shared in extra-urban rail transport than in individual road commuting	Antje Willnow
35.	There should be a ban on domestic flights, speed limits, all costs to be charged (internal and external, level playing field)	OTIF
36.	The impact will mainly be on the established projects. Discussions are pending about the right moment to change from nuclear-power energy towards renewable energy sources and what are the adequate power supplies to stock energy. This represents just one aspect, i.e. what should be the priority, without delaying any type of development or without damaging the environment.	Ministry of Transport and Infrastructure
37.	Climate policies will have to address this sector as it will have a huge impact on the resolution of these problems.	Município de Faro
38.	Internalization of external costs can help make rail more competitive vis-a-vis other modes.	UNECE
39.	There has been more attention to promoting rail as a sustainable mode of transport. Unfortunately, the social sustainability of the sector has been neglected and there have been few significant public investments to expand the modal share of rail. Without significant price increases in other transport modes, the risk of social dumping in rail and a race to the bottom in workers' wages, conditions and rights remains high.	European Transport Workers' Federation

Question 5 – Do you believe that there will be any permanent impact on the development of this sector following the COVID-19 pandemic?



### EIB's comments

The EIB is observing the impact of the pandemic onto the transport demand for EIB financed projects, and the consequences for sectoral transport demand across the EU, with wide variations between member states. While freight, including rail freight, has been rather resilient, the use of public transport modes including rail, in all segments, has decreased during the pandemic, with clear recovery on its way. However, it is difficult to predict a “new normal”, given that trends and patterns e.g. suggesting an increase of telework with consequences for commuting, or video conferencing replacing business travel have not stabilised.

However, the EIB's lending intends to support investments on sustainable mobility and thus rail based on a long-term vision, which promotes a shift towards greener modes of transport and affordable transport solution for all, including zero emission public transport, shared mobility and active modes.

Rail transport infrastructure and fleets, whether conventional or high speed, passenger, freight or mixed use, are already at the core of EIB's financing. Their implementation requires years and their social, environmental and economic benefits last for decades. They are strategic assets that need to be implemented now in order to meet the ambitious objectives set in the EU Green Deal and the EC Smart and Sustainable Mobility Strategy therefore they will continue to be priorities in the revised TLP.

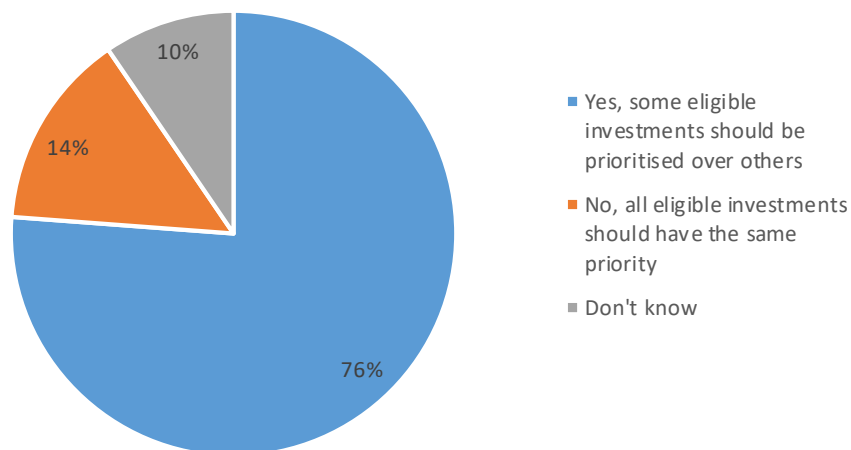
Ref	Summary of Contributions	Contributor
1.	Unfortunately, COVID-19 has <b>reduced</b> the number of public transport passengers!	Response 974008607
2.	Less use of this transport sector during the pandemic.	OTIF
3.	The decrease of passenger numbers during the COVID-19 pandemic can have a severe impact on this sector in the short to mid-term. It remains to be seen whether extra-urban rail can pick up some of the short-haul passengers that used aviation.	Global Infrastructure Investor Association
4.	COVID-19 will increase the use of <b>teleworking</b> and therefore reduce the use of public transport.	Alstom, UNIFE
5.	It is currently hard to predict if impacts of the COVID-19 pandemic on extra-urban rail will be permanent. However, the increased use of teleconferencing and web meetings may negatively impact the rail passenger demand for business travellers and commuters.	European Union Agency for Railways
6.	Both tendencies, home office (+) and preference for cars (-) will remain.	Antje Willnow
7.	The Dutch knowledge institute on Mobility (KiM) expects structurally more working from home, teleconferencing and distance learning which will have a dampening effect on the development of the distance travelled by train.	Ministry of Infrastructure and water Management
8.	We are likely to see continued decrease in the number of passengers as a result of the wide-spread introduction of remote working.	European Transport Workers' Federation
9.	Changes of travel behaviour initiated by the pandemic such as increased use of video conferences and home office might stay. On the one hand this can reduce transport demand, but can also reduce the load during peak hours.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie
10.	More telecommuting will remain a permanent fixture of work life from anywhere that offers reasonably high-speed internet access. Some may choose to move away from urban areas, others may move more frequently between urban areas.	Bank Information Center
11.	The shift from public personal transport to individual mobility can probably remain for several years after the COVID pandemic.	Ministry of Transport

Ref	Summary of Contributions	Contributor
12.	Shift of railway users to road transport (individual cars).	ECTRI
13.	People will use less public transport.	Back on Track Belgium vzw-asbl
14.	There will be a fear of contamination on public transport.	UNIFE, Alstom
15.	Epidemic mandatory mask wearing, license cards, etc.	Budapest Airport Zrt.
16.	COVID restrictions and possible changes of supply chains can result in the decrease of transport need.	Ministry of Transport
17.	People will be increasingly focused on the issue of mobility, but also on safety in terms of health, considering air quality and social distancing.	Ferrovie dello Stato Italiane S.p.A
18.	The Covid 19 outbreak will have demonstrated the resilience of rail and its climate friendly character with a strong incentive for modal shift. At this stage, it remains difficult to forecast the long-term effect of Covid.	UNIFE, Alstom
19.	Railways have played a key role in ensuring mobility while tackling the virus. The Covid-19 pandemic has shown that both passenger and freight rail is a safe choice in times of crisis. This is a positive impact.	European Rail Infrastructure Managers (EIM)
20.	It remains difficult to assess to what extent the effects will manifest themselves in the behaviour of (potential) passengers in the long term.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr
21.	To date, passenger numbers have not returned to public transport. The pandemic has reduced public confidence in the safety of collective travel. It remains to be seen if and how quickly this will return. Potential benefits are the acceleration to flexible working, reducing the peak travel times and therefore overall capacity of the rail system.	International Union of Railways
22.	Certain impacts are predicted only in the short term.	MÁV-Volán Group
23.	The increase of electricity prices can have a severe impact on the sector in the short to the mid-term. It remains to be seen whether extra-urban rail can pick up some of the short-haul passengers that used planes as a transport method.	Global Infrastructure Investor Association
24.	Long-distance passenger transport will remain lower than before.	STIB-MIVB
25.	Covid-19 pandemic changed the transport pattern for the short term, the recovery is uncertain.	Ralph-Uwe Dietrich
26.	Roads are free and open for lorries.	Response 832108188
27.	On the negative side, the higher prices of energy and materials increase the input cost of production and services.	Croatian Chamber of Economy
28.	There will be more privacy on night trains and, possibly, more sitting space.	Response 1039141480



Ref	Summary of Contributions	Contributor
29.	While the COVID-19 pandemic has disrupted the growth path by causing lower passenger and freight volumes for rail operators, the attractiveness of rail will allow the sector to recover quickly and continue its positive development.	Service Public Fédéral Mobilité et Transports
30.	Policy makers are aware of the importance of improving the quality of service in railway transport for reasons of social equity.	ECTRI
31.	New opportunities for business and business travel are created.	SNCF
32.	There is a shortage of road transport drivers which will lead to a higher use of rail.	Croatian Chamber of Economy
33.	Positive - more people will discover local (European) travel and smarter ways to spend time in a quality manner as a result of working from home.	European Sleeper Coöperatie U.A.
34.	The problems regarding the development of the sector should cease to exist as there are solutions to fight the pandemic.	Ministry of Transport and Infrastructure
35.	The direct effects of COVID-19 pandemic (reduction of number of passengers) could be overcome in due time.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie
36.	The increased use of e-commerce may positively impact rail freight's share in the logistics value chain.	European Union Agency for Railways
37.	In the medium term, the rail sector will be growing again and the covid episode will eventually be forgotten.	Response 290033127
38.	If the sector is to be impacted, it will not be by the COVID-19 pandemic.	Município de Faro
39.	In a changing economy, travel patterns will change and logistic chains will be reconsidered and re-designed.	Community of European Railway and Infrastructure Companies (CER)
40.	We see certain effects currently. Some of them will last but probably the reduction in unnecessary trips will last.	Miguel de Ortazar
41.	Over the past year and a half, railways have operated with minimum passenger numbers. Overcoming the financial consequences of this difficult time is not easy. This is why (public) investments in railway infrastructure, also in this post-pandemic era, remains vital.	European Rail Infrastructure Managers (EIM)

Question 6– Should the EIB prioritise certain eligible extra-urban rail investments?



Ref	Summary of Contributions	Contributor	EIB comment
1.	<b>TEN-corridors</b> should be brought up to speeds of 200 km/h and more.	Jori Milbradt	In the revised TLP, investments into new and upgraded electrified rail infrastructure, particularly on the TEN-T network will remain a priority for EIB support. The regulation on Union guidelines for the development of the trans-European transport network, with the revision proposal COM(2021)812final presented on 14/12/2021, define speed requirements for the TEN-T rail network elements.
2.	The completion of the TEN-T network is crucial for the freight sector and the EIB could intervene where member states lack funding resources.	Service Public Fédéral Mobilité et Transports	Contributing to the completion of the TEN-T networks is a long standing EIB priority. The EIB financing is often combined with funding through EU grants.

Ref	Summary of Contributions	Contributor	EIB comment
3.	The main focus is to achieve the implementation of certain corridors regarding extra-urban rail investments. Extra-urban rail investments could be financed afterwards and in a different phase.	Ministry of Transport and Infrastructure	
4.	The railway sector needs sufficient finance for boosting digitalisation such as the deployment of the digital automatic coupling (DAC) and the accelerated ERTMS deployment.	Community of European Railway and Infrastructure Companies (CER)	
5.	In line with the TEN-T / CEF policy goals, the EIB should prioritise investments that are of a cross-border nature and that contribute to the creation of the Single European Railway Area through increased interoperability.	European Union Agency for Railways	Contributing to the completion of the TEN-T networks, which improve cross border accessibility and connectivity is a long standing EIB priority. Projects improving cross-border connections receive higher ratings within EIB's Additionality and Impact Measurement Framework (AIM).
6.	Cross-border priority.	OTIF	The regulation on Union guidelines for the development of the trans-European transport network, with the revision proposal COM(2021)812final presented on 14/12/2021, gives a priority to missing links and the improvement of cross-border connections.
7.	Creation of the Single European Railway Area through increased <b>interoperability</b> .	European Union Agency for Railways	EIB financing of infrastructure investments for digitalisation and automation will continue to be prioritised as a means of optimising the use of rail resources and capacities and improving safety and interoperability, as well improving the integration and connectivity between the different modes in the transport system.  The EIB requires the conformity of the projects its finances with the EU interoperability requirements.
8.	Investments in connectivity with ports/airports.	Confederación Nacional de la Construcción (CNC)	
9.	In order to facilitate multimodality, interoperability needs to be further developed.	Community of European Railway and Infrastructure Companies (CER), The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT),	

Ref	Summary of Contributions	Contributor	EIB comment
		International Union of Railways	
10.	Improved interoperability is needed.	European Rail Infrastructure Managers (EIM)	
11.	Investments that focus on the cooperation with other rail companies and/or modes of transport that provide the best service should be favoured.	European Transport Workers' Federation	
12.	Interoperability and multimodality need to be developed.	SNCF	
13.	The EIB should support a more integrated railway system as a viable alternative to air and road transport	Counterbalance, E3G, Greenpeace, WWF EPO	
14.	EIB's investment in extra-urban rail should also promote inter-urban links.	Alstom, UNIFE	
15.	Current and future projects developed by independent digital railway ticket sales platforms and multimodal aggregators.	ALLRAIL asbl	Under the new TLP, economically viable investments into new and upgraded electrified rail infrastructure will continue to be a priority for EIB support. In project appraisals, modal shift potential positively contributes to the benefits within a cost-benefit analysis.
16.	The EIB should focus on upgrading selected sections where the potential for a modal shift is high, bearing in mind the need for inter-connectivity.	Joint contribution made by NewClimate Institute and Germanwatch	
17.	Investments in sustainable rail infrastructure to accommodate a modal shift to train transport.	Ministry of Infrastructure and water Management	
18.	Investments in high-speed rail lines are needed.	Confederación Nacional de la Construcción (CNC)	The EIB has been supporting investments into economically viable high-speed lines for decades, and is continuing to do so.

Ref	Summary of Contributions	Contributor	EIB comment
19.	The current existing gaps in the European railway network should be tackled with new lines (incl. high speed lines) which are able to bring significant journey time reductions, especially for large groups of passengers.	European Rail Infrastructure Managers (EIM)	
20.	The EIB shall give priority to the following eligible investments: - Financing of rolling stock for domestic and cross-border passenger services; - Financing of rolling stock for passenger services on open access lines;	ALLRAIL asbl	In the revised TLP, EIB prioritises all electric or zero direct emissions (e.g, hydrogen) rolling stock, i.e. for domestic and/or cross-border services, for operations fulfilling public service obligations and/or for commercial rail services.
21.	Decarbonising the transport sector requires high-speed rail networks, essential for medium- to long-distance national and European travel as more and better high-speed railway systems provide a viable alternative to air and road transport, thus shifting passenger and freight transport onto tracks.  Investments should focus only where HSR has the greatest potential. Selecting the routes should be supported by transport modelling efforts.	Joint contribution made by NewClimate Institute and Germanwatch	The achievement of a substantially larger modal share of rail both in passenger and goods transports is foreseen in order to meet the decarbonisation path for the transport sector set out by the European Commission. The EIB has been supporting investments into economically viable high-speed as well as conventional lines, in particular, those that are part of the TEN-T, for decades, and is continuing to do so under the new TLP.
22.	Connecting Europe sustainably requires fast extra-urban rail. It should be made more attractive compared to airplanes and cars.	Ralph-Uwe Dietrich	
23.	Investment should focus on long-distance travel and where many customers are affected.	Response 552589262	
24.	Extra-urban rail shall be provided in congested and commuting corridors to create a cost-effective and competitive alternative to road-based transport.	ECTRI	
25.	New and upgraded lines between EU countries are needed. This will shift passengers to rail on trans-border journeys up to +/- 600 km (up to 1000 km taking into account night and high speed trains).	European Rail Infrastructure Managers (EIM)	
26.	The priority should be given to the modernisation and enhancement of the current network as it will have a stronger impact on the quality of the services.	Community of European Railway and Infrastructure Companies (CER),	

Ref	Summary of Contributions	Contributor	EIB comment
		SNCF, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
27.	Capitals that are close to each other should be linked by rail as quickly as possible.	Jori Milbradt	Apart from the two island capitals of Cyprus and Malta, all EU capitals are linked by rail already. Improvements of the TEN-T rail network will increase their connectivity further.
28.	The EIB should prioritize investments in zero-emission trains. In particular, battery and hydrogen trains should be promoted as a technological alternative where direct electrification is not viable. This is particularly the case for low density lines, last mile connections and some regional trains.	Alstom, UNIFE	In the new TLP, EIB prioritises all electric, locally zero-emission rolling stock. In addition to catenary-powered electric rolling stock, an increasing share of new fleets to replace diesel trains for lines carrying lighter traffic will be battery-electric, hydrogen powered or bi-mode rolling stock, and these will also be a priority for EIB support.
29.	Zero emission technology: investments in sustainable rolling stock such as hydrogen trains.	European Rail Infrastructure Managers (EIM), Ministry of Infrastructure and water Management	
30.	Development of alternative fossil fuel energies.	Community of European Railway and Infrastructure Companies (CER), SNCF, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	While the EIB's CBR acknowledges a role for alternative fuels, support of fossil fuels is phasing out.
31.	EIB should privilege projects to improve the existing railway routes over the new expensive infrastructure. Also strict environmental due diligence should be conducted by the EIB	CEE Bankwatch Network	The EIB has been supporting economically viable investments both for the upgrade of existing, and the construction of new rail infrastructure, and is continuing to do so under the new TLP. The EIB Environmental and Social Sustainability Framework (ESSF) approved in February 2022 strengthens

Ref	Summary of Contributions	Contributor	EIB comment
	with the view to exclude financing projects which impact biodiversity (protected areas and critical habitats).		sustainable and inclusive development, and the support for the transition to economies and communities that are climate and disaster resilient, low carbon, environmentally sustainable and more resource-efficient. Compliance with EU and national environmental law and procedures is assessed as part of EIB's due diligence process and is a prerequisite for EIB financing.
32.	The EIB should prioritise: - Support for the electrification and the acquisition of rolling stock for rail passengers transport - Support for small and conventional railway connections and night trains are also essential. - Only support the electrification of coaches and vessels and not support powertrains relying on gas, biofuels, or oil	Greenpeace	The TLP prioritises electrification of rail infrastructure and rail rolling stock.  Financing of fossil fuel propelled rolling stock will be generally not supported; with exceptions possible only in cases of advanced biofuel or high ridership where electrification might not be an option yet
33.	Only support for the electrification of coaches and vessels should be given, and not to powertrains relying on gas, biofuels, or oil.	Counter Balance, E3G	
34.	The EIB shall give priority to financing of second-hand diesel rolling stock.	ALLRAIL asbl	Acquisition of second-hand rolling stock is not eligible for EIB financing, as it is a transfer of existing assets. Retrofitting of existing rolling stock is eligible for Bank financing.
35.	The priority should be given to the modernisation and enhancement of the current network as it will have a stronger impact on the quality of the services. Investments in countries with less developed rail network and fleet (for example Central and Eastern Europe). The management of network occupation is also a priority as well as the development of alternatives to fossil energy when the electrification of the network is not relevant.	International Union of Railways	The EIB has been supporting economically viable investments both for the upgrade of existing, and the construction of new rail infrastructure, and is continuing to do so under the new TLP. In cases where catenary electrification is not economically justified, electrification can be achieved through the replacement of diesel fleets with battery or hydrogen electric fleets.
36.	Priority of renewal over new infrastructure.	OTIF	
37.	Modernisation of lines.	European Rail Infrastructure Managers (EIM)	

Ref	Summary of Contributions	Contributor	EIB comment
38.	The EIB should prioritise support for the renewal and electrification of rolling stock for rail passenger transport.	WWF EPO	The new TLP prioritises the electrification of rail rolling stock, and replacement of diesel fleets with battery or hydrogen electric fleets in cases catenary electrification is not economically justified.
39.	Electric rail freight transport and electric passenger transport are the most environmentally friendly transport par excellence!	Response 974008607	This is why the new TLP prioritises the electrification of rail rolling stock
40.	Electrification of lines.	Community of European Railway and Infrastructure Companies (CER), European Rail Infrastructure Managers (EIM), The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT),	The new TLP prioritises both the electrification of rail infrastructure, and of rolling stock. In cases where catenary electrification is not economically justified, electrification can be achieved through the replacement of diesel fleets with battery or hydrogen electric fleets.
41.	There should be a periodization of electric rail projects where electricity comes from green sources.	Global Infrastructure Investor Association	
42.	The EIB should prioritize electrification and policies supporting electrification in eligible extra-urban rail investments.	Bank Information Center	The TLP prioritises electrification of rail infrastructure and rail rolling stock.
43.	Investments in electric railways need massive upscaling. Beyond the TEN-T, national electrification plans should be developed and financed.	Joint contribution made by NewClimate Institute and Germanwatch	Within the remit of the new TLP, both the electrification of rail infrastructure, and of rolling stock, are prioritised. Further, the Bank offers a range of advisory services, the development of a national railway electrification strategy for a beneficiary country could be supported through JASPERS (Joint Assistance to Support Projects in European Regions)
44.	ERTMS: Implementation of the European rail traffic management system increases overall safety, contributes to more efficient use of the railway infrastructure capacity and improves cross-border railway connectivity.	Ministry of Infrastructure and water Management	EIB financing of infrastructure investments for digitalisation and automation – such as ERTMS - will continue to be prioritised



Ref	Summary of Contributions	Contributor	EIB comment
45.	Digital solutions such as the European Rail Traffic Management System (ERTMS) and the new 5-G railway communication system, Future Railway Mobile Communication System (FRMCS).	European Rail Infrastructure Managers (EIM)	
46.	The EIB should upscale investments towards the digitalisation of train services and rail traffic management to minimise delays and avoid competition between increased rail demand for passenger transport and freight transport.	Joint contribution made by NewClimate Institute and Germanwatch	
47.	Investments in countries with less developed rail network and fleet should be supported.	Community of European Railway and Infrastructure Companies (CER), MÁV-Volán Group, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT),	The EIB financing is often combined with funding through EU grants. A wider range of grants is available for less developed regions and countries.
48.	More mass transport means fewer CO2 emissions.	Pro Bahn	As a collective transit mode, railways are the land transport mode consuming the least energy and generating the least GHG emissions per additional transport unit.
49.	Eligible investments shall be justified based on the quantification of their impacts, including social and environmental benefits.	ECTRI	The EIB's due diligence assessing the project viability incorporates economic, environmental and social components. Carbon and environmental burdens are taken into account in EIB's due diligence, and in particular counted as externalities in the cost benefit analysis. The EIB Environmental and Social Sustainability Framework (ESSF) approved in February 2022 strengthens sustainable and inclusive development, and the support for the transition to economies and communities that are climate and disaster resilient, low carbon, environmentally sustainable and more resource-efficient. Compliance with EU and national environmental law and procedures is assessed as part of EIB's due diligence process and is a prerequisite for EIB financing.
50.	Carbon and environmental burdens should be taken into account.	Back on Track Belgium vzw-asbl	

Ref	Summary of Contributions	Contributor	EIB comment
51.	Good working conditions for the workers, including the presence of a collective bargaining agreement should be the prerequisites of any investment.	European Transport Workers' Federation	The EIB Statement of Environmental and Social Principles and Standards, approved by the EIB Board in 2009, contains clear provisions on compliance with the principles and standards entailed in the eight ILO Core Labour Conventions.  The EIB investment priorities in the transport sector are explained in the new TLP.
52.	All eligible investments should have the same priority	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
53.	Rail transport should be supported without any priority and restrictions.	Ministry of Transport	
54.	All cost-beneficial investments are needed.	Finnish Transport Infrastructure Agency	
55.	Eligible investments should be prioritized with a focus on total life cycle cost of rail assets, total cost of ownership, passenger experience, optimized operations and positive and significant contribution to overall climate change targets.	UNIFE	
56.	Priority should be given to projects where the result and effect achieved are greater than from e.g. the development of personal vehicles	Budapest Airport Zrt.	
57.	Priority should be given to situations where new road projects can be avoided and substituted by rail.	Antje Willnow	
58.	Priority should be given to local lines used daily to encourage workers and school pupils to use public transport, cycling or walking.	Response 290033127	
59.	All transport systems should be treated equally. The chain is as strong as its weakest link.	Croatian Chamber of Economy	The EIB will continue to support projects across all transport modes, in particular contributing to decarbonisation of the transport system.
60.	A cost-efficiency analysis and a technical feasibility study should be performed before deciding which investments to prioritize.	Global Infrastructure	There are a variety of different planning cultures across the EU. However, in order to qualify for EU grants or EIB financing,

Ref	Summary of Contributions	Contributor	EIB comment
		Investor Association	projects need to be underpinned by feasibility studies and an economic assessment.
61.	High quality cost-benefit analysis should be required for any new high speed railway route.	CEE Bankwatch Network	
62.	Access to public transport network in rural regions.	CIMBAL - Comunidade Intermunicipal do Baixo Alentejo	Better connectivity and equal accessibility are addressed within the new TLP.
63.	Access to financing mix components for rolling stock for new entrant operators.	European Sleeper Coöperatie U.A.	EIB does already finance projects involving new entrants, some types of investments may be covered by guarantee instruments under InvestEU
64.	Smaller railway connections (rather than high-speed trains), and night trains.	Counterbalance, E3G, WWF EPO	The EIB rail portfolio includes various projects that concern the improvement of “small” regional rail connections and services on the conventional railway network, in a number of cases cross-border.
65.	Night train routes can be an alternative to air travel, potentially at lower costs and for longer distances than high-speed connections by air.	Joint contribution made by NewClimate Institute and Germanwatch	The financing of new (zero emission) rolling stock is an important EIB activity. All projects inter alia need to demonstrate long term economic and financial viability in order to justify the investment and EIB involvement.
66.	<p>To decarbonize the long-distance rail services, the EIB should prioritize rail investments, such as</p> <ul style="list-style-type: none"> <li>- the electrification of remaining part of the network at local level and at EU level,</li> <li>- the conversion to alternative fuels and renewing of rolling stock,</li> <li>- the equipment of service facilities for the supply of alternative fuels and digitalization.</li> <li>- For the industry, support to research on the efficiency of energy consumption.</li> <li>- Focusing on the necessity of interoperable and suiting rolling stock, which is currently lacking on the market.</li> <li>- Focusing on the freight sector with investment needed across the whole sector.</li> </ul>	Service Public Fédéral Mobilité et Transports	<p>The new TLP prioritises both the electrification of rail infrastructure, and of rolling stock. In cases where catenary electrification is not economically justified, electrification can be achieved through the replacement of diesel fleets with battery or hydrogen electric fleets. Rolling stock projects within the EU must also meet the relevant standards for interoperability.</p> <p>With the new TLP, the EIB will continue to pursue and prioritise combined transport and more efficient rail corridors through the finance of rail motorways, intermodal centres and combined transport terminals. Contributing to the completion of the TEN-T networks is a long standing EIB priority. The EIB financing is often combined with funding through EU grants</p>

Ref	Summary of Contributions	Contributor	EIB comment
	<ul style="list-style-type: none"> <li>- Multimodal freight hubs which are needed in the logistic chain to facilitate the modal shift in all EU member states.</li> <li>- The completion of the TEN-T network is crucial for the freight sector and the EIB could intervene where member states lack funding resources.</li> <li>-</li> </ul>		
67.	Prioritization should be based on global efficiency.	Miguel de Ortuzar	
68.	A great part of transport pollution is caused by private cars. Some investments should be made to extra-urban rail. For the aforementioned reasons, priority should be given to road transport anyhow.	European Road Haulers Association (UETR)	The new TLP allows justified EIB involvement in all modes and transport sectors. The achievement of a substantially larger modal share of rail both in passenger and goods transports is foreseen in order to meet the decarbonisation path for the transport sector set out by the European Commission.
69.	Due to the significant advantages of rail concerning climate effects (high level of electrification and energy efficiency) pushing rail is highly important to reach the climate targets in the transport sector.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	The achievement of a substantially larger modal share of rail both in passenger and goods transports is foreseen in order to meet the decarbonisation path for the transport sector set out by the European Commission. The new TLP thus prioritises the investment into projects electrifying rail.
70.	Investments should be prioritized in order to comply with the DNSH principle and support the decarbonization process and construction of HS lines	Ferrovie dello Stato Italiane S.p.A	The EIB Climate Bank Roadmap stipulates that the proposed DNSH criteria are used as a "floor", i.e. the level below which the EU Climate Bank would not support a project.
71.	The investments should be prioritized for lines constituting the AGC/AGTC networks	UNECE	The EIB as the EU Bank focuses on the Core Network Corridors, TEN-T and their extensions into neighbouring countries as per applicable regulations. The TEN-T, developed since the 1990s, to a large extent build on and incorporate the then already existing UNECE networks and network specifications.
72.	Priority is to be given in particular to lines where the transfer of traffic from the road network is of greatest benefit.	Správa železnic	Under the new TLP, economically viable investments into new and upgraded electrified rail infrastructure remain a priority for EIB support. In project appraisals, modal shift potential positively contributes to the benefits within a cost-benefit analysis.
73.	Of course public money needs to be prioritized.	Response 832108188	Thank you for your comment.

## Additional comments

Ref	Summary of Contributions	Contributor	EIB comment
1.	The EU must set a finite transport policy framework so that there is a shift from road to rail. Unfortunately, the opposite is the case at the moment: relocation of the transport of goods from rail to road due to the wrong transport policy framework at EU level!	Response 974008607	The EIB acts within the EU policy framework. The new TLP defines the areas in which the EIB gets involved, and the EIB priorities within the transport sector, contributing to the sustainability and decarbonisation of the transport system.
2.	ETF opposes intensified and further liberalisation and increasing fragmentation of the European railway systems. This has not benefitted the sector, its users and, particularly, the workers. Today's transport infrastructure investments determine tomorrow's modal split. We need public investments combined with a comprehensive strategy that promotes rail as part of multimodal transport system with the presence of dialogue, representatives and collective agreements considered as pre-requisites in any investment in any market.	European Transport Workers' Federation	
3.	De-privatisation of rail infrastructure and commitment to shift freight transport away from the road is needed. There is no long-term investment interest for private companies in maintaining rail infrastructure.	ECTRI	
4.	This comment is relevant for all types of railway projects, not only extra-urban rail. We believe that in its new TLP, the EIB should commit to finance only railway projects that are fully TSI-compliant as well as provide financial support during transition regimes for infrastructure, rolling stock, ERTMS and telematics. As mentioned in Chapter 2.12 already, transition and migration phases in railways are long-term processes that often face a financing gap, both in terms of upgrading for compliance with TSI and with technological transformations. In fact, the EIB should include in the TLP also the possibility to finance equipment as part of existing vehicles upgrades/retrofit or infrastructure (such as ERTMS, digital automatic couplers, interoperability enablers) and not focus its transactions on new rolling stock and new infrastructure.	European Union Agency for Railway	<p>EIB generally requires applicable Technical Specifications for Interoperability are applied in for the projects it finances.</p> <p>The new TLP states that the EIB will seek to develop innovative financing facilities enabling modernisation, retrofitting, digitalisation and automation of railway rolling stock, train and locomotive fleets – all priorities for EIB support. Such investments may concern, for example, the replacement of diesel engines by electric or hydrogen-powered propulsion, the introduction of automatic couplings for freight rolling stock, or the installation of on-board ERTMS and automatic train operation equipment.</p>

## Chapter 5 – Extra-urban Roads

Question 1 – What do you believe is the technological roadmap for decarbonising short- and long-distance road transport?

Ref	Summary of Contributions	Contributor	EIB comment
1.	Electro mobility is the basic technology but the whole electro mobility cycle must be completely solved.	Miguel de Ortuzar	Roads currently account for about 72% of all transport related emissions. In line with the core themes of the EC's long term policies, including the Green Deal, EIB's CBR (para 4.29) outlines a mix of solutions to addressing this urgent decarbonisation need in the sector; i.e. (i) modal shift, (ii) efficiency improvements; and (iii) increased electrification and use of alternative fuels, including biofuels and low-carbon hydrogen. Electrification is already technologically possible for about 75% of roads vehicles, i.e. passenger cars and light goods vehicles. It is the rollout at scale of increased electrification, which needs support. Accordingly, the CBR envisages support for both EV charging infrastructure and fleet electrification. Under the TLP, the EIB will notably prioritise support for fleets of zero-emission vehicles and associated charging infrastructure. The EIB also agrees that there are still some challenges in circular economy aspects in electro mobility and that electrification process will have to be underpinned by the availability of green electricity (with low grid emission factor). Progress in these areas is underway.
2.	<b>Electromobility</b> should and will play the central role in decarbonising road transport, including passenger cars, vans, trucks and buses.	European Federation for Transport & Environment; WWF EPO	
3.	Electromobility should play the central role in decarbonising road transport, including passenger cars, vans, trucks and buses. Direct electrification based on high-capacity batteries and high-power charging infrastructure, is a cost-effective, energy-efficient way to reduce transport emissions quickly and reach zero emissions by mid-century.	European Federation for Transport & Environment; The SLOCAT Partnership on Sustainable, Low Carbon Transport	

Ref	Summary of Contributions	Contributor	EIB comment
		(SLOCAT); WWF EPO	
4.	Trolleybuses, battery cars and lorries with trollies	Response 832108188	<p>According to the EIB's CBR, the decarbonisation pathway for the road sector includes increased electrification. The EC's Fit for 55 strategy provides a credible pathway towards emission free road vehicle transport, which is also a priority under the TLP, the form of both EV charging infrastructure and fleet electrification, including conductive and inductive charging systems as well as other AF recharging/refueling technologies.</p> <p>The EIB will notably prioritise support for fleets of zero-emission vehicles and associated charging infrastructure. For the specific criteria, please refer to Annex 2, Table C of the EIB's CBR.</p>
5.	Strengthen electric road vehicles	Response 511707695	
6.	(1) Electrification of light-duty vehicles in the short term (no later than 2035). (2) Electrification of the Medium Duty Vehicles by 2040. (3) Electrification of heavier heavy-duty vehicles between 2040 and 2050 at the latest.	Service Public Fédéral Mobilité et Transports	
7.	Electric Cars and efficient trucks will contribute to decarbonization of both short- and long-distance road transport, and should be 100% of sales by 2035.	Bank Information Center	<p>As per the EIB's CBR, the decarbonisation pathway for the road sector includes both increased electrification and the increased use of alternative fuels (biofuels, low carbon hydrogen). In its Fit for 55 strategy, the EC also sees the future of trucking as emission-free. As per the EIB's CBR, the EIB foresees to focus support on vehicles meeting the "substantial contribution criteria" under the EU Taxonomy.</p> <p>In general, the EIB sees long-haul heavy transport decarbonisation to be enabled by a broad mix of technologies including battery electric, fuel cell or other alternative fuel solutions, in combination with conductive/inductive charging systems and refueling options expected to show significant efficiency improvements in operations and asset management. There is already some visibility on the potential availability of ZE truck technologies. The associated charging and refueling infrastructure of low carbon alternative fuels compatible with the EU Sustainable Finance taxonomy will also be prioritized.</p>
8.	For ZE Trucks for regional transport, technologically will be available around 2028-2030; for mainstream trucks there will be ZE technique (BEV) available, Long-distance ZE-truck not before 2030.	Ministry of Infrastructure and water Management	

Ref	Summary of Contributions	Contributor	EIB comment
9.	For heavy vehicles which may be harder to move to battery, we will have to look at efficient use of biofuels.	EuroRAP, Road Safety Foundation	The EIB takes a technology-neutral approach to its support for the deployment of alternative fuel technologies provided that they comply with the EIB's CBR. Its Annex 2, Table C describes that mobile assets solely powered by advanced biofuels (biofuels as per Renewable Energy Directive (RED) II with low ILUC (indirect land-use change) risk) can be supported. The requirements include safeguards to limit support to advanced biofuels that are deemed sustainable.
10.	EIB should support programs to accelerate the development, evaluation, validation, and production of near-zero and zero-emission trucks.	Bank Information Center	The EIB supports research and innovation investments in zero emission trucks, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B. The Transport Lending Policy does not cover the support to R&D needed for zero emission trucks. The Climate Bank Roadmap, Annex 2, Table B and the Digital & Human Capital (IDHC) Orientation 2021-2027 describe that projects that enable the development of zero emission transport solutions for passenger and commercial vehicles are supported. The support covers the entire drivetrain (batteries, fuel cell stacks, components, electronics storage systems etc.). In addition, most of these investments account to the EIB Group climate action and environmental sustainability targets.
11.	By 2025, we need to have a full assessment and more innovation of the <b>road charging facility infrastructure</b> to ensure adequate roll out of battery electric vehicles (BEVs). By 2028 we need to improve the battery energy density to improve uptake of BEVs by consumers & develop our technology for optimising charging times.	EuroRAP, iRAP, Road Safety Foundation, TLN	According to the EIB's CBR, the decarbonisation pathway for the road sector includes increased electrification. Along with the EC and Member States, the EIB see the availability of adequate charging infrastructure as a prerequisite for further development of electromobility. The upcoming Regulation on the deployment of alternative fuels infrastructure (repealing Alternative Fuels Directive) should be instrumental in that effort.
12.	A prerequisite for long-distance electric transport technology is the construction of charging stations and the development of battery technology. Financial support is necessary for economical implementation.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr; Croatian Chamber of Economy; MÁV-Volán Group	
13.	Decarbonisation of the transport sector is possible and needs to be accompanied by investments in electrification, stationary and dynamic charging infrastructure	Hauptverband der deutschen Bauindustrie	



Ref	Summary of Contributions	Contributor	EIB comment
14.	Road transport should be fully electrified, both for passenger and freight transport – roads and in particular highways need to provide electric charging infrastructure.	Joint contribution made by NewClimate Institute and Germanwatch	
15.	For long distance transport, a mix of fuels needs to be supported where also accompanying charging of refueling infrastructure is an important pre-condition.	TLN	
16.	Electricity generation substantially decarbonised by 2060.	Croatian Chamber of Economy	According to the EIB's CBR, the decarbonisation pathway for the road sector includes increased electrification. As per the EC's long-term strategy, all pathways converge on one central element: power generation should be fully decarbonised by 2050 and be able to absorb the additional demand generated by electromobility.
17.	The power grid shall also need to be able to cope with the increased demand for electricity.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
18.	EuroVI Diesel engines --> gas engines for distances up to 600 km (CNG) or up to 1.400 km (LNG) --> successive substitution by bio CNG and bio LNG --> successive growth of short-distance (last mile) operation by e-drive, either battery or fuel cell.	Antje Willnow	According to the EIB's CBR and TLP, the EIB can support vehicles that run on biofuels, including Bio CNG and Bio LNG. CNG, a fossil fuel, is not supported as such. However, road vehicles that run on conventional fossil fuels can be supported under certain conditions. For further reference, please refer to CBR, Annex 2.
19.	Development of electricity (for cars) and hydrogen (for trucks). Phase-out of diesel and petrol.	Hauptverband der deutschen Bauindustrie, Jori Milbradt, METROREXS.A. Bucharest, Miguel de Ortuzar, Response 290033127; Response 974008607,	<p>The EIB's CBR recognizes that for land transport decarbonisation, both electricity and hydrogen will have to become mainstreamed. Support to the related investment is foreseen in the CBR (e.g. Annex, Table C).</p> <p>The EIB Group has partnered with the Hydrogen Europe and the Hydrogen Council and supported several investments in greener road transport (notably purchase of hydrogen fuelled public transport vehicles and the necessary infrastructure). This work will continue under the revised TLP.</p>
20.	In order to achieve climate neutrality in 2040, the vehicle fleet must be converted to <b>emission-free</b> drives in good time.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	These solutions qualify as “substantial contribution” under the first delegated act of the EU Taxonomy and, in line with EIB's Climate Bank Roadmap, account to the EIB Group climate action and environmental sustainability targets.
21.	Battery electric vehicles and alternative fuels for existing vehicles as well as other technologies contributing to decarbonisation are conceivable. This includes hydrogen.	Bayerisches Staatsministerium für Wohnen, Bau	

Ref	Summary of Contributions	Contributor	EIB comment
		und Verkehr	
22.	Favour NGV and biofuel until electrical and hydrogen technology can be tested against the need and operational characteristics and only under acceptable economic conditions (the cost of decarbonisation should not be passed on to the final customer, which might favour individual modes).	UTP (Union des Transports Publics et ferroviaires)	According to the EIB's CBR and TLP, the EIB can support vehicles that run on biofuels. CNG, a fossil fuel, is not supported as such. However, road vehicles that run on conventional fossil fuels can be supported under certain conditions. E.g. for public transport buses, bus fleets with emissions below 50 g CO <sub>2</sub> per passenger kilometer. See annex 2 Table C of the CBR.
23.	Increasing hybrid and plugin electric drive can help distribute the load more evenly, but it does not trigger it. The real solution is the hydrogen plant, which will spread for another 10-20 years.	Budapest Airport Zrt.	EIB's CBR para 4.29 recognizes that the decarbonisation pathway for the road sector involves electrification and increased use of alternative fuels (biofuels, low carbon hydrogen). This is consistent with the EC views and goals in alternative fuels with which the EIB's TLP is aligned.
24.	Use of hydrogen (fuel cell) as an alternative to pure electric vehicles only if it is produced from renewable energy and reserved for heavier vehicles.	Service Public Fédéral Mobilité et Transports	
25.	Exclusion of alternative fuels (synthetic fuels and biofuels) over time.		
26.	Biofuels, hydrogen	Finnish Transport Infrastructure Agency	
27.	Timeline of alternative fuels technology must be synchronized with the one of alternative fuels infrastructure development.	European Road Haulers Association (UETR)	
28.	For short distance done by LCV, coming years until 2025, there will not be any technological issue for decarbonization.	Ministry of Infrastructure and water Management	
29.	Investment in sustainable <b>road infrastructure</b> is also necessary because it will not be possible to completely shift traffic flows to the volumes that the road carries.	Hauptverband der deutschen Bauindustrie	The EIB's CBR foresees continued support to the road sector, but makes investments in road capacity expansion projects subject to compliance with a stricter economic test, which, inter alia, ensures that capacity expansion projects which rely on high short-term (i.e. not yet decarbonized) vehicles are not supported by EIB. According to the CBR, all EIB activities need to be aligned with the Paris Agreement temperature and adaptation goals, and "consistent with pathways towards low-carbon and climate-resilient development".
30.	Resilient infrastructure first then support for all types of developing technology for road transport regardless of propulsion energy.	Comunidade Intermunicipal do Cávado	
31.	On extra-urban roads, considerable investment needs to be made repurposing existing road networks, ensure they are multimodal for use by private public and pedestrian in customer safety technology, as well as smarter motorways, traffic management to reduce congestion.	Global Infrastructure Investor Association	

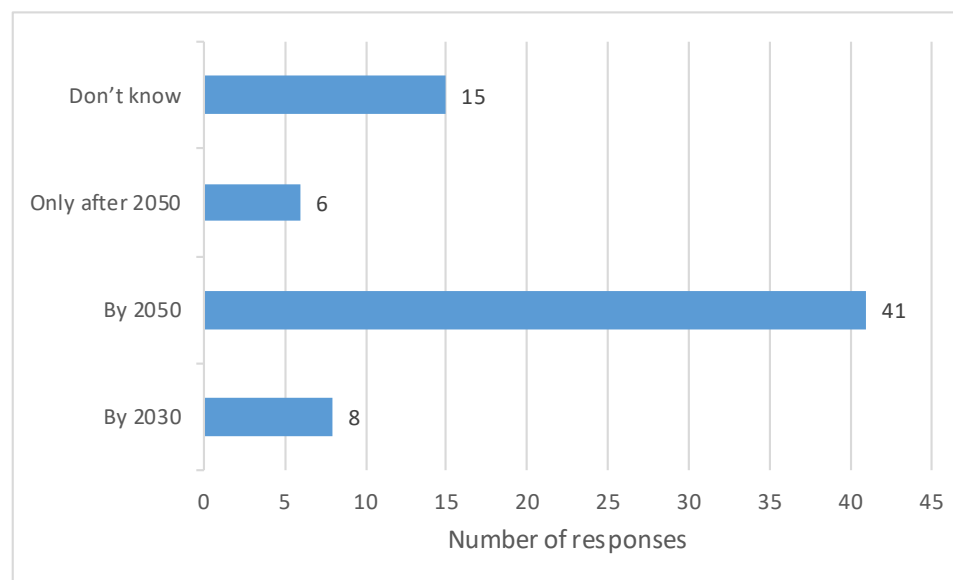
Ref	Summary of Contributions	Contributor	EIB comment
32.	The European Agreement on Main International Traffic Arteries (AGR), of 15 November 1975 should be part of the roadmap.	UNECE	
33.	Traffic management systems, particularly for freight transport, will also play a key role in optimising freight routes, avoiding unnecessary travel, enhancing intermodal transport and reducing the need for long-distance travel by optimising freight flows.	Joint contribution made by NewClimate Institute and Germanwatch	The EIB shares your view that digitalization in road transport is part of the efficiency improvements required in the path towards transport decarbonisation. The EIB notes that this is also recognized in the latest EU policies, such as the revised TEN-T regulation. ITS investments are also foreseen in the EIB Climate Adaptation Plan. The EIB's commitment to innovation is summarized in its <a href="#">Innovation for inclusive Green and Digital Transition – Innovation, Digital and Human Capital Orientation 2021-27 (eib.org)</a>
34.	It is important to focus on Intelligent Transportation Systems.	Global Infrastructure Investor Association	
35.	creation/increase of low emission or zero emission zones; Intelligent Cooperative Transport Systems (C-ITS); - autonomous driving	Arthur D. Little, Município de Lousada	
36.	<b>Inter-city</b> roads should enable commuting by bike.	Joint contribution made by NewClimate Institute and Germanwatch	The EIB believes that cycling infrastructure should be introduced along inter-urban roads where there are good demand prospects. Many of the current EIB investment in bypass roads and similar infrastructure already includes bicycle paths. This type of infrastructure is considered climate change mitigation under the EU taxonomy.
37.	Short-distance: electrification; Long-distance: (1) transfer to rail, (2) sustainable fuels, (3) avoidance (route and fleet optimization)	Ralph-Uwe Dietrich	<p>The modal shift of passenger and goods traffic away from roads towards the greenest modes, namely rail and inland waterways, constitutes a central pillar of the EU transport decarbonisation strategy. In fact, the EU's modal shift strategy sets out that rail freight traffic should increase by 50% by 2030 and double by 2050, whereas transport by inland waterways and short sea shipping should increase by 25% by 2030 and by 50% by 2050. The EIB considers that the extent of the modal shift will be primarily driven by EU energy and transport policies. In line with the EIB's TLP, the EIB will support investments leading to modal shift from private cars to public transport, shared mobility and active modes.</p> <p>The TLP also envisages a continuous support for extra urban roads, for which the EIB has been using the so-called "adapted economic test" to align its economic model assumptions, specifically the reduced road transport demand, with the EC</p>

Ref	Summary of Contributions	Contributor	EIB comment
38.	For lorries, they should be left to the benefit of the car like train and support shuttles and carpooling between lines.	Response 981558580	PRIMES-TREMOVE energy demand model.
39.	<b>Modal shift</b> to rail and waterways for long-distance	METROREX S.A. Bucharest	
40.	Shifting road transport to other modes, wherever possible.	Response 511707695	
41.	Modal shift to rail - also for the last mile. Landuse planning to avoid any last mile but instead direct rail connection.	Response 1039141480	
42.	Lorry transport to rail after improvement of the railway infrastructure.	Pro Bahn	
43.	It is necessary to shift passenger's and goods' transport from road to rail.	Správa železnic	
44.	Switching to train transport	urgewald	
45.	Reduction in the volume of loading of lorries often far too large compared to the volume of goods actually transported.	Response 290033127	
46.	Development of short traffic routes so as not to multiply heavy truck journeys across Europe.		
47.	De-privatisation of rail infrastructure and commitment to shift freight transport away from the road.	ECTRI	
48.	For short-distance trips, a shift in usage is needed to halt GHG emissions.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	According to the EIB's CBR, the decarbonisation pathway for the road sector includes modal shift, efficiency improvements, increased electrification, as well as the increased use of alternative fuels (biofuels, low carbon hydrogen). All these factors are expected to work together to reduce the use of carbon-based fuels.
49.	Reducing greenhouse gas emissions and stimulating alternative transportation. It amplifies digitalization, electrification, and encourages transport sharing.	Ministry of Transport and Infrastructure	
50.	Less fuel	Croatian motorways Ltd	
51.	Zero-emission vehicles will be available across all segments by 2030. Use-cases will depend on alternative fuels	FEBIAC	According to the EIB's CBR, the decarbonisation pathway for the road sector involves modal shift, efficiency improvements,

Ref	Summary of Contributions	Contributor	EIB comment
	infrastructure availabilities.		increased electrification, as well as the increased use of alternative fuels (biofuels, low carbon hydrogen). AF infrastructure is key in the adoption of AF vehicles and as per the TLP (Section 5), the EIB will prioritise financing of charging infrastructure for fleets of zero-emission vehicles.
52.	The configuration and distribution of EU funds for recovery must take into account all the technologies that enable environmental and climate objectives to be met, without excluding any of them. All technologies are necessary to decarbonize transport and this objective will not be achieved with only some of them.	CEOE; Confederación Española de Transporte Autobús - CONFEBUS	
53.	Alternative fuels deployment, digitalisation and automation (ITS and CAD)	Ministry of Infrastructure, Ministry of Transport	
54.	Four axes (green transformation, digitalization, employment and public service). Measures for the decarbonisation of the sector and the modernization of infrastructures and vehicles, including the implementation of an aid plan for the renewal, acquisition and retrofitting of fleets. However, in view of the upcoming changes, it is imperative to proceed with technical expertise and the highest level of efficiency.	Confederación Española de Transporte Autobús - CONFEBUS	
55.	Depends on <b>technological</b> development. If there is the political will, decarbonising will be possible. But politics should not indulge into micro-management.	Hanns Kerschner	
56.	Reductions of tailpipe emissions based on alternative fuels, electromobility, automation, digitalisation and modal shifts.	ECTRI	For the EIB, the decarbonisation of individual road transport is equally important (as decarbonisation of road freight transport). According to the EC, lorries, buses and coaches are responsible for about a quarter of CO <sub>2</sub> emissions from road transport in the EU and for some 6% of total EU emissions. Despite some improvements in fuel consumption efficiency in recent years, these emissions are still rising, mainly due to increasing road freight traffic. The EIB is ready to continue supporting ZE trucks and infrastructure, including hydrogen based solutions. Annex 2 Table C of the CBR describes which transport investments are supported by the EIB. Heavy-duty vehicles (HDV) are also supported if meeting the criteria of the EU Taxonomy for 'substantial contribution'. This implies that the vehicles need to demonstrate CO <sub>2</sub> emissions per tonne-kilometre (gCO <sub>2</sub> e/tkm) at least 50% lower than the average reference value defined for that type of vehicle. In line with par.
57.	Focus on decarbonising short and long distance <b>freight transport</b> .	Municipio de Paredes	

Ref	Summary of Contributions	Contributor	EIB comment
			4.36 of the CBR, in support of SMEs and mid-caps, the Do No Significant Harm (DNSH) criteria of the EU Taxonomy have been adopted across MBIL-type products constituting a lower bar to meet.
58.	Public authorities should define a clear roadmap to no longer subsidise <b>fossil fuels</b> in the short term — before phasing out vehicles running through fossil fuels in the medium term — and to stop financing projects aimed at increasing road infrastructure capacity.	Service Public Fédéral Mobilité et Transports	As per the CBR, the EIB does not support projects for transport of fossil fuels projects. The EIB will remain technology-neutral in its investments, and open to new technological developments and alternative fuels, in line with the work of the EU Technical Expert Group and the EU Taxonomy.
59.	Should focus on service and quality. Technology that allows road users to travel green, comfortably and fast	Metropolitano de Lisboa	The EIB will remain technology-neutral in its investments, and open to new technological developments and alternative fuels.
60.	Existence of a logistics chain combining all modes of transport.	Município de Paredes	Multimodal transport solutions and intermodal terminals are prioritised within the TLP, as are Mobility as a Service solutions, under the “Digitalisation and Automation” heading.
61.	Rapidly increase technology for use	ECOV	As per the EIB’s CBR, the decarbonisation pathway for the road sector involves modal shift, efficiency improvements, increased electrification, as well as the increased use of alternative fuels (biofuels, low carbon hydrogen). The EIB has traditionally sought to avoid supporting a particular technology at the expense of other technologies having potential to deliver the same goals.
62.	Support of the industry of vehicles with decarbonising technology. Bet on public service transport and better information for the public. Infrastructure improvement.	Município de Faro	
63.	Prioritize the least impacting energy resource well to wheel	Back on Track Belgium vzw-asbl	The supply and consumption of energy determine, among other things, the climate and environmental externalities of a project and, consequently, the costs and benefits to society of that project. The EIB does indeed carry out a comprehensive cost-benefit analysis. Its approach is described in the document “The Economic Appraisal of Investment Projects at the EIB” ( <a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a> ). The document is currently under revision.

