

From: [REDACTED] (MOVE)
To: [MOVE PSO REGULATION](#)
Subject: FW: ETF preliminary contribution to the revision of the PSO interpretative guidelines / Regulation 1370/2007
Date: vendredi 11 février 2022 09:45:16
Attachments: [ETF contribution to the PSO guidelines consultation.pdf](#)
[image006.png](#)
[image008.png](#)
[image009.png](#)
[image010.jpg](#)
[image011.png](#)
[image012.jpg](#)

From: [REDACTED] (MOVE) [REDACTED]@ec.europa.eu>
Sent: Thursday, February 10, 2022 4:58 PM
To: [REDACTED] (MOVE) [REDACTED]@ec.europa.eu>
Cc: [REDACTED] (MOVE) [REDACTED]@ec.europa.eu>
Subject: FW: ETF preliminary contribution to the revision of the PSO interpretative guidelines / Regulation 1370/2007

[REDACTED]

From: [REDACTED] <[REDACTED]@etf-europe.org>
Sent: Thursday, February 10, 2022 3:59 PM
To: BJORKLUND Mona (MOVE) <[REDACTED]@ec.europa.eu>; [REDACTED] (MOVE) [REDACTED]@ec.europa.eu>; [REDACTED] (MOVE) <[REDACTED]@ec.europa.eu>
Cc: [REDACTED] [REDACTED]@etf-europe.org>; [REDACTED] <[REDACTED]@etf-europe.org>
Subject: FW: ETF preliminary contribution to the revision of the PSO interpretative guidelines / Regulation 1370/2007

To the DG MOVE Policy Coordinator MOVE A, Mona Bjorklund
DG MOVE [REDACTED] **A.4, Legal Issues and Enforcement,** [REDACTED]
DG MOVE [REDACTED] **A.4, Legal Issues and Enforcement,** [REDACTED]

Dear Ms. Bjorklund, [REDACTED], [REDACTED]

RE: European Commission consultation on the PSO interpretative guidelines / Regulation 1370/2007

We welcome the European Commission consulting the ETF on the revision of the PSO Interpretative Guidelines on Regulation 1370/2007. However, on behalf of the ETF member organisations from the sectors concerned, I would like to raise with you some issues relating to content and method in conducting this consultation process. I would also like to make a couple of proposals that we find urgent, in order to address the issues in question.

The question of deadline / Although the deadline for contributions was extended to today, giving us thus approximately 7 weeks to react (winter break considered), this revision concerns more than half of our member organisations, notably from both rail

and road sections, as well as members of our Urban Public Transport Committee. Hence, in order for the ETF to provide a robust and complete contribution, reflecting views of our diverse membership in a thorough and inclusive manner, we will need more time to provide the European Commission with feedback. By today, 10 February, we can only provide preliminary comments (the attached document was sent out already, to Unit A.4), in addition to which we would appreciate very much to have a meeting with you, to discuss a number of concerns and aspects specific to each of the above mentioned sections / sectors.

ETF content-related concerns / The draft EC guidelines document that was brought to our attention as part of this consultation process clearly shows that the revised interpretative guidelines go beyond the spirit and the political aims and objectives of the PSO Regulation itself. Changes of this kind can only be subject to a proper legislative process, with full involvement of the co-legislators, the European Parliament and the Council. In stating so, please rest assured that the ETF consulted with experts specialised in PSO legal matters and in EU legislation.

ETF method-related concerns / Furthermore, we can only regret the way in which this consultation process is conducted and to this end we'd like to bring to your attention that DG MOVE coordinates many other processes of the kind in a much more transparent and participative way, to only mention the development of guidelines on the recently adopted Mobility Package in road transport. This is done via committees presided by the European Commission, having member states and social partners on board. This not only contributes to bringing support to the process, but also excludes the risk of having the European Commission exposed to criticisms on working behind closed doors.

To conclude, we urge the European Commission to set up a committee whose remit covers the revision of PSO guidelines, and to re-start working in this in an inclusive manner. The said committee could for instance cover many other aspects stemmed from the future revision of EU legislation (development of guidelines but also of implementing or delegating acts) in rail.

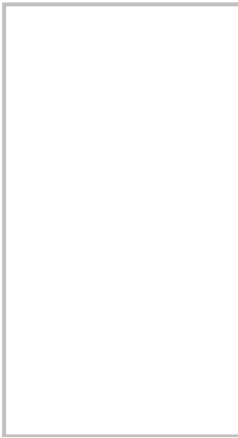
As mentioned above, we will contact you shortly with a proposal for dates, for a meeting with our leading structures of the sections concerned.

Please rest assured of our readiness to cooperate in improving the shortages signalled above.

Kind regards,


European Transport Workers' Federation
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From: [REDACTED]

Sent: Thursday, 10 February 2022 15:21

To: MOVE-PSO-REGULATION@ec.europa.eu

Cc: [REDACTED] [REDACTED] [<\[REDACTED\]@etf-europe.org>](mailto:[REDACTED]@etf-europe.org)

Subject: ETF preliminary contribution to the revision of the PSO interpretative guidelines

Dear madam / sir,

Attached, the ETF preliminary contribution to the revision of the PSO interpretative guidelines.

Kind regards



[REDACTED]

Head of Land Transport

European Transport Workers' Federation

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Phone: [REDACTED]

Email: [REDACTED] [<\[REDACTED\]@etf-europe.org>](mailto:[REDACTED]@etf-europe.org)

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