

## **Consultation on TBER and and LMTG**

*The German Bus and Coach operators association (bdo) is the leading association of the German bus industry and represents the interests of private and medium-sized enterprises in the areas of public transportation, coach tourism, and long-distance bus services in dealings with politics and the public.*

The European Union's commitment to creating a sustainable and competitive transport system must include all modes of transport, especially road passenger services like buses and coaches. These vehicles play a crucial role in connecting communities and reducing environmental impacts, yet they are sidelined in these State aid schemes. For Europe to reach its decarbonisation goals, road-based passenger transport must be fully integrated into support schemes aimed at fostering greener mobility.

### **Buses and Coaches: A core component of Green Mobility**

Public transport is a driving force of sustainable travel, and buses and coaches are among the most efficient ways to reduce road traffic and emissions. Their importance is especially pronounced in rural areas, where options for mobility are limited. Here, buses provide affordable and reliable means of transportation, linking remote regions to urban centers. This is critical not just for accessibility, but also for economic and social cohesion across the continent.

From an environmental standpoint, buses and coaches are the lowest emitters of greenhouse gases per passenger-kilometre. They are more efficient than cars, planes, and even long-distance trains when it comes to carbon emissions. Replacing private car trips with bus services can significantly cut down on pollution, with studies indicating that a single bus can replace up to 30 cars, slashing emissions in the process. These contributions are pivotal for meeting Europe's climate targets, yet they go mostly unrecognised in this policy discussions.

### **The challenge of high costs and unequal support**

One of the biggest hurdles to widespread adoption of zero-emission buses and coaches is the high cost of acquiring and maintaining such vehicles. They are currently expensive and almost impossible for operators to purchase without financial assistance since the vast majority of bus and coach operators are SMEs. This is especially true in the long-distance sector, where such vehicles are not yet widely available, making the transition to sustainable transport more challenging for bus operators.

Unfortunately, current EU policies tend to focus financial support on multimodal transport systems, leaving road-only operators without the aid they need to modernise their fleets. This creates an uneven competitive landscape, where those relying solely on buses and coaches struggle to keep pace with other forms of transport. In order to achieve a fully decarbonised transport sector, financial incentives must be made accessible to road transport operators, so they too can invest in greener vehicles.

### **The infrastructure problem: What road transport needs**

Achieving sustainable mobility isn't just about upgrading the vehicles on the road; it also requires building the infrastructure to support them. Electric buses and coaches need a robust charging network, and right now, that infrastructure is far from sufficient. Charging stations are unevenly distributed across Europe, with some regions having none at all. Without the necessary infrastructure, even the most advanced zero-emission vehicles will struggle to become viable options for long-distance and cross-border journeys.

Moreover, local governments often prioritise infrastructure investments for private cars or local public transport, leaving long-distance road transport behind. This imbalance needs to be addressed if road-based transport is to play a meaningful role in Europe's sustainable mobility future. Investments in infrastructure, especially for long-distance routes, are critical to ensuring the feasibility of electric buses and coaches.

### **Supporting the transition: Financial and policy adjustments**

To bring road transport fully into the fold of the EU's sustainable mobility strategy, the policy framework needs to be adjusted. Road passenger transport should be included in all relevant state aid schemes and financial incentives that support decarbonisation efforts. Excluding buses and coaches from these initiatives risks undermining the EU's broader climate goals, especially in areas where road transport is the primary or only option for many people.

State aid, for example, should support not just the purchase of zero-emission vehicles but also the creation of new commercial routes that make use of these buses. Currently, road-only transport operators face challenges that others do not, such as high-interest rates and difficulty securing credit. By offering targeted financial assistance, the EU can help these operators overcome these barriers, levelling the playing field between road and other forms of transport.

### **Conclusion**

The EU's decarbonisation objectives cannot be fully realised without taking bus and coach transport into account. Together with the International Road Transport Union we have repeatedly highlighted that focusing aid schemes solely on non-road transport has not delivered the desired results in the past. If the goal is truly to reduce the environmental footprint of transport across the board, then road transport must be given the same opportunities for investment and development as other sectors.

To correct this imbalance, EU legislators should look to harmonise transport policies and definitions across the board. Clear, consistent guidelines would help ensure that road transport operators are not excluded from financial support, allowing them to participate in the transition to more sustainable practices.

The road transport sector, particularly buses and coaches, is ready and willing to contribute to Europe's sustainable future. However, achieving this requires a more inclusive policy framework that extends financial support and infrastructure investment to them as well.