## Question 2 – How fast can long-distance road transport realistically be decarbonised?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Cars will be exported to poorer countries and run there for 10 to 20 years more. Even when able to decarbonize until 2030, 20 years from then CO <sub>2</sub> will be produced elsewhere.	Response 1039141480	The EIB is well aware of the risk of exporting highly polluting vehicles to developing countries and aligns with the efforts of UNEP and World Bank to encourage implementation of stricter regulations in importing countries in the developing world.
2.	A high percentage can already be reached by 2030, if there is the political will and momentum.	Hanns Kerschner	The EIB is committed to supporting the gradual decarbonisation of transport in the EU and beyond. The EIB notably aligns with the EC policy goals and underlying strategies. As per the latest PRIMES-TREMOVE transport model underpinning the EC transport decarbonisation policies, the pace of penetration of alternative energy powered vehicles in the EU is likely to be insufficient to support road transport decarbonisation by 2030. This is partly due to an over-optimism in the availability of electric trucks at large scale in early 2020's. The EIB agrees that political will combined with stricter regulation is required to reach the targets.
3.	Until 2030, we can make big improvements on long-distance road transport but it is impossible to achieve great results.	Município de Faro	
4.	Provided that alternative fuels are sufficiently available, the target could be reached in 2030. In the current state of knowledge, the target 2050 appears more realistic.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
5.	Much will depend on the availability of alternative charging and fuel infrastructure. Vehicles expected to be fully available across all segments by 2030.	FEBIAC	



Ref	Summary of Contributions	Contributor	EIB comment
6.	By 2025-2030, electric trucks will be less expensive than their diesel counterparts, as will electric cars, when fuel costs are taken into account.	Bank Information Center	<p>The EIB's TLP will be aligned with the EC policy priorities to enhance sustainability of road transport including the uptake of zero -emission vehicles, renewable and low-carbon fuels and deployment of related zero-emission infrastructure, enhancement of road safety. The EIB will notably prioritise financing of charging infrastructure for fleets of zero-emission vehicles.</p> <p>The EIB's public strategies focus on Paris alignment of all EIB activities. The EIB notes that as per the latest PRIMES-TREMOVE transport model underpinning the EC green transport policies, with the full implementation of dedicated policies and strategies, the transport sector decarbonisation shall reach 95% by 2050 (in the EU).</p> <p>In line with EU transport policy, the EIB will consider economically justified operations on the TEN-T core and comprehensive networks as a priority, and its extensions into neighboring countries. The stock of road infrastructure is currently unequally distributed across Europe and further development of the TEN-T network is still required, particularly in those countries that lag behind in development, including TEN-T parking and service areas equipped with alternative fuel infrastructure. Elsewhere, although the TEN-T network may be well-developed, some parts are suffering congestion or poor maintenance, and underinvestment is leading to a deteriorating quality of the infrastructure.</p> <p>The EIB will also prioritise road projects implemented in the context of an Integrated Regional Development program or equivalent plans designed to ensure a balanced territorial development or to address issues of accessibility or transport poverty.</p>
7.	2030 is too early	Marc-Olivier Leclercq	
8.	Long-distance transport could be gradually only medium-large professional companies. The larger the company is the easier to enforce measures for fleet renewal, and other measures. 2030 is too close	Stelios Efsthadiadis	
9.	Technology for decarbonization is available today but roadmaps for wide-spread implementations (in the EU) focus on requirements towards new vehicles. Hence, rollout will not be fully completed by 2030, particularly not beyond the EU.	Arthur D. Little	
10.	Technological solutions already exist but further infrastructure development is needed. The 2030 horizon seems too early. 2040 would be more realistic.	Service Public Fédéral Mobilité et Transports	
11.	With readily available electric charging infrastructure and the replacement of the current freight and passenger vehicle fleet by electric vehicles, long-distance road transport can be decarbonised latest by 2040.	Joint contribution made by NewClimate Institute and Germanwatch	
12.	Long-distance road transport can realistically be decarbonised by 2040	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	
13.	When clear goals and incentives somewhere between 2030 and 2040 given clear advantages starting from now.	Back on Track Belgium vzw-asbl	
14.	Long-distance electromobility and hydrogen technology should also be mature by 2050!	Response 974008607	
15.	2050 is too late, but 2030 seems impossible. Transfer to rail can provide the largest part, sustainable fuels should complement.	Ralph-Uwe Dietrich	
16.	Long-distance road transport decarbonisation could be achieved by year 2050. Moreover, in this case, 2030 will be a	Ministry of Transport and	



Ref	Summary of Contributions	Contributor	EIB comment
	milestone for seeing how far the technological and modernization went.	Infrastructure	
17.	2030 is in 9 years' time. Not possible by this deadline. 2050 is more sustainable as electricity and hydrogen technologies are still at an early stage.	Response 290033127	
18.	The achievement of the 2050 targets will depend on the degree of cooperation of stakeholders and their full engagement.	ECTRI	
19.	For Europe decarbonisation can be achieved by 2050; Other countries need longer; for example, the objective of climate neutrality has also been set at a later stage. However, massive investments are necessary to achieve these objectives, in particular in the development of renewable energy infrastructure, transport and loading in passenger cars, as well as innovation in road construction such as dynamic charging infrastructure.	Hauptverband der deutschen Bauindustrie	
20.	Given the fact that technological developments will accelerate the timeframe will possibly be shorter and lie somewhere between 2030-2050.	TLN	The EIB agrees and stands ready to support the significant investment needs required for the transition.
21.	Provided that internal combustion cars and vans are phased out by 2035 as well as most trucks and buses, it will take around 10 - 20 years to phase out and replace the legacy ICE fleet throughout Europe. Important to speed up the phase-out of ICE vehicles in road transport to shorten the 'tail' of the legacy fleet from the 2030s on.	European Federation for Transport & Environment; The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT); WWF EPO	
22.	Based on current policies and developments, with an average lifetime of a diesel truck in NL of 7 years and total truck park of 140.000 and with purchase 2028, it will take a longer period for transit to a complete ZE park.	Ministry of Infrastructure and water Management	
23.	It is difficult to determine since alternative technologies are developing at a slower pace than those that exist for the urban environment.	Confederación Española de Transporte en Autobús – CONFEBUS; CEOE	The EIB's CBR recognizes that technological pathway towards the decarbonisation in individual road passenger transport exists, whereas individual road transport accounts for about 75% of CO <sub>2</sub> emissions from road transport in the EU, while there are many challenges left, related to long-distance road freight transport, in particular. Spread of alternative

Ref	Summary of Contributions	Contributor	EIB comment
24.	Decarbonization timeline must be realistic. In some EU MS freight, rates are getting lower, with companies hardly managing transport costs. Long time is needed to develop adequate engines, affordable vehicles, true alternative non contaminant fuels valid for long-distance services, the establishment of a network of alternative fuel supply stations and of course, the time gap for allowing companies to update their vehicles fleet in an economic and realistic manner.	European Road Haulers Association (UETR)	technologies and possible breakthrough technological solutions would influence the pace of the progress.
25.	We need to get rid of internal combustion engines soon! It is important to be able to buy cheap electric cars citizens from less developed countries. To make small RES power plants in people's homes.	Railway Signalling Automation Telecommunication And Industry Association	
26.	It will be a very slow process, especially the accelerating depreciation and replacement of diesel devices with electrical technologies or hydrogen power.	Budapest Airport Zrt.	
27.	Precondition is to accept above described limits (in sustainable bio methane, renewable electricity) and to decide for modal shift.	Antje Willnow	
28.	Vehicles already exist but infrastructure needs to be prepared. In favor of raising the resilience of infrastructure in order to minimize damage due to climate change and at the same time prepare it for new zero-emission vehicles.	Croatian Chamber of Economy	The EIB's Climate Adaptation Plan provides an initial response to this need. The EIB's TLP will be aligned with the EC's policy priorities to enhance sustainability of road transport including the uptake of zero -emission vehicles, renewable and low-carbon fuels and deployment of related zero-emission infrastructure, enhancement of road safety, as well as smart and distance-based road charging.
29.	In the long-distance transport, in addition to the current technical development of batteries, the hydrogen-based fuel cell may be the solution.	MAV-Volán Group	The EIB will remain technology-neutral in its investments, and open to new technological developments and alternative fuels. The TLP foresees support for hydrogen based transport solution.
30.	For private vehicles the technology is sound, and for heavy goods vehicles will be solved. Partnership between public and private sector is needed for electromobility.	Miguel de Ortazar	The EIB's TLP recognises and emphasises the importance of private sector involvement in the financing and delivery of sustainable transport infrastructure. Many EIB operations in the transport sector also include public and private support at differing levels. The EIB has supported and will continue to support PPP/concession-type projects in the transport sector when demonstrated to be the appropriate way forward – including in terms of value for money.

Ref	Summary of Contributions	Contributor	EIB comment
31.	Replacing cars running on fossil fuels with electric cars does not address the huge resource inefficiency of the private car system. It is difficult to see how building new roads fit the goals of the Paris Agreement. Building and expanding roads generates more traffic, exhaust fumes and noise. Less traffic is traffic and not more or bigger roads, which only risk inducing the demand. Investments in motorways and highways does contribute to local mobility and compete with less carbon-intensive transport modes such as trains. The EU in a large majority of its regions has an extremely dense network of motorways and highways, many of which create severe problems of ecosystem fragmentation and even disruptions in environmentally protected areas. Several cases of problematic motorway projects supported by the EIB testify for the biodiversity, climate and human health risks linked to such operations.	Counter Balance; E3G	The EIB sees the road network as part of the overall transport system. While the EIB agrees that modal shift is to be encouraged within the overall transport system to greener modes, the EIB foresees individual road vehicles remaining an important part of the future mobility mix. The EIB continues to support the EC's plans for the completion of the TEN-T network to ensure accessibility for less developed regions and equal access to economic and social activities. The EIB is working on a methodology to integrate biodiversity and ecosystem externalities into its economic appraisal.
32.	Depending on the development of railway infrastructure	Pro Bahn	The EIB notes that the development of the railway infrastructure has been an inseparable part of the EC strategy for land transport decarbonisation for several years now. This is reflected in various funding instruments (e.g. Invest EU), but also in the revised legal framework (e.g. TEN-T Regulation). The railway sector receives substantial EIB lending support and will continue to be a priority for EIB in the revised TLP.
33.	The digitalization of extra-urban roads and the achievement of customer safety will require a long process.	Global Infrastructure Investor Association	The EIB group looks forward to continue supporting projects that enhance digitalization, including in road transport, as a priority. The CBR lists ITS related projects as eligible for EIB financing.
34.	People will not accept the decarbonisation without harsh laws	Response 832108188	The EIB sees policy incentives and other non-legislative measures to play a great role in supporting the decarbonisation transition. Legal requirements though may meet public resistance.
35.	Certain parts of Europe still encountering a lot of resistance in drifting to the new changes	Mutakwa Samuel Sikazwe	The EIB climate survey results confirm your observations in terms of attitude to changes required to meet the EU climate ambition.

Question 3 – How do you see the demand for extra-urban road transport developing in the period up to 2050?

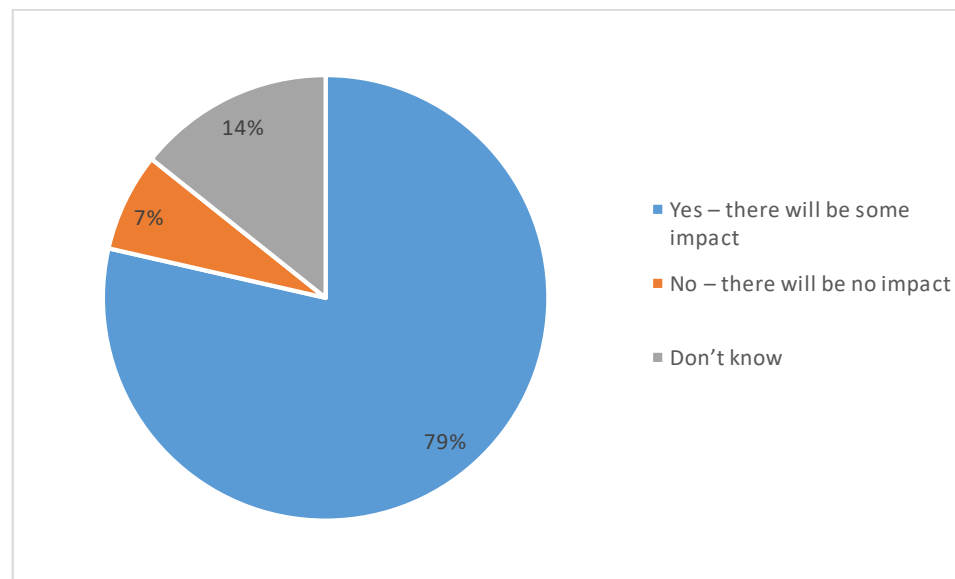
Ref	Summary of Contributions	Contributor	EIB comment
1.	Increasing	Finnish Transport Infrastructure Agency Carl Hansen Mutakwa Samuel Sikazwe Bayerisches Staatsministerium für Wohnen, Bau und Verkehr TLN Správa železnic Ministry of Infrastructure	<p>The EIB sees the future demand for the extra urban road transport to be mainly driven by EC energy, transport and fiscal policies, which affect costs and thus individual choices.</p> <p>In this context, the EIB refers to the EU Reference Scenario 2020, according to which the transport activity for road passenger and freight is projected to grow throughout the projection period until 2050, with freight growing faster than passenger transport activity.</p> <p>The EIB also notes the expected impact of EC policies on road transport to 2050 and in particular the expected modal rebalancing and constrained demand growth.</p>
2.	Developing countries in the south-east will definitely see a rise in demand for better road infrastructure and economically powerful countries will see more demand for alternatives.	Jori Milbrandt	
3.	It is naturally growing steadily, unless alternatives are made attractive enough (rail, water transport).	Ralph-Uwe Dietrich	
4.	It will increase in Europe due to the prevalence of individual car use, but the 1 person / 1 car phenomenon can be prevented in developing countries by developing appropriate public transport, especially rail, in time.	Budapest Airport Zrt.	
5.	Demand for extra-urban road freight transport will increase. Effective management of road transport demand, with a view to reducing it, should be considered at European level.	Service Public Fédéral Mobilité et Transports	
6.	We see it to grow approximately 5%.	Croatian motorways Ltd	
7.	Because all predictions are in favour of increasing of international trade especially Europa-China. It will rise accordingly.	Croatian Chamber of Economy	
8.	Road transport will have more demand because it will be necessarily many displacements of population. Teleworking, will lead to increased use of long-distance transports.	Município de Faro	
9.	Highly probable. There is an increased demand for hydrogen cars, as well as diesel combustion car, even though cars will	Ministry of Transport and	

Ref	Summary of Contributions	Contributor	EIB comment
	not be produced anymore. Road maintenance will be under pressure if there are no developments in railway vehicles, or infrastructure.	Infrastructure	Please see response to points above.
10.	We expect the current trends to continue, with increasing demands in the field of freight transport and individual transport, while in public transport it depends on the quality of services and environmental awareness education.	MAV-Volán Group	
11.	If the Intelligent Transport Systems are implemented alongside digitalization, and the overall customer experience and security improves, it is likely that the demand will increase. Another important factor will be the development of electric vehicle's batteries, which should increase enough to allow for extra-urban trips using this technology.	Global Infrastructure Investor Association	
12.	I see demand increasing. The semi or autonomous vehicles may encourage elderly people or other users that currently do not drive. The private vehicle fleet may make it unnecessary to own a car. Connected or autonomous cars should drastically reduce accidents and improve road safety.	Miguel de Ortuzar	
13.	Demand for extra-urban road transport will increasingly reflect the degree to which it is electrified. As a baseline, demand will increase in line with pre-pandemic trends.	Bank Information Center	
14.	Despite the modal shift to rail, road transport will remain the important part of the multimodal transport system and the demand for extra-urban road transport will grow further.	Ministry of Transport	
15.	Decreasing	Pro Bahn	
		Response 832108188	
		Metropolitano de Lisboa	
		METROREX S.A. Bucharest	
		Comunidade Intermunicipal do Cávado	
		Município de Lousada	
16.	It may decrease if rail becomes borderless, flexible, seamless, faster and easier.	UNECE	
17.	The demand will tend to decrease but require specific	ECTRI	

Ref	Summary of Contributions	Contributor	EIB comment
	measures to accelerate this development. Shifts are planned to occur from road to rail and maritime transport.		Please see response to points above.
18.	Less but give the premises freight transport on (automated) rail is supported massively.	Back on Track Belgium vzw-asbl	
19.	Extra urban transport needs to be performed by rail transport to growing extent.	Wilhelm Borchert GmbH	
20.	It is expected to decrease because it is abnormal to see so many lorries across Europe to transport all many goods. The future is at the local level, in short circulation. Lorries will remain but less than today.	Response 290033127	
21.	Road transport is an essential activity – transport has a high degree of flexibility, availability or economic adjustment capacity that can be hardly provided by other transport modes. Improvements of other transport modes and investment for an EU-wide effective co-modality will impact the demand of extra-urban road transport.	European Road Haulers Association (UETR)	
22.	Freight traffic forecasts fail to multiply volumes for all modes of transport before; The largest increase is expected in maritime freight transport, but volume of road could also increase fivefold. Investment in innovative road infrastructure solutions in connection with e-mobility is a necessary or indispensable contribution to prosperity and climate protection.	Hauptverband der deutschen Bauindustrie	
23.	Traffic producing air pollutants (combustion of petrol and diesel) will dominate by 2050.	Response 974008607	
24.	No real idea, this is more a political question.	Hanns Kerschner	
25.	Stable? Except for home deliveries?	STIB-MIVB	
26.	There's currently too much uncertainty around this question.	European Federation for Transport & Environment; The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
27.	Only electric cars	Railway Signalling Automation Telecommunication And Industry	

Ref	Summary of Contributions	Contributor	EIB comment
		Association	Please see response to points above.
28.	COVID-19 has put transportation and mobility at the center. Interurban mobility is affected by the combination of transport between densely populated cities and areas with lower population density. Improving bus services in depopulated areas can help to contain or even reverse depopulation processes.	CEOE; Confederación Española de Transporte en Autobús – CONFEBUS	
29.	The modal split in continental freight may move to rail but road will remain the strongest. For intercontinental traffic, road may emerge as a good alternative, claiming higher market shares than rail. Ocean transportation will remain the main mode in terms of volumes.	Arthur D. Little	
30.	As we move through different levels of automation it is really critical that the road infrastructure can support the use of technology. Although some say that road markings may not be needed for automation, they will remain critical extra information for many years to come since they will offer additional information to support system choices. Moreover, they are important for human drivers, which will be in the loop for decades to come also.	European Institute for Road Assessment – EuroRAP, iRAP, Road Safety Foundation	
31.	Well maintained roads. Upgraded/safer roads. Recharging infrastructures for e-vehicles and alternative fuels. Adaptation to connected and autonomous vehicles.	Confederación Nacional de la Construcción	The EIB's TLP will put an emphasis on the safety aspects of the road projects and on road safety investments. The EIB's Group Climate Bank Roadmap (CBR) supports investments in zero direct emission mobile assets, which includes drones with zero [tailpipe] emissions. The TLP endorses the development and deployment of zero direct CO2 emission aircraft (including drones).
32.	Up to 2050, having safe infrastructure which can cope with automated and non-automated cars is going to be essential. For freight, there will be more efficient shared usage between companies. However, uptake of these BEVs will depend on the battery life and infrastructure charging facilities. There may be more demand for deliveries by drones which would reduce demand for road transport.	EuroRAP	

Question 4 – Do you believe there will be any long-term impact on the development of this sector as a result of climate policies' increasing cost?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Traffic will increase next year again	Response 832108188	The EIB sees the future demand for the interurban road transport in the EU to be mainly driven by EU energy, transport and fiscal policies, which impact costs and thus individual choices. There are early indications that climate policies may lead to increased transport costs, at least in the transitional phase.
2.	It might increase demand for public transportation to meet the gap between rising costs of traditional private transport and lowering costs of owning and operating EV. Improving EV charging infrastructure will require huge capital deployment to meet consumers demand.	Global Infrastructure Investor Association	
3.	The demand for logistics is expected to further increase regardless of these policies, due to further growth of e-commerce and remote working. As a result of cost increase, the cost for transportation will be redefined and reach a more realistic level. The current race to the bottom; e-commerce deliveries at zero-costs is going to end.	Ministry of Infrastructure and water Management	The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, prioritizing investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality. EIB will notably prioritise financing of charging infrastructure for fleets of zero-emission vehicles.



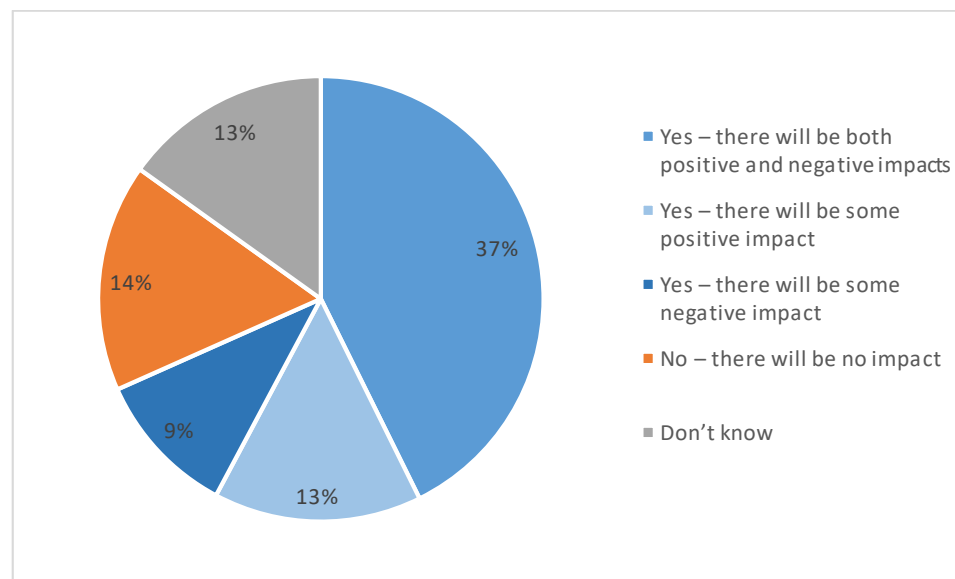
Ref	Summary of Contributions	Contributor	EIB comment
4.	Passengers and cargo shippers may choose rail, which creates lower external costs.	UNECE	The EIB notes that according to the EU reference scenario 2020, there should be a modal shift along the overall demand growth slowdown. The EIB also sees transport investments moving to less polluting modes and vehicles.
5.	Shift to less polluting modes	OTIF	
6.	Without economic support and government intent, the development of the sector may slow down.	MAV-Volán Group	
7.	When costs increase, consumers will carefully consider the transport they invest in. This could lead to less motorised private transport. Freight transport is expected to grow as mail order is already growing strongly and will continue.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	The EIB already sees a shift of investments towards less polluting modes of transport. At the same time, decarbonisation of long haul road freight transport remains a challenge in a short term.
8.	Rising fuel costs and secondary costs	Response 1039141480	The EIB also sees the EU climate policies, such as gradually increasing carbon tax, to initially result in higher transport costs.
9.	Introduction of new fees, taxes and/or road pricing charges for the use of the infrastructure or the application of "polluter pays" or "user pays" principles would penalize a transport mode such as bus.	Confederación Española de Transporte en Autobús - CONFEBUS	
10.	The impact of growing costs is long-term.	Antje Willnow	
11.	Road transport costs will increase.	ECTRI	
12.	Industry developments and the production of vehicles and infrastructures using cleaner energies will increase costs because the technology is expensive. As time passes and profits increase, the costs will decrease.	Município de Faro	
13.	There will be a greater pressure to make the infrastructure safer to encourage public switch to BEVs. This will require significant investment if the timeline of the current changes are to be met.	EuroRAP	As per the latest EIB Investment report, the total transport investment has been stagnating in the EU (at around 1.1% of GDP) since 2006. The recent EC funding initiatives, such as The Recovery and Resilience Facility, should provide new momentum to transport infrastructure funding in the EU and in particular in safety and climate.
14.	The face and economics of long distance road transport may change significantly due to climate policies and associated developments. The required investment costs may lead to a stronger market concentration.	Arthur D. Little	
15.	Climate policy is likely to accelerate electrification and is a powerful driver for climate-optimised infrastructure. Climate policy will require innovation that needs to be funded.	Hauptverband der deutschen Bauindustrie	In many EU countries, the climate policies have been instrumental in driving the sector electrifications already. The technological development may become the main driver of the update in coming years. The EIB's commitment to innovation is articulated in its <a href="#">Innovation for inclusive Green and Digital Transition – Innovation, Digital and Human Capital Orientation 2021-27 (eib.org)</a>

Ref	Summary of Contributions	Contributor	EIB comment
16.	Either the construction costs will increase, due to additional projects to maintain and protect the environment; or there will be no construction at all due to climate policies barriers, thus reevaluating and discovering other alternatives.	Ministry of Transport and Infrastructure	The CBR foresees continued support to the road sector, but makes investments in road capacity expansion projects subject to compliance with a stricter economic test, which, inter alia, ensures that capacity expansion projects which rely on high short-term (i.e. not yet decarbonized) vehicles are not supported. As per EIB's CBR, all EIB activities need to be aligned with the Paris Agreement temperature and adaptation goals, and "consistent with pathways towards low-carbon and climate-resilient development".
17.	Currently electric vehicles are more expensive than combustion engine powered cars but there is room for improvement. In years to come we will refuse to own a car and rent one if private fleet operators offer better and cheaper opportunities.	Miguel de Ortuzar	The EIB is aware that there is a cost gap of about 10 000 EUR between EVs and ICE vehicles today. However, there are good prospects for reducing this gap. For example, McKinsey predicts that the cost parity could be reached as soon as in 2025. [ <a href="#">Making electric vehicles profitable - McKinsey Center for Future Mobility</a> ]
18.	There's currently too much uncertainty regarding these issues.	European Federation for Transport & Environment	Although the future is uncertain, the EIB is carefully following the EC Reference Scenario forecast (latest update 2020), which is meant to reflect all EU climate policies related to energy and transport. Both policies and predicted changes in transport demand imply cost impacts.
19.	It is hard to predict how climate policies will impact the sub-sector or urban-roads.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
20.	There could be impacts, but the framing of the question is problematic. Climate policies in the transport sector should not be seen in terms of costs but rather in terms of investment to facilitate clean mobility.	Joint contribution made by NewClimate Institute and Germanwatch	
21.	Yes, because trucks symbolise excessive globalisation. The current system will have to renew profoundly in the coming years.	Response 290033127	
22.	While the promise of electrification is used by the EIB to continue funding motorways and highways, this is based on very optimistic assumptions. Indeed, we are still a long way from decarbonising car transport. Furthermore, <u>simply replacing cars running on fossil fuels with electric cars will not be sufficient, as it does not address the huge resource inefficiency of the private car system.</u> It is therefore difficult to	CEE Bankwatch Network ; Greenpeace	According to the EC Reference Scenario 2020 and in line with EU energy and transport policies, the road transport should be largely decarbonized by 2050. Given the relatively clear sectoral pathway towards decarbonisation, the EIB will address concerns around capacity expansion through an adapted economic test for large projects. In particular, demand forecasts will be adapted in line with recognised long-term

Ref	Summary of Contributions	Contributor	EIB comment
	see how building new roads could fit with the goals of the Paris Agreement. Building and expanding roads furthermore generates the so-called “induced travel demand” phenomenon. What is needed and urgent is less traffic and not more or bigger roads, which only risk inducing the demand. Investments in motorways and highways also do not contribute to local mobility and compete with less carbon-intensive transport modes such as trains. Furthermore, the EU already has an extremely dense network of motorways, many of which create severe problems of ecosystem fragmentation and even disruptions in environmentally protected areas - the Natura 2000 areas.		modelling studies, with due attention to penetration rates of electric vehicles. Net emissions from the project will be valued at a shadow cost of carbon, which is consistent with the path towards a 2050 climate neutrality target. This approach will screen out projects dependent on high short-term traffic growth (and hence emissions). The EIB will continue to support robust projects designed to improve existing traffic flows, rehabilitation projects, or projects with strong safety elements. (EIB CBR 4.35). The services have traditionally paid close attention to the extent of induced travel demand (‘the increment in new vehicle traffic that would not have occurred without the improvement of the network capacity’), as it directly affects project benefits considered in the economic assessment of the project.
23.	We recommend to: End the financing of any expansion or capacity increase in motorways and highways; As part of the TLP, provide public information about the new economic test for roads and detailed examples of how it is applied for EIB operations. For all future road projects, the EIB needs to be transparent and disclose the detailed outcomes of its assessments. Implement in a stringent manner the EIB's economic and financial appraisal of all transport projects to align both with 1.5°C scenarios, ensuring a solid assessment of less carbon-intensive alternatives and indirect emissions (“Scope 3” emissions). Only invest in the transformation of mobility systems. Funding to urban and local roads must be conditioned on actively contributing to sustainable mobility (more space devoted to pedestrian, public transport, active mobility)."	Greenpeace	The EIB will continue to support robust projects designed to improve existing traffic flows, rehabilitation projects, or projects with strong safety elements (EIB CBR 4.35). The application of the adapted economic test ensures that the project represents a sound use of resources under a restrictive scenario based on high carbon costs. Please note that by the application of the CBR, all operations supported by the EIB are to be Paris aligned already. When funding urban and local roads, alternative modes are prioritised in the context of urban and regional strategic mobility plans, with many of the projects integrating dedicated cyclists infrastructure.
24.	The increasing price on GHG emissions should drive electrification of the sector.	Bank Information Center	The EIB agrees with your observation, but note that carbon pricing faces challenges in gaining public acceptance. This is particularly problematic for road transport, which is, in many countries, already heavily taxed. Carbon pricing may also disproportionately affect low-income households and impact on business competitiveness. Nevertheless, in the adapted economic test for road infrastructure projects, the EIB assumes a gradual increase in carbon costs. In practice, net emissions from the project are valued at a shadow cost of carbon, which is consistent with the path towards a 2050 climate neutrality target.

Ref	Summary of Contributions	Contributor	EIB comment
25.	Climate policies and their impact on energy availability and prices can have a significant impact on the transport sector.	Ministry of Transport	The EIB also expects the EU climate policies to impact transport costs. At the same time, the impact of increased costs on transport volumes might be modest. Personal mobility may be more affected, leading to certain modal shift.
26.	Climate policy "cost increases" will marginalize the traffic with air pollutants (combustion of gasoline and diesel).	Response 974008607	The EIB expects EU policies to evolve towards internalisation of external costs of transport (including those from non-carbon emissions).
27.	Climate policies' increasing cost should be balanced by promotion of sustainability options.	Ralph-Uwe Dietrich	The EIB sees the promotion of more sustainable travel options to be at the heart of the EU Fit to 55 strategy and other initiatives, such as Invest EU.
28.	Technological change is costly.	Hanns Kerschner	The EIB is aware that achieving ambitious reductions in greenhouse gases (GHG) is particularly challenging for transportation due to the technical limitations of replacing oil-based fuels. Investment gaps are at the center of these challenges and the EIB stands ready to help.
29.	Serious support from the state!	Railway Signaling Automation Telecommunication And Industry Association	We also expect that EU climate policies for transport will include various motivational measures including subventions, as we see currently with the EVs in different EU countries.
30.	This segment is primarily responsible for the replacement of gasoline and diesel fuel.	Budapest Airport Zrt.	We are aware that achieving ambitious reductions in greenhouse gases (GHG) is particularly challenging for transportation due to the technical limitations of replacing oil-based fuels. Investment gaps are at the center of these challenges and the EIB stands ready to help.
31.	Win - win situation	Pro Bahn	We also see the opportunities in transport decarbonisation process for the economy and social wellbeing.
32.	Positive impact (new trade routes, jobs etc.)	Croatian Chamber of Economy	
33.	There will be a short medium and long-term impact. The policies of individual MS imply change with companies adjusting their systems and vehicles to new environmental requirements, pushed to renew fleet as well as to important adjustments on their traditional procedures.	European Road Haulers Association (UETR)	We also expect impacts on the sector, including demand and costs. The fleet managers are already impacted as we also see from the demand for loans to finance various fleet renewal schemes across the EU.

Question 5 – Do you believe that there will be any permanent impact on the development of this sector following the COVID-19 pandemic?



Ref	Summary of Contributions	Contributor	EIB comment
1.	The modal shift to road will change to pre Covid situation within three years.	Response 1039141480	At this point, the EIB believes many changes in the modal mix are largely temporary and that shared-mobility solutions, including public transit, will rebound and continue to capture increased market share. This is in line with the EU Reference Scenario 2020, which expects a rebound in road transport activity in the period 2025-2030. At the same time, the EIB recognizes that the pandemic could produce some permanent shifts over both the short and long term (e.g. a long-term decrease in vehicle miles traveled due to reduced commuting). Moreover, other lasting impacts on mobility may be expected as we witness changes in the macroeconomic environment, regulatory trends, technology, and consumer behaviors.
2.	It is now rather hollow at activity level, but this will eventually pick up again with the restart of activity.	Response 290033127	
3.	More home & enterprise deliveries (smaller but more frequent deliveries)	METROREX S.A. Bucharest	
4.	Because of online purchases, it might be there is more road transport. It needs to be consolidated in freight rail transport	Back on Track Belgium vzw-asbl	
5.	The digitalization of extra-urban roads and the achievement of customer safety will likely attract new users.	Global Infrastructure Investor Association	

Ref	Summary of Contributions	Contributor	EIB comment
6.	The increase in online shopping that implies delivery and last mile mobility trend will last.	Miguel de Ortuzar	Please see response to points above.
7.	One COVID-19 pandemic impacts is the electronic commerce increase. Bulk transport/logistics have boosted.	Stelios Efstathiadis	
8.	Permanent impact is possible, there is a forecasted increase in city logistics due to e.g. growth of online sales. For business this is a positive development, for climate (if not done ZE) this might be a negative development.	Ministry of Infrastructure and water Management	
9.	With the increase in teleworking, a reduction in road transport to the workplace can be expected.	Service Public Fédéral Mobilité et Transports; Miguel de Ortuzar	
10.	Fewer business trips will be taken, especially for short meetings	Joint contribution made by NewClimate Institute and Germanwatch	
11.	The question of the extent to which changes caused by the Covid pandemic will have an impact on transport in the long term, such as the absence of business travel and the use of the home office, cannot yet be conclusively assessed. Transport is expected to continue to grow even after the coronavirus outbreak. In addition, the coronavirus outbreak has highlighted the importance of the flexibility of the transport sector, which must also be supported in the long term alongside rail transport. Also and especially in crisis situations, transport of goods and people must be able to be flexible and secure services. It is crucial to apply innovation to climate-friendly infrastructure.	Hauptverband der deutschen Bauindustrie	
12.	COVID restrictions and possible changes of supply chains can result in decrease of transport need.	Ministry of Transport	
13.	People move less	Response 511707695	
14.	Vehicles will become safer from infections, but the number of passengers will continue to decline.	MAV-Volán Group	
15.	Both passenger and goods transport are forecast to lose revenue globally in 2021.	ECTRI	

Ref	Summary of Contributions	Contributor	EIB comment
16.	Long waiting times at the border, less heavy vehicle transport, at some point increase car traffic.	Croatian motorways Ltd	
17.	Telecommuting will remain reducing certain work-related demand for extra-urban road transport, but potentially increasing commercial demand as consumers rely on (long-distance) delivery of goods.	Bank Information Center	
18.	As regards passenger transport, road transport may appear more secure in the context of the COVID-19 pandemic. On the other hand, it is not certain that this trend will continue over time.	Service Public Fédéral Mobilité et Transports	
19.	The shift from public personal transport to individual mobility can probably remain for several years after COVID pandemic.	Budapest Airport Zrt., EuroRAP, iRAP, Joint contribution made by NewClimate Institute and Germanwatch, Ministry of Transport, Ministry of Transport and Infrastructure, Response 974008607, Response 511707695	<p>The EIB's CBR recognizes that the decarbonisation pathway for the road sector involves modal shift. However, the extent of the modal shift will be primarily driven by EU energy and transport policies.</p> <p>In line with the EIB's TLP, the EIB will support investments leading to modal shift from private cars to public transport, shared mobility and active modes.</p>
20.	Reduction in use of public transport and an increase in private vehicle mobility but this will not last once pandemic risks are under control.	Miguel de Ortuzar	
21.	Reticence to use public transport will remain, particularly for the elderly and more vulnerable for years to come.	Road Safety Foundation	
22.	Safely managing any ongoing mode shift to more vulnerable modes will likely be a priority. Reduced traffic flows led to increased speeds and increased risk. There is a risk that these speeds remain high unless they are actively managed.	European Institute for Road Assessment – EuroRAP; iRAP	

Ref	Summary of Contributions	Contributor	EIB comment
23.	The economic and operational stress suffered by drivers of transport companies during the pandemic cannot be ignored. The negative impact is the disappearance of many companies unable to assume the economic cost of the lack of activity for a long period, and the economic and social precariousness. A Transport Contingency Plan must be adopted by the EU for coordination, harmonization and harmonized implementation of rules binding for all EU MS.	European Road Haulers Association (UETR)	While it is up to EU and Member States' policy makers to develop appropriate policies and supporting measures, the EIB stands ready to finance fleet investment programmes by the haulers.
24.	Positive in new trading routes, multimodal terminals, zero emissions, new jobs.	Croatian Chamber of Economy	The EIB shares your view that not all of the trends observed in international goods transport are of a temporary or short nature and that the supply chain shock may entail positive impacts on the sector over the long term.
25.	We see the EIB's role in using public funding to assist a just transition as much as feasible. The forecasts on the further development of a given sector should be less relevant to the EIB than understanding how it can focus its funding where it can make the biggest difference in benefit of citizens and territories in Europe and beyond.	Counter Balance	As you might be aware, the EIB has played in active role in several EU initiatives meant to facilitate the transition and more generally to support sustainable recovery. For example, in cooperation with several Member States, the EIB will manage the Recovery and Resilience Facility, a flagship EU investment initiative to ensure recovery from the challenges of COVID-19, and which is meant to deliver on climate action, harness digital opportunities and accelerate the energy transition.
26.	Positive impacts because of the necessity for a change in the transport system will always serve to increase improvements. Negative impacts because of the increasing of the costs due to a lower demand during a considerable period of time.	Município de Faro	At this point, the EIB believes many changes in the modal mix are largely temporary and that shared-mobility solutions, including public transit, will rebound and continue to capture increased market share. This is in line with the EU Reference Scenario 2020, which expects a rebound in road transport activity in the period 2025-2030. At the same time, the EIB recognizes that the pandemic could produce some permanent shifts over both the short and long term (e.g. a long-term decrease in vehicle miles traveled due to reduced commuting). Moreover, other lasting impacts on mobility may be expected as we witness changes in the macroeconomic environment, regulatory trends, technology, and consumer behaviors.
27.	COVID 19 has no response to the need to improve transport infrastructure. Influence.	Pro Bahn	
28.	Impacts to roads do come from the governments, not from this pandemic.	Response 832108188	
29.	Covid-19 pandemic changed the transport pattern for the short term, the recovery is uncertain.	Ralph-Uwe Dietrich	
30.	COVID-19 has placed transport and mobility in the center.	Confederación Española de Transporte en Autobús - CONFEBUS	
31.	Covid-19 impact is neglectable compared to climate policies costs and other impacts.	Antje Willnow	



Ref	Summary of Contributions	Contributor	EIB comment
32.	It is hard to predict how COVID-19 and the resulting policies will impact the sub-sector or urban-roads.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	

Question 6– What are the most effective road safety measures to reduce the unacceptable level of death and injury on the world’s roads?

Ref	Summary of Contributions	Contributor	EIB comment
1.	<b>Speed limits</b> and if necessary reduced road width.	Response 1039141480	Safety for all road users is one of the cornerstones in the EIB Transport Lending Policy. The Bank recognises speed management as a particularly important element in the Safe System approach to road transport, namely in urban areas, where walking and cycling needs to be promoted as safe and convenient modes of transport.
2.	Speed limits on motorways and all other roads!	Response 974008607	
3.	Traffic management incl. speed control for road transport. High standard transport infrastructure like in the Netherlands	Antje Willnow	
4.	Homogeneous flow of traffic over 130 km on trunk roads	Pro Bahn	
5.	Speed limit, car safety controls (like the German TÜV), automation and reducing of traffic.	Jori Milbrandt	The EIB’s priorities for safety are addressed in the new Transport Lending Policy’s chapter 2, 4 and 5, which is focusing on road infrastructure safety. However, in line with the objectives of the EU Sustainable and Smart Mobility Strategy, the Bank will also support development and innovation in the transport sector to stimulate the deployment of connected and automated mobility, geolocation, and the use of data and artificial intelligence for a safer, more sustainable, multimodal, and smarter mobility.
6.	Speed cameras, but connected to each other and calculating the average speed between each camera.	Railway Signalling Automation Telecommunication And Industry Association	
7.	Speed limit Dedicated truck lanes?	STIB-MIVB	
8.	Law enforcement because driving under influence, higher speed than allowed and distractions play an important role. Strong investment in road maintenance to guarantee driving conditions and reduction of black spots. Connected and autonomous self driving vehicles will help to reduce fatalities. An early alarm installed in vehicles in case of accident is compulsory. And to protect pedestrians and cycling both in urban and extra urban areas digitalization and technology will have relevant effects.	Miguel de Ortuzar	
9.	speed limits and more <b>controls</b> by police	Marc-Olivier Leclercq	On maintenance, as per EIB CBR 4.35, the EIB will continue to support road rehabilitation projects and is mobilizing its resources to enlarge its road rehabilitation/renewal portfolio of supported projects. The CBR furthermore allows the EIB to support RDI in accordance with the specific criteria included both in the CBR and in EU regulations. Legislation, sanctions, fines, and police enforcement, are usually under the remits of ministries, which are not direct beneficiaries of EIB lending.
10.	Lower speeds, more control and punishment of drunk/drug driving	Response 552589262	
11.	Video surveillance	Croatian Chamber of Economy	
12.	Reducing speed in cities and all inhabited areas. This can be achieved by regulation but also by geolocation of vehicles.	Ministère de la Transition écologique	
			Please see response to points above.

Ref	Summary of Contributions	Contributor	EIB comment
13.	Speed limits, law enforcement. Political decisions should be guided by the number of victims.	Hanns Kerschner	
14.	Speed limits, city bans, on-board safety systems	OTIF	
15.	Put on strict control systems.	Municipio de Paredes	
16.	Regular technical inspection and maintenance, control of personal responsibilities, analyzing of cases that have already happened, keeping pace with the development of technology, putting safety first instead of profit.	Budapest Airport Zrt.	
17.	Implementing traffic calming measures & prioritizing non motorized traffic in urban areas	Mutakwa Samuel Sikazwe	The Bank is already supporting - and will continue to support - investments in traffic calming in urban areas, and facilities and infrastructure for pedestrians and cyclists as part of Sustainable Urban Mobility Plans. The Bank will also promote a shift towards greener modes of transport and affordable transport solutions for all, and any other investments supporting collective transport and multimodality.
18.	Impose the same <b>safety</b> standards (safety belts, airbag, etc.) in all countries of the world, including the third world. Making road improvements safe, harmonising road signs and road works at European or even global level	Response 290033127	The UN's regional commission in Europe, UNECE, is managing the international road traffic conventions and leading the effort to promote them. Road infrastructure safety in the EU is addressed through Directive 2008/96/EC on road infrastructure safety management, and the EIB is also applying the principles of the Directive on projects outside the EU.
19.	Creation of the national road safety systems - please refer to UNECE Inland Transport Committee's Recommendations on national road safety systems.	UNECE	We appreciate and take note of the UNECE Inland Transport Committee's Recommendations. The TLP's chapter 5 on priorities for EIB support specifically mentions the UN's recommendations and the Safe System approach, and how the Bank can support their implementation.
20.	In the Netherlands the most effective proven instrument to increase road safety is investments in safer infrastructure for cyclists, both urban and extra-urban.	Ministry of Infrastructure and Water Management	(see point 17 above)
21.	What is important is to ensure that EIB operations in the road safety field do not end up expanding the capacity of roads and motorways, but rather focus on the safety of already existing infrastructure.	Counter Balance	The EIB will continue to support projects with strong safety elements, rehabilitation projects, and robust projects designed to improve existing traffic flows (EIB CBR 4.35). The application of an adapted economic test will be applied to ensure that such projects represent a sound use of resources under a restrictive scenario based on high carbon costs. Please note that by the application of the CBR, all operations supported by the EIB are to be Paris aligned. When funding urban and local roads, alternative modes are prioritised in the context of urban and regional strategic mobility plans, with

Ref	Summary of Contributions	Contributor	EIB comment
			many of the projects integrating dedicated cyclist infrastructure.
22.	Building motorways, investing in <b>maintenance</b>	Finnish Transport Infrastructure Agency	The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR). Focus will be on improving the conditions and safety on existing roads.
23.	Adapted <b>infrastructures</b>	Traxio	As per EIB CBR 4.35, the EIB will continue to support road rehabilitation projects and is mobilizing its resources to enlarge its road rehabilitation/renewal portfolio of supported projects.
24.	Effective measures is the updating of the road signing. Effective measures are also rumble strips along the road edge lines that will awake the driver when departing from his/her traffic lane.	Stelios Efstathiadis	
25.	Identification and upgrading of roads where the number of deaths and injuries occur. Ensure investment in maintenance and road/traffic signs. Developing solutions as 2+1 roads. Massive deployment of ITS and connected systems.	Confederación Nacional de la Construcción (CNC)	Moreover, in line with the objectives of the EU Sustainable and Smart Mobility Strategy, the Bank will support research and development and innovation in the transport sector to stimulate the deployment of connected and automated mobility and the use of data and artificial intelligence.
26.	Better maintenance of road infrastructure is an important key to improving road safety.	Fédération nationale des Travaux Publics (FNTF)	
27.	Better infrastructure, adequate maintenance all over the EU. Harmonized and sufficient checks by authorities, coordinated action among Member States putting into effect an EU register on infringements and international compulsory documentation for road transport companies and drivers.	European Road Haulers Association (UETR)	Road infrastructure safety in the EU is addressed through the Road Safety Directive and is a high priority to the Bank. Asset preservation and climate resilience will also be a priority for EIB support through the rehabilitation and upgrading of existing road networks.  The UN's regional commission in Europe, UNECE, is managing the international road traffic conventions and leading the effort to promote them.
28.	Roads should be developed and managed in line with the Global Plan for the Decade of Action for Road Safety and Global Road Safety Performance Targets. Adopting a multi-sectoral approach to road safety is critical, however measures likely to have a positive impact come from the vehicle technology sector and systems such as ESC and ADAS, and from road infrastructure safety measures which are proven to be highly effective in reducing fatal and serious injury.	iRAP	The EIB acknowledges and supports the Global Plan for the Decade of Action for Road Safety, and the SDG Global Road Safety Performance Targets. These will be important references for the global road safety agenda and the EIB's priorities the coming decade. Others include the EU Road Safety Policy Framework 2021-2030, the EU Strategic Action Plan on Road Safety 2021-2030, and the EU directives on road safety.
29.	Effective road safety measures should focus on innovative approach of the safe system approach - policy, regulation and implementation of measures that address safe infrastructure, safe vehicles, safe users, safe speeds and post-crash care. In	European Institute for Road Assessment - EuroRAP	The EIB's priorities for safety are addressed in the new Transport Lending Policy's chapter 2, 4 and 5, with a focus on road infrastructure safety.

