

[REDACTED] (MOVE)

From: [REDACTED] (MOVE)

Sent: lundi 7 février 2022 12:16

To: [REDACTED] (MOVE); [REDACTED] (MOVE); [REDACTED] (MOVE)

Cc: [REDACTED] (MOVE)

Subject: flash: meeting SGI Europe on IG

Dear all,

A flash summary of this morning's meeting on IG to 1370.

Regards,

[REDACTED]

SGI Europe

On 7/2 A4 met with representatives of SGI Europe, a sectoral organisation representing (largely incumbent) SGI providers (focused on AT, DE + Scandinavia/ UK stakeholders).

The discussion focused on the following points of the draft revised Interpretative Guidelines for Regulation 1370/2007, specifically:

- Definition issues: in their view the statement that the power of public authorities is not unlimited goes against the narrative of the COM policy documents for sustainable transport (SSMS and European Green Deal);
- More need on clarity on application of SNCM test: how to assess demand, which modes of transport can be taken into account, how to analyse market failure, what justification can be used, perception that it is a *new* test, concern that it brings legal uncertainty, to add that does not apply in case urban transport not liberalised;
- Question of grouping cost-covering and non-cost covering services and of cherry picking: inclusion of market operators risks increased coordination costs/ transaction costs and potentially higher impact on public budget.