Ref	Summary of Contributions	Contributor	EIB comment
	terms of infrastructure, getting the 3 Star standard adopted and provision of self-forgiving roads is key.		
30.	Safety measures and improved technology (ERTMS)	Správa železnic	<p>The EIB welcomes potential new technologies and innovative solutions with good impacts. EIB financing of ERTMS and other infrastructure investments for digitalisation and automation will continue to be a priority (see Chapter 4 - Rail).</p> <p>Directive 2008/96/EC on road infrastructure safety management, amended by Directive (EU) 2019/1936, includes provisions for signs and markings, and for network-wide road safety assessments and network safety management.</p> <p>The Bank is also hosting the Safer Transport Platform, which can be contacted for potential support to develop dedicated road safety investment programmes within the EU. Such programmes can include a range of different solutions and measures.</p>
31.	Our members have done analysis on Safety Pilot Programs and Customer Engagement and delivered promising results: •Installation of LED-illuminated advanced curve signage near an area prone to accidents has reduced vehicle crashes by 95% •Installation of static warning signs, flashing alert beacons and dynamic ramp speeds	Global Infrastructure Investor Association	
32.	Better traffic signs, better legislation for traffic. Better road infrastructures. Implementation of measures in critical points.	Município de Faro	
33.	Construction of highways, video surveillance system and application of more severe sanctions.	METROREX S.A. Bucharest	<p>The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR). Focus will be on improving the conditions and safety on existing roads.</p> <p>The EIB recognize the important connection between speed and road accidents and considers speed and road safety management as an important part of a road's operation. Legislation, sanctions, fines, and police enforcement, are usually under the remits of ministries, which are not direct beneficiaries of EIB lending. However, the application of Directive 2008/96/EC and Directive (EU) 2019/1936 is a high priority to the Bank.</p>
34.	Measures that can lead to a reduction of traffic accidents with injuries and deaths are the improvement of traffic signalization and protective fences and protective systems. Trainings are important when taking driving exams and during years of driving. Prevention is very important, and the introduction of speed control on motorways is effective.	Croatian motorways Ltd	
35.	Adopting the 5 pillar safe system approach of safe road use, safer vehicles, safe speed, safe roads and roadsides and post-crash care.	EuroRAP	The EIB's priorities for safety, as addressed in the Transport Lending Policy's chapter 2, 4 and 5, are focusing on road infrastructure safety, but the Bank recognize the importance of all pillars of road safety, and the Safe System Approach in general.
36.	- speed limit; - oversight; - Intelligent Cooperative Transport Systems (C-ITS).	Município de Lousada	The EIB's priorities for safety are addressed in the new Transport Lending Policy's chapter 2, 4 and 5 are focused at road infrastructure safety, including better and safer facilities

Ref	Summary of Contributions	Contributor	EIB comment
37.	Reduction of vehicle speed, mass and power. — Adaptation of the infrastructure to allow more and more secure space for vulnerable users. — Prevention by acting on behaviour rather than imposing heavy fines. — Use of technologies at vehicle level (autonomous vehicle and in the meantime development of driver assistance tools and use of ANPR cameras to detect inappropriate behaviour — Reinforcing sanctions in particular for repeat offenders, but also by providing training as an alternative to penal punishment.	Service Public Fédéral Mobilité et Transports	for cyclists and pedestrians. Moreover, the EIB acknowledges the importance of speed management, good road conditions, and the potential safety benefits of Advanced Driver Assistance Systems (ADAS) and ITS.  To this end, the CBR allows the EIB to support RDI in accordance with the specific criteria included both in the CBR and in EU regulation.  The Bank will support research and development and innovation in the transport sector stimulating the faster deployment of connected and automated mobility and the use of data and artificial intelligence for a more sustainable, multimodal, safer and smarter mobility.
38.	First, a secure infrastructure is needed. The driver assistance system and automation can then make a further contribution.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
39.	- (Semi-) autonomous driving: increased safety technologies (e.g. assistants) on short- and mid-term basis, fully autonomous driving on long term basis - Regulation/policies: many markets (outside the EU and US) are lacking in implementation and monitoring as well as enforcement of standards such as maximum driving hours, qualification, load safety etc. - Infrastructural enhancements, e.g. allowing for better separation of (heavy duty) road and passenger traffics	Arthur D. Little	Regulations, sanctions and fines are usually under the remit of ministries and entities, which are not direct beneficiaries of EIB lending.
40.	<b>Autonomous driving</b>	Metropolitano de Lisboa	
41.	Development of autonomous and connected vehicles: remove the human factor in driving.	FEBIAC	
42.	Technological progress has, and will in future, lead to a reduction in road fatalities, including sensing and developments, up to and including autonomous driving.	Hauptverband der deutschen Bauindustrie	
43.	Autonomous electric cars with limited speed and following the rules when driving.	Railway Signalling Automation Telecommunication And Industry Association	
44.	Some degree of automation	STIB-MIVB	
45.	The existence of technological systems analysing the costs and effectiveness of measures implemented so that an assessment can be made.	Município de Paredes	The EIB acknowledges the potential to use new technologies to measure Key Performance Indicators (KPIs) for road safety. These are needed for project evaluation and to document

Ref	Summary of Contributions	Contributor	EIB comment
			progress towards the Decade of Action for Road Safety. They are also needed to assess the benefit-cost ratio of road safety investments, e.g. as part of Road Safety Impact Assessments, which are included as requirements in Directive 2008/96/EC on road infrastructure safety management, as amended by Directive (EU) 2019/1936.
46.	Change car use to <b>public transport</b>	Comunidade Intermunicipal do Cávado, MÁV-Volán Group	Public transport is in itself a means to reduce road accidents and to change the modal split in a safer and more sustainable direction. The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR). The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, prioritizing investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.
47.	The bus accident rate is the lowest of all the road transport modes. It is the safest means of road transport. Traveling by bus is 20 times safer than in a private vehicle.	Confederación Española de Transporte en Autobús - CONFEBUS	
48.	Road safety measures should focus on making roads safer by adding sidewalks and bike lanes. Road safety must be incorporated into road infrastructure, safer vehicles and equipment (e.g. helmets), mobility planning, and urban and environmental planning.	Bank Information Center	The EIB prioritizes safe infrastructure for all road users, including pedestrians and cyclists, and integration of safety concerns in planning at a very early project stage.
49.	Many cities have restricted the flow and speed of motorised vehicles to improve the safety of pedestrians and cyclists. Deployment of low-emission zones has helped to reduce emissions of carbon dioxide and nitrogen dioxide and yielded measurable improvements in road safety and public health.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The EIB acknowledges the initiatives in an increasing number of cities around the world, which gives high priority to sustainable transport and safety for pedestrians and cyclists. The TLP's chapter 5 on priorities for EIB support highlights the Bank's attention to approved Sustainable Urban Mobility Plans as a pre-requisite for the EIB's support. Urban road investments where the primary objective is to support active modes, road safety, and traffic calming, will also continue be a high priority.
50.	Collective and public transport modes are safer than private vehicles. Promoting public transport, including the bus mode, is an effective measure for a safer transport network. Investment in maintenance and upgrading roads is an essential issue for safety reasons. Solutions such as 2+1 roads and deployment of ITS and connected systems will decisively contribute to road safety.	CEOE	Public transport is a key element of sustainable transport, and also a means to reduce road accidents. The EIB will continue to support public transport projects, and road rehabilitation projects (EIB CBR 4.35), mobilizing its resources to enlarge its road rehabilitation/renewal portfolio of supported projects. Finally, in line with the objectives of the EU Sustainable and Smart Mobility Strategy, the Bank will support research, development and innovation in the transport sector to stimulate the deployment of connected and automated

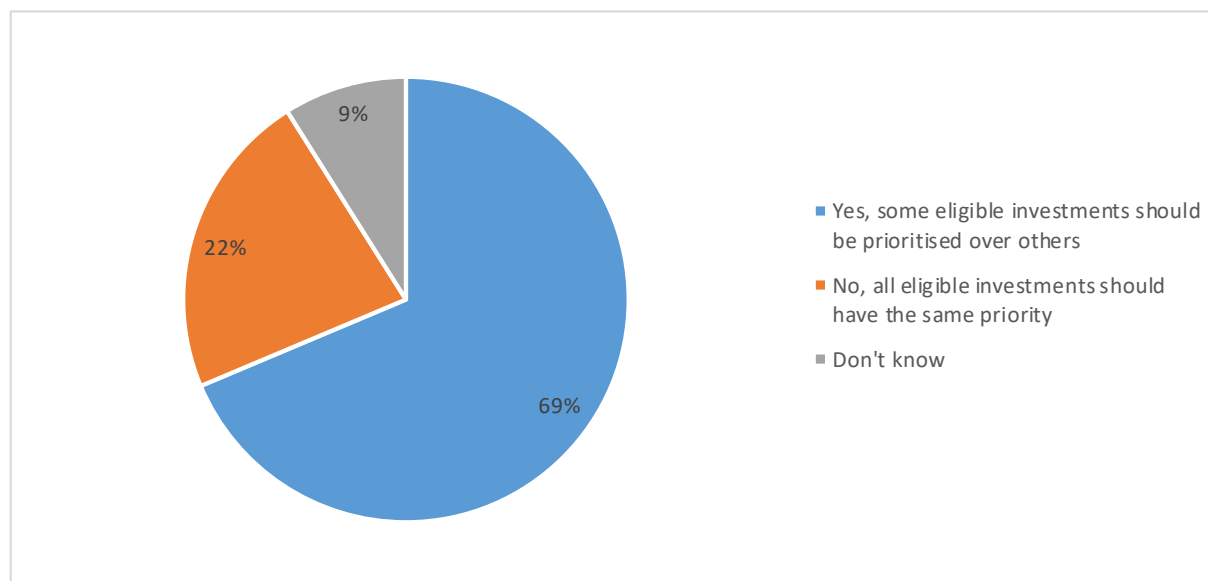


Ref	Summary of Contributions	Contributor	EIB comment
51.	Climate action in the transport sector such as a shift to public transport or introducing speed limits may lead to reduced road accidents and fatalities. At the same time, passenger car restricting measures lead to reduced GHG emissions, demonstrating the inherent link between climate action in the transport sector and reduced fatalities from road accidents.	Joint contribution made by New Climate Institute and Germanwatch	<p>mobility, and the use of data and artificial intelligence (AI).</p> <p>The EIB acknowledges public transport and safe facilities for active modes as an important focus area for sustainable and safe transport. The EIB's priorities for safety and active modes of transport are addressed in the new Transport Lending Policy's chapter 2, 4 and 5, which is focusing on road infrastructure safety.</p> <p>In line with the objectives of the EU Sustainable and Smart Mobility Strategy, the Bank will also support development and innovation in the transport sector to stimulate the deployment of connected and automated mobility, geolocation, and the use of data and artificial intelligence for a safer, more sustainable, multimodal, and smarter mobility. The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR).</p> <p>Speed management on roads in operation is an important element of the Safe System approach, which the Bank supports, as also reflected in Directive 2008/96/EC on road infrastructure safety management amended by Directive (EU) 2019/1936.</p>
52.	<ul style="list-style-type: none"> <li>- Comprehensive and clear legislation, on a number of risk factors associated with road traffic injuries and deaths, enforced with appropriate penalties and accompanied by public awareness campaigns</li> <li>- increasing road lanes</li> <li>- technological advancements regarding digital security system for transports (emergency tire breaks to avoid car accidents)</li> <li>- implementation of vehicle-to-vehicle communication technologies and related support-technologies for road infrastructure to prevent accidents.</li> </ul>	Ministry of Transport and Infrastructure	<p>The EIB acknowledges the importance of regulations and enforcement. These are usually under the remits of ministries that are not direct beneficiaries of EIB lending. Nevertheless, they form an important part of the Safe System approach, which is stated as a priority in the TLP chapter 5 on priorities for EIB support.</p> <p>The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR).</p> <p>ITS systems and advanced driver assistance systems are also making increasingly important contributions to the Safe System approach. In line with the objectives of the EU Sustainable and Smart Mobility Strategy, the Bank will support research and development and innovation in the transport sector stimulating the faster deployment of connected and automated mobility and the use of data and artificial</p>



Ref	Summary of Contributions	Contributor	EIB comment
			intelligence (AI) for a more sustainable, multimodal, safer and smarter mobility.
53.	Adopting a multisector approach to road safety is critical, however measures that are most likely to have a positive impact come from the vehicle technology sector and systems. Measures such as clearing or protecting roadsides, median treatments to reduce head on crash risk, facilities for walking and cycling and safer junctions.	Road Safety Foundation	The multisector Safe System approach is an important reference for all road safety stakeholders, including the EIB. New vehicle technologies are expected to have major impacts in the coming decades. The EIB's main focus will be on Safe Roads and EIB's priorities for safety are addressed in the new Transport Lending Policy, chapter 2, 4 and 5.
54.	Infrastructure measures dedicated to increased safety, ITS, enforcement and education, legal measures, technical progress on safety systems in vehicles	Ministry of Infrastructure	The EIB acknowledges and gives priority to infrastructure safety, as addressed in the new Transport Lending Policy, chapter 2, 4 and 5, including safe infrastructure for pedestrians and cyclists. Advanced driver assistance systems and ITS systems are also recognised as increasingly important elements of the Safe System approach in the coming decades. The Bank will support research, development and innovation in the transport sector to stimulate the deployment of connected and automated mobility and the use of data and artificial intelligence (AI), in line with the objectives of the EU Sustainable and Smart Mobility Strategy.
55.	Intelligent Speed adaptation and awareness to drive with less stress + decent safe infrastructure for vulnerable road users	Back on Track Belgium vzw-asbl	
56.	Reducing speed and motorised transport volumes are highly effective for increasing road safety. The set of most effective road safety measures will depend on the reference conditions/context. Shifts of urban road transport to a competitive public transport, walking and cycling could be effective and address most sustainability goals.	ECTRI	
57.	slow travel ; en commun...	Response 981558580	The EIB also recognize public transport as an important element of sustainable urban transport in line with the EIBs Climate Bank Roadmap, as set out in the EIB's priorities for safety in the TLP chapter 2, 4 and 5, with focus on road infrastructure safety.
58.	ITS / C-ITS; reduction of conflict points between transport modes – e.g. level crossings removal, building of cycle paths and cycle lanes; speed limit reduction at road sections with low safety levels.	Ministry of Transport	
59.	Improve safety and direct vision regulations.	European Federation for Transport & Environment	Thank you for your contribution.
60.	Less traffic	Response 832108188	

### Question 7 - Should the EIB prioritise certain eligible extra-urban road investments?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Investments should prioritize roads that constitute E-road network as per AGR Agreement.	UNECE	As you know, being the EU Bank requires us to focus our lending on TEN-T roads. But there should be a sound overlap between the two networks in the recast TEN-T Regulation.
2.	Bridging the missing links on TEN-T network.	Croatian Motorways Ltd	As per EIB' TLP, the EIB will prioritize the development of the core and comprehensive TEN-T road network in the EU, and strategic road corridors outside the EU. It will support robust projects that meet the adapted economic test, including in regions where the network remains relatively underdeveloped. With this approach, the EIB aligns with and support the EC Smart and Sustainable Mobility strategy.
3.	European interconnectivity, reduction of long-distance road transport, reduction of short-distance flights, hurry up traffic flow (avoid traffic jam, improve customs clearance, etc.)	Ralph-Uwe Dietrich	As per EIB's CBR 4.34, the EIB Group will continue to support the development of the core and comprehensive TEN-T road network in the EU, and strategic road corridors outside the EU. The recast TEN-T regulation with its renewed focus on transport corridors and intermodal nodes should be instrumental in driving investments in sustainable transport

Ref	Summary of Contributions	Contributor	EIB comment
			solutions.
4.	Quality of road infrastructure (eg markings) and connectivity.	FEBIAC	The quality of road infrastructure financed by the Bank has always been an important screening and monitoring criteria for the Bank. New road infrastructure in the EU must notably comply with the requirements of the EU Road Infrastructure Safety Directive, which includes safety audits at various stages of the project. Review of horizontal traffic signs, including markings, is a standard part of a road safety audit.
5.	To prioritize road investments a type of CBA exam should be made regarding social, environmental and economic issues. Transborder road connections should be supported when necessary to foster labor and goods markets and to improve access to education. Road access to multimodal infrastructures should be guaranteed at least in case of rail connection. Multimodal infrastructures sharing infrastructure for different modes should be fostered as they are examples of circular economy, better use of scarce resources, and reduction of carbon footprint and if closely looked at probably an example of climate change mitigation measures.	Miguel de Ortazar	The EIB does indeed carry out a comprehensive cost-benefit analysis. Its approach is described in the document “The Economic Appraisal of Investment Projects at the EIB” ( <a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a> ), which is currently under revision. The economic viability of the projects financed by the Bank has always been a key eligibility criteria, with extra-urban road projects required to have a <b>high internal economic rate of return</b> . The EIB Climate Bank Roadmap makes it even harder for individual projects, notably those with low observed traffic (e.g. cross-border sections), to show such an economic performance. Schemes providing for multimodal transport connectivity are a priority for the EIB. Schemes under EU 25 m in cost are typically financed under specific programmes and require an overarching regional strategic mobility plan paying due attention to multimodality and modal shift.
6.	Those for connecting links with intermodal transport and those for basic roads to access Green Corridors for road transport.	European Road Haulers Association (UETR)	Since there is currently no commonly accepted criteria for “green corridors”, the Bank is keen to finance corridor roads meeting high environmental criteria and characteristics of green infrastructure.
7.	Renewal, no additional roads	OTIF	According to the EIB’s CBR 4.35, the EIB will continue to support road rehabilitation projects and is mobilizing its resources to enlarge its road rehabilitation/renewal portfolio. Under the TLP, the EIB will notably prioritize road projects on the TEN-T road network.
8.	Road maintenance. Recharging infrastructure for e-vehicles.	Confederación Nacional de la Construcción (CNC)	According to the EIB’s CBR 4.35, the EIB will continue to support road rehabilitation projects and is mobilizing its resources to enlarge its road rehabilitation/renewal portfolio of supported projects. Financing of EVs charging infrastructure is a priority of the new EC Fit for 55 Strategy and the EIB is looking forward to support such projects as a priority in the future.

Ref	Summary of Contributions	Contributor	EIB comment
9.	Investments that are in line with the Global Plan for the Decade of Action for Road Safety and Global Road Safety Performance Targets should be prioritised. Roads that account for 75% of travel should be lifted to at least 3-stars and all new, upgraded and rehabilitated roads should achieve at least a 3-star rating. Where demand is high, or where it is desirable to induce demand – such as for walking and cycling around transport hubs – star ratings can go beyond 3-stars.	European Institute for Road Assessment – EuroRAP, iRAP	According to the EIB's CBR 4.15, the EIB will continue support for projects designed to improve existing traffic flows, rehabilitation projects, or projects with strong safety elements.
10.	The evidence on effectiveness needs to be taken into account. Strong evidence exists for vehicle technologies and safer road infrastructure to reduce road death and injury.	Road Safety Foundation	According to the EIB's CBR 4.15, the EIB will continue support for projects designed to improve existing traffic flows, rehabilitation projects, or projects with strong safety elements.
11.	Preparation for more <b>EVs</b>	Response 552589262	The EIB hopes to increase our lending in both EV fleets and electric charging infrastructure. The upcoming Regulation on the deployment of alternative fuels infrastructure (repealing Alternative Fuels Directive) should be instrumental in driving the effort in Member States.
12.	Investment in areas that contribute to efficient climate change mitigation needs to be prioritised, such as the development of stationary and dynamic charging infrastructure.	Hauptverband der deutschen Bauindustrie	
13.	The EIB should prioritize infrastructure and policies supporting road transport electrification in its extra-urban road investments. EIB should provide targeted financial incentives to accelerate cost parity between zero emission and conventional technologies, while increasing volumes will generate economies of scale and further reduce costs in the long term, especially for heavy duty vehicles.	Bank Information Center	
14.	Zero emission LCV and trucks and accompanying smart charging infrastructure, and smart road safety measures that also contribute to the transition to a sustainable transport system, i.e. safer infrastructure for cyclists.	Ministry of Infrastructure and water Management	
15.	Supporting the procurement of electric and <b>hydrogen</b> charging networks and zero-emission vehicles is the most effective way to spread zero-emission vehicles.	MAV-Volán Group	According to the EIB's CBR, the EIB looks forward to continue financing infrastructure that is required for zero direct emission transport (e.g. electric charging points, hydrogen fueling stations or electric highways)
16.	EIB should not solely focus on bio/synthetic fuels – it is important to invest in EV charging infrastructure to meet consumer demand of electric vehicles and to invest in nascent technologies such as hydrogen.	Global Infrastructure Investor Association	According to the EIB's CBR, the EIB Group looks forward to continue financing infrastructure that is required for zero direct emission transport (e.g. electric charging points, hydrogen fueling stations or electric highways). Moreover, the specific support for the development of low-emission hydrogen, suitable hydrogen storage solutions, retrofit of gas transmission and distribution networks and renewal of public transport fleets has been foreseen under the CBR. The EIB will remain technology-neutral in its investments, and open to

Ref	Summary of Contributions	Contributor	EIB comment
			new technological developments and alternative fuels. It has been based on the work of the EU Technical Expert Group and the EU Taxonomy.
17.	It is essential to give a definitive boost to a strategic industry for the economy and society such as bus transport. It is an efficient mean of transport and easy to connect with other modes, as well as being essential for certain groups, highlighting also its ability to move large groups of people at low cost.	Confederación Española de Transporte en Autobús - CONFEBUS	The EIB understands the advantages of the collective road transport over individual car travel in terms. The Bank has traditionally supported bus fleets renewal (and greening). As per EIB's CBR, it is proposed that transport bus fleets adopt the recommended criteria for making a substantial contribution under the EU Taxonom. Specifically, bus fleets will have to demonstrate that the emissions are below 50 g CO <sub>2</sub> per passenger kilometer. (See annex 2 Table C of the CBR.)
18.	Collective modes such as coaches to be preferred over individual cars by coach. Rail freight should be favoured between the regions of a country and between countries themselves over lorries over the same distances. Work on the delivery of the last km from the freight hub to the final destination of the truck product.	UTP (Union des Transports Publics et ferroviaires)	
19.	Priority should be given to investments leading to a modal shift towards more sustainable modes of transport and reduction of GHG emissions from extra-urban road transport.	Service Public Fédéral Mobilité et Transports	The TLP will prioritize investments leading to modal shift from private cars to public transport, shared mobility and active modes.
20.	Priority should be given to investments related to safest modes (such as bus), road maintenance, intermodality, recharging/refueling infrastructures and rail corridors. Each of them contribute to road safety and decarbonization.	CEOE	The TLP will prioritize investments into safe infrastructure, charging infrastructure and TEN-T corridors.
21.	The EIB should align all investments in road infrastructure with the Avoid-Shift-Improve hierarchy. In assessing a potential road project, it is important to consider the extent to which the road itself, as well as the circumstances of the area where the road would be built. Better urban design has the potential to reduce GHG emissions by about one third. The rapid market uptake of electric bicycles expands the potential for longer-distance travel in both the urban and rural contexts. The transition to a zero-emission transport sector requires reliable charging infrastructure for electric vehicles. In order to make this a reality, large investments to build electric charging points are required. Freight transport requires larger-scale infrastructure which takes time to build and has a long lifetime, making such investments prone to carbon lock-in. Therefore, supporting climate-neutral freight transport infrastructure from the beginning is essential, especially given the urgent need to act. Efficient use of multiple modes of transport, and a smooth transfer of cargo from one transport mode to another, can	Joint contribution made by NewClimate Institute and Germanwatch	The EIB shares your view that each road infrastructure project should be viewed through the lens of a transport system, in which each transport mode has a role to play. Whilst the Bank is not always in a position to influence the conceptual setting of a particular transport system, the Bank requires state-of-the-art multimodal mobility plans to be in place for the area or region concerned. Typically, regional and urban mobility plans incorporate transport investment programmes including road schemes complementary to other modes schemes and thus respectful of the ASI principles and environmental, climate and safety impacts. As regards the support for the decarbonisation of the freight transport, the EIB policy has been to avoid supporting a particular technology on the account of alternatives. Moreover, it is currently still not certain, which technology will become the leading solution in freight transport decarbonisation. Finally, support to multimodal transport in EIB lending policy will now be ensured among else, by the revised TEN-T regulation, which newly put an emphasis on the

Ref	Summary of Contributions	Contributor	EIB comment
	increase load factors and reduce energy demand – important efficiency measures.		connectivity of transport modes.
22.	Rail expansion has been forgotten decades and should now be a priority	Pro Bahn	In past three years, the EIB financed railway projects at a volume of more than EUR 3 billion per year, far exceeding funding providing for other modes of transport. EC policies foresee a renewed support for funding railway projects in the EU.
23.	There are better investments like railroads	Response 832108188	
24.	Road safety in urban areas should be addressed at the same time	Mutakwa Samuel Sikazwe	The EIB's priorities for safety are addressed in the new Transport Lending Policy, chapter 2, 4 and 5.
25.	Cost-beneficial investments are all needed	Finnish Transport Infrastructure Agency	The EIB does indeed carry out a comprehensive cost-benefit analysis. Its approach is described in the document "The Economic Appraisal of Investment Projects at the EIB" ( <a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a> ). The document is currently under revision. The EIB applies stringent cost-benefit criteria as part of its project investment eligibility check and will continue to do so under the new TLP.
26.	If it means "long distance", then no. Please focus on day to day life of millions of citizens, before considering improving quality of life of the wealthiest ones who travel a lot. Does "Extra urban" means "peri urban and rural" areas? If yes, then yes! If it means "long distance", then no. Please focus on day to day life of millions of citizens, before considering improving quality of life of the wealthiest ones who travel a lot.	ECOV	Both EU transport policies and EIB's TLP recognize the social dimension of climate and transport policies. In our economic appraisal, the EIB applies standard values across population for e.g. value of time, or safety, thus not directly privileging investments that primarily benefits certain population groups.
27.	Promote less polluting modes like walking and cycling followed to mass least polluting modes	Back on Track Belgium vzw-asbl	In the extra-urban road projects financed by EIB, the EIB has been attentive to the inclusion of complementary infrastructure for soft mobility modes, such as parallel cycling lanes. In the urban setting, Shared mobility and active modes, including bike sharing, bike lanes and pedestrian areas, are already supported by the EIB and will continue to be supported in the future.
28.	The EIB should only give priority to certain eligible investments in extra-urban public transport by <b>rail</b> !	Response 974008607	Taking into account various transport and mobility needs and contexts, including geographic and location differences, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap. According to EIB's CBR, the decarbonisation pathway for the road sector includes modal shift, efficiency improvements, increased electrification, as well as the increased use of

Ref	Summary of Contributions	Contributor	EIB comment
			alternative fuels (biofuels, low carbon hydrogen). EIB's TLP will be aligned with the CBR and will continue supporting EU policies, such as those moving good transport from road to rail. Taking into account various transport and mobility needs and contexts, including geographic and location differences, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap.
29.	Investments in road transport and its infrastructure should not be prioritised — and should be kept to a strict minimum.	Service Public Fédéral Mobilité et Transports	According to the EIB's CBR, the decarbonisation pathway for the road sector includes modal shift, efficiency improvements, increased electrification, as well as the increased use of alternative fuels (biofuels, low carbon hydrogen). The CBR foresees continued support to the road sector, but makes investments in road capacity expansion projects subject to compliance with a stricter economic test, which, inter alia, ensures that capacity expansion projects which rely on high short term (i.e. not yet decarbonized) vehicles are not supported. As per EIB's CBR, all EIB activities need to be aligned with the Paris Agreement temperature and adaptation goals, and “consistent with pathways towards low-carbon and climate-resilient development”.
30.	The EIB should end financing of any capacity increase in motorways. The new economic test is in a pilot phase, and it is unclear what impact it will have. If the EIB assumes a rapid uptake of electric vehicles, it could simply mean the bank would build more roads. Carbon pricing is also far from sufficient, as it does not take biodiversity impacts into consideration. The new economic test is in a pilot phase, and it is unclear what impact it will have. If the EIB assumes a rapid uptake of electric vehicles, it could simply mean the bank would build more roads. Carbon pricing is also far from sufficient, as it does not take biodiversity impacts into consideration. In addition, the choice of a technical tool to screen out carbon-intensive projects will make the scrutiny of its implementation complicated for external stakeholders, leaving a large discretion for the EIB on the use of this tool. It is also unclear to what extent induced traffic and scope 3 emissions will be taken into account in the economic test calculations. Overall, the shadow carbon price will not be sufficient to induce a modal shift and this therefore cannot be	Counter Balance; WWF EPO	The adapted economic test introduced under the EIB's CBR has been used by the Bank to appraise new road capacity enhancement projects under the decarbonisation scenario foreseen in the EC Smart and Sustainable Mobility Strategy. This includes high carbon costs and a policy mix leading to significant modal shift. The EIB is working on a methodology to integrate biodiversity and ecosystem externalities into its economic appraisal.



Ref	Summary of Contributions	Contributor	EIB comment
	a way to make decisions on road infrastructure investment.		
31.	It is also unclear to what extent induced traffic and scope 3 emissions will be taken into account in the economic test calculations. Overall, the shadow carbon price will not be sufficient to induce a modal shift and this therefore cannot be a way to make decisions on road infrastructure investment. The EIB should provide public information about the new economic test for roads, and detailed examples of how it is applied for EIB operations. For all future road projects, the EIB needs to be transparent and disclose the detailed outcomes of its assessments. The EIB should also implement in a stringent manner the EIB's economic and financial appraisal of all transport projects to align both with 1.5°C scenarios, ensuring a solid assessment of less carbon-intensive alternatives and indirect emissions (i.e. "Scope 3" emissions). Smaller road infrastructure should be given a thorough and made publicly available screening test and a clear assessment of environmental, social and climate risks, after exhausting all other alternatives.	CEE Bankwatch Network; E3G	The EC's Sustainable and Smart Mobility Strategy defines decarbonisation scenarios under a comprehensive policy mix including carbon costs. Significant demand shift to cleaner modes is thereby foreseen alongside demand containment and efficiency gains (ASI). The adapted economic test takes all this into account: carbon costs, demand evolution as well as fleet decarbonisation. The adapted economic test is not the only criteria to address the eligibility of road projects. Projects must be part of an overarching multimodal strategy that provides for due consideration of modal rebalancing and general decarbonisation of the transport system. In the context of the expected decarbonisation of vehicles by 2050, we see the optimisation of land-use planning, resource allocation among sectors and consumer choices, behaviours and priorities within the private car system as increasingly important factors beyond the detailed quantification of emissions. Resilience concerns may also apply, such as during the pandemic, when multiple road connections appeared as a safeguard against logistic bottlenecks and supply issues. The definition of the optimal capacity of certain systems is likely to evolve in the light of a post-pandemic approach to resilience, logistics and systemic disruptions.
32.	Only accept investments that do not benefit at the same time fossil fuelled road transport.	Response 511707695	As per the EIB's CBR, the following project types are not eligible anymore for EIB financing: vehicles and infrastructure dedicated to the transport and storage of fossil fuels (dedicated vessels and railcars, coal and oil terminals, LNG bulk breaking facilities, etc.). "Dedicated" is defined as built and acquired with the explicit intention to predominantly transport or store fossil fuels over the life of the project.
33.	Biofuels must be abandoned.	Response 290033127	We are aware that biofuels have a limited decarbonisation impact. In fact, most studies have found that producing first generation biofuels usually yields reductions in greenhouse gas emissions of 20 to 60% when fossil fuels are replaced provided the most efficient systems are used and carbon dioxide emissions from changes in land-use are excluded, whereas second generation biofuels can reduce emissions by 70-90%, still falling short to help ensuring transport decarbonisation in the long term. The CBR refrains the EIB from supporting biofuels production that make use of



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			feedstocks that can serve as food or compromise food security.
34.	The EIB should exclude the financing of any roads that encroach on Natura2000 sites or Key Biodiversity Areas.	WWF EPO	The EIB Group's Environmental Policy provides several safeguards for preserving protected areas, going beyond the applicable EU legal framework. Additionally, the EIB has committed through its Climate Bank Roadmap to develop additional environmental risk tools, which may strengthen requirements on projects encroaching on Natura 2000 sites. In addition, the EIB is working on a methodology to integrate biodiversity and ecosystem externalities into its economic appraisal.
35.	Everything that can have the greatest environmental impact should be prioritised.	Response 290033127	The EIB has been working on a methodology to integrate biodiversity and ecosystem externalities into its economic appraisal, along with traditionally considered environmental impacts of extra-urban road infrastructure projects.
36.	The eligible investments that should be prioritised should be the ones that have more impacts over the population improving the conditions of living.	Município de Faro	The socio-economic impacts of a project have constituted a key eligibility criteria for the Bank under the current TLP and this will not change with the new TLP. Furthermore, the EIB AIM framework provides for a systematic measurement of project' outcomes. Nevertheless, determining broader strategic impacts remains methodologically challenging.
37.	The magnitude of flexibility and speed for financing should be considered. If the investments move at a slow pace, there is no necessity to integrate "premium investments" for certain eligible extra-urban road investments.	Ministry of Transport and Infrastructure	The speed of realization of an investment is above all dependent on the quality of the project preparation. The EIB offers different types of financial instruments that have a great deal of flexibility and allow a quick mobilization of investments.
38.	In which they represent significant progress locally.	Budapest Airport Zrt.	The socio-economic impacts of a project have constituted key eligibility criteria for the Bank under the current TLP and this will not change with the new TLP. Furthermore, the EIB AIM framework provides for a systematic measurement of project' outcomes. Nevertheless, determining broader strategic impacts remains methodologically challenging.
39.	First/last mile roads for social and territorial cohesion.	ECTRI	The EU policies emphasize the role of urban nodes and their connectivity to TEN-T network. Both are prioritized for EIB financing under the new TLP. Both EU transport policies and EIB's TLP recognize the social dimension of climate and transport policies. Our economic appraisals enable us to assess the impacts on population impacted by the project.
40.	Stronger focus on enabling autonomous driving on key routes	Arthur D. Little	The EIB shares your view that digitalization in road transport is part of the efficiency improvements required in the path towards transport decarbonisation. The EIB notes that this is

Ref	Summary of Contributions	Contributor	EIB comment
			also recognized in the latest EU policies, such as the revised TEN-T regulation. ITS investments are also foreseen in the EIB Climate Adaptation Plan. The EIB's commitment to innovation is summarized in its <a href="#">Innovation for inclusive Green and Digital Transition – Innovation, Digital and Human Capital Orientation 2021-27 (eib.org)</a>
41.	Charging and refueling infrastructure for alternative fuels (non-fossil such as green hydrogen and biofuels).	TLN	According to the EIB's CBR, the decarbonisation pathway for the road sector involves modal shift, efficiency improvements, increased electrification, as well as the increased use of alternative fuels (biofuels, low carbon hydrogen). AF infrastructure is key in the adoption of AF vehicles and as per the TLP, the EIB will prioritise financing of charging infrastructure for fleets of zero-emission vehicles.

## Additional comments

Ref	Summary of Contributions	Contributor	EIB comment
1.	The railroad must be prioritized over the road!	Response 974008607	The European Commission's Smart and Sustainable Mobility Strategy emphasizes the sustainability of rail transport, targeting a doubling of traffic on high-speed rail by 2030 (tripling by 2050) as well as the doubling of rail freight traffic by 2050. Several EU funding initiative prioritize rail investments over the road. Rail will remain a priority for the EIB under the revised TLP.
2.	The urban approach to airports needs to be improved so that their fast and comfortable nature can be better explained. Thus, instead of a crowded approach, it is worth operating on simple, fast expressways.	Budapest Airport Zrt.	Recent EC's policy initiatives, put a great emphasis on the transport nodes and their connectivity in a multimodal way, so that the strengths of each transport mode can be fully exploited. Airport connections to the TEN-T railway network and investments aimed at encouraging multi-modality and increased use of public transport to access the terminals are, indeed, a priority of the EIB.
3.	The mandate of EIB should be modified so that it is possible to finance cost-beneficial road projects also outside TEN-network	Finnish Transport Infrastructure Agency	Due to its Statute, the focus of EIB financing in the EU interurban road sector has been on TEN-T. The EIB has been able to finance road projects that provide direct connectivity to TEN-T in the past years and also road schemes under regional and urban programmes, particularly in Cohesion regions. Projects not-related to TEN-T often show a relatively poorer economic performance and often due to their size are less likely in need of EIB funding. Under the revised TLP, the EIB will also prioritise road projects implemented in the context of an Integrated Regional Development program or equivalent plans designed to ensure a balanced territorial development or to address issues of accessibility or transport poverty.
4.	Moving car ownership and use to car sharing or Uber like services has the same safety issues as owning a private car. EV's and fossil fuel cars have the same infrastructure related safety concerns. It should be recognised that there are countries within the EU at different stages in their transition journey and this can present challenges	EuroRAP	The reinforced EU legal requirements on the road infrastructure safety should help ensure that roads are inherently safe. EIB has been working on its road safety strategy under which specific goals for road safety design and safety performance of the roads should be articulated.
5.	Various approaches exist to help improve road infrastructure and reduce road casualties. Star rating for designs can be used to assess the safety standard of new roads as per WHO road safety goal 3.	iRAP (ref.7); Road Safety Foundation	The EIB sees car sharing as playing an important role in the future mobility patterns. Various market forecasts expect a strong growth of this segment following the COVID-19 pandemic. The segment is likely to benefit from underpinning

Ref	Summary of Contributions	Contributor	EIB comment
			technological innovations. The EIB considers car-occupancy rates in its economic appraisal. Finally, the EIB has supported projects that included car-sharing parking areas near strategic roads.
6.	It is essential to consider how to change mobility practices regarding the individual car. Beyond the carbon criterion, increasing the number of passengers per car allows for better optimization of each trip, reducing traffic and the associated nuisances, such as congestion, noise and local pollution. In this respect, it seems essential that the EIB takes up this issue and proposes solutions to increase the occupancy rate of vehicles, as an objective in its own right, and therefore in the same way as other sustainable mobility solutions. It is possible to operate "carpooling lines" in low density areas which as quality of service as good as a tram or a metro. This cutting-edge innovation requires high level of technologies used in a fully integrated environment. Investing massively in innovation with the objective of structurally increasing the occupancy rate would make it possible to prepare the road system of the future, based on efficient, inclusive, resilient and therefore sustainable use.	ECOV	We see car sharing to play an important role in the future mobility patterns. Various market forecasts expect a strong growth of this segment following the COVID-19 pandemic, while the segment is likely to benefit from underpinning technological innovations. The EIB considers car-occupancy rates in its economic appraisal, but cannot impose specific goals on project promoters, who are not at the position to control those. Finally, the EIB has supported projects that included car-sharing parking areas near strategic roads.
7.	A successful EU internal market requires optimal use of intelligent transport systems and coordinated transport options. Barriers that restrict the internal market should be removed. Strengthening the internal market must take place both from the point of view of labour mobility and the transport of goods, while at the same time respecting the requirements of climate policy. Remote regions must also be connected to transport networks. We are in favour of a holistic approach, linking climate policy, the economy and people in a future-oriented way — this is only possible with long-term equal treatment between the rail and road options.	Hauptverband der deutschen Bauindustrie	The EIB shares your view that the sustainable transport system requires a holistic approach in planning and operation. It has been a role of the EIB to support transport projects that address market failures, and thus contribute to a more efficient market. Finally, the EIB acknowledges the importance of well-functioning internal markets for the ITS, which is a prerequisite for step increase in effectiveness of road transport at the time of ever more frequent climate change adverse effects on road infrastructure.
8.	Projects aimed mainly on road capacity expansion should not be supported under the EIB Lending Policy. Supporting such projects would be contrary to the overarching policy goals such as the Green Deal and the Sustainable and Smart Mobility.	European Rail Infrastructure Managers (EIM)	While road capacity expansion is a means for better road infrastructure performance, projects involving road capacity expansions are now subject to stringent requirements under the EIB adapted economic test. This type of project could well be justified in particular cases (e.g. rapid demographic growth in concerned areas and limited possibilities for alternative transport infrastructure).

Ref	Summary of Contributions	Contributor	EIB comment
9.	The EIB must make achieving a significant reduction in overall GHG emissions compared to the most likely business as usual scenario, and complementary resource efficiency and pollution prevention policies, central to the design and a criterion for approval and success of every road transport project. This must be applied to the entire project, not just to the portion financed by the EIB. The EIB should have a time-bound commitment to phase out purchases of internal combustion vehicles for all their projects and for their own operations. This should be done at the earliest feasible date, i.e. 2023. * For promoting fuel efficiency and reducing the GHG footprint of a project to be meaningful, goals ideally should be expressed as an absolute reduction, with a firm, time-bound commitment.	Bank Information Center	<p>The EIB aims at reducing GHG emissions of the operations it finances while ensuring that they are aligned with the Paris Agreement. As per application of its Carbon footprint methodology and CBA methodology, the entire project under consideration is subject of its assessment, not just the portion financed by the Bank. As per its CBR, the EIB has restricted financing of non-green vehicle fleets, by applying criteria stemming from the EU policy.</p> <p>The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB's CBR. In line with the CBR, large road capacity expansion projects with an investment size of EUR 25 million or greater will be subject to an adapted cost benefit test incorporating carbon prices and traffic profiles compatible with full decarbonisation by 2050. This adapted economic test will provide a framework to confirm the Paris alignment of new road capacity expansion projects. Justified investments in the EU will also have to demonstrate adequate provision of alternative fuel infrastructure.</p>

## Chapter 6 – Inland waterway transport

### Question 1 – What do you believe is the technological roadmap for decarbonising inland waterway transport?

Ref	Summary of Contributions	Contributor	EIB comment
1.	<b>Hydrogen</b> powered ships, reducing drag	Jori Milbradt, Response 974008607	Zero direct (carbon) emission vessels are eligible for EIB financing in line with the Climate Bank Roadmap and will be prioritised under the Transport Lending Policy.
2.	Complete shutdown with diesel and oil propulsion. <b>Electricity</b> can be a good solution, but it is generated by burning fossil fuels. Because nuclear power propulsion is unlikely for a long time to come, in the long run, <b>hydrogen energy</b> can provide good value for money while protecting the environment.	Budapest Airport Zrt.	Zero direct (carbon) emission vessels are eligible for EIB financing in line with the Climate Bank Roadmap and are will be prioritised under the Transport Lending Policy.
3.	Sustainable fuels; Fuel decarbonation; Biofuels	Ralph-Uwe Dietrich, STIB-MIVB, Response 511707695	<p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible.</p> <p>The EIB will also prioritise the modernisation and technological development of the inland navigation fleet, in particular with regards to the environmental performance, efficiency and safety. Both new builds as well as the retrofitting of existing vessels will be eligible for EIB financing.</p> <p>Intermodal logistics centres remain eligible for EIB financing.</p>
4.	Alternative fuels infrastructure and vessels deployment.	Ministry of Transport	
5.	Alternative fuels and propulsion will play an important role in inland navigation.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
6.	Availability of <b>alternative fuels for skippers</b>	Ministry of Infrastructure	
7.	<b>Wall electricity/hydrogen plugs</b> and <b>least polluting machines</b> combined with ships running on electricity/hydrogen	Back on Track Belgium vzw-asbl	
8.	Possibly <b>electric-/battery-based shipping</b> for short-sea / short-distance maritime transports (e.g. along Rhine river) See also answer for Maritime chapter	Arthur D. Little	
9.	Use of <b>sustainable fuels</b> can play a role in the decarbonisation of the sector. <b>Electrification of smaller vessels</b> such as recreational craft can also contribute to the decarbonisation of this sector.	Service Public Fédéral Mobilité et Transports	
10.	- Electric vessels - Zero-emissions-fuelled vessels also may play a role to a lesser extent	Joint contribution made by NewClimate	

Ref	Summary of Contributions	Contributor	EIB comment
	- Charging infrastructure along inland waterways - Green ports	Institute and Germanwatch	Please refer to EIB's response to points 3 onwards.
11.	Till 2025 evaluation of <b>electrification with overhead catenary</b> . Development of <b>hybrid e-ships</b> . 2025-2050 <b>electrification</b> throughout Europe starting first on canals.	Response 1039141480	
12.	<b>Biofuels</b> for existing vessels, retrofit to <b>replacable batteries</b> once feasible and affordable (with subsidies and extended loans) until <b>E-fuels</b> are available	Van Oord	
13.	Use <b>electric wires</b> for a European standard-electro-ship	Response 832108188	
14.	Increase the use of green technologies such as <b>electric batteries and hydrogen fuel cells</b> . These technologies already exist and in use, however need to be boosted to achieve the green transition. Lastly, hydrogen fuel cells are already in use and are a proven solution to decarbonising this sector.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), WWF EPO,	
15.	No idea, perhaps <b>natural gas</b> as a bridge technology, but after it?	Hanns Kerschner	
16.	New <b>propulsion</b> (hydrogen, LNG etc.) and network of good <b>logistics centers</b> in ports.	Croatian Chamber of Economy	
17.	Adding <b>terminal infrastructure</b> for more simplified modal shift on existing inland waterway transport routes. Focus on some sections which bear the capacity to replace high amount of road transport. Encouraging inland waterway operators by more attractive conditions for fleet enlargement.	Antje Willnow	
18.	Technological roadmap for decarbonizing inland waterway transport also focuses on reducing 55% of emissions by considering peculiar strategies, such as: the usage of appropriate fuels (or <b>e-fuels</b> ), enabling <b>high energy efficiency with e-fuels or low energy efficiency with e-fuels</b> (the second plan is the most plausible one).	Ministry of Transport and Infrastructure	
19.	Increase traffic and means of inland waterway transport with the <b>intermodality between ports</b>	Response 981558580	
20.	The energy transition in inland navigation is key to attaining the climate-neutral agenda by 2050. Only a combination of	SEA Europe (European	
			Please refer to EIB's response to points 3-19 above.

Ref	Summary of Contributions	Contributor	EIB comment
	<p>zero-emission innovative solutions, fuels, operational approaches and technologies can bring about the change needed to meet the 2050 level of ambition of the European Green Deal. To tackle the energy transition in a cost-efficient and accessible way, it is fundamental to recognize the diverse range in types of <b>vessels</b>, quickly step up the availability and rollout of a heterogeneous mix of clean alternative <b>fuels</b>, alternative <b>fuel infrastructure</b> and propulsion methods with a network approach and in accordance with the principle of technological neutrality and based on a LCA approach; use of all readily deployable options to reduce inland navigation emissions, including bridging fuels and transitional systems, and acknowledge the importance to the energy transition of <b>ports</b> and European <b>shipyards</b>, which is where the building, conversion and <b>retrofitting of ships</b> takes place. In this regard, financing support for R&amp;I, deployment and fleet renewal investments in Europe is paramount.</p>	<p>Shipyards and Maritime Equipment Association)</p>	<p>The technological roadmap for the decarbonisation of the sector will consist of many different technological and operational solutions. Both efficiency improvement measures and alternative fuels and propulsion methods will be required to decarbonise IWT.</p> <p>Likewise, Different segments of the market will require different technologic solutions and that there is no one-size fits all approach to decarbonising the sector.</p> <p>The long physical life of the IWT vessels requires a quick adoption of carbon-free technologies while these technologies are still under development and their application in the sector is currently not commercially viable.</p> <p>The EIB will remain technology-neutral in its investments, and open to new technological developments and alternative fuels.</p> <p>The <a href="#">EIB's Climate Bank Roadmap</a>, Annex 2, Table C, confirms which investments are eligible for EIB support.</p> <p>The EIB supports upstream research, innovation and development activities, including in transport, as specified in the <a href="#">EIB's Climate Bank Roadmap</a>, Annex 2, Table B.</p> <p>The financing of shipyards is outside if the remit of the EIB Transport Lending Policy and priorities are covered under other EIB sectoral lending policies. We kindly invite you to refer to the <a href="#">EIB's Innovation, Digital &amp; Human Capital (IDHC) lending programme</a> which sets the direction for the 2021-2027 period.</p>
21.	<p>As with other modes, <b>electrification</b> is likely the best technology for decarbonising inland waterway transport. However, <b>direct wind power (sails)</b> can also play a role. Additionally, <b>maintenance and operations</b> also are vital for efficiency. Techniques like removing debris from propellers, smoothing the surface of the hull with sharkskin-like coating, and “slow steaming”—reducing a ship’s operating speed—all lower energy consumption.</p>	<p>Bank Information Center</p>	<p>Please refer to EIB’s response to points 3-19 above.</p> <p>Vessels operational expenditure is not a type of eligible cost for EIB financing.</p>



Ref	Summary of Contributions	Contributor	EIB comment
22.	Financing of the transport operators for the <b>acquisition of boats moved at cleaner energies</b> . Financing of public authorities in order to <b>enable the contract of transport operators with boats with cleaner technologies</b> .	Município de Faro	<p>The EIB will prioritise the modernisation and technological development of the inland navigation fleet, in particular with regards to the environmental performance, efficiency and safety. Both new builds as well as the retrofitting of existing vessels are expected to be eligible for EIB financing.</p> <p>Furthermore, the EIB will prioritise investments in alternative fuelling infrastructure which could eventually enable public authorities to promote the provision of public transport systems using cleaner technologies.</p>
23.	<p>EC and CCNR share the same long-term objective: an inland navigation without GHG emissions by 2050. The CCNR roadmap on the reduction of emission in inland navigation will therefore address not only greenhouse gas emissions but also air pollutant emissions.</p> <p>It was decided to <b>focus on a set of technologies with a technology readiness level (TRL) of 5 and above</b>. <b>Other technological options</b> like lithium-air batteries, LOHC, formic acid (hydrozine) or green ammonia in combination with FC or ICE might play roles in <b>later stages</b> of the energy transition. In addition, for the time being, the CCNR Secretariat recommends taking into account the following ideas:</p> <ul style="list-style-type: none"> <li>• The energy transition to a zero-emissions inland navigation is accompanied by <b>technological uncertainties</b> relating to prices, the availability of fuels for inland navigation, and technology development, especially zero-emission technologies.</li> <li>• Given the uncertainties surrounding the development of certain technologies and the production capacities of alternative fuels, the CCNR acknowledges the identification of <b>two possible pathways</b>, one conservative and one innovative, but both sufficiently ambitious to achieve the Mannheim Declaration's targets.</li> <li>o The <b>conservative pathway</b> refers to a pathway in which the alternative fuels and technologies considered are relatively easy to implement and cost efficient in the short-term. Such alternatives consist, for instance, in advanced biodiesel that can be used in existing diesel engines, or LBM that can be</li> </ul>	Secretariat of the Central Commission for the Navigation of the Rhine	<p>The EIB notes and closely follows the developments that the CCNR is reporting on, concerning the greening of the sector and as part of this public consultation process.</p> <p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. The EIB will prioritise the modernisation and technological development of the inland navigation fleet, in particular with regards to the environmental performance, efficiency and safety. Both new builds as well as the retrofitting of existing vessels are expected to be eligible for EIB financing. Vessels operational expenditure is not a type of eligible cost for EIB financing.</p> <p>Vessels designed and built to be dedicated to the transport of fossil fuels are not eligible regardless of their type of propulsion system and engine in line with the requirements of the Climate Bank Roadmap.</p> <p>The EIB will remain technology-neutral in its investments, and open to new technological developments and alternative fuels.</p>

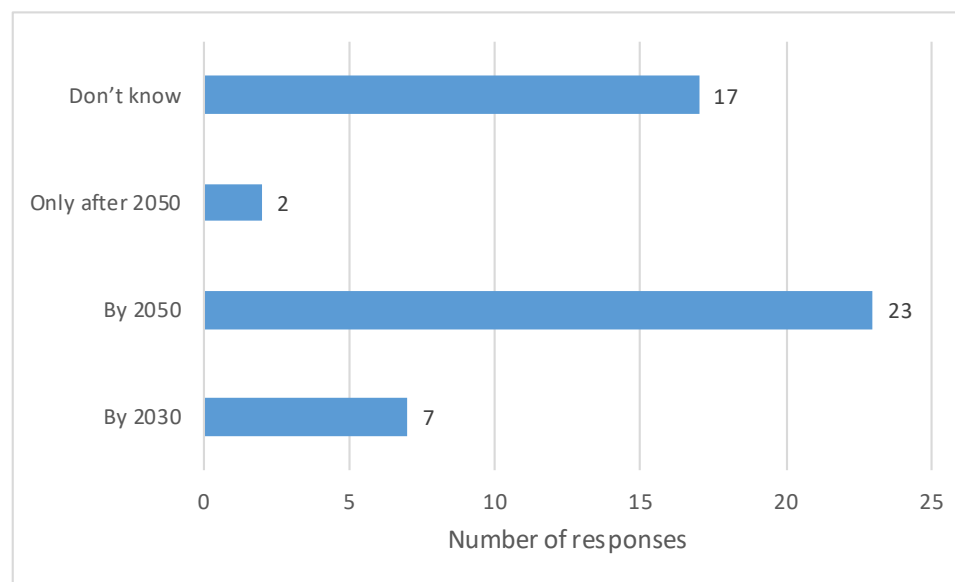
Ref	Summary of Contributions	Contributor	EIB comment
	<p>used in gas engines. These are fuels and techniques which have a relatively <b>higher TRL and are already available on the market.</b></p> <p>o The <b>innovative pathway</b> encompasses a more innovative approach, in which the fuels and technologies considered are currently still in their infancy stage (low TRL) and significantly <b>more expensive as compared with advanced biodiesel and LBM.</b> This concerns alternatives like battery-electric and hydrogen-powered propulsion systems, which are also zero emission locally. They are expected to become more mature in the years to come.</p> <ul style="list-style-type: none"> <li>• The <b>transition pathways</b> describe the expected evolution of the entire fleet with a breakdown of the technologies used. It concerns the <b>building of new vessels, as well as the retrofiting and scrapping of existing vessels.</b></li> <li>• <b>Reduction of GHG emissions</b> is the most challenging part, as air pollutants can be avoided to a large extent with combustion engines and modern exhaust gas after treatment systems.</li> <li>• <b>Reduction of energy consumption</b> by all possible means is an important lever to reduce emissions. However, <b>reduction of energy consumption will not be enough to meet the objective of a zero-emission fleet in 2050.</b></li> </ul> <p>At this stage, for the development of a European funding and financing instrument, <b>no technology should be excluded</b>, no priority can be set on a specific technology.</p>		
24.	Technological roadmap for decarbonizing inland waterway transport also focuses on reducing 55% of emissions by considering peculiar strategies, such as: the usage of appropriate fuels (or <b>e-fuels</b> ), enabling <b>high energy efficiency with e-fuels or low energy efficiency with e-fuels</b> (the second plan is the most plausible one).	Ministry of Transport and Infrastructure	
25.	Increase traffic and means of inland waterway transport with the <b>intermodality between ports</b>	Response 981558580	The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland

Ref	Summary of Contributions	Contributor	EIB comment
			port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. Furthermore, intermodal logistics centres remain eligible for EIB financing.
26.	Limited potential since <b>IWT is very vulnerable to climate-change effects</b> , especially to the variation of water levels in the waterways. Also, there are many environmental restrictions.	Správa železnic	<p>The EIB is aware of the particular vulnerability of the sector to the effects of climate change as well as the environmental restrictions that exist when it comes to implement new IWT projects, particularly greenfield investments.</p> <p>In this sense, we kindly refer you to the <a href="#">EIB's Climate Adaptation Plan</a> which will strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure. The EIB will significantly increase adaptation financing to support the European Union Adaptation Strategy for smarter, more systemic and faster adaptation, both across Europe and globally.</p> <p>The environmental compliance of these projects as well as a sound preparedness of the projects for the likely effects of climate change are requirements under the Bank's Environmental and Social Standards which are applicable to all the projects it finances.</p>
27.	No longer build any. This is because it has a lot of arable land. It is better to <b>develop rail freight</b> , which is less harmful to local fauna and flora. For existing tracks, they need to be maintained, their impact on local fauna and flora reduced, and the <b>method of propulsion of the barges changed to electricity and hydrogen</b> .	Response 290033127	<p>Investments in the rehabilitation and improvement of the navigability conditions of fairways which are part of the TEN-T network (in the EU and neighbouring countries) or of relevance in the context of applicable transport policies/strategies (outside the EU and its neighbours) are eligible for EIB financing. Such investments in fairway infrastructure must be compliant with the EIB Environmental and Social Standards which, amongst others, ensure that the investments the Bank undertakes minimize and mitigate, as applicable, the impact in the local fauna and flora.</p> <p>All large inland waterway investment projects supported by the EIB are subject of a socio-economic cost benefit analysis taking into account relevant impacts including external impacts for society at large. Its approach is described in the</p>

Ref	Summary of Contributions	Contributor	EIB comment
			document <a href="#">The Economic Appraisal of Investment Projects at the EIB</a> which is currently under revision.  Taking into account various transport and mobility needs and contexts, including geographic and location differences, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap.
28.	The European Agreement on Main Inland Waterways of International Importance (AGN), of 19 January 1996 should be part of the roadmap.	UNECE	The EIB prioritises inland waterway investments that are part of the TEN-T network or equivalent strategically planned networks outside the EU, where the Bank has a mandate.  Economically justified projects that fit within a sustainable transport strategy can be supported if they are assessed to comply with the EIB's requirements and priorities.
29.	The Ministry of Infrastructure and Water Management is working on a roadmap within the CCNR; it will be adopted early December 2021	Ministry of Infrastructure and water Management	The EIB continues to actively engage with the CCNR in the follow up of the work currently ongoing in support of the sector transition towards a zero emission fleet.
30.	<b>ENGINES:</b> The average turnaround time of Inland waterway transport engines is above 30 years, so huge <b>investments will be needed for renewal and retrofiting</b> . <b>FUEL:</b> Limiting fuel consumption and emissions of greenhouse gases and pollutants needs to be a priority. There has been some innovation in the area already. Liquified natural gas, for example, looked very promising, but does not provide the scale the sector needs. The CDNI waste disposal points network's further development is also key for promoting better waste disposal, as well as the creation of concepts for treating gaseous residues of liquid cargoes are needed. All of these elements should be part of a regulatory framework. <b>INFRASTRUCTURE:</b> constant assessment of infrastructural performance needs to be prioritised as well to improve overall safety and navigational efficiency. The global climate changes create both high and low water levels hindering the overall reliability and performance of the sector and affect the safety of the crew. <b>SKILLS:</b> In line with the aforementioned initiatives, investments in new skills is critical to ensure that workers are prepared and protected in the process of introducing new fuels and their handling procedures.	European Transport Workers' Federation	Please refer to EIB's response to points 3-19 above concerning propulsion systems and infrastructure.  The EIB is also aware of the widely recognised challenges the sector faces in its professionalization. However, the financing of educational facilities is outside if the remit of the EIB Transport Lending Policy and such priorities are covered under other EIB sectoral lending policies. In this sense, we kindly invite you to refer to the <a href="#">EIB's Innovation, Digital &amp; Human Capital (IDHC) lending programme</a> which sets the direction for the 2021-2027 period.

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31.	A mix of combined policies (technology, alternative fuels/renewable energy, multimodal transport, smart policy measures for sustainable urban mobility) sensitive to each context.	ECTRI	<p>The revised EIB Transport Lending Policy prioritises investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. The EIB will also prioritise the modernisation and technological development of the inland navigation fleet, in particular with regards to the environmental performance, efficiency and safety. Both new builds as well as the retrofitting of existing vessels are expected to be eligible for EIB financing.</p> <p>The EIB considers that all modes are key in improving the multimodality of the transport system into a network of rail, inland waterways, short sea shipping routes and roads, which are linked to urban nodes. Multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions. Investments in safe and green modes need to be made in a multimodal context to harness their maximum potential, incorporating also last mile considerations into investment decisions concerning transport between hubs. Also, supporting investments in digitalisation are needed for efficient multimodality, both in freight and in passenger transport.</p>

## Question 2 – How fast can inland waterway transport realistically be decarbonised?



Ref	Summary of Contributions	Contributor	EIB comment
1.	<p>It would <b>not be realistic to achieve a zero emission IWT before 2050</b> due to the following barriers:</p> <ul style="list-style-type: none"> <li>- knock-on effect of the costs involved in reducing emissions on transport costs requires acceptance on the part of shippers and the entire transport chain.</li> <li>- no positive business case</li> <li>- <b>scant interest from engine and technology suppliers</b> in developing and offering new propulsion and energy solutions specifically for inland navigation vessels.</li> <li>- <b>Limited shipowners' investment capacity</b></li> <li>- <b>limited certainty for investments in zero-emissions technologies, which require a longer time-horizon.</b></li> <li>- fragmented nature of the sector also becomes a barrier when considering ways of strengthening the shipowners'</li> </ul>	Secretariat of the Central Commission for the Navigation of the Rhine	<p>The EIB acknowledges that EC policy priorities for waterborne transport include the development of zero emission ports as well as the transition towards zero and low emission vessels both of which are actions promoted by the Smart and Sustainable Mobility Strategy. In this context, new vessels as well as the retrofit of the existing fleet and infrastructure for alternative fuels for zero-emission fleets play a vital role.</p> <p>The revised EIB Transport Lending Policy prioritises investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. The EIB will</p>

Ref	Summary of Contributions	Contributor	EIB comment
	<p>investment capacity, such as joint financing of greening technologies.</p> <p>Most zero-emissions technologies are still at an experimental stage and thus not yet sufficiently developed to enable large-scale use. Zero-emission technologies are expected to be available for roll-out rather from 2035 onwards.</p> <p>There are multiple challenges to be considered, i.e. (1) more R&amp;D to accelerate innovation in green technologies and alternative fuels, (2) more significant investments in bringing existing technologies to maturity and/or in improving them so that they too can be used in combating climate change and (3) the integration onboard ships of new innovative or mature technologies and fuels.</p> <ul style="list-style-type: none"> <li>- <b>Pilot applications of zero-emissions technologies</b> in inland vessels remain essential first steps in identifying and addressing the technical barriers to the deployment of technologies. At the same, such applications should clarify the capital/operational costs and <b>demonstrate a viable business case</b>.</li> <li>- This should also be accompanied by the <b>development of appropriate alternative fuels bunkering infrastructure</b> (investment in new infrastructure and in repurposing existing infrastructure).</li> <li>- Transition towards zero emissions also needs <b>acceptance among the inland navigation work force</b>. Education and training (initial and continuous) can create such acceptance while actively supporting the deployment of zero emissions technologies on board inland navigation vessels.</li> <li>- At this stage, the current <b>regulatory framework</b> for inland navigation does not provide the necessary legal certainty to ensure investment, encourage players to take the plunge and more generally create sufficient incentives for zero-emission technologies. <b>Improvements of the regulatory framework</b> should allow the normal use of alternative fuels and batteries on board inland navigation vessels. This mainly concerns vessels, crew, police requirements and the transport of dangerous goods.</li> </ul>		<p>prioritise the modernisation and technological development of the inland navigation fleet, in particular with regards to the environmental performance, efficiency and safety. Both new builds as well as the retrofitting of existing vessels will be eligible for EIB financing.</p> <p>Investments in support of the digitalisation of waterways and vessels, including the further deployment of River Information Systems technologies, automation, safety and security of the IWT sector will also continue to be prioritised.</p> <p>Further investment is also needed for the development of the environmental performance of the IWT fleet. The EIB will prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.</p> <p>The financing of R&amp;D activities is outside if the remit of the EIB Transport Lending Policy and such priorities are covered under other EIB sectoral lending policies. In this sense, we kindly invite you to refer to the <a href="#">EIB's Innovation, Digital &amp; Human Capital (IDHC) lending programme</a> which sets the direction for the 2021-2027 period.</p> <p>Concerning the regulatory framework, the EIB continues to follow developments in it which may have an effect in the IWT sector but, given its institutional characteristics, it does not propose regulation as such.</p>

Ref	Summary of Contributions	Contributor	EIB comment
2.	Hydrogen propulsion should be technically mature by <b>2050!</b>	Response 974008607	<p>Your views concerning the duration of the transition pathway are noted.</p> <p>The EIB acknowledges that further investment is needed for the development of the environmental performance of the IWT fleet.</p> <p>The revised EIB Transport Lending Policy prioritises the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.</p>
3.	Maybe until the 2050 because the technology may have to develop more in order that the investments may be more competitive.	Município de Faro, Response 1039141480	
4.	2030 it is too short, it is in 9 years' time. It is a long process to replace the entire fleet of vessels.	Response 290033127	
5.	Marine should select 1-2 promising renewable fuel options and start deploying now	Ralph-Uwe Dietrich	
6.	Rapid and short changes need to be implemented in key segments and rather concentrated there.	Budapest Airport Zrt.	
7.	Possible or probable it could be sooner as well, depending on the current fleet as well as the investments type.	Ministry of Transport and Infrastructure	
8.	<b>Electric vessels and fuel switch to synthetic zero emissions</b> can decarbonise inland waterways transport by 2040 already (Climact, NewClimate Institute, 2020).	Joint contribution made by NewClimate Institute and Germanwatch	
9.	While this has received less attention than other modes of transport, knowledge/ technological spillovers should allow inland waterway transport to be decarbonized in tandem with other transport sectors.	Bank Information Center	
10.	Long Life-Cycles in Inland Navigation technology roadmap not clear yet - including infrastructure investments	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	
11.	Inland water way transport <b>needs no decarbonization</b> , but more application instead of road transport. That's low hanging fruit for progressive decarbonization. Bio-LNG operation for inland navigation is even more resource efficient than for road transport.	Antje Willnow	<p>The modal shift of passenger and goods traffic away from roads towards the greenest modes, namely rail and inland waterways, constitutes a central pillar of the EU transport decarbonisation strategy. In fact, the EU's modal shift strategy sets out that rail freight traffic should increase by 50% by 2030 and double by 2050, whereas transport by inland waterways and short sea shipping should increase by 25% by 2030 and by 50% by 2050. The EIB notes that rail and inland waterways could deliver further modal shift in specific transport demand segments, but at the cost of large investments.</p>



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			The EIB considers that all modes are key in improving the multimodality of the transport system into a network of rail, inland waterways, short sea shipping routes and roads, which are linked to urban nodes. Multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions. Investments in safe and green modes need to be made in a multimodal context to harness their maximum potential, incorporating also last mile considerations into investment decisions concerning transport between hubs. Also, supporting investments in digitalisation are needed for efficient multimodality, both in freight and in passenger transport.
12.	River vehicles are expensive and their depreciation is very long.	Croatian Chamber of Economy	The EIB acknowledges that further investment is needed for the development of the environmental performance of the IWT fleet. The EIB will prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.
13.	<p>Inland waterways integrate the urban transport and, hence, these shall be part of the decarbonisation challenge. In many countries inland waterway has not been considered an attractive option during recent decades. Infrastructure is outdated, digitalization almost not existent. In combination with increasing issues of low water and dry weather or extreme weather, in particular <b>smaller waterways have completely been ignored</b> for freight transport.</p> <p>Innovative vessel technology has been developed and <b>financial solutions for freight skippers/vessel owners</b> (small, family run one vessel companies) are needed to shift to these new vessel technologies. IWT has to be fully integrated – also digitally – into the TEN.</p>	ECTRI	<p>While acknowledging the importance of the entire network of inland waterways, the revised EIB Transport Lending Policy prioritises interventions, including investments in infrastructure and digitalization, along those waterways which form part of the TEN-T networks in line with EU policy for the development of transport infrastructure, or in line with equivalent prioritisation outside the EU where the Bank has a mandate.</p> <p>Investments in support of the digitalisation of waterways and vessels, including the further deployment of River Information Systems technologies, automation, safety and security of the IWT sector will continue to be prioritised.</p> <p>The EIB is aware of the particular challenge the transition poses to small vessel owners and notes the need to explore solutions to address such challenge.</p>
14.	Many technologies are already developed and in use, and only need to be ramped up. <b>Use of electricity and hydrogen</b> only need to be boosted. This can be done by increasing the needed infrastructure for these fuels. <b>Installing charging stations along waterways</b> is more than feasible before 2030	European Federation for Transport & Environment, The SLOCAT	As set out in the revised Transport Lending Policy (chapter 5), the EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at

Ref	Summary of Contributions	Contributor	EIB comment
	(the European Federation of Inland Ports have called for full electrification by 2030). Similarly, stakeholders in the sector are showing the way forward for hydrogen transport and storage along waterways.	Partnership on Sustainable, Low Carbon Transport (SLOCAT), WWF EPO	reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible.
15.	Depreciation in IWT runs at least 10 to 20 years. Vessels are in service from 30 to at least 100 years. Engines are replaced between 10 (applies for a dozen large push boats only) and 100 years.	Ministry of Infrastructure and water Management	<p>The EIB is aware of the particularities of the propulsion systems used on board the IWT fleets as well as of the challenge the transition poses to small vessel owners.</p> <p>IWT vessels propelled through the use of alternative fuels are eligible for EIB financing provided they meet with the established end-of-tail CO<sub>2</sub> operational efficiency criterion.</p>
16.	From an R&I perspective, the waterborne transport sector is committed to deliver solutions of all main ship types and services before 2030, so to be able to ensure zero-emission waterborne transport before 2050 (Co-Programmed Partnership on Zero-Emission Waterborne Transport, cPP ZEWT). However, the question on how fast the decarbonization of the inland water transport can be realistically achieved by 2050 is dependent on the amount of <b>investments</b> the sector make to scale up existing technologies, the supporting <b>policies</b> that the EU is planning to adopt and the <b>financial instruments</b> available that will be conducive to those goals	SEA Europe (European Shipyards and Maritime Equipment Association)	<p>The EIB acknowledges that EC policy priorities for waterborne transport include the development of zero emission ports as well as the transition towards zero and low emission vessels both of which are actions promoted by the Smart and Sustainable Mobility Strategy. In this context, new vessels as well as the retrofit of the existing fleet and infrastructure for alternative fuels for zero-emission fleets play a vital role.</p> <p>The revised EIB Transport Lending Policy prioritises investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. The EIB will also prioritise the modernisation and technological development of the inland navigation fleet, in particular with regards to the environmental performance, efficiency and safety. Both new builds as well as the retrofitting of existing vessels are expected to be eligible for EIB financing.</p> <p>Investments in support of the digitalisation of waterways and vessels, including the further deployment of River Information Systems technologies, automation, safety and security of the IWT sector will also continue to be prioritised.</p> <p>Further investment is also needed for the development of the environmental performance of the IWT fleet. The EIB is</p>

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			expected to prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.

Question 3 – How do you see the demand for inland waterway transport developing in the period up to 2050?

Ref	Summary of Contributions	Contributor	EIB comment
1.	It depends on the level of future investments in IWW and the navigation status generally. IWW transport plays a specific role in oversized freight shipping.	Ministry of Transport	<p>The EIB is aware of the different views offered concerning the future demand for IWT, particularly within the EU and the neighbouring countries.</p> <p>The EIB also acknowledges that the modal shift of passenger and goods traffic away from roads towards the greenest modes, namely rail and inland waterways, constitutes a central pillar of the EU transport decarbonisation strategy. In fact, the EU's modal shift strategy sets out that rail freight traffic should increase by 50% by 2030 and double by 2050, whereas transport by inland waterways and short sea shipping should increase by 25% by 2030 and by 50% by 2050.</p> <p>The EIB continues to monitor the findings of relevant sector stakeholders concerning the future demand of IWT, in particular, the work that the EC, the CCNR, other International River Commissions and relevant sector stakeholders are conducting in the field.</p>
2.	If we keep industry in Europe the demand will remain; if not there will be a further shift to maritime transport.	Response 1039141480	
3.	This is more a political decision. There is a large potential, but I don't know how it can be used.	Hanns Kerschner	
4.	Demand strongly depends on pricing, thus policy. The demand varies very much in Europe due to the river and canal structure.	Antje Willnow	
5.	There will be <b>no increased demand</b> for IWT.	Správa železnic	
		Response 290033127	
6.	Unfortunately, the toxic heavy fuel oil drive will be in the foreground until 2050!	Response 974008607	
7.	Rather stable	Finnish Transport Infrastructure Agency, Ministry of Infrastructure	
8.	For the time being, the situation regarding the developments is in a slow phase, similar to the demand.	Ministry of Transport and Infrastructure	
9.	In a scenario in which European transport is decarbonised by 2040, inland waterway transport <b>increases</b> to 709 billion tonnes kilometre in 2050 (Climact, NewClimate Institute, 2020).	Joint contribution made by NewClimate Institute and Germanwatch	
10.	Provided that it develops further as a low-cost and low- or zero-carbon mode of transport, the demand for inland waterway transport is likely to <b>grow</b> faster than, or at least in tandem with, other modes of transport for freight and tourism/recreation.	Bank Information Center	
11.	The market observation from the CCNR explains that in detail. <a href="https://inland-navigation-market.org/?lang=en">https://inland-navigation-market.org/?lang=en</a>	Ministry of Infrastructure and water Management	

Ref	Summary of Contributions	Contributor	EIB comment
12.	Demand in absolute terms for inland waterway transport will continue to <b>grow</b> by 2050. The relative value demand for inland waterway transport will increase by 2050 as it is an economic and ecological alternative to road transport. However, the share of transport in total transport will still remain marginal, as it inevitably requires inland waterways.	Service Public Fédéral Mobilité et Transports	
13.	Maritime transport is linked to most of the movement of goods over long distances and will be the scenario in the coming years.	Município de Paredes	Please refer to the EIB's comments on maritime transport in Chapter 7 of the feedback to the consultation process and in Chapter 7 of the revised TLP.
14.	I don't think it will increase more than it is now, at least not a big increase due to demand. But the boats that exist and make the transportation must be replaced by another with cleaner energies and that do not harm the environment (in general of course).	Município de Faro	<p>The EIB acknowledges that further investment is needed for the development of the environmental performance of the IWT fleet.</p> <p>The revised EIB Transport Lending Policy prioritises the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.</p>
15.	Same or slight increase once greener than trucks, however, it may reduce when rivers run short of water because of climate change	Van Oord	<p>The EIB will continue to support, amongst others, technological measures aiming at improving the navigability conditions along waterways, particularly during extreme weather periods.</p> <p>The EIB kindly refers you to the <a href="#">EIB's Climate Adaptation Plan</a> which will strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure.</p> <p>The EIB will significantly increase adaptation financing to support the European Union Adaptation Strategy for smarter, more systemic and faster adaptation, both across Europe and globally.</p>
16.	Inland waterways have reached capacity limitations on key routes (e.g. Rhine) already; on top, effects of climatic change make an effective utilization of inland waterways more difficult. Today, inland waterway transport is a key alternative to rail transportation for bulk freight and heavy machinery. It will likely stay as a potential transport option but we do not expect inland	Arthur D. Little	Priority will be given to the financing of projects that eliminate bottlenecks on the existing networks giving attention to the consistency of interventions along the main corridors. Expansion projects forming part of the TEN-T network of inland waterways that show an acceptable economic justification will also be supported. Outside the EU, the EIB will

Ref	Summary of Contributions	Contributor	EIB comment
	waterway traffics to significantly increase and / or expand their share in the overall transportation mix.		<p>support IWT projects which are consistent with the appropriate external mandate.</p> <p>The EIB is aware of the particular vulnerability of IWT to the fluctuating water levels which are expected to be more extreme due to the effects of climate change. Investments in support of measures (digitalisation and infrastructure) to improve navigability, particularly under extreme climatic events, will continue to be supported by the Bank.</p> <p>The EIB kindly refers you to the <a href="#">EIB's Climate Adaptation Plan</a> which will strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure.</p> <p>The EIB will significantly increase adaptation financing to support the European Union Adaptation Strategy for smarter, more systemic and faster adaptation, both across Europe and globally.</p>
17.	Gradual increase if connectivity improves, and when supported by regulation. It should grow and even take market share from road transport. It will increase because air and land transportation will become more expensive due to rising fuel prices.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr, Budapest Airport Zrt., Croatian Chamber of Economy, Ralph-Uwe Dietrich, STIB-MIVB	<p>The revised EIB Transport Lending Policy prioritises the rehabilitation and upgrade of inland navigation infrastructure, as well as economically justified investments in new IWT infrastructure, including inland ports and their associated intermodal and/or logistic facilities and equipment, which are expected to improve connectivity.</p> <p>The EIB considers that all modes are key in improving the multimodality of the transport system into a network of rail, inland waterways, short sea shipping routes and roads, which are linked to urban nodes. Multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions. Investments in safe and green modes need to be made in a multimodal context to harness their maximum potential, incorporating also last mile considerations into investment decisions concerning transport between hubs. Also, supporting investments in digitalisation are needed for efficient multimodality, both in freight and in passenger transport.</p>
18.	Demand is set to <b>grow</b> as inland waterway transport remains relatively underused as a mode, especially when it comes to	SEA Europe (European	The revised EIB Transport Lending Policy will prioritise the rehabilitation and upgrade of inland navigation infrastructure,

Ref	Summary of Contributions	Contributor	EIB comment
	the hinterland connection of seaports and the supply of important industrial centers and urban agglomerations, as well as for passenger transport.	Shipyards and Maritime Equipment Association)	as well as economically justified investments in new IWT infrastructure, including inland ports and their associated intermodal and/or logistic facilities and equipment, which are expected to improve connectivity as well as enable a modal shift towards the mode.
19.	<p>In the years to come, the demand for inland waterway transport is likely to <b>increase</b>. On the one hand, demand for local products, that are not shipped from another continent, will probably develop. Instead of using road transport inland waterway transport provides a more sustainable alternative. Inland waterway freight transport will play a crucial role in attaining the objectives of the Green Deal in terms of the modal shift, which the European Commission have committed to improving in favour of IWT. On the other hand, passenger transport could develop in the years to come. Indeed, 50 % of the EU population lives close to the sea and along rivers so inland waterway passenger transport offers an environmentally friendly alternative in terms of both energy consumption and noise emissions. In addition, it would help to decrease congested road networks and provide an alternative to the expansion of road infrastructure in densely populated areas. Thus, the use of ferries as an alternative to personal cars could increase in the years to come.</p> <p>Similarly, inland waterway transport could play an important part in tourism. River cruises, ferries, day trip vessels, water taxis and water shuttles can become a cleaner option for tourism and public transport in regions and cities with accessible and navigable rivers, canals and lakes, which would also make urban mobility more sustainable and effective</p>	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	<p>The EIB acknowledges that EC policy priorities for waterborne transport include the development of zero emission ports as well as the transition towards zero and low emission vessels both of which are actions promoted by the Smart and Sustainable Mobility Strategy. In this context, new vessels as well as the retrofit of the existing fleet and infrastructure for alternative fuels for zero-emission fleets play a vital role.</p> <p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. Such investments aim at achieving a good navigation status of the networks which should eventually enable an increase of the modal share for IWT.</p> <p>The financing of tourism sector activities is outside if the remit of the EIB Transport Lending Policy and priorities are covered under other EIB sectoral lending policies.</p> <p>Through the revised Transport Lending Policy, the EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.</p>
20.	The sustainable and smart mobility strategy of the EC sets the goal of increasing transport by inland waterways and short sea shipping by 25% by 2030, and by 50% by 2050. A growing demand is the strategy!	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	The EIB acknowledges that EC policy priorities for waterborne transport include the development of zero emission ports as well as the transition towards zero and low emission vessels both of which are actions promoted by the Smart and Sustainable Mobility Strategy. In this context, new vessels as



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			<p>well as the retrofit of the existing fleet and infrastructure for alternative fuels for zero-emission fleets play a vital role.</p> <p>The EIB will continue to support investments in IWT infrastructure and fleet, both subject to specific eligibility considerations, in order to support the achievement of the goals set by the EC.</p>
21.	<p>The three main cargo segments in IWT embrace dry cargo, liquid cargo as well as container transport. In its present structure, IWT rather relies on traditional market segments. The future trend developments differ consistently within the three main categories. Overall, the energy transition will continue to have an important effect on transport volumes in inland navigation. This concerns <b>coal</b> in particular. Liquid mineral oil products will continue to be an important component of the energy sector and of inland navigation volumes for the next decade, but a <b>gradual decline</b> is underway in certain regions.</p> <p>For chemicals, the outlook is far more positive.</p> <p>Regarding agricultural products and foodstuffs, it is expected that a certain regionalization of production and a change in consumer habits to more regional products will influence long-distance transport. A further <b>slowdown</b> of world trade is expected to have an influence on the growth rates in container transport.</p> <p>Inland navigation remains one of the environmentally friendliest transport modes. Nowadays, it sees fluctuations due to hydraulicity, and due to economic trends in the freight volumes transported. However, it continues to explore possible new markets both in passenger and freight transport with high potential for development to rely on. Passenger transport is particularly considered due to increased urbanization.</p> <p><b>Three main pillars of new markets/segments</b> presenting growth potential within inland navigation can be identified. These encounter <b>urban logistics, new cargo flows</b></p>	Secretariat of the Central Commission for the Navigation of the Rhine	<p>The EIB acknowledges that EC policy priorities for waterborne transport include the development of zero emission ports as well as the transition towards zero and low emission vessels both of which are actions promoted by the Smart and Sustainable Mobility Strategy. In this context, new vessels as well as the retrofit of the existing fleet and infrastructure for alternative fuels for zero-emission fleets play a vital role.</p> <p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. The EIB will also prioritise the modernisation and technological development of the inland navigation fleet, in particular with regards to the environmental performance, efficiency and safety. Both new builds as well as the retrofitting of existing vessels are expected to be eligible for EIB financing.</p> <p>Investments in support of the digitalisation of waterways and vessels, including the further deployment of River Information Systems technologies, automation, safety and security of the IWT sector will also continue to be prioritised.</p> <p>Further investment is also needed for the development of the <i>environmental</i> performance of the IWT fleet. The EIB is expected to prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.</p>

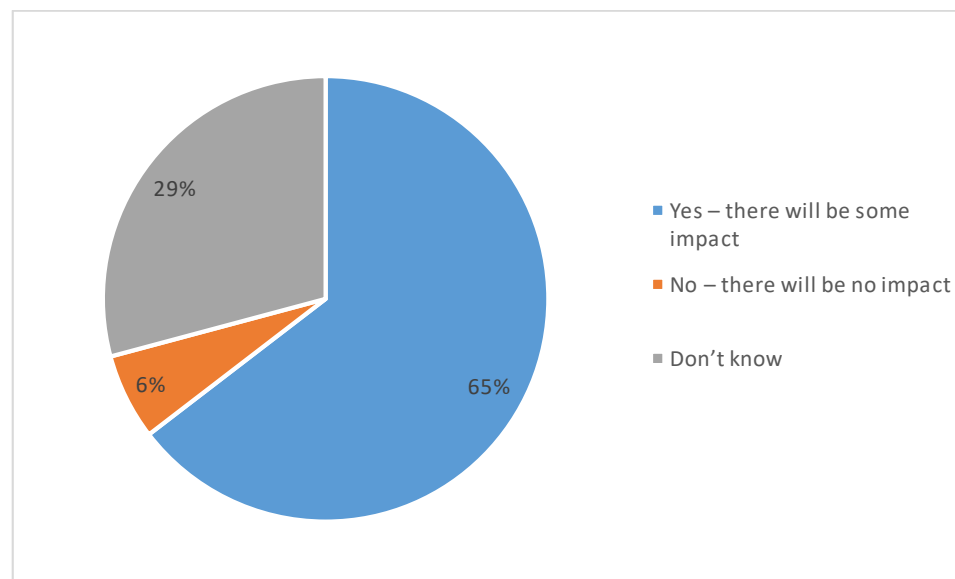


Ref	Summary of Contributions	Contributor	EIB comment
	<p><b>triggered by the energy transition (transport of alternative energies like hydrogen or transport of components for the generation of alternative energies such as windmills) and the circular economy.</b> It is important to state, that these three fields are interrelated and are partly overlapping. An example would be the transport of household waste in an urban agglomeration which would then be recycled to new energy and again transported by ship. This case would apply to all the three fields simultaneously.</p> <p>In addition, the characteristics of inland navigation make it a suitable transport solution to current challenges and problems within urban environments, where the transport infrastructure is saturated. More generally, new markets in inland navigation can in particular emerge in light of climate policies favoring the decarbonisation of societies and insistence on more sustainable, resilient and future proof transport modes. IWT could therefore play a crucial role for making societies, in particular cities more sustainable from an environmental and social point of view.</p> <p>The saturation of existing transport infrastructure in cities and the rising pressure to improve the sustainability of our economies are self-evident drivers for the development of demand for IWT in the future.</p>		<p>Through the revised Transport Lending Policy, the EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, including investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.</p> <p>Zero/low emission city logistics is a promising area of development for EIB's lending.</p>
22.	<p>The EU green deal emphasises the need for a modal shift towards rail and IWT. If we take those goals seriously, then the only way forward is massive investments. ETF is in favour of prioritising cross-border infrastructure in order to allow maximum opportunities for connected transport solutions. IWT has to become an integrated partner in the global supply chain. Inland waterway transport needs – more than ever before – significant investments in and benefit from <b>financial support for research, development and innovation</b>. If Inland Navigation wants to remain a frontrunner in terms of sustainability, Europe needs to stay ahead of its global competitors in terms of innovation both in hardware as in its human potential. In the coming years, <b>research and innovation</b> into new technologies will be crucial to compete and move towards zero-emission and allow the sector to roll</p>	European Transport Workers' Federation	<p>The financing of R&amp;D activities is outside if the remit of the EIB Transport Lending Policy and such priorities are covered under other EIB sectoral lending policies. In this sense, we kindly invite you to refer to the <a href="#">EIB's Innovation, Digital &amp; Human Capital (IDHC) lending programme</a> which sets the direction for the 2021-2027 period.</p>

Ref	Summary of Contributions	Contributor	EIB comment
	out new innovative solutions to handle a bigger market share in freight transport		
23.	It will mainly depend on the urban transport policy, solid investments in infrastructure, financing models for freight skippers/vessel owners and the role of the blue economy.	ECTRI	<p>The revised EIB Transport Lending Policy will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. Such investments aim at achieving a good navigation status of the networks which should eventually enable an increase of the modal share for IWT.</p> <p>The EIB will continue supporting investments in sustainable urban mobility, promoting a shift towards greener modes of transport and affordable transport solution for all, prioritizing investments in both the renewal or brand new zero emission public transport infrastructure and rolling stock, shared mobility, active modes and any other investments supporting collective transport and multimodality.</p>
24.	More but only if the last mile is flexible and sustainable.	Back on Track Belgium vzw-asbl	<p>The EIB will continue to provide strong support to public transport, including multi modal public transport and availability of transport on the “last mile”, which indeed contribute to more equal access to mobility and hence accessibility to jobs, education or healthcare, as well as better accessibility of remote regions.</p> <p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. Such investments aim at achieving a good navigation status of the networks which should eventually enable an increase of the modal share for IWT.</p> <p>The EIB considers that all modes are key in improving the multimodality of the transport system into a network of rail, inland waterways, short sea shipping routes and roads, which</p>

Ref	Summary of Contributions	Contributor	EIB comment
			are linked to urban nodes. Multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions. Investments in safe and green modes need to be made in a multimodal context to harness their maximum potential, incorporating also last mile considerations into investment decisions concerning transport between hubs. Also, supporting investments in digitalisation are needed for efficient multimodality, both in freight and in passenger transport.

Question 4– Do you believe that there will be any long-term impact on the development of this sector as a result of climate policies' increasing cost?



Ref	Summary of Contributions	Contributor	EIB comment
1.	If the prices increase it will have an impact over this system of transport. So it is important that this sector must be supported by financing. The impact of this kind of transports over the environment is very big. In the case of Faro, where we have a big area with unique flora and fauna where this boats circulate, it is important to change the use of boats that pollute the environment but it is necessary financing support.	Município de Faro	<p>The EIB will continue supporting the sector by prioritising investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. Such investments aim at achieving a good navigation status of the networks which should eventually enable an increase of the modal share for IWT.</p> <p>Further investment is also needed for the development of the environmental performance of the IWT fleet. The EIB is expected to prioritise the modernisation and technological</p>

Ref	Summary of Contributions	Contributor	EIB comment
			<p>development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.</p> <p>All EIB financed investments must ensure compliance with the Bank's Environmental and Social Standards which aim at ensuring an adequate level of protection to the habitats where the projects are implemented.</p>
2.	<p>Any measure/action supporting the greening of the inland navigation must not lead to reverse modal shift given that modal shift to cleaner modes of transport, such as inland navigation, is already a considerable advantage in terms of cutting emissions. Concrete measures to support the greening of inland navigation should not weaken the competitive position of those states or entrepreneurs that fully commit to it. <b>A level playing field must be ensured.</b> Any climate policy implying increased cost for the sector should be subject to a careful <b>impact/sensitivity analysis</b>.</p> <ul style="list-style-type: none"> <li>- the <b>energy transition to zero-emissions inland navigation will incur considerable costs, currently estimated at several billion euros,</b></li> <li>- the energy transition-related costs will exceed the navigation profession's financial resources, the profession therefore being able to bear only a part of the financing required to achieve this transition.</li> </ul>	Secretariat of the Central Commission for the Navigation of the Rhine	The Bank is in continuous dialogue with the EC, Member States and industry stakeholders on how it can widen its financial assistance in order to help to reduce the funding gap and help meet increasing environmental demands of the industry. Thank you for your contribution.
3.	<p>The sectors' current financial capacity to innovate and retrofit is very thin to non-existent, making additional <b>external investment essential if the sector is to reach its green transport potential</b> and contribute to the European Green Deal's goals. While IWT is increasingly seen as essential for an environmentally sustainable future, we need to stay vigilant and <b>ensure that it becomes socially sustainable.</b> Automation and digitalisation are often presented as logical steps in reaching a sustainable future, without reflecting on the social aspects of such changes. The ETF believes that <b>automation and digitalisation cannot be the default setting towards a zero emission future.</b> Instead, a human- and society-centred approach has to be envisaged. To reach that goal, <b>investments in human skills and resources must</b></p>	European Transport Workers' Federation	The Bank is aware of the widely recognised challenges the sector faces in its professionalization. However, the financing of educational facilities is outside if the remit of the EIB Transport Lending Policy and such priorities are covered under other EIB sectoral lending policies. In this sense, we kindly invite you to refer to the <a href="#">EIB's Innovation, Digital &amp; Human Capital (IDHC) lending programme</a> which sets the direction for the 2021-2027 period.

Ref	Summary of Contributions	Contributor	EIB comment
	<p><b>always be integrated</b> into calls for investments into greening the sector. These should be aimed at re- and upskilling and training. We advocate the elaboration of a compulsory periodic training scheme for all crew members to ensure the optimisation of human potential. Especially in the transition period that will create additional uncertainties, the sector's stability and attractiveness have to be the top priority to at least maintain the present workforce levels.</p> <p>Training, retraining and re-skilling programmes will contribute largely to this attractiveness, together with quality living and working conditions both onboard as on shore. If crew members have a long-term attractive prospect, they will continue to work in the sector and shape its sustainable future. Not only do we need EU regulations, but also stringent national implementation to guarantee the zero-accidents-benchmark.</p>		
4.	All vessels will have to switch from different forms of diesel drive trains to electrical drive trains with different zero emission fuels. A study by the CCNR estimates the cost between <b>2,5 and 10 billion euro</b> (depending on the pathway). Given the timeframe of the transition and the cost thereof, most of the fleet will have to be replaced or at least be substantially modified. Some entrepreneurs will not be able to bear that cost and will leave the market. It is yet unclear if the cost will also realize a (negative) modal shift.	Ministry of Infrastructure and water Management	The Bank acknowledges that investment is needed for the development of the environmental performance of the IWT fleet. The EIB is expected to prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels. Thank you for your contribution.
5.	There should be technological innovation for each fleet ( <b>digitalization or digital assistance</b> ), as well as improved <b>engine efficiency</b> in regard to gas emissions reduction.	Ministry of Transport and Infrastructure	<p>Digitalisation as a promising area of development of EIB's lending, having the potential to drive behavioural change and lead to a more efficient use of transport assets, improve safety, increase multimodality and foster a shift to greener transport.</p> <p>Investments in support of the digitalisation of waterways and vessels, including the further deployment of River Information Systems technologies, automation, safety and security of the IWT sector will continue to be prioritised.</p>
6.	The European Commission has committed to improving modal shift in favour of IWT as a means of reducing congestion on the road network. It has also announced broad support for the decarbonisation of the sector, from sustainable investment to barges running on hydrogen propulsion. This comes at the same time as new regulation on road transport, such as the Emissions Trading Scheme and stricter	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low	The Bank is in continuous dialogue with the EC, Member States and industry stakeholders on how it can widen its financial assistance in order to help to reduce the funding gap and help meet increasing environmental demands of the industry.

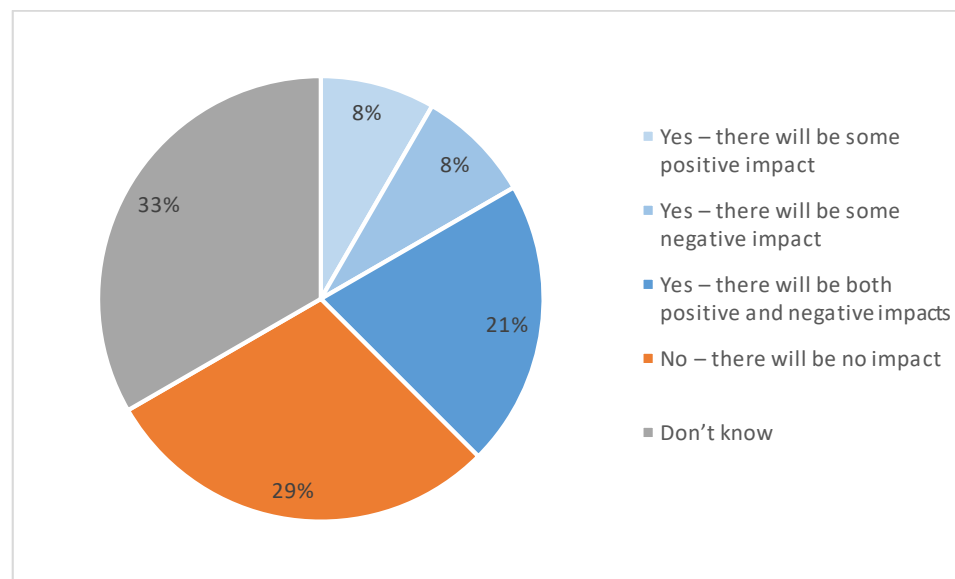
Ref	Summary of Contributions	Contributor	EIB comment
	C02 standards. IWT will be exempt from these regulations. Climate legislation in other sectors will most likely aid the development of this sector in the short term. In the longer term, these benefits will remain given <b>IWT provides a solution to congested road networks.</b>	Carbon Transport (SLOCAT), WWF EPO	
7.	Inland waterways transport is vulnerable to climate change effects (e.g., droughts) and dependence in the water levels.	ECTRI	<p>The particular vulnerability of IWT to the fluctuating water levels are expected to be more extreme due to the effects of climate change. Investments in support of measures (digitalisation and infrastructure) to improve navigability, particularly under extreme climatic events, will continue to be supported by the Bank.</p> <p><a href="#">EIB's Climate Adaptation Plan</a> will strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure.</p> <p>The EIB will significantly increase adaptation financing to support the European Union Adaptation Strategy for smarter, more systemic and faster adaptation, both across Europe and globally.</p>
8.	Climate policies will likely make inland waterway transports less attractive as costs for maintaining a reliable and sustainable inland waterway system will likely increase, relative to other modes.	Arthur D. Little	The revised EIB Transport Lending Policy will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. Such investments aim at achieving a good navigation status of the networks which should eventually enable an increase of the modal share for IWT whilst increasing the reliability of the network even in the context of the expected impacts due to climate change.
9.	<b>Climate policies should be seen as an investment in clean mobility rather than as a cost.</b> For shipping, the impact of even relatively high carbon prices on fuel are marginal compared to other factors such as waiting times at ports or other chokepoints such as the Panama or Suez canals. Small Island Developing States and LDCs may be disproportionately	Joint contribution made by NewClimate Institute and Germanwatch	Priority will be given to the financing of projects that eliminate bottlenecks on the existing networks giving attention to the consistency of interventions along the main corridors. Expansion projects forming part of the TEN-T network of inland waterways that show an acceptable economic justification will also be a priority. Outside the EU, IWT projects

Ref	Summary of Contributions	Contributor	EIB comment
	affected however and special measures should be taken to support them.		must be consistent with the appropriate external mandate and will be a priority.
10.	Yes, the increase of energy costs and needed investments in the fleet will have an impact. The further development of technology, the internalization of external costs for all modes of transport and the public investments in infrastructure and funding programs will influence the level of impact.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	<p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible.</p> <p>Investments in support of the digitalisation of waterways and vessels, including the further deployment of River Information Systems technologies, automation, safety and security of the IWT sector will also continue to be prioritised.</p> <p>It is indeed expected that a further internalisation of external costs for all modes, as is being proposed by the EC in the Smart and Sustainable Mobility Strategy, will have an impact on the price of transport and hence on its development both in terms of volume and in terms of technologies deployed.</p> <p>Further investment is also needed for the development of the environmental performance of the IWT fleet. The EIB is expected to prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.</p>
11.	Rising fuel costs	Response 1039141480	Your comment is noted. The EIB thanks you for the feedback.
12.	It is potentially cheap, so we might see some increase.	Hanns Kerschner	
13.	The rising costs of climate policy will lead to a reduction in the use of toxic heavy oil propulsion!	Response 974008607	
14.	Increasing because of the costs to go electric	Response 832108188	
15.	Regulation must force waterway transport towards sustainability.	Ralph-Uwe Dietrich	
16.	Yes, because of the protection of rivers and lakes, the segment may get more emphasis.	Budapest Airport Zrt.	



Ref	Summary of Contributions	Contributor	EIB comment
17.	Depending the policy for road transport the impact will be high (good) or low (bad)	Antje Willnow	
18.	The climate policies and their impact on energy availability and prices can have a significant impact on the transport sector. The results of climate policies can significantly influence the navigation status.	Ministry of Transport	
19.	Prices of everything are going up.	Croatian Chamber of Economy	
20.	The impact of climate policy costs is likely to be lower for inland navigation than for road transport, as inland waterway transport has lower fuel and personnel costs relative to the volume transported than road transport.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
21.	The increase in the price of fossil fuels and of the tonne of CO2 — which is a good thing — will prompt the industry to reinvent itself in order to survive.	Service Public Fédéral Mobilité et Transports	
22.	Yes, there should be positive impact, if the sector develops as postulated above.	Bank Information Center	
23.	Difficult to say. I would rather say a status quo.	Response 290033127	

Question 5– Do you believe that there will be any permanent impact on the development of this sector following the COVID-19 pandemic?

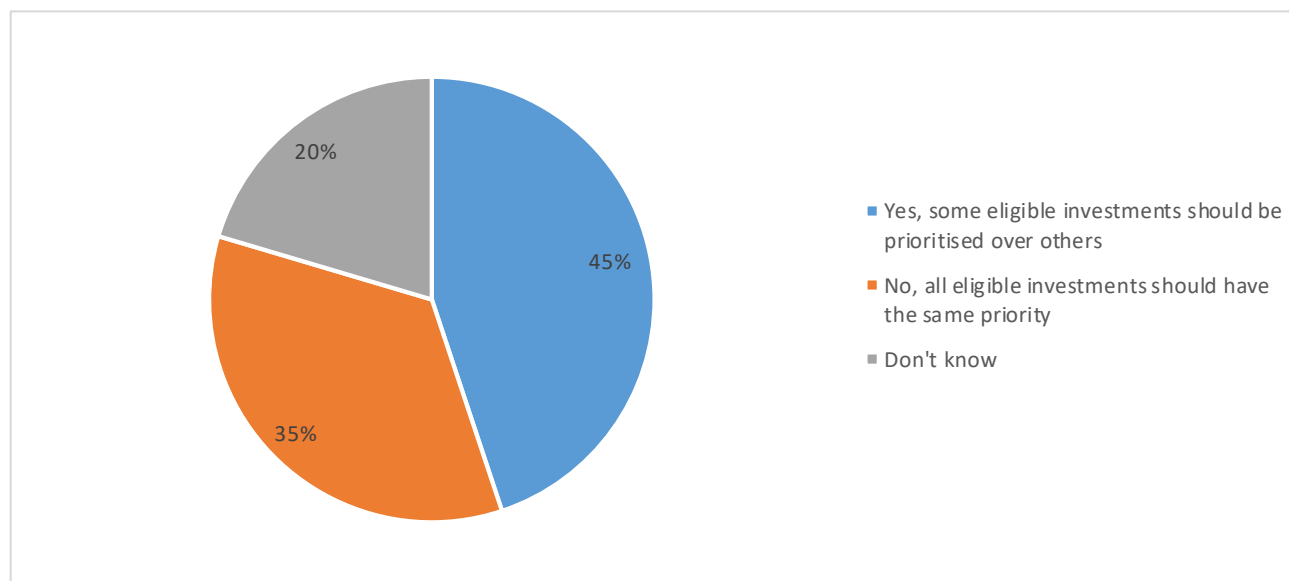


Ref	Summary of Contributions	Contributor	EIB comment
1.	Covid proved the resilience of the sector in delivering key goods - amongst which <b>medicines and hygienic materials</b> - in times of crisis. Other areas experienced profound drops as a result of multiple factors, in particular <b>personnel shortages and cross-border difficulties</b> . Personnel shortages are a systemic issue in IWT which needs to be addressed.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The Bank is aware of the widely recognised challenges the sector faces in its professionalization. However, the financing of educational facilities is outside the scope of the EIB Transport Lending Policy and such priorities are covered under other EIB sectoral lending policies. In this sense, we kindly invite you to refer to the <a href="#">EIB's Innovation, Digital &amp; Human Capital (IDHC) lending programme</a> which sets the direction for the 2021-2027 period.
2.	The COVID-19 crisis further impacted the sector's capability for further investment. The sector is dominated by <b>micro-scale enterprises</b> and characterised by the majority of vessels being in the hands of <b>owner-operators</b> . An almost complete halt of passenger transport comes after years of	European Transport Workers' Federation	The challenges that the transition towards greener propulsion systems poses to the IWT fleets, particularly the smaller owners are noted.

Ref	Summary of Contributions	Contributor	EIB comment
	growth in the sector. <b>River Cruising is a booming business</b> , and every year new vessels enter the sector. <b>COVID-19 changed this positive evolution</b> by halting the entire passenger sector almost overnight. Currently, over 45.000 people work in the sector as mobile workers, working on barges and river cruise vessels. Many more work in infrastructure, inland ports and administration. Recognising the potential role of inland navigation in a sustainable future would spur the <b>creation of additional green jobs</b> in the sector.		<p>The Bank is in continuous dialogue with the EC, Member States and industry stakeholders on how it can widen its financial assistance in order to help to reduce the funding gap and help meet increasing environmental demands of the industry.</p> <p>The financing of activities related to tourism is outside if the remit of the EIB Transport Lending Policy and priorities are covered under other EIB sectoral lending policies.</p>
3.	Companies have realised that just-in-time efficiency becomes a liability when there are supply chain disruptions. This will be important for companies to adjust and address the future growing number of disruptions from severe weather caused by climate change.	Joint contribution made by NewClimate Institute and Germanwatch	The revised EIB Transport Lending Policy will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, inland port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain. Investments in alternative fuel infrastructure along the fairways remain eligible. Such investments aim at achieving a good navigation status of the networks which should eventually enable an increase of the modal share for IWT whilst increasing the reliability of the network even in the context of the expected impacts due to climate change.
4.	<b>Positive:</b> Inland waterway transport of goods proved to be reliable, also in times of crises. <b>Negative:</b> The passenger transport, especially with cabin ships, was one of the most affected sectors of the pandemic. It will need time to recover and will have to include hygienic / pandemic strategies in their business.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	The financing of activities related to tourism is outside the scope of the revised EIB Transport Lending Policy and priorities are covered under other EIB sectoral lending policies.
5.	<b>Positive</b> impacts: the necessity of change that may lead to improvements in the system. <b>Negative</b> impacts - Impacts on demand may result in deserted public tenders.	Município de Faro	Your comment is noted. The EIB thanks you for the feedback.
6.	No permanent impact - there should not be a concern regarding any permanent impact on the development of this sector.	Antje Willnow, Bayerisches Staatsministerium für Wohnen, Bau und Verkehr, Ministry of Transport and Infrastructure,	

Ref	Summary of Contributions	Contributor	EIB comment
		Response 974008607, Response 832108188	Your comment is noted. The EIB thanks you for the feedback.
7.	Covid-19 pandemic changed the transport pattern for the short term, the recovery is uncertain.	Ralph-Uwe Dietrich	
8.	This segment was a huge tourist destination before COVID-19, it will only be after a long time that confidence in large-scale mass and slow travel will be restored. Primarily the transportation will grow.	Budapest Airport Zrt.	
9.	Activity will gradually resume with the return of growth.	Response 290033127	
10.	The impacts should be <b>positive</b> , given the perceived safety of inland waterways as a mode of both freight and recreational transport, provided that inland waterways do not get connected with spread of disease.	Bank Information Center	
11.	Financial sustainability of inland waterways operators (public and private).	ECTRI	

## Question 6 – Should the EIB prioritise certain eligible inland waterway transport investments?



Ref	Summary of Contributions	Contributor	EIB comment
1.	<b>Canals</b> should become prioritised over rivers because of more even water regime and because of the purpose.	Antje Willnow	Priority will be given to the financing of projects that eliminate bottlenecks on the existing networks (both canals and rivers/lakes) giving attention to the consistency of interventions along the main corridors. Expansion projects forming part of the TEN-T network of inland waterways that show an acceptable economic justification will also be supported. Outside the EU, the EIB will support IWT projects which are consistent with the appropriate external mandate.
2.	Prioritise investments with low ecological, emissions and noise impact	Back on Track Belgium vzw-asbl, Response 511707695,	Investments will have to be compliant with the EIB Group's Environmental and Social Policy, which should be read in conjunction with other Group policies, notably the EIB Group Climate Bank Roadmap, the EIB Climate Strategy and the EIB Energy Lending Policy.
3.	Yes, if EIB makes dramatic progress in emissions and environmental protection.	Budapest Airport Zrt.	

Ref	Summary of Contributions	Contributor	EIB comment
4.	EIB should not support the construction of inland waterway <b>LNG terminals</b> as they will have lock-in effects on fossil fuel use.	urgewald	In line with the published EIB Climate Bank Roadmap, facilities exclusively dedicated to the handling and/or storage of fossil fuels are not considered to be Paris-aligned and will not be eligible for EIB support.
5.	Financing of the <b>acquisition of boats with cleaner energies</b> should be one of the first things to improve.	Município de Faro	Investment is needed for the development of the environmental performance of the IWT fleet. The EIB will prioritise support for the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.
6.	<b>Sustainable fuels</b> , may be some electrification	Ralph Uwe Dietrich	
7.	<b>Prioritise technologies able to deliver the largest emissions reductions</b> , especially if (financial) resources are limited. A best use/allocation of resources possible should be sought.	Secretariat of the Central Commission for the Navigation of the Rhine	
8.	In its Climate Bank Roadmap, the EIB states that “alongside railways, [inland waterways] are the most energy efficient and least polluting inland transport mode, particularly for goods transport”. This however misses the fact that the <b>majority of inland waterway vessels are powered by heavy fuel oil</b> and are therefore highly emitting. EIB should: • Only support the development (and R&I) of <b>zero-emission vessels and infrastructure</b> i.e. battery-electric and renewable hydrogen/ammonia-based propulsion systems • <b>End support to vessels and infrastructure relying on gas, biofuels, or oil</b>	Counter Balance, E3G	Investment is needed for the development of the environmental performance of the IWT fleet. The revised EIB Transport Lending Policy prioritises the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels.  Zero direct (carbon) emission vessels are eligible for EIB financing in line with the EIB Climate Bank Roadmap and will be prioritised under the Transport Lending Policy.  The EIB will remain technology-neutral in its investments, and open to new technological developments and alternative fuels.  Concerning the use of the vessels and/or infrastructure, and as stated in the published EIB Climate Bank Roadmap, facilities exclusively dedicated to the handling and/or storage of fossil fuels are not considered to be Paris-aligned and will not be eligible for EIB support. Vessels dedicated to the transport of fossil fuels will also not be eligible for EIB support.
9.	The European Green Deal sets an inland freight transport modal split target of 75% rail and inland waterways. Shipping including inland waterways is the <b>most efficient mode of freight transport to move by freight ton</b> ; it is however a mode that is <b>currently not yet emission-free</b> . Freight on inland waterways must also eventually be electrified or switch to zero-emission fuels. The full electrification of inland	Joint contribution made by NewClimate Institute and Germanwatch	The revised EIB Transport Lending Policy prioritises the rehabilitation and upgrade of inland navigation infrastructure, as well as economically justified investments in new IWT infrastructure, including inland ports and their associated intermodal and/or logistic facilities and equipment.

Ref	Summary of Contributions	Contributor	EIB comment
	<p>waterway transport requires a <b>switch to electric vessels, electric charging infrastructures and equipment for power supply.</b></p> <ul style="list-style-type: none"> <li>- <b>Electricity charging infrastructure</b> along inland waterways</li> <li>- <b>Green ports</b></li> <li>- Pilot projects with <b>electric fleet</b></li> </ul>		<p>This also includes charging infrastructure for alternative/zero emission propulsion systems. However, in line with the published Climate Bank Roadmap facilities exclusively dedicated to the handling and/or storage of fossil fuels are not considered to be Paris-aligned and will not be eligible for EIB support.</p>
10.	<p>The EIB should prioritize inland waterway investments that support <b>decarbonization of inland waterway transport</b>, both through electrification and increased efficiency. Additionally, provided that it serves as a low-cost and low- or zero-carbon mode of transport, <b>inland waterway infrastructure and integration into the overall (multimodal) transport system</b> should be a priority.</p>	Bank Information Center	<p>The revised EIB Transport Lending Policy will prioritise the rehabilitation and upgrade of inland navigation infrastructure, as well as economically justified investments in new IWT infrastructure, including inland ports and their associated intermodal and/or logistic facilities and equipment. However, in line with the published Climate Bank Roadmap facilities exclusively dedicated to the handling and/or storage of fossil fuels are not considered to be Paris-aligned and will not be eligible for EIB support.</p> <p>Priority will also be given to the financing of projects that eliminate bottlenecks on the existing networks giving attention to the consistency of interventions along the main corridors. Expansion projects forming part of the TEN-T network of inland waterways that show an acceptable economic justification will also be supported. Outside the EU, the EIB will support IWT projects which are consistent with the appropriate external mandate.</p> <p>Noting that further investment is needed for the development of the environmental performance of the IWT fleet, the EIB will prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels. Vessels dedicated to the transport of fossil fuels will not be eligible for EIB support.</p>
11.	<p>Inland waterway vehicles powered by <b>renewable energy.</b></p> <p><b>Impact assessment</b> of innovative solutions.</p>	ECTRI	<p>Noting that further investment is needed for the development of the environmental performance of the IWT fleet, the EIB will prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels. Vessels dedicated to the transport of fossil fuels will not be eligible for EIB support.</p>

Ref	Summary of Contributions	Contributor	EIB comment
12.	It is difficult to prioritise individual investments that make sense in themselves. In order to do so, it would first have to carry out an <b>analysis of the cost/benefit ratio</b> .	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	All inland waterway investment projects supported by the EIB are subject of a socio-economic cost benefit analysis taking into account relevant impacts including external impacts for society at large. Its approach is described in the document <a href="#">The Economic Appraisal of Investment Projects at the EIB</a> which is currently under revision.
13.	First, the EIB should provide more fundings to the ramp-up of green technologies, such as <b>battery-electric and hydrogen fuel cell propulsion</b> . Secondly, it is crucial that the EIB provides fundings to develop the <b>supply infrastructure</b> . The technology to decarbonise inland waterway transports already exists but lack of supply infrastructure prevent these technologies to scale-up.	European Federation for Transport & Environment, WWF EPO, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	<p>The revised EIB Transport Lending Policy will prioritise the rehabilitation and upgrade of inland navigation infrastructure, as well as economically justified investments in new IWT infrastructure, including inland ports and their associated intermodal and/or logistic facilities and equipment. This also includes charging infrastructure for alternative/zero emission propulsion systems. However, in line with the published Climate Bank Roadmap facilities exclusively dedicated to the handling and/or storage of fossil fuels are not considered to be Paris-aligned and will not be eligible for EIB support.</p> <p>Noting that further investment is needed for the development of the environmental performance of the IWT fleet, the EIB will prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels. Vessels dedicated to the transport of fossil fuels will not be eligible for EIB support.</p>
14.	The waterways forming the <b>E-waterways network</b> as per the AGN Agreement.	UNECE	In the revised Transport Lending Policy, priority is given to the financing of projects that eliminate bottlenecks on the existing networks giving attention to the consistency of interventions along the main corridors. Expansion projects forming part of the TEN-T network of inland waterways that show an acceptable economic justification will also be supported. Outside the EU, the EIB will support IWT projects which are consistent with the appropriate external mandate.
15.	Right now zero emission solutions are only implemented on a pilot basis: broad deployment is not possible and the legislation is not ready yet. In the short term, focus should be on state of the art of the <b>shelf Stage V engines (NRMM)</b> and a few <b>bio-fuels as drop-in for existing diesel engines</b> .	Ministry of Infrastructure and water Management	Noting that further investment is needed for the development of the environmental performance of the IWT fleet, the EIB will prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing



Ref	Summary of Contributions	Contributor	EIB comment
			vessels. Vessels dedicated to the transport of fossil fuels will not be eligible for EIB support.
16.	All investments should have the same priority to structure an <b>adequate infrastructure for multi-modal transportation.</b>	Ministry of Transport and Infrastructure	<p>The revised EIB Transport Lending Policy prioritises the rehabilitation and upgrade of inland navigation infrastructure, as well as economically justified investments in new IWT infrastructure, including inland ports and their associated intermodal and/or logistic facilities and equipment. However, in line with the published Climate Bank Roadmap facilities exclusively dedicated to the handling and/or storage of fossil fuels are not considered to be Paris-aligned and will not be eligible for EIB support.</p> <p>Priority will be also given to the financing of projects that eliminate bottlenecks on the existing networks giving attention to the consistency of interventions along the main corridors. Expansion projects forming part of the TEN-T network of inland waterways that show an acceptable economic justification will also be supported. Outside the EU, the EIB will support IWT projects which are consistent with the appropriate external mandate.</p> <p>Noting that further investment is needed for the development of the environmental performance of the IWT fleet, the EIB will prioritise the modernisation and technological development of inland navigation fleets, in particular with regards to their environmental performance, efficiency and safety, through the financing of new-builds as well as the retrofitting of existing vessels. Vessels dedicated to the transport of fossil fuels will not be eligible for EIB support.</p>
17.	<b>European waterways are highly vulnerable to changes in climate</b> as they heavily depend on natural precipitation in all its shapes and forms. Climate change already does and will continue to drastically reshape the form, volume, and spread of precipitation. This has a constant and, above all, an unpredictable impact on the navigability of the European waterways. A <b>far-reaching climate policy is urgently needed</b> , and structural measures that shape the future of inland navigation and its role in sustainable transport are necessary.	European Transport Workers' Federation	<p>The revised EIB Transport Lending Policy prioritises the rehabilitation and upgrade of inland navigation infrastructure, as well as economically justified investments in new IWT infrastructure, including inland ports and their associated intermodal and/or logistic facilities and equipment. However, in line with the published Climate Bank Roadmap facilities exclusively dedicated to the handling and/or storage of fossil fuels are not considered to be Paris-aligned and will not be eligible for EIB support.</p> <p>Priority will be also given to the financing of projects that eliminate bottlenecks on the existing networks giving attention to the consistency of interventions along the main corridors.</p>

Ref	Summary of Contributions	Contributor	EIB comment
			<p>Expansion projects forming part of the TEN-T network of inland waterways that show an acceptable economic justification will also be supported. Outside the EU, the EIB will support IWT projects which are consistent with the appropriate external mandate.</p> <p>Investments will have to be compliant with the <a href="#">EIB Group's Environmental and Social Policy</a>, which should be read in conjunction with other Group policies, notably the EIB Group Climate Bank Roadmap, the EIB Climate Strategy and the EIB Energy Lending Policy.</p>
18.	<p>Investments in inland waterway transport should be focused on <b>modernization</b> and possibly in moderate <b>upgrade of existing networks</b>.</p> <p>Developing new waterway systems in regions where it would be almost from scratch should not be supported. In such cases it is usually much cheaper to <b>upgrade the railway system</b> to reach the same capacities.</p> <p>Furthermore IWT is more weather-dependent (which is even more severe in time of climate changes), including insufficient water flows in periods of dries and sometimes a <b>non-navigable period during winter</b>. Typically water projects cause also huge environmental impact. Because of all these factors alternative <b>railway investments</b> turn out usually to be more reasonable.</p>	European Rail Infrastructure Managers (EIM)	<p>The revised EIB Transport Lending Policy prioritises the rehabilitation and upgrade of inland navigation infrastructure, as well as economically justified investments in new IWT infrastructure, including inland ports and their associated intermodal and/or logistic facilities and equipment. However, in line with the published Climate Bank Roadmap facilities exclusively dedicated to the handling and/or storage of fossil fuels are not considered to be Paris-aligned and will not be eligible for EIB support.</p> <p>Priority will be also given to the financing of projects that eliminate bottlenecks on the existing networks giving attention to the consistency of interventions along the main corridors. Expansion projects forming part of the TEN-T network of inland waterways that show an acceptable economic justification will also be supported. Outside the EU, the EIB will support IWT projects which are consistent with the appropriate external mandate.</p> <p>The EIB considers that all modes are key in improving the multimodality of the transport system into a network of rail, inland waterways, short sea shipping routes and roads, which are linked to urban nodes. Multimodality is a prerequisite to modal shift and the improvement of the sustainability of transport in all its dimensions. Investments in safe and green modes need to be made in a multimodal context to harness their maximum potential, incorporating also last mile considerations into investment decisions concerning transport between hubs. Also, supporting investments in digitalisation</p>

Ref	Summary of Contributions	Contributor	EIB comment
			are needed for efficient multimodality, both in freight and in passenger transport.  Investments will have to be compliant with the EIB Group's Environmental and Social Policy, which should be read in conjunction with other Group policies, notably the EIB Group Climate Bank Roadmap, the EIB Climate Strategy and the EIB Energy Lending Policy.
19.	The EU taxonomy criteria for inland navigation are in some points not realistic, esp. from 2025 onwards (zero tailpipe emission). Therefore, not many projects/investments will fit in.	Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie	Your comment is noted. The EIB thanks you for the feedback
20.	We should not invest too much in this sector apart from the transformation of the existing one.	Response 290033127	
21.	Second best way to deliver goods	Response 832108188	
22.	This sector — provided that it decarbonises — must be preferred over air transport, although priority is given to passenger and freight transport by <b>rail</b> .	Service Public Fédéral Mobilité et Transports, Response 974008607	
23.	It would be worthwhile to link usable waterways with the issue of <b>water storage and water management</b> , which is raised by climate change.	Budapest Airport Zrt.	

## Chapter 7 – Maritime transport

### Question 1 – What do you believe is the technological roadmap for decarbonising maritime transport?

Ref	Summary of Contributions	Contributor	EIB comment
1.	The development of alternative fuels and technologies for shipping is in an early stage. It is not clear which fuels and technologies will be the most prevalent in the shipping sector. This makes it currently very difficult for ports to have a long-term perspective on their investments.	European Sea Ports Organisation	The roadmap for the decarbonisation of the sector will consist of many different technological and operational solutions. Both efficiency improvement measures and alternative fuels and propulsion methods will be required to decarbonise maritime transport.
2.	Climate neutral waterborne transport is a goal which needs a pathway open to various <b>technological options and alternative fuels</b> . SEA Europe, calls upon the EIB to support technological neutrality and a goal-based Life Cycle Assessment approach. This is essential in order to avoid a curtailing of (innovative) clean technologies and to stimulate a rapid development of alternative fuels for waterborne transport. Furthermore, during the transitional period, well-established fossil fuels with significant emission reduction potential will be needed and should therefore receive continued financial support. For a number of segments, in particular for long - range distances, LNG is the only available solution at present giving a number of advantages, albeit not perfect as carbon-free solution. In this regard, SEA Europe supports the EIB Climate Roadmap which acknowledges the positive role of LNG in the transition and confirms the EIB's "continued support for LNG projects until the long-term solutions for shipping becomes clearer" as highlighted in the EIB Public Consultation Document.	SEA Europe (European Shipyards and Maritime Equipment Association)	It is acknowledged that different segments of the market will require different technological solutions and that there is no one-size fits all approach to decarbonising the sector. The long physical life of the maritime vessels requires a quick adoption of carbon-free technologies while these technologies are still under development and their application in the maritime sector is currently not commercially viable. This poses a challenge in the transition phase where it is necessary to make real short term progress in reducing emissions while at the same time avoiding a long term lock-in to carbon emitting technologies.  The EIB takes a technology-neutral approach to its support for the deployment of transport technologies, including different alternative fuels, provided that they are, or have the potential to be aligned with the Paris Agreement. The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR) paragraph 4.23 to 4.38.
3.	An exponential curve instead of a linear trajectory should be expected. On one hand, the trajectory of emissions towards full decarbonisation hinges on the introduction and market uptake of economically viable and safe low- <b>and zero-carbon fuels and technologies</b> . On the other hand, using the new technologies at a commercial scale requires sufficient time and a joint effort from all stakeholders in the maritime value chain.	ECSA	The EIB Climate Bank Roadmap withdraws support from facilities exclusively dedicated to the handling and/or storage of fossil fuels. Along the same vain, vessels dedicated to the transport of fossil fuels will also not be eligible for EIB support.

Ref	Summary of Contributions	Contributor	EIB comment
4.	Maritime investment should focus on <b>zero-emission technologies</b> , i.e. battery-electric and renewable hydrogen/ammonia-based propulsion systems. Despite all of the evidence against LNG, the EIB Climate Bank Roadmap states “the EIB will continue to support LNG fueled vessels but will withdraw support for vessels powered by conventional heavy fuel oil”. This stands in contradiction with the objective of the EIB under its Energy Lending Policy to stop supporting fossil fuels.	Counter Balance	<p>Logistic efficiency improvements, including automation and digitalisation in the supply chain are seen as necessary on top of alternative technologies for vessels. Port Integration into a decarbonised energy network is agreed to be an important prerequisite for the the decarbonisation of maritime transport. This includes the provision of alternative fuel infrastructure in ports, charging infrastructure and storage infrastructure for a variety of alternative fuels, which will be a priority for EIB in the revised Transport Lending Policy.</p> <p>Support to wholly conventionally-fueled ships will be exceptional, and limited to lifeline and civil protection services such as medical, rescue, research or fire-fighting, and to ships essential for the operation of TEN-T ports under adequate safety conditions when technically or economically not feasible to use lower or zero-carbon fueled vessels for this purpose.</p>
5.	We recommend to: - End support and financing for LNG terminals, and LNG fuelled vessels. - End the support and financing of port expansions and related transport and industrial infrastructure including the expansion or creation of special economic zones.	Greenpeace	
6.	LNG-fuelled ships and port infrastructures risks leading the shipping sector to technology lock-in, while hindering the transition to truly sustainable and scalable alternatives, such as renewable electricity, e-hydrogen and e-ammonia that crucially need this funding to enter the market. There is growing consensus among the world's largest shipyards that <b>e-ammonia</b> might be the “closest alternative to an ideal fuel” for shipping. For the short-sea shipping segment, <b>green hydrogen</b> seems the most suitable option.	European Federation for Transport & Environment	
7.	LNG is an expensive alternative that will make it more difficult for the shipping industry to align with the Paris Agreement goals in the medium- and long-term	Counter Balance E3G WWF EPO	
8.	The use of transitional fuels ( <b>LNG, biofuels</b> ) will be key while future <b>alternative fuels</b> are developed. Studies indicate there will not be one predominant fuel but an energy mix. Many agree in the long-term ammonia will play a significant role.	CEOE	
9.	<b>Biofuel</b> in parallel LNG as transition fuel switching to green methanol late 20s while post 2030 even nuclear could grow as efficient low carbon power.	Van Oord	
10.	Maritime transport has already a short-term technological roadmap through <b>LNG-fueled ships</b> . It provides a good solution while we solve the problem of other transport sub-sectors that don't have a low-carbon emissions alternative. In the long-term, we agree with the EIB's assessment that <b>various mixed-fuel solutions</b> are the most likely way forward	Global Infrastructure Investor Association	

Ref	Summary of Contributions	Contributor	EIB comment
	or highly efficient <b>batteries</b> , as well as integration of ports into our decarbonised energy network.		
11.	Using <b>clean LNG</b> propulsion with methane slip abatement and successively more carbon capture application of the exhaust gas. Use of green ammonia or methanol as fuel next to bio-LNG	Antje Willnow	
12.	No idea, perhaps <b>LNG</b> as a bridge technology	Hanns Kerschner	
13.	<b>Hydrogen</b> powered ships	Jori Milbradt	<p>The EIB's Climate Bank Roadmap, Annex 2, Table C, confirms which transport investments are eligible for EIB support:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Zero direct (carbon) emission vessels are eligible for EIB financing in line with the CBR and will be prioritised under the revised Transport Lending Policy.</p> <p>The EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The Climate Bank Roadmap, Annex 2, Table B and <a href="#">the Digital &amp; Human Capital (IDHC) Orientation 2021-2027</a> describe that projects are supported which enable the development of hydrogen fuel cell solutions for passenger and commercial vehicles, that cover to the entire drivetrain (fuel cell stacks, components, electronics storage systems etc.).</p>
14.	Until 2030 alternative shipping modes: Sailing, Flettner Rotors, Solar energy 2030-2070 changing to new modes (maybe freight submarines?)	Response 1039141480	
15.	The technological roadmap for decarbonising maritime transport is also <b>hydrogen</b> technology!	Response 974008607	
16.	Alternative propulsion will play an essential role in these ships. <b>Hydrogen and LPG</b> seem to be pushing ahead in this sector.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
17.	Maybe that is the only realistic place for hydrogen driven ships	Response 832108188	
18.	GHG neutrality in the marine sector can only be achieved via the <b>e-hydrogen</b> pathway. E-hydrogen needs to be stored on board and storage density and the quick adaption of supply infrastructure are key challenges to overcome. To address this double challenge, hydrogen carriers like eMethane and eMethanol are enablers of both. Limiting "energy carrier" options to "carbon free fuels" like pure hydrogen or ammonia, will have no benefit to the overall GHG balance. GHG neutrality will only be achieved via alternative fuels which costs 3-4 times higher than today's conventional fuels. To design an economically sustainable energy transition, the energy converter is key: <b>fuel cells</b> are highly efficient and are very power dense (increasing the payload of a ship to compensate higher fuel costs). Due to long lifecycles of (cruise) ships the two dimensions of new ships and existing ships need to be addressed: new "zero emission" ships and the possibilities for refitting solutions for existing vessels. For both segments we see 3 key levers for the transition: (1)	Costa Group	

Ref	Summary of Contributions	Contributor	EIB comment
	to reduce the overall energy demand of ships. (2) to reduce the amount of fuel that is needed to generate this amount of (electric) energy. (3) to replace fossil fuel by efuels.		See response to points above.
19.	Development of <b>solar, electricity and hydrogen sails</b> for vessels. Tightening sanctions for oil spills or degassing, promoting the relocation of industrial production to Europe rather than importing our goods from across Asia	Response 290033127	
20.	More solar and wind engine.	Marc-Olivier Leclercq	
21.	Improvement in <b>better technologies</b> for the construction of boats for maritime transport.	Município de Faro	
22.	Priority should be given to <b>alternative fuels</b> with low or zero emissions. Hybrid engines and wind powered propulsion are the best options for short-term solutions. Further research and R & D is needed to identify the most cost-effective and emission-efficient technical solutions for the different types and sizes of ships.	Service Public Fédéral Mobilité et Transports	
23.	Almost one quarter of ships registered under the flag of an EU MS are over 30 years old so some investments will be needed for <b>renewal</b> . Alternative fuels and sources of energy such as biofuels, synthetic fuels, hydrogen, ammonia or batteries, are emerging as alternatives to conventional fossil fuels. In the medium term, conventional and low carbon fossil fuels will continue as the uptake of alternative fuels remains slow.	European Transport Workers' Federation	
24.	Maritime investment should focus on zero-emission technologies, i.e. battery-electric and renewable hydrogen/ammonia-based propulsion systems.	Counter Balance E3G WWF EPO	
25.	The sector needs to move from fossil fuels to low carbon fuels/e-fuels.	Royal Belgian Shipowners' Association	
26.	Sustainable fuels, new propulsion (sails?)	Ralph-Uwe Dietrich	
27.	Cessation of diesel operation. Electric operation is too expensive, nuclear propulsion at the commercial level is unlikely. The long term solution is <b>hydrogen</b> operation.	Budapest Airport Zrt.	
28.	For maritime (and aviation) transport, with no to limited possibility to refuel, alternative solutions may be needed, such as <b>renewable synthetic fuels</b> .	Joint contribution made by NewClimate Institute and Germanwatch	



Ref	Summary of Contributions	Contributor	EIB comment
29.	EU shipping must kick-start the use of <b>green fuels</b> as soon as possible. There are many alternative fuels to decarbonise maritime transport, but not all are sustainable and scalable. The EIB's focus should be on the uptake of renewable-based electrofuels, which are sustainable and scalable fuels for long-distance maritime transport.	WWF EPO	See response to points above.
30.	Remove fossil fuels.	STIB-MIVB	
31.	The transition towards zero-emission maritime transport will need to address significant challenges. Some technological solutions are currently under development (ammonia, hydrogen, bio & electrical fuels). We support solutions to increase the ship's energy efficiency and related emission efficiency. Achieving a reduction of absolute emissions demands a "race against the clock" in consideration that the average age of a modern maritime vessel is around 25 years.	Assarmatori	
32.	<b>Efficient</b> ship design and devices for more efficient burning of conventional ship fuels, incl. hybrid systems. Using <b>Flettner systems</b> and sails.	Antje Willnow	The EIB will continue to support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet through the financing of new builds as well as the retrofitting of existing vessels. This includes reducing the carbon intensity of ships with the adoption of technical and operational energy-efficiency measures.
33.	There is also need for focus on <b>energy saving technologies</b> such as batteries/flywheels and alternative propulsion systems such as <b>Flettner rotors</b> .	Royal Belgian Shipowners' Association	
34.	In order to decarbonise maritime transport, it is essential to improve <b>technical and operational energy efficiency</b> (i.e. fuel economy). This can be achieved by installing energy saving devices such as wind-assist technologies, but also through operational changes including optimising/reducing operational speed. In parallel, EU shipping must kick-start the use of <b>green fuels</b> as soon as possible.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
35.	A combination of <b>ship design efficiency measures</b> , operational efficiency measures and proper technology mix (for different segments of shipping).	ECTRI	
36.	New larger ships with <b>improved propulsion</b> .	Croatian Chamber of Economy	
37.	Large-scale <b>technological integration</b> , as well as digital assistance and/or support will increase efficiency and fuel reduction.	Ministry of Transport and Infrastructure	

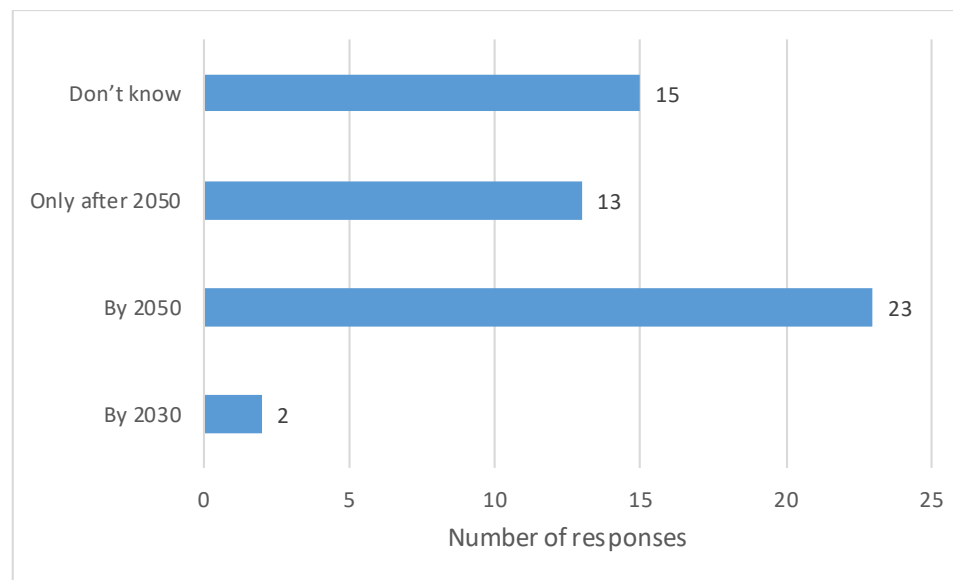


Ref	Summary of Contributions	Contributor	EIB comment
38.	Short term (incremental implementation starts over next years): use of <b>alternative fuels</b> (zero carbon) and more energy-efficient vessels; additional supporting technologies will help to save energy consumption (e.g. satellite-based vessel steering, data sharing among ports and providers along transport chain etc. to reduce waiting times/queuing)	Arthur D. Little	
39.	<b>Increasing shipping efficiency</b> can have a sizable impact in decarbonizing maritime transport. Efficiency begins with ship design and onboard technology..	Bank Information Center	
40.	A road-map for maritime transport might be: 1. Promoting <b>reduction of energy needs</b> ; 2. Developing the use of renewables that can directly be collected onboard. First and foremost is <b>wind energy</b> , which can reliably be used for propulsion; 3. Developing <b>cold ironing</b> in harbours and large onboard electric storage systems (based on batteries for example), to achieve zero emission in ports.	NEOLINE Développement	<p>See answers above.</p> <p>Additionally, the EIB will continue to support port infrastructure and related facilities. In line with the Climate Bank Roadmap, the EIB will also prioritise investments in alternative fueling infrastructure and on-shore power supply.</p>
41.	Working towards the uptake of zero-emission vessels in shipping is important to achieve a climate neutral shipping sector by 2050. <b>Renewable energy and fuels</b> need to be produced, safe and sufficient storage facilities have to be put in place and distribution of the renewable energy and fuels to the end users has to be established.	Ministry of Infrastructure and water Management	
42.	Besides renewable energy supplies investment is required on electricity transmission grids, shore-side charging infrastructures, new fuel production facilities, energy storage, bunkering infrastructures.	ECTRI	
43.	Shore side electrification is needed to enable ships to plug in at ports.	European Federation for Transport & Environment	
44.	Wall power plugs and most sustainable machines	Back on Track Belgium vzw-asbl	
45.	Investments supporting the transition to net-zero emissions should include projects providing ports renewable synthetic refueling infrastructure such as hydrogen or ammonia.	Joint contribution made by NewClimate Institute and Germanwatch	

Ref	Summary of Contributions	Contributor	EIB comment
46.	Changes to ports infrastructure and shipping activities are necessary. Constant assessment of infrastructural performance needs to be prioritised to improve safety and navigational efficiency.	European Transport Workers' Federation	
47.	Availability of alternative fuels, automation of operations	Ministry of Infrastructure	In line with the Climate Bank Roadmap, the EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fueling infrastructure, port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain.
48.	It will be of major importance how the recently published "Fit for 55" horizontal legislative package of the European Commission and especially the FuelEU Maritime Initiative will in practice be implemented and address safety, training and protecting measures for seafarers using new maritime fuels. In line with the aforementioned initiatives, investments in new skills are critical to ensure that workers are prepared and protected in the process of introducing new fuels and their handling procedures	European Transport Workers' Federation	The EIB recognises that safety of port operations including bunkering of fuels is of utmost importance and requires full regulatory compliance on this in the project it finances.  Support to education and training is outside of the remit of the EIB Transport lending policy but is addressed under other sectoral policies of the EIB.
49.	This includes engagement in ports, dockers, companies, shipping companies, maritime safety.	Município de Paredes	
50.	<b>Biofuels</b> could be used to replace heavy-fuel oil, however, there is little evidence that there would be enough capacity to sustainably produce biofuels in sufficient quantities. Instead, the legislator's focus should be on the uptake of <b>renewable-based electrofuels</b> , which are sustainable and scalable fuels for long-distance maritime transport.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	<p>According the EC policy scenarios forecast, bio-fuels or e-fuels are an important part of the fuel mix in a low-carbon scenario for maritime transport (see Sustainable and Smart Mobility Strategy, Commission Staff Working Document, SWD(2020) 331 final, <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0331&amp;from=EN">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0331&amp;from=EN</a>)</p> <p>EIB support to the production and supply of these fuels is covered under the EIB Energy Lending Policy.</p> <p>The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR). In line with the Climate Bank Roadmap, the EIB does not support biofuels production that make use of feedstocks that can serve as food or compromise food security.</p> <p>The revised Transport Lending Policy will continue to prioritise investments in alternative fuelling infrastructure.</p>

Ref	Summary of Contributions	Contributor	EIB comment
51.	Luxury cruise shipping must be banned and container ships must comply with speed limits. Taxing the transport of non-essential or non-ethical/environmentally responsible goods	Response 981558580	Thank you for your input. Regulatory measures could indeed support the decarbonisation of the sector.

## Question 2 – How fast can maritime transport realistically be decarbonised?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Ships have a long lifespan. Maybe some will be converted but I think new Sailing ships will need special hulls	Response 1039141480	<p>The long physical life of the maritime vessels requires a quick adoption of carbon-free technologies while these technologies are still under development and their scale application in the maritime sector is currently not commercially viable. The revised Transport Lending Policy also includes support for pilot projects that offer innovative solutions.</p> <p>The EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
2.	All the ships running now have to be old enough to be scrapped	Response 832108188	
3.	Alternative fuels are not yet widely available and most projects covering these fuels still have a relatively low TRL and are tested on smaller vessels with lower energy demands. By the time the TRL becomes more mature, there is still time needed to do a rollout of the technologies: vessels have an average life-span of 20-30 years.	Royal Belgian Shipowners' Association	
4.	Ships are expensive and take a long time to depreciate, after which a new boat needs to be purchased and the old ship needs to be sold or even better recycled. Ports can adapt to new conditions and modernize relatively quickly.	Croatian Chamber of Economy	
5.	This technology is still late so improvements should be slow.	Município de Faro	
6.	The speed of the decarbonisation of maritime transport will <b>depend on the evolving technologies</b> . It is important that transitional solutions, in line with EU infrastructure requirements	European Sea Ports Organisation	

Ref	Summary of Contributions	Contributor	EIB comment
	(TEN-T & AFIR), continue to be supported until zero-emission solutions are market ready.		Please see response to points above.
7.	<p>I consider that compensating measures (like planting trees) are not real decarbonization.</p> <p>If the question is : How fast can a new-built mid-sized ocean going merchant vessel realistically be totally decarbonised? =&gt; Then my answer would be 2030</p> <p>If the question is : How fast can all new-built vessels be decarbonised ? =&gt; Then my answer would be maybe 2050, if very strong measures are taken today in order to support initiatives toward that goal.</p> <p>If the question is about complete maritime decarbonisation, answer will directly depends from when the previous milestones will be reached.</p>	NEOLINE Développement	
8.	Drastic decarbonization is <b>not possible</b> due to missing zero emission propulsion technics.	Antje Willnow	
9.	European maritime transport can decarbonise by <b>2040</b> : the phase-out of fossil fuel consumption is a function of an increase in efficiency, and an accelerated switch to battery-electric, hydrogen and synthetic fuels based on zero-emission electricity.	Joint contribution made by NewClimate Institute and Germanwatch	
10	The technologies for the decarbonization of shipping are not currently available. It is necessary to encourage large-scale R&D programmes to develop them. It is unrealistic to expect a complete decarbonization before <b>2050</b> .	CEOE	
11	Solutions such as Ammonia-fuelled engines could be deployed in a few years notwithstanding the necessary logistic chain that is currently missing. Taking into account the global shipyards sector's productive capacity, which is required to replace the existing global fleet, a significant decarbonisation of the sector is <b>not feasible prior to 2050</b> in line with the International Maritime Organisation's Statement.	Assarmatori	
12	Maritime transport could be electrified for short-distance trips and other technologies (such as hydrogen and ammonia) could be used for intra-EU and extra-EU trips. To fully decarbonize maritime transport by 2050, EU-related shipping needs to test and deploy green fuels as soon as possible.	ECTRI	

Ref	Summary of Contributions	Contributor	EIB comment
13	The increased climate ambition of the EU 'Fit for 55' climate package is welcome. Although consistency among the proposals of the package is missing, certain decarbonisation targets are introduced for the period up to <b>2050</b> with intermediate targets in 2030. What is currently possible, both technologically and commercially, taking into account a life-cycle approach, needs to be considered.	ECSA	Please see response to points above.
14	In order to accomplish its emission reduction target by 2050, EU-related shipping needs to deploy green e-fuels as soon as possible. Shipping companies need to start deploying zero-emission enabled vessels from 2025 onward. Once the supply and the demand have developed, green e-fuels should be scaled up fast to achieve full decarbonisation of the sector by 2050, in line with the Paris Agreement.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
15	Taking into account the lifespan of ships of 30 years, ships that are taken into the fleet now will still be operational in 2050. Therefore <b>2050</b> is the most realistic assessment in order to move towards zero-emission vessels.	Ministry of Infrastructure and water Management	
16	Hydrogen technology will <b>not be mature until 2050</b> .	Response 974008607	
17	Although there's some evidence that the transition could happen earlier, given the diversity within the EU, the decarbonization of maritime transport will most likely happen by <b>2050</b> .	Global Infrastructure Investor Association	
18	Vessels have a lifetime of between 20 and 30 years, depending on the type of vessel. At present, technological solutions are not yet sufficiently advanced and available so that all existing ships can be adapted in order to navigate with zero emissions by 2030. 2050 is possible if the sector obtains clarification on the (future) availability and competitiveness of zero-emission fuels. Given the international nature of maritime transport, it is important to ensure sufficient availability outside the EU.	Service Public Fédéral Mobilité et Transports	
19	The process is expected to be very slow and other, more rapid areas will deplete resources	Budapest Airport Zrt.	The EIB recognizes that this challenge will indeed require a long term effort and will adapt its policies and instruments to provide the best support to the sector throughout the transition.  Recognising the above and the current context, , the EIB's
20	It remains <b>difficult to make any kind of robust projection</b> on how fast the maritime transport can be decarbonized	European Transport Workers' Federation	

Ref	Summary of Contributions	Contributor	EIB comment
21	The push for decarbonizing maritime transportation has only started “recently”. This will lead to a delayed decarbonization process that will last <b>longer than 2030</b> .	Arthur D. Little	priorities as proposed under the revised Transport Lending Policy include strategic port infrastructure; digitalization and decarbonisation and the development and deployment of zero direct CO2 emission ships.
22	<b>2030</b> is too early	Marc-Olivier Leclercq	
23	As transportation vehicles are the ones that need to be adequate to the environment, with the appropriate investments, the <b>2030 milestone could be reached</b> .	Ministry of Transport and Infrastructure	
24	Transport has to be decarbonized by <b>2050</b> , maritime transport needs global agreement and shared efforts.	Ralph-Uwe Dietrich	
25	2030 it is far too short, it is in 9 years’ time. <b>2050</b> the time to replace all vessels and still with a very proactive policy.	Response 290033127	
26	Shipping assets last for 25-30 years. We expect the first zero-emission ship to be put on the market as from 2030 provided financial support and regulatory derogations be activated (supra). The number of zero emission ships will however increase at low speed in the early phase because of remaining regulatory barriers. To get the world fleet turning fully to zero-emission ships will require that the lee-time of <b>25-30 years</b> be passed, meaning more or less <b>2060</b> .	Costa Group	
27	This sector appears more challenging than others.	Bank Information Center	Indeed, the international nature of the sector means that a large part of the regulatory framework is agreed multilaterally by the International Maritime Organization. EU Regulations contribute and complement, international commitments at a larger scale..
28	Only possible on a worldwide scale	OTIF	
29	Still very quick needed seen the climate emergency.	Back on Track Belgium vzw-asbl	The EIB recognizing the climate emergency committed to align financial support with the Paris Agreement objectives and goals through the adoption of the Climate Bank Roadmap.
30	The question on how fast the decarbonization of the inland water transport by 2050 can be realistically achieved is <b>dependent on the amount of investments</b> the sector make to scale up existing technologies, the supporting policies that the EU is planning to adopt and the financial instruments available that will be conducive to those goals.	SEA Europe (European Shipyards and Maritime Equipment Association)	Thank you for your comment. Please see Chapter 6 of this issues matrix for the EIB’s comments on the inland waterway sector/ of the revised TLP.
31	Fossil LNG is no solution to shipping's climate problem, including as a transitional role, contrary to what suggested in the EIB's consultation document. T&E recommends that efforts focus in	European Federation for	It is acknowledged that different segments of the market will require different technologic solutions and that there is no one-size fits all approach to decarbonising the sector.

Ref	Summary of Contributions	Contributor	EIB comment
	the first decade of decarbonisation on technical and operational efficiency measures. These can be easily implemented between now and <b>2030</b> , for immediate and cost-effective GHG savings.	Transport & Environment	<p>The long physical life of the maritime vessels requires a quick adoption of carbon-free technologies while these technologies are still under development and their application in the maritime sector is currently not commercially viable.</p> <p>This poses a challenge in the transition phase where it is necessary to make real short term progress in reducing emissions while at the same time avoiding a long term lock-in to carbon emitting technologies.</p> <p>The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR) paragraph 4.23 to 4.38.</p>



### Question 3 – How do you see the demand for maritime transport developing in the period up to 2050?

Ref	Summary of Contributions	Contributor	EIB comment
1.	Shrinking on the Baltic route and the Chinese belt initiative, may still be increasing on trade routes with North and South America as well as Africa.	Jori Milbradt	<p>Thank you for sharing your insights and sector expertise for this question. The EIB performs an analysis of market developments for the projects it finances. The input of sector experts is of high value in these analyses.</p> <p>EC forecasts still expect transport volume growth in the maritime sector (See Sustainable and Smart Mobility Strategy, Commission Staff Working Document, SWD(2020) 331 final, <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0331&amp;from=EN">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0331&amp;from=EN</a>).</p> <p>In fact, the EU's modal shift strategy requires that transport by inland waterways and short sea shipping should increase significantly in order to obtain the decarbonisation objectives set out in its policy.</p> <p>As transport will be increasingly multimodal and international, the efficiency of door-to-door journeys of peoples and goods will also be more and more dependent on seamless connections between different transport modes and between countries, in particular within the Single Market of the EU.</p> <p>As such, and subject to the specific criteria in the Climate Bank Roadmap, the EIB will remain demand-driven and focused on the sectors where market failures are identified and significant investment needs remain, including the maritime sector.</p>
2.	Traditional forecasts envisage an increase in the global DWT. Yet the evolution will not be shared equally between the various shipping segments. Taxonomy for instance will have a negative effect of oil tankers while economic crisis or pandemic impact differently individual segments. Cruise is expected to become a recognize "safe bubble" vis-à-vis possible pandemic because of their robust Health & Safety Protocols, generating an increase for demand.	Costa Group	
3.	I see no decline, I hope parts of the potential growth are compensated by new silk road rail transport capacity.	Antje Willnow	
4.	As the new silk road is developing and due to rising fuel costs global transportation will fall. Local production will grow again. Therefore I expect a shift to rail transport with lesser tonnage in total. But, as I will write on aviation there will be a significant growth of intercontinental passenger and general cargo transport.	Response 1039141480	
5.	May shrink in a few years as local/regional production gets favoured. Furthermore, consumption of all sort of non-essential products made in low cost countries will reduce because of pressure on resources and carbon footprint.	Van Oord	
6.	It depends on the roadmap of globalization.	Hanns Kerschner	
7.	<p>Demand for international maritime transport is strongly connected to globalization.</p> <p>In other words, the question is :</p> <p>Will globalization continue to expand or be counterbalanced by industrial relocalization ?</p> <p>If the answer is "yes", then international maritime transport will quickly continue to develop given the world population increase.</p> <p>If the answer is "no", then international maritime transport might develop at a lower speed, and even enter in recession.</p>	NEOLINE Développement	

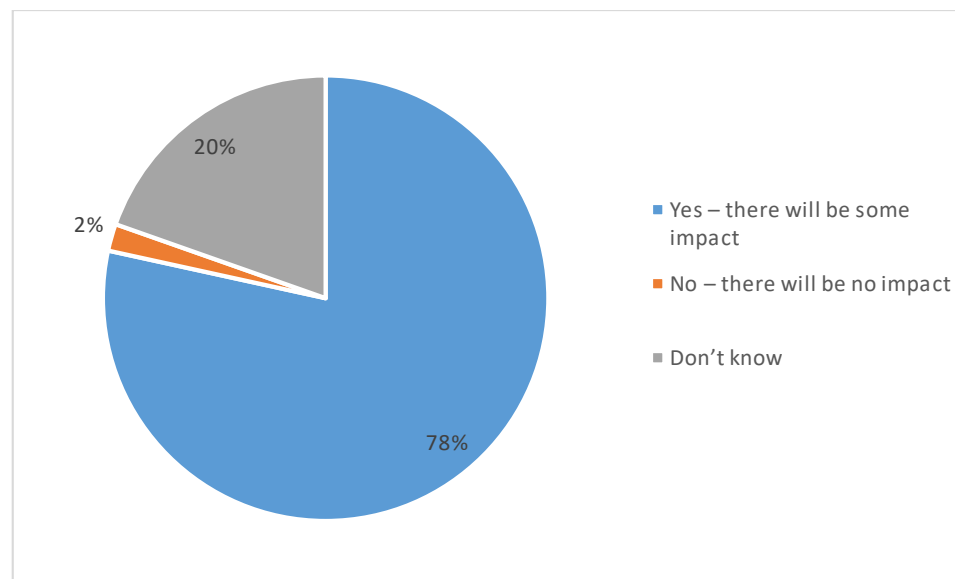
Ref	Summary of Contributions	Contributor	EIB comment
	Regarding short sea, things might be different, and dependant from local dynamics and EU regulations. If regulations and/or taxation start to affect road transport, then short-sea maritime could be strongly developed in several areas.		Please see response to points above.
8.	Very high. The demand for longer distances should improve over the years due to the globalisation of the world.	Município de Faro	
9.	At an increasing rate due to the importance of international trade, more precisely due to the Free Trade Agreements between different regions or states.	Ministry of Transport and Infrastructure	
10.	Global trade will increase, so maritime transport is expected to grow.	Bank Information Center, Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
11.	The demand for maritime transport follows more or less the economic growth of countries/regions. There will be a decline in the transport of fossil fuels but since the energy density of the new fuels is x times smaller than that of other fossil fuels, more vessels will be needed to transport these to feed the same energy demand	Royal Belgian Shipowners' Association	
12.	The development of the maritime transport demand until 2050 will be characterized by the burning of toxic heavy fuel oil!	Response 974008607	
13.	<b>Increasing</b>	Croatian Chamber of Economy, Finnish Transport Infrastructure Agency, Ministry of Infrastructure	
14.	Increasing because of the growing wealth in the world	Response 832108188	
15.	It will grow, but currently not sustainable.	Ralph-Uwe Dietrich	

Ref	Summary of Contributions	Contributor	EIB comment
16.	This is expected to increase as air and rail transport become more expensive due to higher prices for fossil fuels and electricity of future.	Budapest Airport Zrt.	Please see response to points above.
17.	According to the International Maritime Organization, due to projected growth in global seaborne trade, shipping's global emissions are also expected to increase by up to 50% between now and 2050. If we look more specifically at green fuels, their demand and production could easily scale up if the right incentives are set up.	European Federation for Transport & Environment, Ministry of Infrastructure and water Management, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
18.	Once the pandemic crisis will be overcome, a growth rate equal to the pre-crisis period is expected.	Assarmatori	
19.	Demand for maritime transport will most probably continue to increase, although this will depend on many factors, including global economic uncertainty and trade tensions. Should maritime freight transport grow at a rate of 3.6 percent per year, maritime trade volumes will almost triple by 2050.	ECTRI	
20.	Despite the current supply chain struggles, international maritime transport will continue to grow and ADL expects it to grow over-proportionally (>3-4% p.a.) in relation to other modes.	Arthur D. Little	
21.	In terms of transport volume projections, the fourth IMO study on GHG provides detailed transport volume projections for different long-term scenarios. In all analyzed scenarios the total transport volume would increase between 40 %-100% until 2050. According to SEA Europe Market Forecast 2021, seaborne trade is forecast to reach 15.2 billion tonnes in 2040.	SEA Europe (European Shipyards and Maritime Equipment Association)	
22.	During the COVID-19 pandemic, maritime transport has proven critical for the supply chain, and the problems we're currently seeing will most likely increase. Maritime transport accounts alone for more than 80% of the world trade, so it's unlikely that demand will go down. Increase of localized shipping routes as the world looks to diversify its supply chain	Global Infrastructure Investor Association	

Ref	Summary of Contributions	Contributor	EIB comment
	away from Asia, over 40% of global tonnage comes from China, Greece and Japan. Due to pandemic inducing supply chain shortages, it will be imperative to ensure there is a fairer distribution of production to meet our increasing demand for things.		Please see response to points above.
23.	International reports clearly show that maritime transport will continue to develop significantly in the coming decades.	Service Public Fédéral Mobilité et Transports	
24.	The growing trend in shipping is clear due to economies of scale and because it is the only mode of transport for certain goods and raw materials. Changing this model in the short to medium term will be difficult.	CEOE	
25.	Water-based transport is expected to grow by 17% between 2015 and 2050.	Joint contribution made by NewClimate Institute and Germanwatch	
26.	<p>International shipping is expected to grow during the next few decades. An increase in transport volumes for all ship categories until the year 2050 has been projected, except for oil transport where tonne-miles will be reduced by more than 30 %. The largest relative trade increases are expected for natural gas carriers and container ships.</p> <p>The forecast estimates a total increase of 24 % from 2018 to 2050 and 9 % growth in trade between 2030 and 2050.</p> <p>Furthermore, for the next decade, an annual growth in short-sea shipping in Europe is expected in the range of 3-4 %. A number of scenarios estimate that short-sea shipping, covering national and a part of international maritime transport activity, may grow by 23-24 % by 2030 relative to 2015 and by 46-49 % by 2050. Overall, inland waterways and short-sea shipping activity is projected to grow by 23-24 % by 2030 relative to 2015 and by 47-50 % by 2050.</p> <p>Increasing volumes of trade with neighbouring countries is also projected (e.g. Turkey, Russia and North Africa). On the other side, short-sea shipping may face uncertainties due to limited harmonisation in cross-border operations. The largest annual growth rates in the demand for short-sea shipping are expected in the Baltic Sea, with a 2.1 % increase, and in the Mediterranean Sea, with a 1.95 % increase. Regarding cargo</p>	European Transport Workers' Federation	

Ref	Summary of Contributions	Contributor	EIB comment
	types, the largest increase in short-sea shipping until the year 2025 is expected for large containers and roll-on, roll-off (Ro-ro) cargo. It remains to be seen whether this projected growth will ultimately benefit the development of high-quality maritime clusters and safeguard job opportunities for European maritime professionals and the European maritime skills base. Reduced job opportunities for European seafarers negatively impact the attractiveness of the profession, discouraging young people from considering a career at sea. This could lead to a shortage of maritime personnel and an erosion of maritime knowledge and skills in traditional seafaring countries in the EU. Without a domestic maritime skills base, it will be difficult for those countries to develop effective maritime policies and their maritime clusters. At the same time, the lack of highly qualified European maritime professionals will make it difficult for Europe to develop sustainable and quality shipping services. If Europe is serious about protecting its maritime jobs and maritime skills base, reducing transport greenhouse gas emissions, facilitating a modal shift by releasing the potential of short sea shipping connections, and rejuvenating its maritime clusters for the benefit of the broader European economy, then the concept of a European Maritime Space for socially sustainable shipping offers a solid foundation to build on.		Please see response to points above.
27.	<b>Decreasing</b>	Response 981558580	
28.	This is expected to decrease as oil and gas have no future and will be phased out, container ports and giant bulk carriers are the excesses of globalisation. In a desire to return to short supply chains, these vessels have no place.	Response 290033127	
29.	To achieve our climate goals, it is obvious that changes need to occur in global society. As ecological awareness increases, it is probable that a more circular economy will develop over the years. This should result in a progressive decrease, or at least a slowing, of demand for maritime transport. Furthermore, with the development of recycling, bulk transport will be affected as less raw materials will be needed.	European Federation for Transport & Environment, Ministry of Infrastructure and water Management,	
30.	Flattening. Example: reduced fossil fuel transportation...	STIB-MIVB	

Question 4– Do you believe that there will be any long-term impact on the development of this sector as a result of climate policies' increasing cost?



Ref	Summary of Contributions	Contributor	EIB comment
1.	<b>Rising fuel costs</b> and secondary cost due to impacts of pollution by heavy fuel oil.	Response 1039141480	It is recognised that a switch to low-carbon technologies will come at a significant financial cost and that both the capital investments of the technologies and initial operating costs will be higher than in the current situation. The cost competitiveness is expected to improve as the low-carbon technologies mature.  A reduction of energy use through logistic and vessel efficiency improvements will be required to reduce the total transition costs towards low carbon technologies and projects contributing to this are a priority in the Transport Lending
2.	Yes, climate policies' cost should <b>incentivize efficiency and decarbonization</b> , and this should yield benefits both to maritime transport and people & the planet more broadly.	Bank Information Center	
3.	The climate policy "cost increases" will, in the long term, marginalize the burning of the toxic heavy fuel oil!	Response 974008607	
4.	Global international climate policies are the only driving force for maritime decarbonization..	Ralph-Uwe Dietrich	
5.	The EU cruise sector has pioneered many innovations and latter have been developed in joint partnership with EU yards. This trend could be maintained if appropriate financial instruments and related criteria are properly designed.	Costa Group	

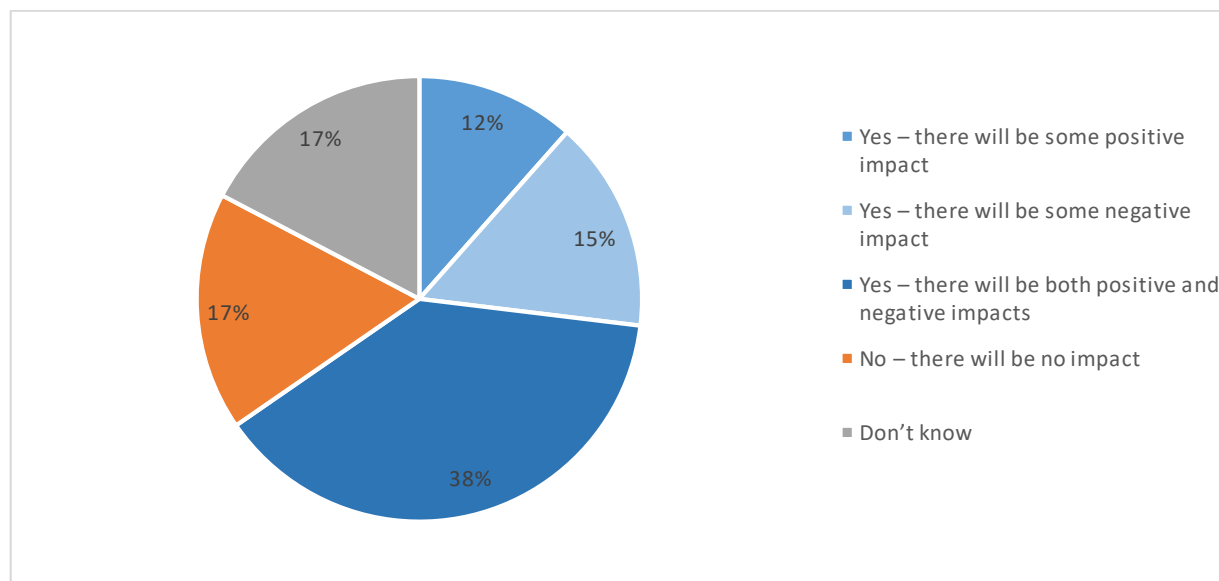
Ref	Summary of Contributions	Contributor	EIB comment
	<p>The existing Taxonomy criteria would render virtually impossible cruise ships building in Europe while said ships represent today more than 80% of European yards' portfolio.</p> <p>The major risk with shipping is to see a carbon leakage materializing shift from one regional market to another. The other risk is to see European early movers in new technology be penalized by additional CAPEX and OPEX making their position uncertain vis-à-vis third markets operators.</p>		<p>Policy, in line with the EIB Climate Bank Roadmap (CBR) paragraph 4.23 to 4.38.</p> <p>The EIB approved its first Adaptation Plan in 2021, with the aim to strengthen investment and technical support to protect projects from the impact of more extreme weather and increase climate resilience of existing and new infrastructure. The plan describes, among other things, how the EIB will increase its efforts to promote the consideration of physical climate risk in investment decisions.</p> <p>The EIB's Adaptation Plan is available at: <a href="https://www.eib.org/en/publications/the-eib-climate-adaptation-plan">https://www.eib.org/en/publications/the-eib-climate-adaptation-plan</a></p> <p>Thank you sharing your insights.</p>
6.	Yes, because this sector is primarily responsible for protecting the oceans and seas.	Budapest Airport Zrt.	
7.	Very ambitious decarbonisation is necessary and very strong regulations should be implemented. Consequently, induced costs might be too high for some goods to remain with a delocalized production. Some companies might rerout their investments to prioritize local production. At a significant scale, it could lead to a <b>reduction in international maritime transport</b> demand and start a "domino" effect with potential consequences for maritime transport.	NEOLINE Développement	
8.	Next to <b>GHG reduced ship operation</b> the rising steel prices for a bit greener steel have highest impact.	Antje Willnow	
9.	It will be <b>more expensive</b> to carry goods	STIB-MIVB	
10.	<p>International: The EEX/CII will force ship owners to <b>improve the energy efficiency</b> of their vessels.</p> <p>European: initiatives such as EU ETS/Fuel EU Maritime will also force shipowners/ship operator to <b>consume less fuel</b>.</p> <p>These policies can only work when they follow the polluter pays principle and when the new alternative fuels will be subsidised during the initial years to boost the uptake.</p>	Royal Belgian Shipowners' Association	
11.	Prices of transport are going up fast and because of that all goods will go up, especially ore and energy.	Croatian Chamber of Economy	
12.	Shipping will always become <b>less efficient</b> than diesel unless nuclear takes over	Van Oord	
13.	The increasing of cost will have a big impact in the sector because bigger distances increase significantly the costs.	Município de Faro	
14.	The increase in costs is likely to have a smaller impact compared to road and air transport, as the ratio between the volume transported and the cost of staff and fuel is cheaper.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	

Ref	Summary of Contributions	Contributor	EIB comment
15.	As a minimum, rising water levels will require <b>port facilities to be reviewed</b> .	Ministère de la Transition écologique	Please see response to points above.
16.	Yes because taxes on imported products and therefore highly polluting products will increase significantly. Part of the population will refuse long-distance shipping.	Response 290033127	
17.	Climate policies will increase shipping costs, products' prices will be affected and demand for goods should decrease. Hopefully the maritime sector will develop in a greener way. Greener ships who run on e-ammonia or e-hydrogen will be more numerous and green fuel prices could stabilise at lower levels than today. In addition, the expected increase in costs due to ETS are around 30% of current fuel prices.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
18.	Climate policies could have an impact on shipping companies that do not have the financial capacity to invest in the technological changes necessary to decarbonize their fleet.	Ministry of Infrastructure and water Management	
19.	The ETF believes that automation and digitalisation cannot be the default setting towards a zero-emission future. Instead, a human- and society-centred approach has to be envisaged. To reach that goal, investments in human skills and resources must be integrated into calls for investments into greening the entire maritime sector. These should be aimed at re- and upskilling and training, to increase the attractiveness of the sector. Training, retraining and re-skilling programmes will contribute largely to this attractiveness, together with quality living and working conditions both onboard as on shore.	European Transport Workers' Federation	
20.	Overall, an increase in the cost of transport is foreseeable due to the necessity to <b>implement new technologies</b> and to the required investments for the fleet's renewal.	Assarmatori	
21.	The cost of maritime transport services will increase as a result of climate change adaptation and the need to provide a climate-resilient transport system.	ECTRI	
22.	Hopefully less long distance goods creation and transport	Back on Track Belgium vzw-asbl	
23.	Maritime transport will <b>adapt to new climate policies</b> and the long-term preferred option vs. other modes despite decarbonization.	Arthur D. Little	
24.	There will be <b>long term impacts</b> on the competitiveness of European maritime industry, which is a capital-intensive and globally competing	SEA Europe (European Shipyards	



Ref	Summary of Contributions	Contributor	EIB comment
	industry if no adequate policy support and framework conditions are in place to support the twin green and digital transition of maritime transport.	and Maritime Equipment Association)	Please see response to points above.
25.	If the legislation forces the transition to be quicker than what the technology is ready to deploy, <b>prices can go up</b> .	Global Infrastructure Investor Association	
26.	This will depend mainly on the cost of alternative fuels. If these costs do not become competitive with traditional fuels, this will slow down the transition to zero-emission shipping in the short term. In the long term, the <b>price of goods will increase</b> above average, which could reduce the demand for goods and therefore for ships. Small shipping companies are likely to face difficulties due to the investments that will be needed and the administrative burden that will be created by the ETS and the FuelEU.	Service Public Fédéral Mobilité et Transports	
27.	Thousands of small and medium-sized enterprises could disappear in the coming years because they are <b>unable to adapt to new environmental standards</b> . In Europe, the burden on European companies that will be imposed in the coming years may create a two-tier market and competitive disadvantages vis-à-vis non-EU companies.	CEOE	
28.	The backbone of the European fleet are SMEs, which operate in Europe and internationally. The current deal size of EIB financing instruments is not fit for purpose for the needs of SMEs. There will be long-term impacts on the development of this sector as a result of climate policies' increasing cost. However, they are difficult to quantify because the shipping industry is characterised by a diversity of ship types, sizes, range of operations, modi operandi and business models.	ECSA	
29.	Climate policies should not be seen purely in terms of costs but rather as investments in clean mobility and better public health through reduced air pollution.	Joint contribution made by NewClimate Institute and Germanwatch	
30.	Hopefully oil fired ships get forbidden soon	Response 832108188	

Question 5– Do you believe that there will be any permanent impact on the development of this sector following the COVID-19 pandemic?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Covid is probably <b>unimportant</b> , apart from cruise ship traffic.	Hanns Kerschner	<p>The global pandemic is having significant impact on passenger volumes in the maritime sector. The extent to which long term impacts will remain should become clear over the coming years. The EIB will take into account relevant changes in terms of market and regulatory requirements as a result of the pandemic in its project appraisal.</p> <p>Also for freight supply chains the pandemic had an impact and showed the vulnerability of the global supply chain for supply shocks. The future resilience of this transport network and the global supply chains will be a point of attention for EIB projects.</p> <p>Thank you for sharing your insights and expert views.</p>
2.	The cruise sector has developed robust sanitary protocols offering a “safe bubble” for guests and tourists. Cruise is likely to become a destination of choice for <b>citizens looking for safe vacations</b> . In the short term, it will take a few years to absorb the unrepresented losses of last 18 months. In the mid-term, full resumption is only possible if the Internal Market acquis are fully respected by Member States.	Costa Group	
3.	Mainly <b>passenger ships</b> have been affected by the COVID19 crisis. Shipping trade is in the process of recovering to pre pandemic values, although already ongoing trends could be reinforced by COVID19, potentially leading to structural	Ministry of Infrastructure and water Management	

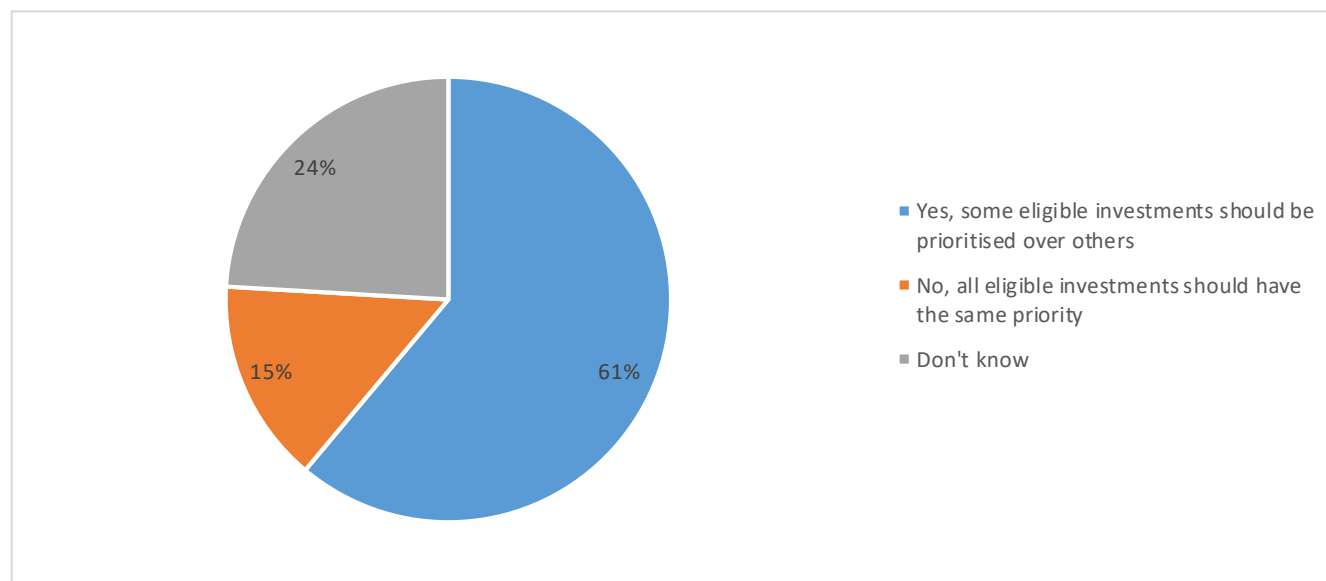
Ref	Summary of Contributions	Contributor	EIB comment
	changes in trade patterns. In addition, the energy transition will affect the development of the sector.		Please see response to points above.
4.	The <b>passenger and cruise ship industry</b> were the most affected by the COVID-19. The ongoing crisis had devastating consequences for the 2021 season as very few cruises were booked due to the continued insecurity caused by the pandemic. The recovery of the sector is dependent on the wider state of the pandemic and travel restrictions being Other ship types were not affected such as oil tankers, chemical tanker, general cargo and container ships.	European Transport Workers' Federation	
5.	Unaware of any scientific studies that prove development of this sector will be permanently influenced after the COVID-19 pandemic!	Response 974008607	
6.	I think corona slowed maritime traffic and the demand will fasten it up again	Response 832108188	
7.	It will only be after a long time that confidence in large-scale mass and slow travel will be restored	Budapest Airport Zrt.	
8.	Maritime transport will grow with globalization. It seems unstoppable.	Ralph-Uwe Dietrich	
9.	COVID-19 crisis reveals that containers international maritime transport is very vulnerable. Difficulties in this sector are today very large, and the global logistic chain is severely affected for already more than a year and an exit is not yet sighted. <b>This durably affect economy and lot of companies financial health</b> , which is a strong negative impact. However, if this can lead some actors to recreate secondary lines between secondary harbors, that will <b>benefit local economy and local development</b> of each region as well as increasing resilience.	NEOLINE Développement	
10.	As Covid will not vanish, <b>interruption of supply chains</b> will occur.	Antje Willnow	
11.	Some shipping companies start looking at technologies that allow vessels to be <b>remotely controlled</b> because of a potential crew shortage. Some non-shipping companies will <b>re-think their value chains</b> to prevent future interruptions	Royal Belgian Shipowners' Association	

Ref	Summary of Contributions	Contributor	EIB comment
12.	<b>Core industry</b> and <b>energy sector</b> vital for any country will be coming home. Supply chains will be shorter.	Croatian Chamber of Economy	Please see response to points above.
13.	COVID-19 taught us that <b>local production of goods</b> brings security, and that emissions can reduce when we buy and travel less	Van Oord	
14.	Yes, much more negative impacts because the <b>lower demand on products</b> and the lower demand on <b>transportation</b> of people have a big impact in this sector.	Município de Faro	
15.	It depends mainly on each state or region. <b>Restrictions</b> protocol due to COVID-19 pandemic increase further verification processes.	Ministry of Transport and Infrastructure	
16.	No, activity will be gradually restarted.	Response 290033127	
17.	Maritime trade is a function of international trade, and thus linked to its fluctuations.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
18.	To the extent that trade dynamic has been affected by the pandemic, maritime transport was, and will continue to be affected. The pandemic <b>distorted global demand for goods</b> , especially in the e-commerce sector.	European Federation for Transport & Environment	
19.	The pandemic has undoubtedly been a disruptive factor for the sector and we now see there are great difficulties with <b>very high costs</b> for transporting containers, for example. These problems will persist for a few months, but the market situation is expected to normalise in 2022.	Service Public Fédéral Mobilité et Transports	
20.	The pandemic resulted in an <b>increase in containers' prices</b> , and consequently products' costs increased as well.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	

Ref	Summary of Contributions	Contributor	EIB comment
21.	The COVID-19 pandemic has underlined the strategic role of maritime transport as the backbone of global and local trades and economies.	Assarmatori	Please see response to points above.
22.	<ul style="list-style-type: none"> <li>- New organisational modes</li> <li>- New technologies</li> <li>- Emergency plans and automatic stabilisers</li> <li>- Drive companies out of the market</li> </ul>	ECTRI	
23.	More webshop shipments and longer deliver times	Back on Track Belgium vzw-asbl	
24.	Covid-19 has had a negative impact on the global supply chain that has affected directly maritime transport. At a port level as well as for other stakeholders across the maritime supply chain there could be lessons from the pandemic that can be applied to cope with future disruptions and maintain business continuity. Increased prevalence of e-commerce will help drive the maritime industry into a strong recovery. Digitalisation has had a huge impact. It has driven crew connectivity, ship efficiency and route optimization.	Global Infrastructure Investor Association	
25.	There is likely to be increasing commercial demand for maritime transport as consumers rely on long-distance delivery of traded goods.	Bank Information Center	
26.	Covid has accelerated environmental agendas in Europe, with a consequent impact on shipping	CEOE	
27.	Due to the diversity of the shipping industry, the impact and the time effect of the COVID-19 pandemic can vary.	ECSA	<p>The EU's industrial strategy is outside of the remit of the EIB Transport Lending Policy.</p> <p>Within the TLP the EIB will continue to support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet through the financing of new builds as well as the retrofitting of existing vessels. This includes reducing the carbon intensity of ships with the adoption of technical and operational energy-efficiency measures</p>
28.	COVID-19 had a massive dramatic impact on the European shipbuilding industry in particular due to its <b>strong reliance in terms of product portfolio on the cruise and ferry sectors</b> . A potentially positive lesson from Covid-19 was to show the big risks for Europe in being <b>dependent on foreign nations for shipbuilding</b> . Without its own shipyards, Europe will become entirely dependent on Asian shipbuilding to build or retrofit zero-emission ships that the EU needs to protect its defense and maritime borders and to access its seas, trade and Blue Economy. The EU, and the EIB group in particular, has a major role to play to turn the current crisis into an	SEA Europe (European Shipyards and Maritime Equipment Association)	

Ref	Summary of Contributions	Contributor	EIB comment
	opportunity to foster the green transition of waterborne sector activities and support Europe's maritime technology sector as strategic solution provider with long-lasting economic, environmental and societal benefits.		

Question 6– Should the EIB prioritise certain eligible maritime transport investments?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Due to the extensive integration of EU cruise activities in the EU supply chain and the benefit of transport infrastructure developments for access to less accessible peripheral regions, special attention should be paid to <b>cruise infrastructure developments</b> .	Costa Group	The revised Transport Lending Policy will continue to prioritise investments in TEN-T ports the development of TEN-T ports in the EU and Neighbourhood, including their associated infrastructure in line with the EU transport policy.
2.	Investments could be made in <b>technological advancements</b> for cargo checks, or <b>multi-modal systems</b> to increase efficiency.	Ministry of Transport and Infrastructure	<p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain.</p> <p>The development of shore-side electrification within the ports is a priority in the EU policy and for the EIB.</p>
3.	<b>Improvement of connectivity</b> of ports with rail lines/main roads.	Confederación Nacional de la	The revised Transport Lending Policy will prioritise investments in low-carbon hinterland connections to seaports

Ref	Summary of Contributions	Contributor	EIB comment
		Construcción (CNC), CEOE	to support multi-modal logistics in line with the EU policy priorities.
4.	Develop <b>shore-side electrification</b> so that ships can plug-in in ports. This would improve the air quality in port areas and enable GHG savings.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The development of shore-side electrification within the ports is a priority in the EU policy and in EIB's Transport Lending Policy.
5.	Changes to <b>ports infrastructure</b> and shipping activities are necessary. Constant assessment of infrastructural performance needs to be prioritised to improve safety and navigational efficiency.	European Transport Workers' Federation	The EIB's Transport Lending Policy will continue to prioritise the development of TEN-T ports in the EU and Neighbourhood, including their infrastructure, associated equipment, access enabling works and equipment, hinterland access infrastructure, related intermodal facilities and specialised vessels, such as tugs, ice breakers and pilot vessels, which are essential to achieve the operation of the TEN-T port network under conditions of adequate safety and security conditions.
6.	It is crucial that <b>port infrastructure</b> investments support the <b>transition to zero emissions</b> via the greening of port infrastructure. Investments supporting the transition to zero emission shipping should include projects providing ports with renewable synthetic refueling infrastructure such as hydrogen or ammonia.	Joint contribution made by NewClimate Institute and Germanwatch	The development of port infrastructure contributing to more sustainable maritime transport and port operations is of utmost importance. Therefore alternative fueling infrastructure in line with the Climate Bank Roadmap will remain a priority for EIB financing.
7.	The EIB should end its support and financing of port expansions and related transport and industrial infrastructure including the expansion or creation of special economic zones.	Counter Balance, E3G, Greenpeace	<p>Ports are nodes for intermodal exchange of goods and passengers. Ports allow allocating traffic flows optimally across transport modes and increase the energy efficiency of the overall transport and industrial system. The concentration of transport flows via large ports also allows large-scale hinterland transport via rail and inland waterways and as such support a transition to a more sustainable transport system.</p> <p>Lack of necessary port capacity leads to congestion and a suboptimal allocation of transport flows over the transport network which increases the environmental impact of the</p>



Ref	Summary of Contributions	Contributor	EIB comment
			<p>transport system and makes the overall industrial and logistic system less sustainable. Well planned and economically justified investments in port expansion, including the development of related industrial infrastructure, contribute to more sustainable transport and industrial development.</p> <p>Port infrastructure investment projects assessed for financing by the EIB are subject of a socio-economic cost benefit analysis taking into account relevant impacts including external impacts for society at large. Its approach is described in the document “The Economic Appraisal of Investment Projects at the EIB” (<a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a>), which is currently under revision.</p> <p>All port investment projects supported by the EIB are assessed for their compliance with relevant EU environmental legislation.</p>
8.	Investments <b>improving transport systems</b> climate resiliency.	ECTRI	The resilience of EIB financed infrastructure for climate change is a priority and part of the project appraisal process. Projects contributing to adaptation for impacts of climate change are prioritised.
9.	Investments should <b>support the uptake of e-fuels</b> in shipping demand. The supply chain for green fuels is almost nonexistent and there is a lack of refueling infrastructure in ports. E-fuels compatible ships need to be constructed from 2025 onward.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The development of port infrastructure contributing to more sustainable maritime transport and port operations is a priority. Therefore supporting alternative fueling infrastructure investments in line with the Climate Bank Roadmap will also remain a priority for EIB financing.
10.	Almost one quarter of ships registered under the flag of an EU MS are over 30 years old so some investments will be needed for <b>renewal</b> . Alternative fuels and sources of energy such as biofuels, synthetic fuels, hydrogen, ammonia or batteries, are emerging as alternatives to conventional fossil fuels. In the medium term, conventional and low carbon fossil fuels will continue as the uptake of alternative fuels remains slow.	European Transport Workers' Federation	<p>The EIB's Climate Bank Roadmap, Annex 2, Table C, sets out investments that are eligible for EIB support:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>

Ref	Summary of Contributions	Contributor	EIB comment
11.	The EIB should <b>prioritize/finance investments in climate-optimized vessels</b> that promote economic added value, regional industrial growth & employment creation in the EU with positive spill-over effects throughout the full European maritime value chain, incl. Europe's shipbuilding and marine equipment sector. In the current crisis recovery context and debate on strategic autonomy, EU-supported Financing Institutes should play a greater role in supporting EU companies who want to do business in the EU and create added value in Europe. It is thus essential that the new EIB lending policy fully incorporates recommendations from the recent DG MOVE Study which argues that in the context of access to green finance "priority should be given for those ship projects for which full value chain is fully developed in Europe."	SEA Europe (European Shipyards and Maritime Equipment Association)	Zero direct (carbon) emission vessels are eligible for support and will be prioritised under the transport lending policy.  The development of port infrastructure contributing to more sustainable maritime transport and port operations is a priority. Therefore alternative fueling infrastructure in line with the Climate Bank Roadmap will also remain a priority for EIB financing.
12.	EIB might prioritise investments for <b>non-polluting vessels</b>	Finnish Transport Infrastructure Agency	
13.	Shipping companies need to make large investments to convert their fleets to use <b>synthetic fuels</b> . Dual fuel engine ships that can run on ethanol are an important signal of which way the market is going. These investments should be prioritised across shipping companies.	Joint contribution made by NewClimate Institute and Germanwatch	
14.	Investment in ships that use transition fuels should be facilitated.	CEOE	
15.	Instead of singular zero-emissionships, <b>fleets of high-quality efficient design</b> need to be prioritised as these projects lack support of investing parties. This also helps European ship yards.	Antje Willnow	
16.	The EIB should prioritize support for <b>shipping efficiency</b> through ship design and onboard technology along with maintenance and operations to save fuel. It should also support research, development and deployment of fuel-switching and electrification.	Bank Information Center	The roadmap for the decarbonisation of the sector will consist of many different technological and operational solutions. It is recognised that both efficiency improvement measures and alternative fuels and propulsion methods will be required to decarbonise maritime transport.
17.	Shipowners have to get better ships	Response 832108188	The EIB will continue to support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet through the financing of new builds as well as the retrofitting of existing vessels. This includes

Ref	Summary of Contributions	Contributor	EIB comment
			reducing the carbon intensity of ships with the adoption of technical and operational energy-efficiency measures.
18.	The EIB should prioritize projects that diversify production locations, and projects that increase <b>digitalization</b> to drive efficiency.	Global Infrastructure Investor Association	<p>The future resilience of the transport network and global supply chains will be a point of attention in EIB operations.</p> <p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain.</p>
19.	It may be appropriate to prioritize the development of technologies and fuels in the first years and then deployment worldwide.	CEOE	<p>The EIB's Transport Lending Policy allows also to support pilot projects providing innovative solutions.</p>
20.	Refitting and small-scale projects aimed to improve the environmental performances of the existing vessels should be supported and financed, driving the EIB to target also smaller transactions in order to include SMEs.	Assarmatori	
21.	The EIB should prioritise maritime investments to <b>scale up existing technologies</b> into mature ones and to deploy them onboard ships in accordance with the new climate-related requirements.		
22.	Investments for <b>alternative fuels</b> (and associated facilities and infrastructures)	ECTRI	<p>The development of port infrastructure contributing to more sustainable maritime transport and port operations is a priority. Therefore alternative fueling infrastructure in line with the Climate Bank Roadmap will also remain a priority for EIB financing.</p>
23.	Investing in solutions that deliver absolute reductions in zero emissions and net emissions is a priority.	Service Public Fédéral Mobilité et Transports	<p>The EIB's Climate Bank Roadmap, Annex 2, Table C, sets out the types of investments that are eligible for EIB support:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>Zero direct (carbon) emission vessels are eligible for EIB financing in line with the Climate Bank Roadmap and will be prioritised under the revised Transport Lending Policy.</p> <p>The development of shore-side electrification within the ports is a priority in the EU policy for the EIB.</p>
24.	Regarding the least environmental impact regarding emissions, land use, noise...	Back on Track Belgium vzw-asbl	
25.	Prioritise maritime investments that accelerate the energy transition AND climate adaptation/coastal protection!	Van Oord	

Ref	Summary of Contributions	Contributor	EIB comment
26.	Removing old vessels like cars, stopping polluting thermal engines and investing in solar, wind, electricity and hydrogen.	Response 290033127	Zero direct (carbon) emission vessels are eligible for EIB financing in line with the Climate Bank Roadmap and will be prioritised under the revised Transport Lending Policy.
27.	Yes, if that project is a leap forward compared to other sectors	Budapest Airport Zrt.	<p>The EIB's framework for assessing the additionality and impact of projects and its own intervention is described in: <a href="https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality.">https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality.</a></p> <p>The AIM assessment applies to every project financed by the EIB. It seeks to show how the EIB delivers additionality and impact. The framework rests on three Pillars:</p> <p>Pillar 1: the EIB should ensure alignment with EU policies and address less than optimal investment situations that result from market failures;</p> <p>Pillar 2: the EIB should lessen these sub-optimal investment situations and constructively shape investments in terms of scale, scope, structure, quality and/or time;</p> <p>Pillar 3: the EIB should contribute financial and non-financial support to the project that complements support from other organisations and sources.</p> <p>The three Pillars are accompanied by project results indicators.</p>
28.	As decarbonisation in this sector is long term, only effective decarbonisation projects should gain credits from now on.	Response 1039141480	<p>The roadmap for the decarbonisation of the sector will consist of many different technological and operational solutions. Stakeholders indicate that both efficiency improvement measures and alternative fuels and propulsion methods will be required to decarbonise maritime transport.</p> <p>Different market segments will require different technologic solutions and that there is no one-size fits all approach to decarbonising the sector.</p>

Ref	Summary of Contributions	Contributor	EIB comment
			The long physical life of the maritime vessels requires a quick adoption of carbon-free technologies. These technologies are still under development and their application in the maritime sector is currently not commercially viable at scale.
29.	The EIB should give certain investments in maritime transport priority over investments in aviation, because maritime transport is more environmentally friendly than air transport!	Response 974008607	<p>Indeed waterborne transport remains on average the least carbon intensive mode of transport and a significant contributor to climate-action mitigation, providing an alternative to more carbon intensive transport modes. The development of ports, inland waterway infrastructure and related fleets are crucial to reach modal shift to low carbon modes, which is required to meet interim carbon emission target.</p> <p>The EIB will continue to support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet through the financing of new builds as well as the retrofitting of existing vessels. This includes reducing the carbon intensity of ships with the adoption of technical and operational energy-efficiency measures.</p>
30.	EIB can promote positive examples. These have to be adapted by the international maritime transport.	Ralph-Uwe Dietrich	The EIB's Transport Lending Policy allows also to support pilot projects offering innovative solutions.
31.	Currently the taxonomy has set the threshold for retrofits at 10% but <b>every improvement</b> should be encouraged, especially since the fuels of the future are not yet available.	Royal Belgian Shipowners' Association	<p>The EC Taxonomy is outside of the remit of EIB's Transport Lending policy.</p> <p>The EIB will continue to support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet through the financing of new builds as well as the retrofitting of existing vessels. This includes reducing the carbon intensity of ships with the adoption of technical and operational energy-efficiency measures.</p>
32.	It will be of major importance how the recently published "Fit for 55" horizontal legislative package of the European Commission and especially the FuelEU Maritime Initiative will in practice be implemented and address <b>safety, training and protecting measures</b> for seafarers using new maritime fuels. Investments in new skills are critical to ensure that workers are prepared and protected in the process of introducing new fuels and their handling procedures.	European Transport Workers' Federation	The EIB recognises that safety of port operations including bunkering of fuels is of utmost importance and requires full regulatory compliance in the project it finances. Support to education and training is outside the scope of the EIB Transport lending policy but is addressed under other sectoral policies of the EIB.

Ref	Summary of Contributions	Contributor	EIB comment
33.	Investments should be prioritised toward: - Short sea - Secondary routes - Energy savings - Use of wind energy onboard vessels	NEOLINE Développement	<p>The roadmap for the decarbonisation of the sector will consist of many different technological and operational solutions. Both efficiency improvement measures and alternative fuels and propulsion methods will be required to decarbonise maritime transport.</p> <p>It is acknowledged that different segments of the market will require different technologic solutions and that there is no one-size fits all approach to decarbonising the sector.</p> <p>Support to short sea shipping is a priority for EIB lending in line with EU policy in this regard.</p>
34.	Following the <b>technology-neutral approach</b> and due to the considerable diversity of the shipping industry, eligible investments should not be prioritised.	ECSA	<p>The EIB takes a technology-neutral approach to its support for the deployment of all transport technologies, including different alternative fuels, provided that they are, or have the potential to be aligned with the Paris Agreement.</p> <p>The EIB's Climate Bank Roadmap (CBR) specifies the types of investments that the Bank considers as aligned with the Paris Agreement and that are therefore eligible for EIB support. The alignment of EIB support and the EU Taxonomy of Sustainable Activities is described in the CBR.</p>
35.	The EIB must also ensure <b>Carbon Contracts for Difference (CCfDs)</b> are designated for the maritime sector.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	This is outside of the remit of EIB Transport Lending Policy.
36.	Since the application and use of zero emission fuels in shipping is still at the beginning stage, <b>all developments</b> should receive an even priority. Having said this, there should be a focus in investments that contribute to the uptake of zero-emission vessels. There is no business case to invest in sustainable ship technology due to the high cost of investment.	Ministry of Infrastructure and water Management	The roadmap for the decarbonisation of the sector will consist of many different technological and operational solutions. Both efficiency improvement measures and alternative fuels and propulsion methods will be required to decarbonise maritime transport.

Ref	Summary of Contributions	Contributor	EIB comment
	Moreover, due to the large price difference between traditional fossil fuels and renewable energy, investments in renewable energy on the demand and supply side are lacking in order to stimulate the necessary transition towards renewable energy in shipping. The EIB is advised to consider the priorities identified by the Dutch 'maritime masterplan' for its EIB strategy.		<p>Different segments of the market will require different technological solutions and that there is no one-size fits all approach to decarbonising the sector.</p> <p>Sustainable ship-technologies are still under development and their application in the maritime sector is currently not commercially viable at scale. The EIB's Transport Lending Policy allows therefore also to support pilot projects in innovative solutions.</p>
37.	Overall, well-established low carbon fuels with significant emission reduction potential such as LNG will be required during the transitional period, playing a significant role in the decarbonization of waterborne transport if applied with climate neutral synthetic fuels in the future. Financial support for LNG projects is still highly requested.	Assarmatori	<p>It is acknowledged that different segments of the market will require different technologic solutions and that there is no one-size fits all approach to decarbonising the sector.</p> <p>The long physical life of the maritime vessels requires a quick adoption of carbon-free technologies while these technologies are still under development and their application in the maritime sector is currently not commercially viable.</p>
38.	LNG is not a solution.	Joint contribution made by NewClimate Institute and Germanwatch	<p>This poses a challenge in the transition phase where it is necessary to make real short term progress in reducing emissions while at the same time avoiding a long term lock-in to carbon emitting technologies.</p>
39.	The EIB should avoid any investment in fossil fuels, including LNG technologies or infrastructures.	Counter Balance, E3G, Greenpeace, European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), urgewald	<p>The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR).</p>

## Additional comments

Ref	Summary of Contributions	Contributor	EIB comment
1.	Need for non-polluting vessels is big	Finnish Transport Infrastructure Agency	The EIB will continue to support the improvement of the environmental performance and the decarbonisation of the maritime shipping fleet through the financing of new builds as well as the retrofitting of existing vessels.
2.	The crucial question is whether sustainability criteria will also become imposed on freight or external effects. What is the scope of "maritime transport"? A vessel, fleet or a transport project? The ULCS requirements in many ports enduring dredging activity is not worth a support. Import of raw materials, either mineral or organic, such as aluminum oxide or palm oil are never of sustainable origin.	Antje Willnow	Regulatory measures could indeed support the sustainable development of the sector but are outside the scope of the EIB Transport Lending Policy.
3.	Everything in international trade starts with maritime transport.	Croatian Chamber of Economy	Indeed maritime transport is central both to facilitating international trade and to the transport of passengers and goods within the EU hence why supporting the sector remains a priority for the EIB.
4.	Research and political work is urgently needed into developing programmes for the protection of the poles from becoming major shipping routes.	ECTRI	Additional research can indeed support the sustainable development of the sector but are not within EIB's remit.
5.	It is essential not only to maintain but also to strengthen, both in its wording and its practical implementation, the specific clause in the 2011 EIB Transport Lending relating to the unique situation of shipbuilding (No 97). Moreover, it is essential that the new EIB lending policy fully incorporates a key recommendation from the recent DG MOVE Study which argues that in the context of access to green finance priority should be given for those ship projects where the full value chain is fully developed in Europe. This ensures that all relevant European stakeholders are involved, from SMEs to large shipyard integrators, allowing for a consistent technological growth for the entire sector. And also to prioritize support to the deployment of new green technologies patented in Europe and with a European value chain	SEA Europe (European Shipyards and Maritime Equipment Association)	As the EU Bank, the EIB intends to keep its approach to lending inside and outside the EU coherent with the EU procurement and trade policy and proceeds regularly to any relevant updates stemming from the evolution of EU procurement legislation as adjusted to the context of operations outside the EU, in particular maintaining a dialogue with the EC on applying certain recommendations on levelling the playing field with regards to foreign subsidies. When considering support for transport projects, the EIB will continue to check that the prices in projects are in line with market prices and will monitor any instance of abnormally low tenders in line with the main mechanisms of the EU procurement directives and international best practice as agreed among MDBs. In particular, the Bank will ensure consistency with EU trade policy, in close cooperation with the Commission services responsible and in line with its policies and procedures such as the EIB Guide to Procurement, for any issues concerning local content requirements, market access barriers,



Ref	Summary of Contributions	Contributor	EIB comment
			misappropriation of intellectual property or forced joint venture requirements.
6.	<p>In order to decarbonise transport, ESPO considers the following pillars as crucial:</p> <ol style="list-style-type: none"> <li>1) Decarbonise each transport mode</li> <li>2) Promote a modal shift</li> <li>3) Increase the transport network efficiency/connectivity</li> </ol> <p>In this regard, ESPO would like to stress the need for continued investments in basic infrastructure to achieve the stated objectives. Often, investments in basic infrastructure are perceived as capacity expansion, but such investments can be necessary for various reasons. While investments might be necessary to adapt port infrastructure and hinterland connections to the increasing size of vessels and the resulting cargo peaks, investments in port infrastructure are also needed to accommodate new cargo types resulting from the energy transition.</p> <p>European seaports are increasingly taking up an active role in the field of energy, which also brings new investment needs in terms of basic infrastructure. The overall efficiency of the European transport network can also contribute to decarbonising transport further. In this regard, basic infrastructure investments can be necessary to enable new transport flows.</p>	European Sea Ports Organisation	<p>The EIB's Transport Lending Policy is aligned with the European Commission's Smart and Sustainable Mobility Strategy and the pillars mentioned by you are also addressed there.</p> <p>The EU's Strategy requires modal shift to transport by inland waterways and short sea shipping to increase significantly in order to achieve the set decarbonisation objectives set.</p> <p>As transport will be increasingly multimodal and international, the efficiency of door-to-door journeys of peoples and goods will also be more and more dependent on seamless connections between different transport modes and between countries, in particular within the Single Market of the EU.</p> <p>Taking into account various transport and mobility needs and contexts, including geographic and location differences, the EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap.</p> <p>The EIB will continue to prioritise the development of TEN-T ports in the EU and Neighbourhood, including their infrastructure, associated equipment, access enabling works and equipment, hinterland access infrastructure, related intermodal facilities and specialised vessels, such as tugs, ice breakers and pilot vessels, which are essential to achieve the operation of the TEN-T port network under conditions of adequate safety and security conditions.</p> <p>The EIB will prioritise investments in terminal handling equipment, automation, cargo storage and logistics infrastructure, alternative fuelling infrastructure, port/terminal security equipment and IT systems aimed at reducing congestion and improving the efficiency of the supply chain.</p> <p>The development of port infrastructure contributing to more sustainable maritime transport and port operations is a priority.</p>

Ref	Summary of Contributions	Contributor	EIB comment
			Therefore supporting alternative fueling infrastructure investments in line with the Climate Bank Roadmap will remain a priority for EIB.
7.	EIB funding for ships has been scarce in recent years. The reasons for this low demand need to be analysed and mechanisms should be put in place to attract companies to the EIB.	CEOE	The EIB is in continuous dialogue with the Commission, Member States and industry stakeholders on how it can widen its financial assistance in order to address the financing demands of the industry.
8.	Investment in the sector must be aligned with environmental regulations to provide legal certainty for shipowners. In recent years, there was a strong support for scrubbers to comply the IMO 2020 sulphur cap and this technology is now banned in most European ports		The EIB takes into account (environmental) regulatory developments when assessing the economic justification of the investments it finances.
9.	The EIB should end its support and financing for LNG terminals and LNG fuelled vessels.	WWF EPO	<p>The roadmap for the decarbonisation of the sector will consist of many different technological and operational solutions. Stakeholders indicate that both efficiency improvement measures and alternative fuels and propulsion methods will be required to decarbonise maritime transport.</p> <p>Different segments of the market will require different technologic solutions and there is no one-size fits all approach to decarbonising the sector.</p> <p>The long physical life of the maritime vessels requires a quick adoption of carbon-free technologies while these technologies are still under development and their application in the maritime sector is currently not commercially viable.</p> <p>This poses a challenge in the transition phase where it is necessary to make real short term progress in reducing emissions while at the same time avoiding a long term lock-in to carbon emitting technologies.</p> <p>The EIB's approach of alignment to low-carbon pathways for each sector is detailed in the EIB Climate Bank Roadmap (CBR).</p>

Ref	Summary of Contributions	Contributor	EIB comment
10.	The EIB should halt support and financing of port expansions in Europe and related transport and industrial infrastructure, including the expansion or creation of special economic zones, and only support the development of zero-emission vessels and infrastructure		<p>Ports are nodes for intermodal exchange of goods and passengers. Ports allow allocating traffic flows, optimally, across transport modes and increase the energy efficiency of the overall transport and industrial system. The concentration of transport flows via large ports also allows large-scale hinterland transport via rail and inland waterways and a such supports a transition to a more sustainable transport system.</p> <p>Lack of necessary port capacity leads to congestion and a suboptimal allocation of transport flows over the transport network which increases the environmental impact of the transport system and makes the overall industrial and logistic system less sustainable. Well planned and economically justified investments in port expansion, including the development of related industrial infrastructure, contribute to more sustainable transport and industrial development.</p> <p>Port infrastructure investment projects assessed for financing by the EIB are subject of a socio-economic cost benefit analysis taking into account relevant impacts including external impacts for society at large. Its approach is described in the document “The Economic Appraisal of Investment Projects at the EIB” (<a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a>), which is currently under revision.</p> <p>All port investment projects supported by the EIB are assessed for their compliance with relevant EU environmental regulations.</p> <p>The EIB’s Climate Bank Roadmap, Annex 2, Table C, sets out the types of investments that are eligible for EIB support:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>

Ref	Summary of Contributions	Contributor	EIB comment
			Zero direct (carbon) emission vessels are eligible for EIB financing in line with the Climate Bank Roadmap and will be prioritised under the transport lending policy.
11.	Refining of crude oil on tankers, where refined petrol is produced directly from the loaded crude oil by the time it reaches its destination should be banned.	Budapest Airport Zrt.	Regulatory measures could indeed support the sustainable development of the sector but are outside the scope of the EIB Transport Lending Policy.  Vehicles and infrastructure dedicated to the transport and storage of fossil fuels (dedicated vessels and railcars, coal and oil terminals, LNG bulk breaking facilities, etc.) are no longer supported as indicated in the CBR, table C.
12.	ESPO would like to urge caution against prematurely using Taxonomy criteria into public policy and funding tools until such criteria are adequately defined and tested.	European Sea Ports Organisation	Thank you for your comment.

## Chapter 8 – Aviation

### Question 1 – What do you believe is the technological roadmap for decarbonising aviation?

Ref	Summary of Contributions	Contributor	EIB comment
1.	e-fuels or solar/battery powered planes	Jori Milbradt	Indeed, e-fuels for longer haul and solar/battery powered planes for smaller aircraft and shorter haul are two of the most promising technological solutions to decarbonise aviation that are currently being developed.
2.	<b>Reduce aviation transport</b> to the absolute minimum. Minimum is: Aviation for Survey and producing orthophotos Aviation for rescuing persons /emergency reasons Transporting goods and persons to sites that cannot be reached on land or by ship. Then the decarbonisation can be made till 2030 as this task can be done by manned or unmanned drones	Hanns Kerschner, Response 1039141480	The EIB Group Climate Bank Roadmap (CBR), withdraws support from conventionally fueled aircraft and airport capacity expansions. Aviation provides vital connectivity on a national, regional and international scale and is increasingly difficult to substitute as travel distance increases. For that reason, the EIB monitors closely regulatory and technology developments that will eventually allow the sector to decarbonize in alignment with the Paris Agreement.
3.	Better <b>planning of flight routes</b> could reduce emissions and fuel consumption!	Response 974008607	Indeed. The EIB supports the deployment of the Single European Sky at European level and similar initiatives outside EU with the objective of increasing the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace.
4.	Increase of <b>SAF</b> although only originating from renewable sources not taking lands away from food cultivation.	Budapest Airport Zrt., OTIF, Ralph- Uwe Dietrich	Biofuels production that make use of feedstocks that can serve as food or compromise food security is not supported by the EIB, in line with the Climate Bank Roadmap.
5.	Usage of <b>synthetic fuels</b> as transition period until development of planes with new propulsion.	Croatian Chamber of Economy	There is a wide consensus amongst industry players and regulators that Sustainable Aviation Fuels (SAFs) will play an important role in the decarbonisation of aviation, at least until disruptive propulsion technologies are developed at scale.
6.	A little bit <b>biofuels followed by E-fuels</b> (powered by renewables and nuclear)	Van Oord	
7.	The only way for aviation to decarbonise is for the sector to end its dependency on fossil fuel, by replacing kerosene burnt in planes with truly <b>sustainable alternative fuels (SAFs)</b> or by using <b>zero emission disruptive technologies</b> . Any delay in implementing these technologies will lead to aviation emissions continuing to grow exponentially, which under current assumptions by the IPCC will lead to countries failing to stop temperatures increasing over 2 degrees.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low	The EIB supports the aviation sector efforts to gradually end its dependency on fossil fuels. The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with criteria included in the CBR. The Bank also follows with interest the developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy.

Ref	Summary of Contributions	Contributor	EIB comment
		Carbon Transport (SLOCAT)	
8.	Disruptive zero emissions aircraft are expected to cover shorter distances and therefore can help decarbonise short to medium haul flights as a first step. However, the bulk of CO2 emissions generated by aviation are linked to long haul flights. <b>Blending in SAF</b> is one of the solutions that has the greatest potential to reduce emissions from aviation, as they do not require changes in traditional aircraft design and address the most carbon intensive segment of aviation. But not all SAFs have the same climate impact and availability. <b>Advanced biofuels</b> made from waste and residues could cover maximum 11.4% of aviation's energy demand in 2050. On the other hand, <b>synthetic kerosene (e-kerosene)</b> created from green hydrogen and CO2 captured from the air can provide the most promising solution to decarbonise long haul flights.	European Federation for Transport & Environment	We take note of the reduced percentage that Advanced Biofuels made from waste and residues can cover in the global effort to decarbonize aviation.
9.	In the short/medium term the opportunity to utilise <b>SAFs</b> is a key component of any sustainability strategy.	Aeroporti di Roma	The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap.
10.	While we at Aeroporti di Roma set for ourselves a goal to accelerate utilisation in our airports well ahead of the targets set at European level ("Fit for 55" package), we believe there is a need for <b>incentives to support the quick introduction of SAF</b> at reasonable costs for airlines. Thus, we advocate that policy makers should set guidelines with the aim to allowing effective incentives schemes, securing appropriate financial support, increasing R&D programs and adopting rules that facilitate the transition.		Your decision to set own decarbonisation goals ahead of the wide EU targets is commendable. The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap.
11.	We are also focusing on Sustainable Aviation Fuels (SAF), with plans to make all our commercial aircraft product range 100% SAF-capable by 2030, as well as Air Traffic Management (ATM) solutions and market-based measures (MBM).	AIRBUS	The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap. The Bank also supports the deployment of the Single European Sky at European level and similar initiatives outside EU.
12.	<b>Sustainable Aviation Fuels</b> need to be prioritised, with Small aircraft to move to <b>electric</b> which needs to be encouraged by airlines (e.g. in PSO tendering). A gradual increase of SAFs needs to be ensured. Short-haul will be the primary focus of	European Transport Workers' Federation	The Climate Bank Roadmap withdraws support from conventionally fueled aircraft. The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the CBR.

Ref	Summary of Contributions	Contributor	EIB comment
	development, but long-haul is the highest polluter and needs to be tackled but requires <b>huge investment in R&amp;D</b>		
13.	Availability of SAF, increasing efficiency of operations	Ministry of Infrastructure	The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap. In addition, the Bank supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace.
14.	Decarbonizing aviation will require a rapid and massive <b>transformation of aviation's 'drop-in' liquid energy supply</b> using sustainable aviation fuel (SAF) – from both traditional sources and new sources such as power-to-liquid (PtL) and will also require an <b>acceleration in aircraft and engine technology development</b> , including faster progress towards new types of propulsion: electric, hybrid and hydrogen powered aircraft.	International Air Transport Association (IATA)	SAF availability together with further research in disruptive technologies are key in this major challenge. The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap.
15.	Decarbonizing aviation is one of the biggest challenges, and it's likely that the industry becomes one of the highest emitters of greenhouse gases in the mid-term. Although the path to decarbonize aviation is still unclear, there are already some successful projects using hydrogen that have proven zero-emission flights ( <a href="https://www.zeroavia.com/">https://www.zeroavia.com/</a> ). However, the process of scaling the technology so it's available for long hauls is still far from reach.	Global Infrastructure Investor Association	The Climate Bank Roadmap allows the support to zero emission aircraft. In addition, RDI for disruptive technologies in the sector is a priority.
16.	Electric operation or hydrogen operation with suitably advanced safety technology.	Budapest Airport Zrt.	Indeed, hydrogen propelled aircraft must be accompanied with a sound safety technology package.
17.	Biofuel and hydrogen for the essential flights	Response 511707695, STIB-MIVB	
18.	Including aviation into <b>energy taxation</b> regime.	Antje Willnow	The EIB has as a priority investing in RDI for disruptive technologies in the sector. Taxation and market-based mechanisms such as emissions trading can be policy tools that increase the incentives to switch technologies.
19.	Including aviation in <b>emission trade</b> .		
20.	Application of material and design innovations.		
21.	The aviation sector must first and foremost reduce its size in absolute terms (i.e. fewer flights) in order to consider credible decarbonisation of the sector. In the short term, the taxation of	Service Public Fédéral Mobilité et Transports	

Ref	Summary of Contributions	Contributor	EIB comment
	kerosene at European level must be considered, as must the ban on short-distance flights. In addition, with a view to modal shift, the aviation sector must leave its place (i.e. its relative share) to less polluting modes of transport, such as the train. Finally, technology can also play a role.		
22.	Increasing the <b>prices of kerosene</b>	Marc-Olivier Leclercq	
23.	<b>High taxation</b> of short and medium mail flights by air, as this highly polluting mode has far too high tax advantages with return air tickets at far too low prices. Focus on trains on a continental scale. Support Airbus in the <b>development of hydrogen</b> . Limit the growth of airports in surface areas and instead seek to <b>optimise existing infrastructure</b> . Notre-Dame des Landes was not so long ago...	Response 290033127	
24.	In view of the expectation of a successive increase in passengers, the decarbonisation of aviation requires <b>technological</b> advances such as new materials, more economical engines, better air traffic management, hydrogen aircraft, sustainable fuels.	Município de Paredes	The EIB has as a priority investing in RDI for disruptive technologies in the sector. In addition, the Bank supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace. Finally, The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap.
25.	Decarbonizing aviation is recorded to have a significant impact on <b>air pollution</b> . Thus, commencing investments or projects in terms of reducing air pollution represents a priority.	Ministry of Transport and Infrastructure	There are still a number of uncertainties and lack of data about non-CO2 effects and the EIB monitors developments around the topic. RDI support to further develop disruptive technologies for aircraft that also address non-CO2 effects is a priority for the EIB. Thank you for sharing your views.
26.	- <b>Non-CO2 impacts</b> should no longer be ignored: scientific understanding of non-CO2 effects has increased over the past years to show that these effects (mainly <b>cirrus clouds and NOx emissions</b> ) represent two thirds of aviation's climate warming (EASA, 2020). Technologies to decarbonise aviation need to be deployed urgently but need to address CO2 emissions as well as non-CO2 effects if the sector is ever going to reduce its climate impact.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
27.	The roadmap is extremely uncertain. Aviation is the most polluting transport mode in the world, and its emissions are	WWF EPO	The Climate Bank Roadmap withdraws support from conventionally fueled aircraft and airport capacity expansions.



Ref	Summary of Contributions	Contributor	EIB comment
	<p>rising very fast. In addition, it heavily benefits from multiple subsidies, tax rebates, tax exemptions, etc – which strongly distort competition with more sustainable modes of transport like rail. To shift towards rail transport, which is far more sustainable, it is imperative to <b>stop supporting aviation with public finance and particularly EIB support</b>. An exemption could be crafted for research &amp; development of fully electric planes.</p> <p><b>Traffic reduction</b> must become a priority. Therefore, the EIB should maintain its ban on financing of airport expansion. Lastly, <b>synthetic kerosene (e-kerosene)</b> created from green hydrogen and CO2 captured from the air could be used to decarbonise long haul flights and could benefit from support.</p>		<p>Aviation provides vital connectivity on a national, regional and international scale and is increasingly difficult to substitute as travel distance increases. For that reason, the EIB closely monitors regulatory and technology developments that will eventually allow the sector to decarbonize in alignment with the Paris Agreement.</p> <p>For the moment, the EIB has as a priority investing in RDI for disruptive technologies in the sector as well as in zero emission aircraft. The Bank supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace. The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap. Finally, the EIB also support improving existing airport capacity through safety and security projects, rationalisation and explicit decarbonisation measures.</p>
28.	Aviation is a sector whose prospects for energy transition are difficult and uncertain. To meaningfully reduce GHG emissions of the aviation sector, <b>there is no other way than reducing traffic</b> . Any investment in aviation infrastructure is therefore in complete opposition to the objectives of the European Green Deal and the Paris Agreement.	Counter Balance, E3G, Greenpeace	
29.	The EIB needs to end the financing to airlines and aircraft manufacturing except for synthetic fuels such as power to X made from additional renewable electricity.	Greenpeace	
30.	The EIB should not prioritise capacity expansion in the aviation sector. However, acknowledging that some travel cannot be displaced by other transport modes, the EIB should <b>invest in pilot projects to find sustainable, low carbon and energy efficient solutions</b> for air travel: green hydrogen from excess renewable energy to produce synthetic fuels and electric aviation. The European Commission's Refuel Initiative already pushes Europe in this direction. The EIB should support the associated supply chain to <b>facilitate and scale up synthetic fuel production and innovative R&amp;D</b> to electrify shorter routes	Joint contribution made by NewClimate Institute and Germanwatch	
31.	The best measure is to <b>avoid use a plane</b> when there is a rail solution (within Europe). It is even truer for goods transportation.	STIB-MIVB	

Ref	Summary of Contributions	Contributor	EIB comment
32.	EIB should reaffirm its commitment to not contribute to the expansion of the sector by refusing to invest in airport expansions or conventional fossil-fueled aircraft.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	Please see response to points above.
33.	Aviation cannot continue growing and expanding at the same pace until these technologies start actually reducing emissions from the sector. EIB should reaffirm its commitment to not contribute to the expansion of the sector by <b>refusing to invest in airport expansions or conventional fossil fueled aircraft</b> . Investing in conventional aircraft today would be in complete contradiction with the EU's carbon neutrality objective.	European Federation for Transport & Environment	
34.	Net zero CO2 emissions from all flights within and departing from the EU can be achieved by 2050 through joint, coordinated and decisive industry and government efforts. The European aviation industry is committed to reaching this target and contribute to the goals set in the European Green Deal and the Paris Agreement. <b>Destination 2050</b> shows a possible pathway that combines new technologies, improved operations, sustainable aviation fuels and economic measures – subject to securing the required supporting policy and financing framework at EU and national level.	Aeroporti di Roma, Aerospace and Defence Industries Association of Europe (ASD), AIRBUS, Airports Council International EUROPE, Athens International Airport, European Cabin Crew Association EURECCA, Europeans for Fair Competition,	The EIB follows monitors developments of the various initiatives from the industry, policy-makers and regulators to align the aviation sector to the goals of the European Green Deal and the Paris Agreement. We also took note of the wide European and non-European support to the recent Toulouse Declaration and welcome the eventual adoption of a long-term aspirational goal (LTAG) for international aviation in the next ICAO Assembly.
35.	Airbus supports ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) as the only global market-based measure for international aviation.	AIRBUS	
36.	The challenge of the decarbonisation is not to reduce emissions at all costs, but to do so, whilst at the same time increase welfare, and leave no one behind: social groups, regions.	Airlines for Europe A4E	Aviation provides vital connectivity and the sector plays an important role for a balanced EU developmen. Thank you very much for your contribution.

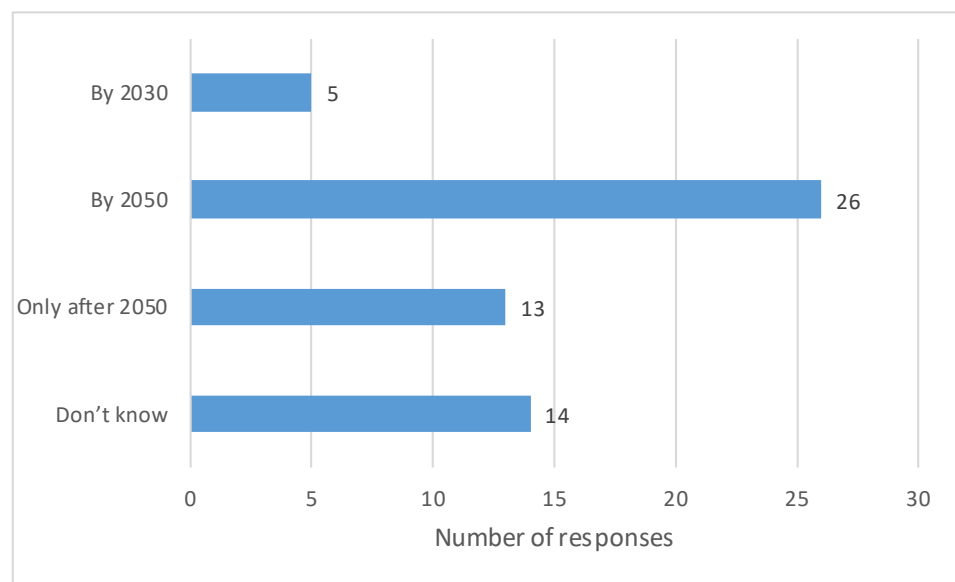
Ref	Summary of Contributions	Contributor	EIB comment
37.	It is imperative that the EIB lending policy stimulates both <b>aircraft platform (ground operations) and propulsion innovations</b> and the roll-out of drop-in sustainable aviation fuel (SAF) i.e. <b>biological and synthetic kerosene</b> .	Ministry of Infrastructure and water Management	In line with the Climate Bank Roadmap, the EIB prioritises support in RDI for disruptive technologies in the sector and zero emission aircraft. In addition, the EIB supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace. The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap. Finally, we also support improving existing airport capacity through safety and security projects, rationalisation and explicit decarbonisation measures.
38.	Airlines must significantly increase the ambition of their emerging commitments to reduce aviation emissions in order to meet Paris Agreement mitigation targets; they can have greater impact with more industry co-ordination, increased alignment with global targets and strengthened national ambitions.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The EIB monitors developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy. In addition, the latest developments of the various initiatives from the industry, policy-makers and regulators to align the aviation sector to the goals of the European Green Deal and the Paris Agreement are also noteworthy such as the wide European and non-European support to the recent Toulouse Declaration
39.	Against this background, the Climate Bank framework for the EIB should indeed set the <b>funding of airport projects as a priority</b> . Overall, EIB funds should have a catalyst effect for achieving EU policy objectives in the Climate Action area. Therefore, we invite EIB to consider all positive externalities, in the area of sustainability but also competitiveness, innovation, social and spatial cohesion when defining the scope of its lending policy for air transport.	Athens International Airport	The Climate Bank Roadmap allows the support from the EIB for improving existing airport capacity through safety and security projects, rationalisation and explicit decarbonisation measures. Thank you very much for sharing your view.
40.	Developments on aircraft and engine technology, ATM, sustainable fuels and other policy measures (e.g., carbon pricing, ETS). Integrated land use and aviation planning and management for multimodal and sustainable transport (e.g. more efficient management of capacity expansion; promote desirable shifts to other modes in shorter haul routes).	ECTRI	These elements are also recognized by the EC Sustainable and Smart Mobility Strategy and the EIB Transport Lending Policy.
41.	In addition to the well-known <b>CO2 pricing tools</b> (CORSIA, EU-ETS), the use of alternative aviation fuels, as well as investments in airport infrastructure (vehicles, buildings), but	Flughafenverband ADV	The EIB supports the manufacturing and distribution of SAFs, investments related to the deployment of the Single European Sky packages and explicit decarbonisation investments in airports. Thank you for sharing your view.

Ref	Summary of Contributions	Contributor	EIB comment
	also a better organisation of airspace (SES2 +), should be mentioned here.		
42.	A) Rapid <b>replacement of older aircraft</b> by modern aircraft leads to an increase in energy efficiency of approximately 1.5 % per annum, but also involves significant investments for airlines. Use <b>of alternative aviation fuels</b> : In this respect, the construction and operation of installations involves significant investments. <b>New types of propulsion for aeroplanes</b> from 2035 onwards (hydrogen/battery). Here too, significant investments are needed for research and deployment. (d) Improved organisation of air traffic control (shorter routes). (e) decarbonisation of airport operations (e-Mobility/building renovation/use of land for energy purposes). (f) Furthermore, CO2 pricing and offsetting instruments (CORSIA, EU-ETS) also contribute to decarbonisation.	Bundesverband der deutschen Luftverkehrswirtschaft e.V.	The EIB Climate Bank Roadmap withdraws support from conventionally fueled aircraft and airport capacity expansions. The EIB has as a priority investing in RDI for disruptive technologies in the sector and zero emission aircraft. In addition, the Bank supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace. The EIB Climate Bank Roadmap also allows the EIB to support RDI and construction of SAF production plants in accordance with the specific criteria included in the document and EU regulation. Finally, we also support improving existing airport capacity through safety and security projects, rationalisation and explicit decarbonisation measures.
43.	Greenhouse gas emissions can be decreased by the more efficient Air traffic management. New technologies are needed using alternative fuels for real decarbonization.	Ministry of Transport	The Bank supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace. The EIB can support research, development and innovation (RDI) and construction of SAF production plants in accordance with the Climate Bank Roadmap.
44.	As outlined in our national action plan on hybrid-electric aviation (AHEV) we believe <b>battery electric short-haul aviation</b> with up to 19 passengers will rapidly become reality, starting in 2030. By 2050 all flights below 500 km will be operated this way. For <b>larger medium-haul aircraft</b> , commonly called regional jets and narrow-bodies, hydrogen (as studied by Airbus Zero-E) seems feasible starting in 2035, but with severe range restrictions (e.g. 2000 km) compared to current A320s and 737s. For <b>long-haul aircraft</b> hydrogen will be feasible at some point (likely around 2050) but here range restrictions must be solved before an aircraft is commercially viable. <b>Hydrogen</b> is a relatively new ambition and, as outlined in the AHEV document, we consider <b>hybrid-electric technologies</b> a promising parallel trajectory. This is a broad term however, and some forms would not entail zero tailpipe	Dutch Ministry of Infrastructure and water Management	Thank you very much for sharing a summary of your very interesting AHEV programme.

Ref	Summary of Contributions	Contributor	EIB comment
	emissions but a radically efficient kerosene-based aircraft for long-haul.		
45.	<p>Within the borders of the aviation ecosystem, a number of levers can be identified and grouped as follows:</p> <ul style="list-style-type: none"> <li>- ground activities levers,</li> <li>- flight operational and technological levers,</li> <li>- new sources of propulsion.</li> </ul> <p>They vary according to time of expected technological maturity and potential impact of aviation emissions by 2050.</p> <p>Outside the borders of aviation, key enabling technologies would be:</p> <ol style="list-style-type: none"> <li>1. Hydrogen tank with high gravitometry</li> <li>2. High performance batteries (Power density &gt;&gt; 350-500Wh/kg ; C-Rate &gt;10) at "affordable" cost (&lt;60-80\$/kWh)</li> <li>3. Direct air carbon capture technology (DACC) at affordable cost – to produce Synfuels</li> <li>4. High performance computing (for UTM)</li> <li>5. Direct Satellite Earth Observation for live en route trajectory adjustment to avoid contrails</li> </ol>	Arthur D. Little	Thank you very much for sharing these very interesting technology insights.
46.	<p>Aviation fuel efficiency will have to rise dramatically if emissions are to be reduced. This can be accomplished by: 1) adopting the latest and most fuel-efficient aircraft; 2) retrofitting existing aircraft with aerodynamic winglets, better engines, and lighter interiors; 3) retiring older aircraft early; 4) operating existing aircraft with fuel-saving practices. More dramatic <b>redesigns of airplane bodies</b> and <b>sustainable jet fuels</b>, such as those made from algae, warrant further development. And other synthetic fuels, namely electro-fuels, will be needed to close the gap.. However strict safeguards are needed to ensure synthetic kerosene would be produced only from zero emission electricity. Additionally, <b>carbon pricing</b> (up to €150/ton CO2e) needs to play a central role in bringing forward further reductions in fuel demand.</p>	Bank Information Center	Thank you very much for your comprehensive contribution and sharing your views.
47.	Less flights that can also be done by rail and less 'fun flights' that are a sign of overconsumption	Back on Track Belgium vzw-asbl	Thank you for sharing your view.

Ref	Summary of Contributions	Contributor	EIB comment
48.	Limit flights that can be operated by direct train for a similar period of time	Ministère de la Transition écologique	
49.	Abolition of unsustainable air tourism and investment in finding more sustainable and slower alternatives such as <b>Zepplin</b>	Response 981558580	
50.	The Fit-for-55 'Refuel EU'-aviation initiative orders that by 2050, sustainable fuels should account for 63% of the total aviation fuel usage. As this is only a proposal, it is uncertain whether this goal will be reached at all. Total decarbonisation is only expected far beyond 2050, at least for long-distance flights with large aircraft. It therefore is logical to <b>first invest in railway infrastructure</b> , which will help to create a modal shift to a transport mode (railways) which is already rather green.	European Rail Infrastructure Managers (EIM)	
51.	Technological roadmap consists of further <b>digital integration</b> concomitantly with fuel efficiency and reduction.	Ministry of Transport and Infrastructure	
52.	In aviation, <b>alternative fuels</b> will become very important. Switching to alternative means of propulsion, particularly in the case of long-haul flights, is likely to be technically difficult for the time being. In the case of short-haul flights, alternative fuels are more likely to be used in addition to alternative fuels.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
53.	Better technology in the <b>construction of planes</b> less impact in the environment.	Município de Faro	

## Question 2 – How fast can aviation realistically be decarbonised?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Only possible on a worldwide scale.	OTIF	The EIB follows monitors developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy. In addition, the latest developments of the various initiatives from the industry, policy-makers and regulators to align the aviation sector to the goals of the European Green Deal and the Paris Agreement are also noteworthy such as the wide European and non-European support to the recent Toulouse Declaration.
2.	Aviation is organised internationally and decarbonisation will not take place on its own through the EU. International solutions are needed to maintain the competitiveness of the European aviation industry.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
3.	The generation of large amounts of electricity or the safe storage and refueling of hydrogen will be a test period of at least 2 decades, plus by the time the technology spreads worldwide.	Budapest Airport Zrt.	Disruptive technologies currently under development still pose a number of challenges. For this reason, the EIB has as a priority investing in RDI for disruptive technologies in the sector.
4.	Airplanes are expensive and need time to depreciate after which they need to be recycled.	Croatian Chamber of Economy	Aircraft asset lifetime is indeed a factor. However the majority of current aircraft can already blend up to 50% SAFs and



Ref	Summary of Contributions	Contributor	EIB comment
5.	2030 it is too short, it is in 9 years' time. The time to replace all aircraft will have to wait for a long time even with a very proactive policy.	Response 290033127	newer models are expected to be certified up to 100% blending capacity in the coming years. The EIB supports research, development and innovation (RDI) on the topic and construction of SAF production plants in accordance with the Climate Bank Roadmap.
6.	As previously explained, it's unlikely that the scale of the technology is ready to deploy shortly. Additionally, the process of adapting the planes will be a slow and rather expensive process.	Global Infrastructure Investor Association	
7.	<p>The rate at which the aviation sector can decarbonise will be determined by the effectiveness of regulation to push the deployment of SAF and the application of the polluter pays principle making burning fossil fuel more expensive. Aviation emissions will keep growing if policymakers keep failing to regulate the sector as they have in the past decades.</p> <p>The question should be how can aviation contribute to the EU's 2030 target. Aviation is expected to remain largely dependent on fossil fuel in 2030, especially as the sector itself estimates an additional 20.000 aircraft will take to the skies in the next decades, reaching nearly 50.000 conventionally fueled aircraft in 2040. With an average lifetime of 20-25 years, without effective regulation to reduce the amount of flying or to force the deployment of SAF or disruptive new technologies, these aircraft will represent an increasing share of global CO2 emissions.</p> <p>Aircraft manufacturers seem confident that hydrogen planes will be available as of 2035. But the emergence of disruptive technologies will be conditioned to strong regulatory and financial shifts. T&amp;E findings show that a 5 year delay in delivery date of these hydrogen aircraft can have a substantial impact.</p> <p>Therefore the EIB cannot afford to delay the shift towards zero emission technologies by continuing to invest in conventional fossil fuel aircraft or expansion of the sector, but rather kick start the development of truly sustainable fuels like e-fuels and aircraft.</p>	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	<p>The EU Fit for 55 package sets ambitious objectives and aviation will play its role.</p> <p>Regarding the EIB contribution, the Climate Bank Roadmap withdraws support from conventionally fueled aircraft and airport capacity expansions and sets as priorities for the sector investing in RDI for disruptive technologies and zero emission aircraft. In addition, the Bank supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace. The EIB can support RDI and construction of SAF production plants in accordance with the Climate Bank Roadmap. Finally, we also support improving existing airport capacity through safety and security projects, rationalisation and explicit decarbonisation measures.</p>



Ref	Summary of Contributions	Contributor	EIB comment
8.	<p>In May 2021, the European airport sector reconfirmed its NetZero CO2 targets, in spite of the fact that air transport is widely recognised as one of the most difficult to decarbonize sectors. 235 airports across Europe committed to Net Zero by 2050 at the latest, and more than 90 airports now set to achieve Net Zero by 2030.</p> <p>If embedded in an ambitious and concrete roadmap towards a Net Zero air transport system, airport capacity expansion can be compatible with the Paris Agreement. We acknowledge that in the short-term, the avenues for significant in-sector emissions reductions from aviation are limited but the new Fit for 55 proposals set out the regulatory mandates that will push technological and market advances.</p> <p><b>Destination 2050</b> highlights that to make the net zero vision for European aviation by 2050 a reality, while maintaining international competitiveness and aviation's benefits to society — quick, decisive joint actions by governments and industry will be needed. Industry will need to continue to substantially invest in decarbonisation and innovation and make the necessary operational transitions, while governments will need to ensure a level playing field and facilitate the transition through incentives and by reducing investment risks with consistent and stable policy frameworks.</p>	<p>Aeroporti di Roma, Aerospace and Defence Industries Association of Europe (ASD), AIRBUS, Airports Council International EUROPE, Athens International Airport</p>	<p>Thank you for sharing your view and your commitment as industry key leaders towards a Net Zero air transport system.</p> <p>A number of Governmental initiatives and legislative proposals have been recently launched and the EU Fit for 55 package is a relevant first step in regulatory terms. As already mentioned before, the EIB also notes the wide European and non-European support to the recent Toulouse Declaration and will welcome eventually the adoption of a long-term aspirational goal (LTAG) for international aviation in the next ICAO Assembly.</p> <p>In line with the Climate Bank Roadmap, the EIB will continue to support airports by improving existing capacity through safety and security projects, rationalisation and explicit decarbonisation measures.</p>
9.	<p>The Air Transport Action Groups (ATAG) Waypoint 2050 report, describes how the sector may be able to meet net-zero CO2 emissions by 2050, with the support of governments and the energy industry.</p>	<p>International Air Transport Association (IATA)</p>	<p>Thank you for pointing out to the Waypoint 2050 report, which is a reference document for the sector.</p>
10.	<p>AIA, in the context of the EU Green Deal, was the first (other than the Swedish airports) airport operator in Europe to announce its commitment to net zero carbon emissions by 2025. The initiative has been code-named "Route 2025" depicting the effort to achieve the target by year 2025, a good 25 years earlier than the relevant Industry milestone. AIA's aim was to become among the first airport operators –if not straight first- in Europe who fully covers its electricity needs by on-site</p>	<p>Athens International Airport</p>	<p>Thank you for sharing the key aspects of your ambitious decarbonisation strategy. The EIB Transport Lending Policy will continue to prioritise support for improving existing airport capacity through safety and security projects, rationalisation and explicit decarbonisation measures.</p>

Ref	Summary of Contributions	Contributor	EIB comment
	production from renewable sources and zeroes out its direct emissions from fuel consumption. The initial evaluation indicated that Route 2025 would be a significant contributor to AIA's value, given the sustainability-linked criteria applied by investors and regulators. Furthermore, taking into account the expected increases in the conventional energy prices, Route 2025 constitutes a positive business case. However, subject to available funding under reasonable terms.		
11.	Given the absence of zero-emissions technologies currently available at scale for commercial aviation in the short term, it is crucial that aviation activities such as the latest generation aircraft, SAF etc. are considered as a transitional activity in the EIB's Transport Lending Policy, and can gain access to sustainable finance to support the transition to a climate-neutral economy.	Aerospace and Defence Industries Association of Europe (ASD), AIRBUS	The EIB can support RDI and construction of SAF production plants in accordance with the Climate Bank Roadmap and monitors the development of the Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy
12.	All use of kerosine fuel means harm including also land use and noise pollution.	Back on Track Belgium vzw-asbl	
13.	The " <b>Destination 2050</b> " report recognizes that decarbonizing aviation by 2050 is possible but it is an ambitious goal. Progress on aircraft and engine technology development, including alternative fuels, international leadership and partnerships will play a key role but their implementation timeline is still uncertain. Other smart (non-technological) policy measures are required in the aviation sector for integrated and multimodal management. Alternative solutions are quite advanced. Airlines have suffered massive losses during COVID though. Furthermore, banks are even more restrictive in financing airlines. As a result, their financial capacities to invest into new, more environment-friendly technologies, is limited. Development of innovative financing models are needed and support to those airlines, who are willing to invest into new technologies, could significantly speed up the decarbonisation of aviation.	ECTRI	
14.	Key is the real availability of economically sustainable SAF	Ministry of Infrastructure	
15.	German airports commit to climate neutrality by 2045. In the air, the availability and use of alternative aviation fuels and the	Flughafenverband ADV	

Ref	Summary of Contributions	Contributor	EIB comment
	introduction of new generations of aircraft are crucial for decarbonisation speed.		
16.	A rapid energy efficient renewal of aircraft fleets and the development of fuel supply for alternative fuels are essential for this purpose. Airports aim to achieve climate neutrality in 2045.	Bundesverband der deutschen Luftverkehrswirtschaft e.V.	
17.	The Destination 2050 report assumes an impact on demand, resulting in the net zero CO2 goal. Nevertheless, European air passenger numbers are projected to grow on average by approximately 1.4% per year to 2050 without compromising the sector's ability to reach net zero CO2 emissions. However, it is worth stressing that this is inevitably intertwined with efficient allocation of airport capacity. If EU's most relevant airports cannot expand, demand will move to airports where capacity is still available and this might result in longer routes and higher emissions for a trip from A to B (where instead of a direct flight, two connecting flights will have to be taken). Operations at capacity-constrained airports are often inefficient, including from an emissions perspective. Aircraft might have to queue for take-off on the ground or for arrival through holding loops in the sky. These inefficiencies increase emissions.	Aeroporti di Roma, Aerospace and Defence Industries Association of Europe (ASD), Airports Council International EUROPE, Athens International Airport	Congestion is a source of increased emissions in itself. The decision to withdraw support from airport capacity expansion coincided with the onset of the Covid-19 pandemic at the time at which the Climate Bank Roadmap was being defined, with short term traffic impact and uncertain longer term implications, coupled with uncertainty regarding viable decarbonisation options and what the EU Taxonomy would consider as green financing in aviation.
18.	Whilst being only one decarbonisation pathway amongst many, and dependent on public policy and financial support, the <b>Destination 2050</b> roadmap can distinguish two trajectories, differentiating intra-European aviation emissions and emissions from departing flights.	Airlines for Europe A4E	Thank you for sharing your view and your commitment as industry key leaders towards a Net Zero air transport system.  In addition to the Destination 2050, we took note of the wide European and non-European support to the recent Toulouse Declaration and will welcome eventually the adoption of a long-term aspirational goal (LTAG) for international aviation in the next ICAO Assembly.
19.	Real decarbonisation can only happen if we decarbonise long-haul and the technology does not yet exist for this.	European Transport Workers' Federation	The EIB has as a priority for the aviation sector investing in RDI for disruptive technologies. Thank you very much for sharing your view.
20.	Technology is not yet mature and aviation is very conservative in implementing new technologies. Security remains the main one, which is not always compatible with innovations. Electricity must prove its worth before it can be implemented	Service Public Fédéral Mobilité et Transports	

Ref	Summary of Contributions	Contributor	EIB comment
	on a larger scale. In addition, as weight plays a crucial role in aviation, battery technology needs to develop further to allow enough energy to be carried on board. The fact that aviation is a global business makes local initiatives unlikely to succeed. We need a real global shift. 1st phase (horizon 2030): Impact on financial situation: Introduction of taxes etc.— Start-up testing sustainable fuels (impact aircraft operations, handling fuel at airports, etc.) 2nd phase (2050 horizon) — Intensive use of sustainable fuels		
21.	The uncertainty around this make any prediction impossible. Airbus has announced a first possible zero-emission aircraft for 2035. It is unlikely that the technology will be ready any time before that. As the EIB's climate bank roadmap, as well as the Transport policy are likely to be revised well before 2035, aviation cannot be featuring in any way in the current EIB lending strategy.	E3G	The EIB Climate Bank Roadmap withdraws support from conventionally fueled aircraft and airport capacity expansions and sets as a priority for the sector investing in RDI for disruptive technologies and zero emission aircraft.
22.	An 80% decarbonized aviation is clearly feasible with SAF in 2050, considering hyper massive CAPEX in green electricity & carbon capture capacities. With lower demand by -15% because of ticket price, this would even more lower total absolute emissions... not reaching -100%, but getting very much close to it.  However a 100% decarbonized aviation is rather for 2060, unless massive efforts are put into it hence our optimistic & voluntary target ambition : 2050 !	Arthur D. Little	Thank you very much for sharing your projections.
23.	Air traffic has to be drastically reduced to protect the population from noise. The remaining air traffic should be switched to power-to-liquid (PtL) kerosene as quickly as possible.	Response 974008607	Thank you for sharing your view.
24.	2050 is too late, but 2030 too ambitious.	Ralph-Uwe Dietrich	
25.	Decarbonisation of aviation is very expensive and competes with other transport sectors for renewable resources. As for the aviation small transport relevance I suppose the society not to give priority to this sector.	Antje Willnow	
26.	It's governments decision.	Marc-Olivier Leclercq	

Ref	Summary of Contributions	Contributor	EIB comment
27.	Very complex and expensive technologies. The implementation of this kind of technologies is slow and it is a very global process.	Município de Faro	
28.	Further the time passes, further there will be technological developments in terms of fuel efficiency. It could also be phased, in terms of each 5 or 10 years. At this rate there could be an air-fleet acquisition with Eco-friendly systems.	Ministry of Transport and Infrastructure	
29.	Long-haul zero-emission (tailpipe) aviation will not be widely available by 2050 according to all predictions. Deep decarbonisation (~75% reduction) and net-zero emissions by 2050 are feasible. 2030 is only 9 years away; the only possibility by then is small-scale adoption of electric aircraft and gradual roll-out of current cutting-edge aircraft (e.g. 777X).	Ministry of Infrastructure and water Management	
30.	This is a significant technological challenge, but technology can rapidly evolve.	Bank Information Center	
31.	With sufficient modal shift to other transport modes, combined with a massive scaling up of synthetic fuel production, aviation can be decarbonised by 2050.	Joint contribution made by NewClimate Institute and Germanwatch	

### Question 3 – How do you see the demand for air transport developing in the period up to 2050?

Ref	Summary of Contributions	Contributor	EIB comment
1.	<b>Decreasing</b> demand.	Antje Willnow Správa železnic	Both The Clean Planet for All communication and the Smart and Sustainable Mobility Strategy from the EC allow for a certain amount of growth in aviation that is deemed compatible with EU decarbonisation targets. The International Energy Agency and the various Industry bodies also foresee certain growth - albeit of differing magnitudes among forecasters - as being compatible with the below two degrees scenario. Different assumptions about the cost of new technology to mitigate climate change and about economic growth should explain most of the differences in projections, although they all foresee a substantial deceleration relative to the trend over the last 20 years. The deceleration reflects, firstly, that the past 20 years saw structural growth due to the development of the low cost airline sector in Europe and, secondly, that going forward the air transport sector will witness a trend of continuous price increases as, firstly, it introduces technology to reduce or eliminate carbon emissions and, secondly, pays for the abatement of residual emissions.
2.	<b>Decreasing</b> on short routes.	Jori Milbradt, Ministry of Infrastructure, Back on Track Belgium vzw-asbl	
3.	This is expected to fall especially for the short and courier services, as there was clearly inflation in supply in the years 90-2000 with the low-cost. Today the prices of an air ticket are far too low compared to the train. We need to rebalance because the plane is very polluting.	Response 290033127	
4.	Will reduce now we discovered that we could communicate effectively without always needing to fly. Fast trains will also come in and replace short distance flights.	Response 981558580, Van Oord	
5.	Demand on shorter haul routes is likely to decrease if there is a competitive long-distance rail based alternative.	ECTRI	
6.	What is necessary is a demand shift from aviation travel mode to rail-travel mode, in particular for distances that can be covered in less than 5 hours by rail mode. Therefore, EIB's priority should be investments that facilitate that mode shift.	E3G	
7.	Growth in demand for air transport may slow due to increase in teleconferences.	Bank Information Center	
8.	In order to curb the demand for air transport and to create a modal shift towards greener modes of transport, specific policy measures should be used such as a ban on short-haul flights and the fair taxation of airplane tickets.	European Rail Infrastructure Managers (EIM)	
9.	Air transport will return to a growth path after the outbreak of the coronavirus outbreak. However, <b>growth rates are expected to be lower in the long term</b> than in previous decades. This is due to traffic shifts on the short distance. Growth will take place on medium and long distances.	Flughafenverband ADV	
10.	Intra-German transport will decrease: In 2050, approximately 71 % of the volume of 2019. International traffic to/from	Bundesverband der deutschen	Thank you for sharing the 2050 assumptions you use for national and international air traffic compared to 2019 seem to

Ref	Summary of Contributions	Contributor	EIB comment
	Germany will continue to grow, but we expect <b>lower growth rates than in the period 2000-2019</b> and lower growth rates than world air traffic. At present, we are setting growth for international transport to/from Germany of almost 60 % by 2050 compared to 2019.	Luftverkehrswirtschaft e.V.	be in line with The Clean Planet for All communication for EU flights.
11.	Still increasing as long as not all externalities are included in the costs and in the price	STIB-MIVB	The EU Refuel package aims, among other objectives, to gradually include externalities in air transport costs. Analysis supporting the EU Clean Planet for All communication allows for certain air traffic growth in the scenario of sufficient internalization to hit the 1.5-degree target of the Paris Agreement. Thank you for sharing your views.
12.	If <b>governments and public bodies continue to subsidize</b> the sector, enabling airlines to artificially stimulate traffic, the sector will continue to increase its emissions, even post-COVID19. Unless technologies to drastically reduce the sector's reliance on fossil fuel are deployed in the next decade, this growth in traffic will translate in increasing amounts of CO2 emissions being released by aviation, representing a growing share of global CO2 emissions, as other sectors decarbonise.  As the sector increases its emissions and if technologies fail to develop, governments will need to increasingly look at cutting demand as an option to reducing the sector's climate impact if they expect to meet their climate obligations. Reducing the number of flights by only 12% would generate 50% reduction in emissions from aviation in 2050, through capping business & leisure travel to specific levels and investing in high speed rail infrastructure. These options will be more and more attractive to governments failing to curb emissions from the sector through technology.	European Federation for Transport & Environment  The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	Thank you for your views. While there are risks from today's vantage point regarding how each technology will eventually fare competitively, there is a portfolio of technologies under development and it is likely that a number of them will prove successful. Indeed, supporting aviation technology RDI is expected to continue to be a very important area of support for the EIB going forward.
13.	The COVID19 groundings and lock-downs also showed the world that a lot of business travelling could be replaced by more efficient conference calls or webinars. The share of business travel post-COVID19 is likely not expected to bounce back to its 2019 levels, as companies realise the cost savings and environmental gains of limiting corporate travel to at least half of what it was in 2019. If business travel is capped to half	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low	We share the view that videoconferencing will play a greater role in the future. It remains to be seen if the short-term impact of the COVID-19 crisis will result in discernible changes in travel behaviour over the longer term.



Ref	Summary of Contributions	Contributor	EIB comment
	of its 2019 levels, it could save 17% of CO2 emissions from aviation.	Carbon Transport (SLOCAT)	
14.	The COVID-19 pandemic has led to an unprecedented drop in air transport in 2020 that continues in 2021. Eurocontrol predicts that <b>traffic will only return to the 2019-level by the mid-2020s</b> . Provided that any potential future crisis will be managed globally in a coordinated manner, demand for air transport will start rising again as of 2025 and will continue to grow up to 2050.	European Cabin Crew Association EURECCA, Europeans for Fair Competition	This is indeed the expectation broadly shared by the air transport industry. A 1% of CAGR is commensurate with the estimations in the EU's Clean Planet for All publication. Thank you for your contribution.
15.	Demand is projected to <b>grow globally but at a slower pace</b> in Europe and even slower in countries such as the Netherlands and the UK with congested airports and relatively large aviation sectors. Roughly 1% compound annual growth rate (CAGR) in amount of flights is what we expect nationally. An increase is expected of (sustainable) unmanned flights (drones), for which investments are needed in U- space to facilitate these flights and to integrate them with manned flight.	Ministry of Infrastructure and water Management	
16.	Steady increase to 2019 numbers by 2024 with some ultra short haul switching to rail but if pre-2019 trends are to recommence, it will be compensated by an increase in long-haul operations	European Transport Workers' Federation	
17.	Regarding Carbon Offsets, recent European Commission study found that up to 85% of offsets from projects under the United Nations Clean Development Mechanism have not fully delivered claimed emission reductions. Therefore, offsets are not a reliable strategy to reduce fuel consumption or emission growth, which can only be assured through direct measures like aircraft efficiency standards and phase-outs of fuel subsidies.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	The offset system (and its improvements) are only a part of the portfolio of policy tools necessary to address the decarbonisation challenge. Thank you for your contribution.
18.	IATA expects to see passenger numbers to recover from 2.3 billion (2021) to reach <b>10 billion in 2050</b> .	International Air Transport Association (IATA)	Thank you for sharing your estimates. We are constantly reviewing available forecasts to bring our traffic growth expectations in line with the latest available evidence. Besides possible behavioural changes like the growth in teleconferencing, it is expected that demand will be the result of the combination of two key factors. First, economic growth, as determined by growth in both income per capita and in population. Secondly, increases in the price of air tickets, as
19.	Since the outbreak of the coronavirus organizations such as ICAO, IATA, ACI and EUROCONTROL published traffic projections for the short and medium term. As the virus spread and travel restrictions were tightened or reimplemented, these projections are frequently revised downward. The latest	Airlines for Europe A4E	



Ref	Summary of Contributions	Contributor	EIB comment
	projections indicate that passenger traffic does not return to pre-crisis levels before 2024-2025. EUROCONTROL's 2018 Challenges of Growth (Regulation and Growth scenario) offers an established reference scenario and provides a forecast of flight movements until 2040, by individual (European) country. In the Destination 2050 reference scenario traffic increases to 11.3 million departing flights and 1.4 billion passengers in 2050. CO2 emissions in 2050 are estimated at 320 Mt. Compared to 2018 levels, this comes down to increases of 55% (flights), 87% (passengers) and 67% (CO2 emissions)		the costs of both new aircraft technology and of residual greenhouse gas emissions are passed on to air transport users.
20.	<p>Preliminary note : below comments are considering a “stable” geopolitical environment, i.e. the world is still a “village” as it has been in the last 20 years and is not becoming a collection of mega but diverging “geo-economical-political” plates... with limited people flow between those plates...</p> <p>Until 2050, aviation will still continue to expand... in 2 dimensions (see below comments) but growth will be slowed down because of 2 demand limiting factors (see below). Overall – before effect of the increase in the cost of fuel ! - we expect +3,5% passenger traffic growth post COVID vs +4% to +4,5% that was planned, i.e. traffic being multiplied by x2,2 between 2019 and 2050. Considering impact of higher fuel, we rather consider a x1,9 passenger traffic in 2050 vs 2019.</p> <p>Growth Dimension 1 : commercial aviation we know today will expand because of the rise of middle class globally ... + because aviation is best suited to link people, cultures and economies in many geographies vs rail or road (South-East Asia, Africa, Central Asia, India, LATAM....) simply because of the topography... + because aviation is a “low CAPEX” &amp; “low land-consuming” business vs rail for instance... and CAPEX deployment and land law are often key barriers to infra projects in emerging countries where the middle-class will rise...</p>	Arthur D. Little	

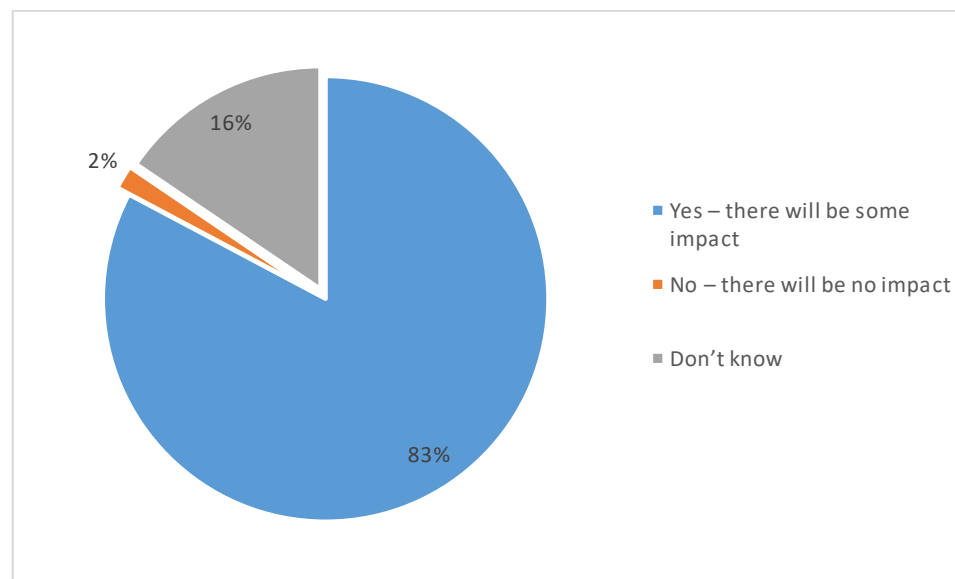
Ref	Summary of Contributions	Contributor	EIB comment
	<p>Growth Dimension 2 : aviation will expand into “new skies” with the rise of “last mile aviation”, i.e. “urban air mobility” : people &amp; goods would use aviation for new types of trips.</p> <p>Demand limiting factor 1 : business travel (25%-30% of total pax traffic) Video conferencing clearing made a point and we believe 10% to 30% of business travel will never come back post-COVID. If we consider a medium impact, we talk -20% of 25% of traffic = -5% (lasting effect until 2050)</p> <p>Demand limiting factor 2 : leisure &amp; VFR travel (Leisure = 50% of pax traffic, VFR = 20%-25% of total pax traffic) Environmental concern will convince a non negligible part of travelers to consider alternatives transportation modes or destinations to aviation related ones. We believe all in all 7% of traffic is at risk... but by 2050, if Aviation is decarbonized, this demand would come back before ... hence this effect is not a lasting one</p> <p>Demand limiting factor 3 : cost of decarbonized fuel We estimate that demand may be decreased by -15% because of higher ticket price to recoup the cost of decarbonized fuel (see below illustration about our estimate for ticket cost with impact of new fuels – ticket prices are in USD2019) As a result grow factor for pax traffic in 2050 vs 2019 would not be x2,2 but x1,9. This is a sensible downgrade vs previous predictions of x3 by 2050... but it is still a doubling of demand in 30 years (instead of usual historical observed growth rate of x2 every 20 years).</p>		Please see response to points above.
21.	Aviation has been one of the sectors most severely impacted by COVID-19. While we expect air travel to recover, the speed of recovery and the longer-term impact of COVID-19 on the aviation sector is uncertain. Additionally, constraints on the supply chain have held up relatively well but are being stretched with huge demand for things. In that sense, a	Global Infrastructure Investor Association	We have also noticed the contrasting performance between passenger and freight during the pandemic. We also take note of the critical role played by air cargo in the logistical response to the pandemic, both in terms of medical equipment and vaccines. The extent to which this will translate into a long-term structural shift in the composition of demand for air

Ref	Summary of Contributions	Contributor	EIB comment
	considerable amount of air freight is co-boarded with passengers, since there has been a decrease in flight numbers less freight has also been moved. Therefore, the balance may be shifting towards air freight and how to repurpose aircraft quicker to switch between passenger and freight, freight could take more of a role, airports around the world are thinking about being multimodal which will likely be an accelerator for airport decarbonisation.		transport is something which we monitor. Thank you for your views.
22.	It will grow, Covid-19 drop will soon be regained.	Ralph-Uwe Dietrich	Thank you for your contribution.
23.	Recovery after COVID until 2024-2025, and growing further steadily as before. Weakening/constant business travel, constant/increasing leisure travel, constant/increasing VFR traffic.	Budapest Airport Zrt.	
24.	As for all modes of transport, we expect an increase in air transport by 2050.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
25.	Decarbonization in the aviation sector remains a challenge in the Global South due to its high costs. International public and private investments that manage to fill the gap would be very helpful to achieve this goal.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
26.	Over the last decades, Air transport has become essential for the modern economy, providing support for key activities all around the world. As the only rapid global transportation network, it facilitates links between businesses, governments and people, enabling world trade, investment and tourism. By 2050, these factors will continue to drive the demand for air transport, with that demand becoming increasingly reliant on emerging and developing economies. In mature markets such as in Europe, air connectivity will continue to play a key pivotal role in unifying the region towards a common goal. But this will only be possible if the entire sector reduces its environmental footprint to its minimum as illustrated by the recent commitment to become net carbon neutral by 2050.	AIRBUS	
27.	Our strategies count with stable growth of demand. But they have not taken into account recent developments.	Ministry of Transport	

Ref	Summary of Contributions	Contributor	EIB comment
28.	At European level, a reduction in internal demand for air transport (especially for leisure flights), to the benefit of the train. Global increase in passenger and freight transport, especially in Southeast Asia and Africa.	Service Public Fédéral Mobilité et Transports	Thank you for your contribution.
29.	Climact and NewClimate Institute (2020) suggest that European aviation demand needs to decline by 50% from today's levels (pre-COVID-19 2020) by 2050. While this significantly reduces the need for zero-emission synthetic aircraft fuel, the remaining 50% still needs to be covered by this still young technology. To achieve such high levels of demand reduction, new and innovative solutions play an even stronger role. In 2020, demand for all aviation was 66% lower than in 2019, with demand for international aviation dropping by 76%. The Climate Action Tracker estimates that emissions will decrease at the same rate, as airlines fly with fully booked planes as much as possible. However, despite the substantial decrease in emissions from international aviation in 2020 and 2021, the CAT projects that international aviation emissions will double - and possibly almost triple - between 2015-2050.	Joint contribution made by NewClimate Institute and Germanwatch	
30.	Air traffic has to be drastically reduced to protect the population from noise. The remaining air traffic should be switched to power-to-liquid (PtL) kerosene as quickly as possible.	Response 974008607	
31.	Increasing on long-distance	Ministry of Infrastructure	
32.	Rapidly increasing. There are many sectors to consider, for instance airways cargo systems are not at the same benchmark as railway or maritime transportation. However, it will rapidly increase in respect to tourism, or passenger transportation, hence air pollution reduction represents a priority.	Ministry of Transport and Infrastructure	
33.	Increasing because of Covid and the peoples addiction for traveling	Croatian Chamber of Economy, Finnish Transport Infrastructure Agency, Response 832108188,	

Ref	Summary of Contributions	Contributor	EIB comment
34.	I think it will increase because the displacements of the population will increase due to global movements.	Município de Faro	

Question 4 – Do you believe there will be any long-term impact on the development of this sector as a result of climate policies' increasing cost?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Rising Fuel costs	Response 1039141480	Thank you for your views. There are four variables identified here: the price of kerosene; the price of policy instruments to internalize the cost of carbon emissions (taxes and market-based mechanisms such as ETS and CORSIA); the price of sustainable aviation fuels (SAF); and the cost of alternative propulsion technology.
2.	This is linked to the cost of decarbonized fuel. We estimate that demand may be decreased by -15% because of higher ticket price to recoup the cost of decarbonized fuel. As a result growth factor for passenger traffic in 2050 vs 2019 would not be x2,2 but x1,9. This is a sensible downgrade vs previous prediction of x3 by 2050... but it is still a doubling of demand in 30 years.	Arthur D. Little	
3.	Fuel taxation will be a first impact	Ministère de la Transition écologique	
4.	Prices in the transport of passengers and goods will increase	Croatian Chamber of Economy	

Ref	Summary of Contributions	Contributor	EIB comment
5.	I believe that the climate policy “cost increases” will have long-term effects on the development of this sector because travelers will then fly less often, which will not only reduce the number of flights but also aircraft noise.	Response 974008607	
6.	Carbon taxes will increase cost of flying, while consciousness about short flights has increased	Van Oord	
7.	It all depends on the (true) ambition level. For instance, Belgium introduced a flight tax to cover up employee costs and only to flights on 500 km, meaning it would be for flights not further than the neighbouring countries	Back on Track Belgium vzw-asbl	
8.	They can't fly with fuel without taxes for the next decade	Response 832108188	
9.	Global international climate policies are the only driving force for aviation decarbonization.	Ralph-Uwe Dietrich	Climate policies will be a key determinant, but disagree that they constitute the only driving force. The aviation industry is competitive and operators face incentives to save fuel as well as other costs, as witnessed by the continued trend in fuel efficiency of aircraft technology in the past.
10.	Given that the ratio of human and fuel needs to the volume of air transport is largely less favourable than in other modes of transport, the increasing costs for climate policy are expected to have a relatively strong impact.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	Energy use and associated emissions is indeed the challenge to address over the next decades. To balance that makes much of the economic case for aviation, as is the case also for maritime transport, rests on its much lower infrastructure intensity relative to alternative modes of transport. Infrastructure and the associated land use also brings about external costs, including environmental costs.
11.	The aviation sector alone contributes to high pollution.	Response 290033127	
12.	Due to decades of under-regulation and over-subsidisation, technologies to decarbonise aviation are in their infancy and therefore still very costly. The <b>aviation sector has benefited from decades of unfair fossil subsidies, such as exemptions from taxes (kerosene taxes or VAT) or state aid</b> , which has made flying artificially cheap compared to other modes of transport. Applying an effective carbon price to the aviation sector will be essential in ensuring pricy technologies are brought to the market, but public and private financing will play a central role in kick-starting the technological shift aviation desperately needs to decarbonise. This is where the EIB can play an important role in filling financing gap to deploy electrofuels for example or ensuring the uptake of hydrogen planes.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), WWF EPO	We agree that efficient pricing of transport services, including external costs, is essential for meeting future transport needs sustainably, environmentally and economically, and that policy instruments are required to achieve that goal.

Ref	Summary of Contributions	Contributor	EIB comment
13.	New regulation has to be smart to <b>safeguard the economic and social sustainability of airlines</b> in order to minimize the financial burden put on the customers and to avoid social consequences. It has to be also coupled with financial instruments <b>allowing for EU airlines to remain competitive globally</b> and to ensure a level playing field with non-EU competitors. The proposals should be considered as one package to <b>address carbon leakage</b> (as aviation is not in the scope of the Carbon Border Adjustment Mechanism).	Europeans for Fair Competition	
14.	The <b>Destination 2050</b> forecast for the EU, UK, EFTA region which accounts for climate policy costs sees that European air passenger numbers are projected to grow on average by approximately 1.4% per year between 2018 and 2050. This is below the consensus of sector's experts, even after COVID.	Aeroporti di Roma	We take note of these forecasts. Projected growth rates are critically dependent on projected increases in air ticket prices, as these reflect the cost of new technology and of residual emissions. To strengthen comparability, it is important for forecasts to make explicit their assumptions about future price increases.
15.	The ACI World Airport Traffic Forecast sees an unconstrained forecast for the period 2020-2014 for the European Union plus United Kingdom to have a compound annual growth rate (CAGR) of 2.6%; which is decreasing over time and would fall a few basis points in the time horizon to 2050. In contrast, the <b>Destination 2050 forecast</b> for the EU, UK, EFTA region that accounts for climate policy costs sees that European air passenger numbers are projected to grow on average by approximately 1.4% per year between 2018 and 2050.	Airports Council International EUROPE	
16.	Assuming of 100% pass-through of costs linked to the compliance/uptake of decarbonisation technologies, and in the absence of financial support to reduce such costs, alignment to the European Green Deal goal is expected to affect the demand for air transport in Europe. This is considering the relatively low profit margins in the sector, and the limited extent to which airlines can absorb costs linked to the decarbonisation. A full pass-through of costs to passengers is likely with measures that affect all competitors. However, if national or regional measures affect only part of the market it may lead to market distortions.  Carbon pricing (ETS or CORSIA) has an impact on the cost difference with conventional kerosene. The higher cost of	Airlines for Europe A4E	There is indeed a balancing act between efficient pricing within the aviation sector, and between aviation and alternative transport modes. Regional distributive effects also need to be taken into account.



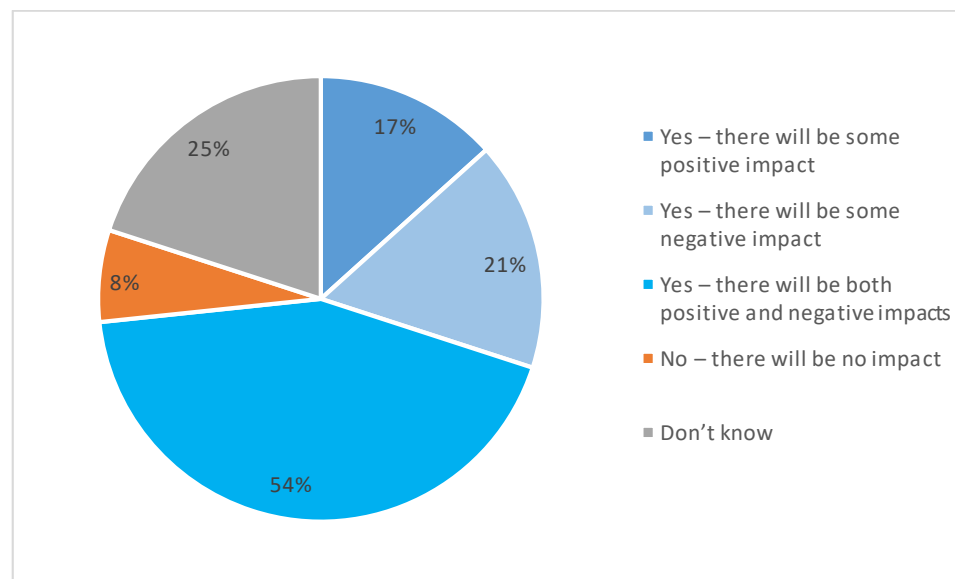
Ref	Summary of Contributions	Contributor	EIB comment
	<p>SAFs does lead to a relatively large demand impact. In 2030 these effects reduce impact traffic by 3% in 2030 (intra-EU+: 4%; non-EU+: 3%). By 2050, various demand impacts, including the introduction of hydrogen-powered aircraft from 2035 onwards, reduce CO2 emissions by 15% (43 MtCO2).</p> <p>These increased in costs will disproportionately affect certain socio-economic groups and regions of Europe, impacting connectivity, and limiting their access to education, training, services and goods.</p>		
17.	Under the proposals in fit-for-55, costs of aviation will rise, especially for flights departing from Europe and even more so for intra-European flights. Analyses including the Commission's Impact Assessments and Destination2050 show some demand reduction through higher ticket prices. Cost pass-through rates in aviation are high but elasticities are low. Demand growth will likely still far outstrip cost increases, especially outside of Europe. Effects of the global Long-Term Aspirational Goal (LTAG) being developed and instruments to achieve this goal cannot yet be predicted.	Ministry of Infrastructure and water Management	Thank you for your contribution.
18.	The European Commission's recently published Fit for 55 package aiming for decarbonisation already shows that with the deployment of sustainable aviation fuels, the impact of EU ETS and CORSIA as well as a potential fuel tax will impose a major financial burden on EU airlines that will be reflected in ticket prices and consequently in passenger choices. New regulation has to be smart to safeguard the economic and social sustainability of airlines in order to minimise the financial burden put on the customers and to avoid social consequences such as downgrading working conditions. It has to be also coupled with financial instruments allowing for EU airlines to remain competitive globally and to ensure a level playing field with non-EU competitors based on reciprocity. The proposals should be considered as one package to address carbon leakage (as aviation is not in the scope of the Carbon Border Adjustment Mechanism).	European Cabin Crew Association EURECCA	

Ref	Summary of Contributions	Contributor	EIB comment
19.	The operating cost of airlines will increase, and that cost will be passed on to consumers but it should not impact the development of the industry significantly	European Transport Workers' Federation	Thank you for your contribution.
20.	Climate policies that result in additional airline costs without hypothecation and reinvestment in new fleet and technologies will slow and not accelerate the decarbonization of the sector.	International Air Transport Association (IATA)	
21.	The polluter-pays principle would most probably apply to aviation as in other industries. <ul style="list-style-type: none"> <li>• Increased taxation on aviation (e.g. aviation fuel tax or else) may create competitive disadvantages against other means of transport especially for Athens airport, which is on the periphery of the EU and therefore at greater risk of competitive disadvantage against nearby non-EU airports (e.g. Turkey).</li> <li>• For the airports' journey towards decarbonisation, investments in new fuel technologies, new energy efficient buildings, and or other decarbonisation-related projects are deemed necessary. All such costs will need to be funded and eventually recovered.</li> <li>• Not finding the funds necessary to move towards decarbonisation could pose major threats to the industry, as measures as flying and capacity expansion bans could not be excluded.</li> </ul>	Athens International Airport	
22.	The aviation industry has committed to decarbonisation by 2050 and to achieve this significant private and public investments will be needed. There is concern that the cumulative costs of the new legislation linked to the Fit for 55, such the new Energy Taxation Directive and the revision of the EU ETS for aviation, will pile up on the industry affecting the ability of the industry to build back better. It is reasonable to expect that this will have an impact in the long term. These measures may also have a substantial impact on the price of airline tickets, making air transport less affordable. It is reasonable to expect that this will have an impact in the long term, and hence the path towards a sustainable growth of air transport needs to strike the right balance between environmental regulations on one hand and the necessary	Aerospace and Defence Industries Association of Europe (ASD)  AIRBUS	

Ref	Summary of Contributions	Contributor	EIB comment
	investments required to support the decarbonisation of European Aviation on the other.		Thank you for your contribution.
23.	Aviation costs are likely to increase. More research is required on the evaluation of costs for future aviation scenarios. The effects of the European Trading Scheme (ETS) on airline companies shall be assessed.	ECTRI	
24.	Yes, the Fit-for-55 plans of the Commission include multiple proposals which will (slightly) raise the price of airplane tickets. Railway infrastructure managers plea for a fair level playing field between the different transport modes.	European Rail Infrastructure Managers (EIM)	
25.	Yes, it is likely to have an impact. The size of the impact will depend on the application of the Emission Trading Scheme, and how much it constraints the ability of companies to keep their regular flight schedules.	Global Infrastructure Investor Association	
26.	More expensive flights will have an impact on demand, especially for leisure flights (citytrips, Visiting Friends and Relatives, holidays, etc.). Impact of taxes and introduction of expensive fuels will have an impact on the cost of air travel and supporting handling activities. Impact of taxes and introduction of expensive fuels will have an impact on the cost of air travel and supporting handling activities.	Service Public Fédéral Mobilité et Transports	
27.	The EUETS price levels are not (yet) sufficient to have a major impact on travel patterns given the elasticity of demand, which is at the same time highly correlated to alternative modes (for example high-speed rail options). Airline balance sheets are a function of much more than the costs of climate policies which are still marginal. Current fuel prices are a larger driver for efficiency.	Joint contribution made by NewClimate Institute and Germanwatch	
28.	Yes, there will be strong pressure for decarbonization due to aviation's high emissions/ passenger mile, and the likelihood of a rising market price of GHG emissions.	Bank Information Center	
29.	The climate policies and their impact on energy availability and prices can have a significant impact on the transport sector.	Ministry of Transport	
30.	Green fuel will increase fuel prices, which may reduce traffic developments. However, if GDP growth and green price surplus increases with the same pace, the net effect is neutral.	Budapest Airport Zrt.	

Ref	Summary of Contributions	Contributor	EIB comment
31.	Impact results from climate policies plus rectified energy taxation	Antje Willnow	Thank you for your contribution.
32.	If any climate measure is ever taken for aviation it will be costly for the aviation sector	STIB-MIVB	
33.	Yes because if the prices go up, than the tickets will cost more and, at least in the touristic and work movements of people, will have big impact.	Município de Faro	
34.	There could be indirect increased costs, such as production costs for technological advancements, or costs that are not directly connected to plane construction. In addition, local increased production taxes will eventually slightly increase plane costs.	Ministry of Transport and Infrastructure	
35.	The use of alternative fuels and investments in climate-friendly airport infrastructure and aircraft are expected to lead to higher costs, which are passed on to customers in the form of higher ticket prices and lead to lower growth in demand.	Flughafenverband ADV	
36.	Despite the increasing fuel efficiency of the fleets, we expect increasing costs for alternative fuel, investment in new aircraft and airport infrastructure and CO2 pricing tools. These will be passed on to customers in the form of higher ticket prices and will dampen growth in demand.	Bundesverband der deutschen Luftverkehrswirtschaft e.V.	

Question 5 – Do you believe that there will be any permanent impact on the development of this sector following the COVID-19 pandemic?



Ref	Summary of Contributions	Contributor	EIB comment
1.	Demand for the transport of goods will increase, as airfreight will become more competitive with other modes of transport due to its speed.	Croatian Chamber of Economy	Interesting observation. This is caused by growing electronic commerce relying on fast door-to-door delivery, (and was accentuated by the pandemic).
2.	Analyses show it will take a while, roughly until 2024, until aviation is back to 2019 levels. We expect demand and supply to recover fully by 2030 thus having <b>no permanent effect on growth</b> . It is important to note that COVID-19 has severely affected the financial position of many airlines, (and airports, handlers, etc.), making investments in SAF and fleet renewal less attractive in the short-term.	Ministry of Infrastructure and water Management	These projections are indeed aligned with those by the aviation industry for the sector.
3.	Some changes have already being seen. They have either accelerated or enabled as a result of COVID-19's impact on aviation. <b>Concentration in airline sector has increased</b> , with	Aeroporti di Roma, Airports Council International	Many thanks for your observations. Indeed the sector will need continued support, both via availability of finance and, for infrastructure operators, via accommodative responses from

Ref	Summary of Contributions	Contributor	EIB comment
	<p>the top 5 airlines now providing nearly 60% of seats departing from EU member states and the UK during the Summer season, an increase from an average of 55% during the prior 5 summers. <b>Consumers have also switched to other transport modes</b>, with surveys showing that travellers are more likely to consider rail or road alternatives. European airports operate in an increasingly highly competitive environment, competing with other airports to win back traffic, based aircraft and new routes.</p> <p>On the back of historic financial losses last year and limited direct financial support from governments, we see acute financial challenges ahead for airports in the recovery phase and systemic financial weakness across Europe's airport industry will result in an <b>investment crunch with far reaching consequences for decarbonisation</b>, consumers, businesses and regional communities across the continent.</p> <p>Airports' financial costs will have increased as a result of increased risk factors and increased debt levels. At H1 2021 European airports' gross financial debt had tripled relative to the level at the end of 2019. Some operating costs are also on the rise as a result of new expectations for cleaning and sanitisation of passenger touch points inside of the airport terminal and for employees.</p> <p>The financial impact of COVID-19 has indeed also pushed airports to make large <b>cost saving measures</b>. Airports have found ways to optimise staffing levels, renegotiation supplier contracts, increase operational efficiency, deploy new technology and procedures. Altogether, airports have reduced operating costs by one-third for the full year 2020 compared to full year 2019, even though the cost savings have not been able to match the amount of revenue loss.</p>	EUROPE, Athens International Airport	regulators regarding items such as regulated charges and the timing of capex plans.
4.	No crisis had same level of impact on aviation as COVID-19: travel bans and restrictions shut down air travel for the first time in history. Aviation has been the hardest hit sector in	Airlines for Europe A4E	Many thanks for your views. Indeed the extent of the disruption to logistic chains has been historically unique.

Ref	Summary of Contributions	Contributor	EIB comment
	Europe and is likely to be the slowest to recover. Specifically for air cargo: massive supply chains' disruption, additional workload & costs for planning routes, due to closed borders, unclear, different and ever-changing travel restrictions for crews, lorry drivers, handling employees, etc. This led to a loss of global market share for EU freight airlines and impacted connectivity, leading to uncertain supply chains within EU Member States.		
5.	Fast return from countries with epidemics will be not possible any more. I expect that in future you will stay in quarantine for ca. 12 days after making a flight from out of the EU. Therefore, it would be <b>faster to use a ship</b> than a plane (as the stay on the ship could be part of the quarantine).	Response 1039141480	Thank you for your contribution.
6.	Within touristic domain, there will be some extra filtering process, or verification process, which will delay the passenger boarding in general. Hence, there will be some delays.	Ministry of Transport and Infrastructure	
7.	EU airlines have been heavily impacted by the COVID-19 pandemic and one of the consequences is the social race to the bottom, as evidenced by certain airlines. The lending policy of the EU (through the EU Taxonomy and the EIB leading policy framework) should target investments e.g. in <b>new fleet and SAFs</b> that drastically reduce CO2 emissions. Financially sound airlines will be able to retain jobs in the aviation sector. Airlines have retired less fuel-efficient fleet, such as A340, A380 and B747.	European Cabin Crew Association EURECCA  Europeans for Fair Competition	
8.	Historically, social standards in aviation have dropped after a crisis (e.g. 2001, 2008), and we anticipate the same again.	European Transport Workers' Federation	
9.	The impacts of the pandemic on international flight capacity ranged from an estimated 37% reduction in Africa to 72% in Asia, although this near-term drop in flights is not expected to greatly alter emission trajectories. Economic recovery packages are reshaping discussions among airlines and governments on bailouts, taxes, fuel mandates and sustainability conditionalities. Green and equitable recovery packages to rationalise subsidies and internalise aviation	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	

Ref	Summary of Contributions	Contributor	EIB comment
	externalities can help to create more efficient aviation policies and infrastructure in line with climate action goals.		Thank you for your contribution.
10.	It is predicted that by 2038 and beyond, passenger numbers will be approximately 460 million lower than anticipated prior to the pandemic, lowering airline revenues. However, the pandemic has also provided an additional <b>stimulus for decarbonizing</b> the sector and setting ambitious sectoral targets.	International Air Transport Association (IATA)	
11.	EIB support to <b>fund transition towards the green recovery</b> will be important in the next years towards full recovery. Even after the COVID crisis, the priority for our sector remains to accelerate aviation's green transition through different levers, as detailed in Destination 2050.	Aerospace and Defence Industries Association of Europe (ASD)	
12.	We do not expect permanent impacts, but the estimation is that the manufacturing industry will not return to pre-crisis level until 2023/2024. We also estimated a fall of R&T funding capacity for at least 3 years (-40% in 2020, -20% in 2021 and -10% in 2022). For these reasons EIB support to fund transition towards the green recovery will be important in the next years towards full recovery. At the same time, we see the Covid crisis as an opportunity to accelerate aviation's green transition, especially by retiring aging aircraft, and replacing them with best in class technology. On average, new aircraft models are consuming 20% to 25% less than previous generations. Therefore, replacing a Single Aisle aircraft can save more than 4500 tonnes of CO2 per year and a Long Range aircraft by 37000 tonnes of CO2 per year.	AIRBUS	
13.	<p>Negative factors</p> <p>1. Permanent loss of ~20% of business travel, i.e. -5% of total demand</p> <p>2. Temporary loss of ~5-10% of leisure travel, i.e. -7% of total demand because of environmental concern.. this would last until aviation shows "real signs" of "at scale" decarbonization, i.e. until 2035-2040</p> <p>Positive factors</p> <p>1. High push and accelerations towards SAF / H2, i.e. towards</p>	Arthur D. Little	

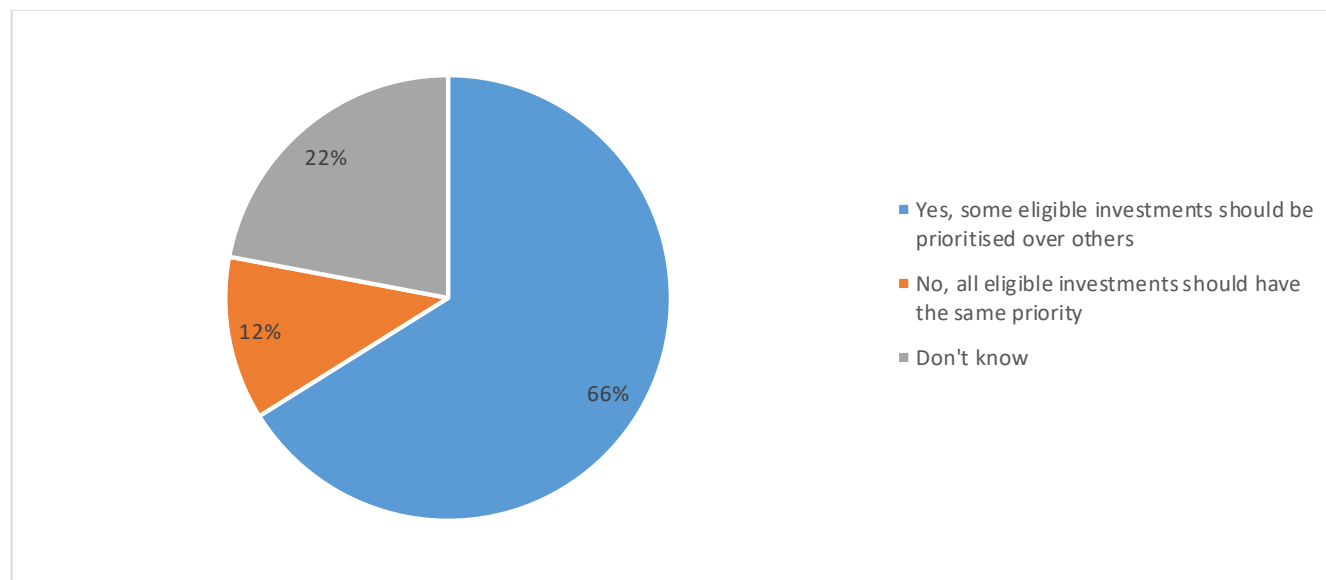


Ref	Summary of Contributions	Contributor	EIB comment
	(i) green electricity production & (ii) carbon capture / waste recycling industrial sectors that will emerge sooner. 2. High push for (very) high performing batteries (much beyond automotive batteries performance...) 3. Emergence of "last mile aviation" (urban air mobility, unmanned aerial services....) with "electric-propelled" new types of aerial vehicles		Thank you for your contribution.
14.	Part of the demand, in particular business travel demand, will not return. However, airlines are already anticipating this development. In the short and medium term, the coronavirus crisis has been accompanied by a very heavy financial burden on airlines. This will take several years to compensate for it. However, for the period 2025-2050, the coronavirus crisis will have no impact on the sector.	Bundesverband der deutschen Luftverkehrswirtschaft e.V.	
15.	Impact will likely be different in cargo and in passenger flights.	Global Infrastructure Investor Association	
16.	Covid-19 pandemic could result into delays of investments of sustainable fuel projects. Introduction of (final) climate policy measures will be post covid19 period.	Service Public Fédéral Mobilité et Transports	
17.	The climate policies and their impact on energy availability and prices can have a significant impact on the transport sector.	Ministry of Transport	
18.	Financial sustainability concerns in some airlines due to demand decrease.	ECTRI	
19.	People will want to travel slower but not with other 'strangers'. People who lost their jobs will not pay an expensive train ticket (full VAT-rate) but rather think they deserve a time off and will choose for a cheap airline rate not implied to VAT	Back on Track Belgium vzw-asbl	
20.	They were slowed down until now and rise again.  COVID-19 pandemic caused a short-term drop, DLR prediction assumes it will be regained soon.	Ralph-Uwe Dietrich, Response 832108188, Response 290033127	

Ref	Summary of Contributions	Contributor	EIB comment
21.	Challenges like pandemics on the long term will generate new ideas, new technologies that helps developing aviation further to be a major element in the economy.	Budapest Airport Zrt.	Thank you for your contribution.
22.	Both, the flights and the oversea destinations bear covid-related risks.	Antje Willnow	
23.	Long-distance trips avoidance (conference calls, video calls instead, and other at-distance activities)	Bank Information Center, STIB-MMB, urgewald, Van Oord,	
24.	The global Covid-19 pandemic has brought with it behavioural changes that were inconceivable before, as companies' respond to restricted travel by introducing home office, virtual meetings, virtual webinars, or virtual conferences. While it is highly uncertain what will happen as countries start to reduce travel constraints, there are clear signs that the pandemic will have a lasting impact on future air travel.	Joint contribution made by NewClimate Institute and Germanwatch	
25.	COVID19 lockdowns have shifted a lot of corporations' travelling policies and working from home will most likely impact the amount of business travel taking place globally, which will have positive impacts on the amount of CO2 emissions released by the sector. However, the aviation sector, especially low cost segments, are using reduced ticket prices to artificially stimulate air traffic growth and therefore emissions in the next years.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	
26.	Business travel will be impacted on short- and medium term as face to face meetings are partially replaced by online meetings.	Europeans for Fair Competition, European Cabin Crew Association EURECCA	
27.	Some positive effect is expected on the number of travelers from remote meetings for business travelers.	Ministry of Transport and Infrastructure	
28.	The Covid-19 pandemic has caused a severe but only temporary fall in demand and therefore in emissions of the aviation sector. It however does nothing to resolve the aviation's underlying climate problems, and the sector is likely	Counter Balance, E3G, Greenpeace	

Ref	Summary of Contributions	Contributor	EIB comment
	to bounce back again and continue to cause a growth in emission.		

## Question 6 – Should the EIB prioritise certain eligible aviation investments?



Ref	Summary of Contributions	Contributor	EIB comment
1.	SAF. Ever <b>growing blending rate for SAF</b> for long term, e.g. add 2 % blending rate each year until 2040. Agree international and force it by common regulation.	Ralph-Uwe Dietrich, WhereIsMyTransport	The EIB can support RDI and construction of SAF production plants in accordance with the Climate Bank Roadmap.
2.	Greening investments should be eligible. But even capacity increase-related investments should be at least limited eligible, regardless of whether it meets certain green criteria by 100%.	Budapest Airport Zrt.	In line with the Climate Bank Roadmap, the EIB can support airports by improving existing capacity through safety and security projects, rationalisation and explicit decarbonisation measures.
3.	Intercontinental aviation projects should be prioritised.	Antje Willnow	Thank you for your contribution. Indeed, aviation is increasingly difficult to substitute as travel distance increases.
4.	Yes, in the present it is necessary to help financially the companies that are in trouble. In second place, it is necessary to support the new technologies with lower emissions.	Município de Faro	In line with the Climate Bank Roadmap, the EIB can support zero emission aircraft.
5.	There should be a financial support for improved airplane acquisitions with Eco-friendly systems or in respect to new	Ministry of Transport and Infrastructure	

Ref	Summary of Contributions	Contributor	EIB comment
	projects that tend to sustain an environmental aspect or protection.		
6.	Technology openness and value for money should be at the forefront of investment support.	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr	
7.	Decarbonisation of aircraft.	Response 290033127	
8.	The EIB should not be supporting projects that continue to expand the fleet of kerosene burning aircraft. It should rather focus on supporting radical disruptive technologies like electrofuels or new zero emissions aircraft concepts, which have the biggest potential to decrease emissions from the sector. "	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT), WWF EPO	
9.	Improvement of <b>connectivity of airports with urban transport</b> infrastructures and <b>long-distance rail stations</b> .	Confederación Nacional de la Construcción (CNC)	Airport connections to the TEN-T railway network and investments aimed at encouraging multi-modality and increased use of public transport to access the terminals are, indeed, a priority of the EIB Transport Lending Policy.
10.	Multimodal investments; investments in smart policy measures (e.g., pricing and regulation).	ECTRI	
11.	Improvement of connectivity of airports with urban transport infrastructures and long-distance rail stations.	CEOE	
12.	Investments supported by the EIB should focus on <b>scaling up the availability of truly sustainable fuels for aviation, including investing in DAC facilities to produce e-kerosene with carbon captured from the atmosphere</b> .  Public funds should also play a central role in identifying technologies that can reduce aviation's non-CO2 effects.	European Federation for Transport & Environment, The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT),	The EIB can support RDI and construction of SAF production plants in accordance with the Climate Bank Roadmap.  There are still a number of uncertainties and lack of data about non-CO2 effects and the EIB monitors developments. RDI support to further develop disruptive technologies for aircraft that also address non-CO2 effects is a priority for the EIB.
13.	EIB investments should not only focus on future technologies but also <b>help airlines invest in new technologies currently</b>	European Cabin Crew Association	The EIB monitors developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy.

Ref	Summary of Contributions	Contributor	EIB comment
	<b>on the market</b> , as new aircraft (e.g. A220/350) emit roughly 20-25% less CO2 than the aircraft they replace. A careful <b>impact assessment</b> should always be carried out to assess the overall impact of any investment on reducing emissions and noise, taking into account life-cycle assessment.	EURECCA, Europeans for Fair Competition,	
14.	The EIB should prioritise lasting in-sector CO2 reduction, e.g. development of radical new concepts including <b>hybrid-electric for long-haul and synthetic SAF roll-out</b> .	Ministry of Infrastructure and water Management	The EIB Transport Lending Policy prioritises investing in RDI for disruptive technologies in the sector and zero emission aircraft.  In addition, the Climate Bank Roadmap allows the EIB to support RDI and construction of SAF production plants in accordance with the specific criteria included in the document and EU regulation.
15.	<p><b>Airport assets and airport management</b> can use their facilities to continue to provide important economic and social connectivity, and also work with their customer airlines, tenants and traveller community, to improve environmental performance.</p> <p>ACI EUROPE urges the EIB to acknowledge the key role of European airports in its new lending policy and to make the necessary funds available to expand and modernize this central pillar of the European transport infrastructure.</p> <p>To ensure compatibility with the Paris Agreement and the European Green Deal, the EIB could consider <b>limiting the eligibility of capacity development projects for financing to those airports that are accredited at Level 3 of Airport Carbon Accreditation or higher</b>.</p> <p>Overall, EIB funds should have a catalyst effect for achieving EU policy objectives in the Climate Action area. Therefore, ACI EUROPE invites the EIB to consider all positive externalities, in the area of sustainability but also competitiveness, innovation, social and spatial cohesion when defining the scope of its lending policy for transport.</p>	<p>Aeroporti di Roma</p> <p>Airports Council International EUROPE</p> <p>Athens International Airport</p>	We take note of your views. The EIB Transport Lending Policy will continue to support airports by improving existing capacity through safety and security projects, rationalisation and explicit decarbonisation measures.

Ref	Summary of Contributions	Contributor	EIB comment
16.	As a sector with few decarbonization options, investment in sustainable aviation fuel (SAF) and synthetic hydrogen fuel (PtL) production as well as electric, hybrid and hydrogen powered aircraft should be prioritized. In addition, <b>investment in SESAR (SES)</b> will bring multiple benefits to the sector including emissions reductions.	International Air Transport Association (IATA)	<p>The EIB supports the aviation sector efforts to gradually end its dependency on fossil fuels.</p> <ul style="list-style-type: none"> <li>The Climate Bank Roadmap allows the EIB to support RDI and construction of SAF production plants in accordance with the specific criteria included in the document and EU regulation and has as a priority investing in RDI for disruptive technologies in the sector.</li> <li>The Bank supports the deployment of the Single European Sky at EU level and similar initiatives outside EU that aim to increase the efficiency of air traffic management and air navigation services by reducing the fragmentation of airspace.</li> <li>Finally, the Climate Bank Roadmap allows the EIB to support airports by improving existing capacity through safety and security projects, rationalisation and explicit decarbonisation measures.</li> </ul> <p>The Bank also monitors developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy and can already finance zero emission aircraft.</p>
17.	<p>The EIB should prioritise investments in a way that supports the industry roadmap towards decarbonisation:</p> <ul style="list-style-type: none"> <li>the development of “best in class” (until 2032 and as per the technical screening criteria proposed by the Platform on Sustainable Finance in August 2021), <b>ultra-energy-efficient technologies</b> compatible with 100% SAF and disruptive zero emission technologies (electric, H2)</li> <li>production, transportation and storage of <b>advanced biofuel / synthetic fuels and green liquid hydrogen</b></li> </ul>	Aerospace and Defence Industries Association of Europe (ASD)	
18.	<p>Facilitating investments in “<b>best in class</b>” <b>aircrafts and infrastructure</b> to allow a widespread access to novel fuels is essential to ensure an optimal financing offer to the sector, which would allow in parallel the long term development of decarbonization technologies, whilst as well guaranteeing that operators can invest in additional decarbonization activities such as an increased uptake of SAFs. Such “best in class” aircraft therefore needs to be included in the priority investments for the airline sector.</p> <p>Regarding emerging technologies, <b>Electric planes</b> are expected around 2035 if the certifications allow it. This would only concern planes with less than 100 passengers and a range of 1,500 km. So rather for regional flights. As for <b>hydrogen planes</b>, there is more uncertainty for the arrival before 2045/2050 and the deployment will be more applicable to medium-haul flights due to the larger volume and weight of hydrogen (for which new compression techniques need to be developed). For long haul aircraft, which represents 80% of Carbon Emission of intercontinental network carriers, <b>SAF</b> is the most promising, and only, option for the low-carbon</p>	Airlines for Europe A4E	

Ref	Summary of Contributions	Contributor	EIB comment
	aviation of the future, together with the renewal of our current fleet.		Please see response to previous points above.
19.	<p>The EIB should primarily focus on supporting the development of “best in class” (until 2032 and as per the technical screening criteria proposed by the Platform on Sustainable Finance) and zero-emission commercial aircraft, including all related new technologies</p> <ul style="list-style-type: none"> <li>. the implementation and massive scale-up of extensive ecosystems relating to the production, transportation and storage of advanced biofuel / synthetic fuels and green liquid hydrogen</li> </ul>	AIRBUS	
20.	<p>EIB should prioritise (no order of priority below)</p> <ul style="list-style-type: none"> <li>.SAF</li> <li>.Direct Carbon Capture technologies</li> <li>.New « sober » aircraft</li> <li>.New « sober » aircraft engines</li> <li>.New “H2” aircraft</li> <li>.New “H2” engines</li> <li>. Investment in new ground facilities for Batteries / H2 storage &amp; distribution at airports</li> <li>. transformation of Air Traffic Control (to lower delays, optimize trajectories...)</li> <li>. Accelerated Fleet renewal</li> </ul> <p>Projects related to “electric” aircrafts for Regional traffic (4 to 70 seaters) or for UAM... are tackling &lt;5% of aviation emissions.. and are already funded by private venture capital... hence it should not be a top priority of EIB...</p>	Arthur D. Little	
21.	In order to accelerate decarbonisation, investments in airport and charging infrastructure, vehicles (apron) as well as new aircraft and installations for the production of alternative aviation fuels are urgently needed.	Flughafenverband ADV	
22.	Fleet replacement, fuel installation and investment in the building structure of airports and in e-mobility on the airport side have a direct and immediate impact on climate change.	Bundesverband der deutschen Luftverkehrswirtschaft e.V.	



Ref	Summary of Contributions	Contributor	EIB comment
23.	We believe <b>hydrogen projects</b> should be prioritized, alongside with other technologies that have already proven their viability towards net-zero flights.	Global Infrastructure Investor Association	Please see response to previous points above.
24.	The EIB should prioritize policies and programs that support development of low- and no-GHG aviation fuels and of <b>aviation efficiency</b> more broadly. This includes a steadily <b>increasing price on GHG emissions</b> .	Bank Information Center	
25.	The Transport Lending Policy should take [the CBR commitments] as a basis for its approach to the aviation sector. The EIB must <b>end its support</b> to airlines and aircraft manufacturing except for synthetic fuels such as power to X made from additional renewable electricity. Vague promises of decarbonisation should however not justify more investments in the aviation sector. The focus should be on reducing flights at a minimum, for instance through much more stringent regulations and the shifting of short- and middle-haul flights to rail.	Counter Balance E3G Greenpeace	The CBR commitments have an overarching role; therefore, the EIB Transport Lending Policy priorities support within the boundary conditions set by the Climate Bank Roadmap.
26.	In revising its lending policy, the EIB should exclude from its investments in the aviation sector (fleet, airport infrastructure, etc.). It may possibly finance the development of decarbonised technologies (SAFs), although this is not the priority.	Service Public Fédéral Mobilité et Transports, Response 1039141480	Thank you for your contribution. The revision of the Transport Lending Policy is being carried out within the broader eligibility framework defined by the CBR.
27.	EU should regulate "against" aviation excessive use, and should <b>price remaining fossil fuel in line with externalities</b>	STIB-MIVB	Thank you for your contribution.
28.	Priorities should be given to investments which are socially and environmentally sustainable and ensure a <b>just transition for workers</b> and citizens.	European Transport Workers' Federation	
29.	<b>Air traffic must be greatly reduced</b> due to its noise. Only reduced air traffic may be promoted, in the sense that all eligible investments have the same priority!	Response 974008607	
30.	It is better to <b>get Europeans back to the trains</b>	Back on Track Belgium vzw-asbl, Response 832108188	
31.	The EU's Green Deal provides a model for other regions in creating a set of coordinated airline taxes that signal clear	The SLOCAT Partnership on	

Ref	Summary of Contributions	Contributor	EIB comment
	incentives and <b>avoid carbon leakage</b> across national and corporate borders. Additionally, investments in passenger rail (capacity, speed, integrated tickets) can help shift short-distance transport from aviation to rail.	Sustainable, Low Carbon Transport (SLOCAT)	

## Additional comments

Ref	Summary of Contributions	Contributor	EIB comment
1.	Investments in expansions or new airports are not more to be defended in this climate emergency state the globe is in.	Back on Track Belgium vzw-asbl	The EIB Climate Bank Roadmap withdraws support from airport capacity expansions.
2.	EIB should not demonize aviation, because non-polluting technologies might come within few decades.	Finnish Transport Infrastructure Agency	Thank you very much for your contribution. The EIB Climate Bank Roadmap withdraws support from conventionally fueled aircraft and airport capacity expansions. Aviation provides vital connectivity on a national, regional and international scale and is increasingly difficult to substitute as travel distance increases. For that reason, the EIB still aims to play a role in supporting the aviation sector efforts to end its dependency on fossil fuels.
3.	Air travel must work hand in hand with other modes to transfer seamlessly to lower emitting transport for short-medium haul distances. All airports should be linked by rail, especially high-speed rail. Processes such as timetabling, ticketing, check in and baggage handling can be organized in collaborative ways to encourage passengers to take the most sustainable mode of transport to complete their journeys.	International Union of Railways	Thank you very much for sharing your opinion. While there may be greater scope for linking airports to rail, the case for each project has to be assessed individually.
4.	EU airlines and their employees have already and will continue to substantially invest in decarbonisation. E4FC members, therefore, support the proposed significant emission reduction to achieve CO2-neutrality in aviation by 2050. Sustainable Aviation Fuels (SAF) are a great lever to decarbonise aviation. The proposed ReFuelEU Aviation Regulation provides a solid basis for scaling up the usage of SAFs throughout the upcoming years. For the foreseeable future, however, SAFs will be more expensive than fossil fuels but this cannot lead to competitive disadvantage of the EU carriers vis-à-vis third country competitors. In order to accomplish the intended climate targets, the EIB should closely coordinate with the European Commission to ensure that the Fit for 55 proposals – particularly on the deployment of sustainable aviation fuels – are linked with sustainable investment opportunities for the whole European aviation industry. Many elements of the Fit for 55 proposals lead to huge cost increases for EU airlines; non-	European Cabin Crew Association EURECCA  Europeans for Fair Competition	Thank you for your contribution and for sharing your concerns regarding competitiveness of EU airlines.  Regarding the EIB contribution, the Climate Bank Roadmap allows supporting RDI and construction of SAF production plants in accordance with the specific criteria included in the document and EU regulation. In parallel, we monitor developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy.

Ref	Summary of Contributions	Contributor	EIB comment
	EU airlines generally do not incur these costs or to a much lesser extent. This may lead to the distortion of competition and passengers choosing routes avoiding EU hubs, as transferring through them will become more expensive. E4FC calls upon the EU and the EIB to assist EU airlines in their energy transition. An example of a supportive policy can be found in the US, where the government launched funding opportunities to support sustainable aviation fuel projects and fuel producers totalling up to \$4.3 billion.		
5.	The European Commission defines the Green Deal as “a new growth strategy (...) where economic growth is decoupled from resource use”. Growth is thus not per se incompatible with the objective of climate neutrality by 2050 and the Paris Agreement. This is confirmed by the Commission in its In-Depth Analysis supporting the Communication A Clean Planet for All. A thriving sector is also likely to generate the revenues necessary for investments into research and innovation in clean technologies as well as the renewal of assets towards less emitting alternatives. Over 80% of emissions from aviation result from flights of more than 1,500 km, for which no practical transport alternatives to aviation exist. Consequently banning capacity development at airports is thus unlikely to result in significant demand reduction. If airports cannot expand, demand will move to those airports where capacity is still available. In the end, this might result in longer routes and higher emissions for a trip from A to B, for instance where instead of a direct flight, two connecting flights will have to be taken. Operations at capacity-constrained airports are often inefficient, including from an emissions perspective. Aircraft might have to queue for take-off on the ground or for arrival through holding loops in the sky. These inefficiencies increase emissions. Capacity development can thus also reduce emissions from aircraft operations.	Airports Council International EUROPE	Both the Green Deal and the A Clean Planet for All communication allow for a certain growth in the air transport system that can still be compatible with the objective of climate neutrality by 2050. In that respect, an efficient offer of airport capacity will intuitively be linked to an efficient operation, thus minimizing emissions.  In the revised Transport Lending Policy, the EIB will continue to be able to support airports by improving existing capacity through safety and security projects, rationalisation and explicit decarbonisation measures.
6.	It is recommended that the EIB aviation investment criteria are aligned with those proposed by the Platform on Sustainable Finance in their draft report on preliminary recommendations for technical screening criteria for the EU taxonomy.	International Air Transport Association (IATA)	We take note of your suggestion. The Bank monitors the developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy

Ref	Summary of Contributions	Contributor	EIB comment
7.	<p>By providing the necessary infrastructure for the transportation of people and goods, as well as facilitating commercial developments on site, the Airport Economic System contributed a total of €3.4 billion to the Greek GDP and about 73,200 jobs nationwide; 16,300 of which correspond to employment in the Airport Community.</p> <p>- Respectively, the contribution to the region's GDP reached an added value of €2.9 billion (3.5% of Attica's GDP) and about 56,100 jobs (4.1% of Attica's employment); 11,600 of which are concentrated in the Mesogheia area. Furthermore, 3,700 residents of Mesogheia are employed at the airport (22% of airport's workforce).</p> <p>- In order to measure the broader benefits driven by the Airport's operation, the study calculated the contribution of the Airport to Greek tourism. Taking into account inbound foreign travellers of Athens International Airport, the study concluded that the added value reached €4.1 billion and contributed 102,000 jobs nationwide.</p> <p>Similarly, transportation services to and from the Airport contributed an added value of €290 million and 5,200 jobs.</p> <p>Employees Protection Despite the severe pandemic impact on AIA's financial figures, the company has up to now secured jobs and, in close cooperation with the Greek State, managed to sustain the high-level of employee protection and labour conditions in general.</p> <p>AIA supports local communities by transparently examining and responding to the multiple requests received along the 20+ years of its operations.</p>	Athens International Airport	Thank you very much for sharing with us key economic data of the AIA impact on wider economic benefits to society.
8.	<p>Decarbonisation of the sector is achievable but will require significant investments and public support. A clear vision is needed on how aviation activities could be considered as environmentally sustainable in order to keep attracting investors and to mobilize the significant amounts of capital which will be required to drive the necessary change. Access to financing is a critical topic for European aircraft manufacturers to create a level playing field globally.</p>	<p>Aerospace and Defence Industries Association of Europe (ASD)</p> <p>AIRBUS</p>	<p>We take note of your suggestion. The Bank monitors developments of Climate Mitigation criteria for aircraft and airlines in the framework of the EU Taxonomy</p> <p>Regarding support to an Hydrogen-ecosystem deployment, the EIB has as a priority investing in RDI for disruptive technologies in the sector and zero emission aircraft, including the necessary ancillary infrastructure.</p>

Ref	Summary of Contributions	Contributor	EIB comment
	<p>We take note of the EIB 2021-2025 Climate Bank Roadmap, which was regrettably published at the same time the Platform on Sustainable Finance (PSF) started working on developing criteria for eligible air transport activities in the EU taxonomy. It is unfortunate that the Climate Bank Roadmap does not sufficiently match challenges faced by aviation to reduce its climate impact, as it is excluding the EIB support to “conventionally-fuelled aircraft” and focusing only on “clean” fuelled aircraft which will not come to the market before 2030 for regional and short haul connections. The way the EIB will support the transition phase towards a potential zero emission aircraft should be better clarified, and it should especially align with the EU Taxonomy, as proposed by the PSF report issued in August 2021, which is not so restrictive as regards to investment in aviation. Financial investments in activities which would enable a major reduction in aircraft emissions can be included in the EU Taxonomy as transition activities so long as they provide “greenhouse gas emissions levels that correspond to the best performance in the sector or industry”. We think that the EIB eligibility criteria for project support should be aligned with the above definition and the additional points included in the ASD paper on taxonomy.</p> <p>As the largest multilateral development bank, it is key that the EIB keeps supporting the aviation sector during the transition phase and helps keep trust with investors.</p> <p>In parallel to the research and development of new generation aircraft, the use of advanced biofuel and synthetic fuel constitutes a workable solution in the near term. The EIB should support the emergence of this new ecosystem and the increased use of sustainable fuels in aircraft operations.</p> <p>In a longer term and with respect to the generalization of liquid hydrogen which will require specific aircraft and infrastructures, the EIB should help fund the activities which will contribute to positioning liquid hydrogen as the future primary energy source not only for aviation but more widely for the whole heavy transport industry.</p>		

Ref	Summary of Contributions	Contributor	EIB comment
9.	Impact on operators, airports & ground handling companies : - Sustainable aviation fuels: introduction of this kind of fuel will be complex (new procedures for all involved) and at a high cost (investments). Important remark: - Involvement of stakeholders (impact sustainable aviation fuels) e.g.: o Aircraft & engine manufacturers (impact on aircraft systems/equipment) o Operators (new procedures, training etc.) o Into-plane fuelers & handlers (new procedures, training etc.) o Airports – storage of fuel / distribution o Air traffic – flight planning o Authorities (supervision, training etc.)	Service Public Fédéral Mobilité et Transports	Thank you very much for your contribution.  We take note that the deployment and blending of SAFs in the fuel mix might entail an impact in operators, airports & ground handling companies that can lead to significant costs. In that regards, the Climate Bank Roadmap allows support for the deployment of SAFs at airports, amongst other explicit decarbonisation measures.
10.	Air transport is in international competition. It is therefore important not to create a structural competitive disadvantage compared to airports and airlines outside the EU in the decarbonisation of air transport in Europe.	Flughafenverband ADV	Thank you for your contribution and for sharing your concerns regarding competitiveness of EU airlines and airports.
11.	The German aviation industry fully supports the objective of decarbonising air transport by 2050 at the latest. This entails significant additional costs, both in the investment sector and in operation, which need to be financed. It is essential that European companies (airports and airlines) do not suffer structural competitive disadvantages in the global air transport market, in particular on transfer routes. Climate instruments that do not respect these possible competitive disadvantages harm the European aviation industry without contributing to climate protection.	Bundesverband der deutschen Luftverkehrswirtschaft e.V.	
12.	Short-haul flights must be banned across Europe for environmental reasons and shifted to the railways. Longer flights within Europe must be largely replaced by an expansion of the night train network!	Response 974008607	Thank you for your contribution.
13.	EU should regulate "against" aviation excessive use, and should price remaining fossil fuel in line with externalities EU should encourage massive modal shift away from aviation - for goods -> rail and waterways	STIB-MIVB	

Ref	Summary of Contributions	Contributor	EIB comment
	- for passengers: long-distance high-speed trains , and night-trains		Thank you for your contribution.
14.	It would be useful to get the inclusion of some text specifically on ' <b>social sustainability</b> ' and prerequisites for social sustainability regarding workers. A focus on regions is useful, but it would also be useful to emphasise the need for just transition for "the people and employment sectors most vulnerable to climate change" as transport falls into this category, particularly aviation. Sustainable Finance Action Plans and other sustainable finance models should include <b>just transition mechanisms</b> and prerequisites to ensure social sustainability regarding workers. On infrastructure, a mention of investment in SAF infrastructure is glaringly missing. SAFs are a main aim of the ReFuel EU Aviation policy, and require investment in infrastructure to support this. There is no mention of <b>high standards of employment</b> . ETF suggest an amendment in the last line of paragraph 11 of the aviation section to include "while maintaining high standards of service, employment, safety and security". In this paragraph it is also encouraged to ensure that governments to select fuel efficient aircraft for Public Service Obligations.	European Transport Workers' Federation	
15.	Low-carbon aviation must be seen as part of an integrated transport system that works hand in hand with other modes of transport. The sequence of strategies of avoid, shift and improve should be applied to aviation - the most carbon-intensive mode of transport.	The SLOCAT Partnership on Sustainable, Low Carbon Transport (SLOCAT)	



## Chapter 9 – Additional comments

Ref.	Summary of Contributions	Contributor	EIB comment
	<b>Appraisal and project selection</b>		
1.	The EIB should prioritise those investments that need the lowest "energy density" in total (building, running, longevity). That will require a fully calculated standardized and transparent energy balance for every submitted project.	Response 1039141480	The supply and consumption of energy determine, among other things, the climate and environmental externalities of a project and, consequently, the costs and benefits to society of that project.
2.	In order to prioritize solutions/investments, appraisal tools such as enhanced cost-benefit analysis shall be applied to support decision making. Distributive impacts among the project stakeholders shall be clearly identified and quantified.	ECTRI	The EIB does indeed carry out a comprehensive cost-benefit analysis. Its approach is described in the document "The Economic Appraisal of Investment Projects at the EIB" ( <a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a> ), which is currently under revision.
3.	The EIB should also enhance transparency and revise project evaluation processes notably with regard to the carbon footprinting exercises including key assumptions and variables considered.	Joint contribution made by NewClimate Institute and Germanwatch	<p>The EIB's methodologies for carbon footprinting of projects is described in the document "EIB Project Carbon Footprinting Methodologies", available at: <a href="https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf">https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf</a></p> <p>That document explains the scope, metrics used, calculation methodologies and common assumptions underlying the carbon footprinting of projects.</p>
4.	EIB must be clear on the need to target investments where the private sector would not ordinarily invest, to ensure the Bank is providing additionality to the market.	Global Infrastructure Investor Association	<p>The EIB's framework for assessing the additionality and impact of projects and its own intervention is described in: <a href="https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality">https://www.eib.org/en/projects/cycle/monitoring/aim.htm#:~:text=The%20EIB%20seeks%20to%20make,alternatives%20is%20defined%20as%20additionality</a>.</p> <p>The AIM assessment applies to every project financed by the EIB. It seeks to show how the EIB delivers additionality and impact. The framework rests on three Pillars:</p>

Ref.	Summary of Contributions	Contributor	EIB comment
			<p>Pillar 1: the EIB should ensure alignment with EU policies and address less than optimal investment situations that result from market failures;</p> <p>Pillar 2: the EIB should lessen these sub-optimal investment situations and constructively shape investments in terms of scale, scope, structure, quality and/or time;</p> <p>Pillar 3: the EIB should contribute financial and non-financial support to the project that complements support from other organisations and sources.</p> <p>The three Pillars are accompanied by project results indicators.</p>
5.	The EIB can 'crowd out' private investment if it is risk-averse in project selection.	Global Infrastructure Investor Association	Private investments play a relatively minor role in financing European transport infrastructures. The EIB has been and is an important financing partner in Public-Private Partnership projects in transport, "crowding in" other financiers taking comfort from the presence of EIB project due diligence. The situation is similar for infrastructures for the electrification/ decarbonisation of transport, or mobile assets.
6.	It is important to exclude investments in any transport infrastructure dedicated to the transport or storage of fossil fuels.	Community of European Railway and Infrastructure Companies (CER)  Joint contribution made by NewClimate Institute and Germanwatch	<p>The EIB's Climate Bank Roadmap, Annex 2, Table C, confirms that the EIB does indeed exclude such investments:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
7.	The EIB should establish a clear list of ineligible transport project funding types.	Joint contribution made by NewClimate Institute and Germanwatch	The EIB's Climate Bank Roadmap, Annex 2, Table C, specifies the types of transport investments that are not considered as aligned with the Paris Agreement and therefore excluded from EIB support:

Ref.	Summary of Contributions	Contributor	EIB comment
			<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>
8.	The connection between the BEI's lending policy and the taxonomy rules is a major source of concern. The taxonomy rules are presented as non-binding, but it is reported that the BEI will strictly follow these rules, making them de facto binding. We would like certainties about the technology-neutral stance of the BEI.	Federation of Belgian Enterprises (FEB-VBO)	<p>The EIB's Climate Bank Roadmap (CBR) specifies the types of investments that the Bank considers as aligned with the Paris Agreement and that are therefore eligible for EIB support. The alignment of EIB support and the EU Taxonomy of Sustainable Activities is described in the CBR.</p> <p>The Transport Lending Policy, in turn, specifies the priorities of the EIB's support to the transport sector, within the eligibilities specified in the CBR. The TLP confirms the EIB's neutrality to different clean transport technologies.</p>
9.	It is important to pay attention to cross-border projects.		Cross-border transport projects, notably TEN-T, are indeed priorities for the EIB, as mentioned in the Transport Lending Policy.
10.	It is important that, in addition to 'greening projects', there is also room for classic infrastructure projects that can improve the efficiency of transport / multimodal transport.		The Transport Lending Policy does indeed consider safety, accessibility and efficiency as critical dimensions of transport systems, alongside their climate and environmental sustainability.
11.	It is important that money is not only allocated to the concrete roll-out of greening projects, but that there is also sufficient budget to conduct fundamental research in the transport sector that can lead to new breakthroughs and insights.		<p>The EIB supports upstream research, innovation and development activities, including in transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table B:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p>
12.	EIB funds should also be used for renewal/revitalisation projects. It is important to support infrastructure that encompasses both digital and hard infrastructure and fleet.	Community of European Railway and Infrastructure Companies (CER)	<p>The EIB's Climate Bank Roadmap, Annex 2, Table C, confirms that investments in the rehabilitation/reconstruction of transport infrastructure are eligible for EIB support, as are investments in digitalisation:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The TLP (Chapter 5) confirms that digitalisation is a priority for EIB support in all transport modes, as are infrastructure upgrade and rehabilitation projects in land transport and inland waterways.</p>

Ref.	Summary of Contributions	Contributor	EIB comment
	<b>Rail and public transport</b>		
13.	The railway sector has to develop as the airline system did since the sixties. The railways needs investments in (digital) infrastructure (connections), railway stations, rolling stock... Especially night trains can be a key to several domains.	Back on Track Belgium vzw-asbl	<p>The EIB supports the development of the railway sector, including investments in rail infrastructure and rolling stock, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:  <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The EIB's priorities for rail are addressed in the new Transport Lending Policy, chapter 5. The revised TLP continues to prioritise investments into new and upgraded electrified rail infrastructure, and prioritises zero-emission rolling stock using catenary power, batteries or hydrogen.</p>
14.	The "European Year of the Rail" is ultimately nothing more than a knock-out, because there is no transport policy framework in the EU that leads to a shift from road to rail, which is why in reality transports are being shifted from rail to road.	Response 974008607	Thank you for your contribution. The European Commission's Smart and Sustainable Mobility Strategy emphasizes the sustainability of rail transport, targeting a doubling of traffic on high-speed rail by 2030 (tripling by 2050) as well as the doubling of rail freight traffic by 2050.
15.	The EU Agency for Railways remains available to strengthen an interinstitutional cooperation in the field of rail interoperability by supporting further the existing expertise of the EIB advisory teams during transactions within and outside of the EU.	European Union for Agency for Railways	Thank you very much for your support. The EIB appreciates the regular exchanges with the EU Agency for Railways participates in meetings on specific topics of common interest organized by the Agency. We seek to further develop the cooperation.
16.	The EIB TLP must go hand in hand with the objectives set in the EU Mobility Strategy for 2030 and 2050 perspective. Investment gap identified by the Strategy must be reduced by channeling funds to railways.	Community of European Railway and Infrastructure Companies (CER)	<p>The EIB's Transport Lending Policy is fully aligned with the European Commission's Smart and Sustainable Mobility Strategy, including in the ambition to support rail transport.</p> <p>See Chapter 5 of the revised TLP for the EIB's approach to the railway sector.</p>
17.	While it is important to focus on each mode pathway to decarbonisation, the systematic view must be taken. Investments in multimodal technology and infrastructure are essential. To achieve shift to sustainable modes of transport, such as rail, they must be linked in to all other modes of transport.		There are indeed critical complementarities and substitutabilities between transport modes. Such interdependencies underlie the qualitative narratives and quantitative demand forecasts in the European Commission's Smart and Sustainable Mobility Strategy and, by extension, the EIB's Transport Lending Policy.

Ref.	Summary of Contributions	Contributor	EIB comment
18.	Integrated and collaborative transport planning and multimodal projects should be encouraged for enhancing positive impacts on sustainability and quality of life.	ECTRI	In concrete terms, the EIB's advisory services can support the development of multimodal solutions at strategic, market and project levels.
19.	Support railways, lightrails, trams and direct (!) electric driven vehicles. If there is hydrogen, batteries etc. we waste energy again.	Response 832108188	The EIB supports investments in clean collective transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:
20.	The EIB should concentrate efforts on investing in low-carbon public transport, such as buses and coaches, which have proven to have the highest returns in terms of environmental, social, and economic benefits.	Confederación Española de Transporte de Autobús - CONFEBUS	<a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>  As explained in the Transport Lending Policy, investments in collective transport are a priority for the EIB.
21.	Massive expansion of public transport capacity: In order to drive the necessary new and upgraded infrastructure, authorisation procedures need to accelerate. The standard assessment needs to modernise to facilitate investment in LPT and prioritise projects that are damaging to the climate.	Stadtwerke München GmbH	The EIB does indeed carry out a comprehensive cost-benefit analysis. Its approach is described in the document "The Economic Appraisal of Investment Projects at the EIB" ( <a href="https://www.eib.org/en/publications/economic-appraisal-of-investment-projects">https://www.eib.org/en/publications/economic-appraisal-of-investment-projects</a> ), which is currently under revision.
22.	At present, the TOC (full life-cycle cost) of electric buses, taking into account the development of charging stations, maintenance workshops, staff training, and battery replacements expected at half of the life-cycle, is not competitive with diesel buses. In terms of climate policy and the achievement of goals, financial support provided by governments and EU institutions have a key role in the acquisition and deployment of the charging infrastructure network and zero-emission vehicles.	MAV-Volán Group	
23.	Decarbonisation of transport, when pursued and achieved, highly contributes to overall decarbonization of the EU societies. Therefore, decarbonization of transport is crucial and needs EIB attention.  The difficulty of this task is obvious. Named a hard-to-abate-sector more discussion of options and support is possible.  Currently, extra urban transport is the only category where this transport mode is being addressed.	Antje Willnow	The EIB's Climate Bank Roadmap (CBR) and its Transport Lending Policy do indeed emphasise the role of the transport sector in the EU's broader decarbonisation efforts. The EIB's CBR specifies the types of investments that the Bank considers compatible with the goals of the Paris Agreement and that, therefore, are eligible for EIB support.
24.	It is necessary to prepare infrastructure resilience to climate change in order to reduce future damage and ensure an uninterrupted supply chain.	Croatian Chamber of Economy	The EIB approved its first Adaptation Plan in 2021, with the aim to strengthen investment and technical support to protect projects from the impact of more extreme weather and

Ref.	Summary of Contributions	Contributor	EIB comment
			<p>increase climate resilience of existing and new infrastructure. It describes, among other things, how the EIB will increase its efforts to promote the consideration of physical climate risk in investment decisions.</p> <p>The EIB's Adaptation Plan is available at: <a href="https://www.eib.org/en/publications/the-eib-climate-adaptation-plan">https://www.eib.org/en/publications/the-eib-climate-adaptation-plan</a></p>
	<b>Waterborne transport</b>		
25.	Resist pressure to block LNG as transition fuel because it reduces CO2 and nitrogen. LNG-engines provide a good pathway to E-fuels. LNG powered vessels have 20+ year lifespan so blocking them early is killing capital and development. Rather support transition to bio LNG and E-fuels when feasible.	Van Oord	<p>The EIB supports investments in LNG-fuelled ships, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The Bank's future support in this respect will be reviewed as part of the process of reviewing the CBR more broadly.</p>
26.	It is important that financing tools are available and efficient for the transition of the shipping industry. In many cases due diligence and the related administrative process or the documentation is lengthy and burdensome. Many vessels are unique or built in small series and the minimum deal size to enter the investment can be too high for ship owners. The minimum deal size is also problematic for projects targeting retrofitting a vessel with a relatively small deal-size. With the diversity of the fleet and the rapid development of technologies, the recognition of transitional fuels and energy carriers is essential. Shipping is an international business and vessels can sail within and/or outside Europe. Calculating the European "contribution" is not always straightforward. Green/sustainable investments based on the current risk models are calculated as the most risky projects. Capital requirements for these projects are extremely high, hence significantly increasing the cost of funding.	European Community Shipowners' Associations (ECSA)	<p>The EIB supports sustainable investments in waterborne transport, as specified in the EIB's Climate Bank Roadmap, Annex 2, Table C:</p> <p><a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a></p> <p>The priorities for the sector can be found in Chapter 5 of the revised TLP. These priorities focus on areas where public policy support through the EIB can demonstrate highest additionality and impact.</p> <p>In addition to standard investment loans, the EIB is in continuous dialogue with the Commission, Member States and industry stakeholders on how it can widen its financial assistance in order to help to reduce the funding gap and help meet increasing environmental demands of the industry.</p>

Ref.	Summary of Contributions	Contributor	EIB comment
27.	The EIB could also support mechanisms for terminal development (ports, multimodal). To calculate the carbon impact of projects eligible for funding, it is necessary to integrate the product life cycle and production chain.	SNCF	<p>Investments in port and multimodal terminals are indeed supported by the EIB.</p> <p>The EIB's methodologies for carbon footprinting of projects in described in the document "EIB Project Carbon Footprinting Methodologies", available at: <a href="https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf">https://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf</a></p> <p>That document explains the scope, metrics used, calculation methodologies and common assumptions underlying the carbon footprinting of projects.</p>
28.	It is important that the EU maintains control over its strategic ports/airports/transport hubs.	Federation of Belgian Enterprises (FEB-VBO)	Thank you for your contribution.
<b>Aviation</b>			
29.	<p>Given the high level of investments needed in the aviation sector to develop new technologies and sustainable aviation fuels capacities at EU level, the EIB should make the decarbonisation of the aviation sector a priority.</p> <p>We ask the EU to put in place a financial environment facilitating a path towards a sustainable growth of air transport leading to a net reduction of air transport emissions, with no social or societal compromises.</p> <p>Current aircraft technology does not support zero or low-emission flying and is unlikely to do so until the next decade. It is important to consider the aviation sector faces strong technological barriers in its green transition and does not have the same alternative solutions as the road transport or maritime sector.</p> <p>The path towards carbon neutrality and the technological constraints are not the same for different modes of transport.</p>	Airlines for Europe A4E	<p>The European Commission's strategy towards the aviation sector is part of their broader Smart and Sustainable Mobility Strategy (<a href="https://transport.ec.europa.eu/transport-themes/mobility-strategy_en">https://transport.ec.europa.eu/transport-themes/mobility-strategy_en</a>).</p> <p>In its Climate Bank Roadmap, the EIB specifies the types of aviation investments that the Bank considers as aligned with the Paris Agreement and hence eligible for its support. (The EIB's Climate Bank Roadmap, Annex 2, Table C: <a href="https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf">https://www.eib.org/attachments/thematic/eib_group_climate_bank_roadmap_en.pdf</a>).</p> <p>The EIB will continue to monitor developments in the aviation sector closely. EIB-eligibilities in the aviation sector, like in all other sectors, will be reviewed in the context of the review process specified for the Climate Bank Roadmap.</p>

Ref.	Summary of Contributions	Contributor	EIB comment
	The EIB criteria and project selection grid should account for this.		
	<b>Other additional comments</b>		
30.	In order to achieve the objectives of climate change mitigation and air pollution, additional qualified staff are needed. The training capacity of educational institutions needs to develop further along with the content of relevant training courses.	Stadtwerke München GmbH	<p>Thank you for your contribution. The EIB supports investments in education infrastructure, as well as in innovation and skills in both public and private sectors, as specified in the Bank's Innovation, Digital &amp; Human Capital Orientation (2021-27):</p> <p><a href="https://www.eib.org/en/publications/innovation-for-inclusive-green-and-digital-transition">https://www.eib.org/en/publications/innovation-for-inclusive-green-and-digital-transition</a></p>
31.	<p>Private funds are ready to invest heavily in infrastructure projects in the form of PPPs or concessions, provided that their counterpart has at least a financial rating of "A". Most developing countries do not have this rating, in which case private funds are ready to use export credit insurers to cover their counterparty risk.</p> <p>Apart from these export credit insurers, they usually have a cover period of 8 to 12 years, exceptionally 15 or 18 years for some in certain sectors.</p> <p>This is insufficient in areas where investments need to be amortised over 30 years to ensure that tariffs paid by users are "sustainable". This is a major handicap for these projects and a large proportion of them are abandoned when they are economically viable and would make a very significant contribution to the "Millennium Goals".</p>	Fédération nationale des Travaux Publics (FNTP)	<p>The Transport Lending Policy recognises and emphasises the importance of private sector involvement in the financing and delivery of transport infrastructure.</p> <p>The EIB has supported and will continue to support PPP projects in the transport sector, among other sectors, also in developing countries.</p>
32.	EIB should be realistic about the level of investment the transition will require and this cannot come from public sources alone. There is an estimated €150bn - €175bn available to invest into European infrastructure among GIIA member investors alone, and it is vital that the EIB helps create the conditions to facilitate this investment.	Global Infrastructure Investor Association	
33.	When setting emission targets, the EU must take into account what is feasible at the current stage of technical progress and production capacity. Excessive targets can lead to significant additional costs, and some countries will fall behind due to financial constraints.	MÁV-Volán Group	Thank you for your contribution. The EIB supports projects that are in line with EU policies, including emission targets, and its own Climate Bank Roadmap (CBR). Annex 2 of the CBR contains detailed information about the emission standards applied to the different sectors of EIB support.



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34.	<p>The EIB could play an important role in working with the Commission and MS governments to develop a clear investable projects pipeline to enhance the role of the private sector in achieving the EU's long-term goals to become a climate-neutral economy by 2050.</p> <p>Additional clarity will help investors understand where the opportunities for investment are and will work to improve the collaboration between the EIB, InvestEU and private investors.</p>	Global Infrastructure Investor Association	Thank you for your contribution. In co-operation with the European Commission and EU Member States, the EIB's advisory services support all stages of the project cycle, including strategic and market development as well as upstream project preparation, and are available to both public and private promoters.
35.	Data and information will be critical to mainstream climate adaptation in EIB transport operations. The availability of data and climate projections is indispensable to understand the impacts that a changing climate will bring to transport infrastructure assets during their lifetime. The consultation report can highlight further the need for better data and climate projections and for its consistent use in the design and operations of EIB-financed transport projects.	Everbridge	The EIB's Climate Adaptation Plan confirms (paragraph 3.25): "The EIB will explore the potential of innovation primarily, but not exclusively, around climate data, research and innovation. The EU is at the forefront of climate modelling and analytics, with several centres of excellence and universities having a track record of providing essential raw oceanic and atmospheric data, producing state of the art climate and impact models and offering climate information and services to help public and private organisations to adapt."
36.	All modes of transport are necessary, and they will have to meet our economic needs. It is imperative that all modes have equal and fair opportunities to go green.	Federation of Belgian Enterprises (FEB-VBO)	The EIB will continue to support all modes of transport, as per the eligible types of transport investment specified in its Climate Bank Roadmap.
37.	Pipelines are also one of the transport options with a very high potential for greening. It is essential to look at this from a transport point of view.		Pipelines are covered in the EIB's Energy Lending Policy ( <a href="https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf">https://www.eib.org/attachments/strategies/eib_energy_lending_policy_en.pdf</a> ) as well as in the Climate Bank Roadmap.
38.	It is unacceptable that EU rules are not required to ensure that not all electro-mobility facilities are accessible. How public policy can be further developed without thinking about accessibility.	Ministère de la transition écologique	Thank you for your contribution.
39.	There is a need for a European integrated data system.	Federation of Belgian Enterprises (FEB-VBO)	



# Transport Lending Policy

## Issues Matrix

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