

*“Commission proposal for a Directive amending Directive 2010/40/EU  
on the framework for the deployment of  
Intelligent Transport Systems  
in the field of road transport and for interfaces with other modes of transport”*

## **EuroGeographics’ feedback**

TR 51080067776-74

Ref. no.2022/0014

Brussels, 15<sup>th</sup> March 2022

### Key points:

- By simplifying access to their data, EuroGeographics members are driving applications to realise a wide range of social, economic and environmental benefits, all integrating transport.
- EuroGeographics welcomes modernisation of the existing ITS rules followed by properly identified problems that should be addressed such as interoperability, cooperation and data sharing.
- EuroGeographics members are keen to contribute to the implementation of ITS Directive by making available high-quality public-sector data from the range of spatial data.
- Open Maps for Europe is a new online service that provides free to use maps from more than forty European countries in machine-readable format including transport network.

---

### About us

EuroGeographics is an independent international not-for-profit organisation representing Europe’s National Mapping, Cadastral and Land Registration Authorities. Our strength lies in our extensive membership and we believe in a modern digital and green society empowered by the use of trusted geospatial services from these official national sources.

By simplifying access to their data, our members are driving applications to realise a wide range of social, economic and environmental benefits all incorporating the transport component.

EuroGeographics’ pan European products, EuroRegionalMap and EuroBoundaryMap, have been used as a backbone data contributing to the EU transport policy developments and implementation.

## About Proposal for Amending ITS Directive

EuroGeographics welcomes the proposal and its overall aim for updating and modernising of existing rules from 2010 in the area of Intelligent Transport Systems (ITS) in the field of road transport and for interfaces with other modes of transport.

The proposal offers appropriate solutions for identified problems that should be addressed such as actions required to improve coordination in accessibility of data and the need to improve the availability of data in a digital machine-readable format.

Adding the availability of data to the scope and subject matter of the Directive is of high importance to our members, producers, and holders of the road or other modes of transport network datasets used as a basis for ITS development. That affirms the importance of data, and feature their key role in providing intelligent services for citizens, particularly open data from public sector bodies.

Addressing the availability, we highlight that EuroGeographics provide pan-European data produced using authoritative data from official national sources. This includes administrative boundaries, topographic mapping and a digital elevation model in machine-readable format fully aligned with Open data and PSI Directive, data protection and privacy requirements. This interface known as “Open Maps for Europe” is a new online service that provides free to use maps from more than forty European countries. Our production system is unique internationally, and a particularly important example of international collaboration in the geospatial area.

In addition, some of our members are developing smart mapping or modern mapping platforms fit for the future, and some has developed their own autonomous car and started to research autonomous big data as a possible way to provide road environment data for mapping in the future.

We are very proud that our member is National Access Point (NAP) for Belgium making the (geo)information needed for innovative travel information apps accessible in one place. The purpose of NAPs, as introduced in the regulation, is to create a catalogue for open data covering all modalities from all transport actors including transport networks as a basis for creating multimodal travel information services.

We are also comfortable with the simple definitions of terms “availability of data” and “accessibility of data” provided in this proposal. We may say that we meet the requirements, as certain categories of data types exist in machine readable format and could be easily obtained for the purpose of sharing at the respective portal. Our datasets are harmonised and only one single licence is needed for the wide geographical coverage. Data sharing is the core of our existence, and the recent flag use sample is a single agreement between EEA and EuroGeographics for the provision of members’ data to the Copernicus service.

## Final remarks

We are aware that this proposal is an important component of the future common European mobility data space based on European strategy for data we want to be coherent with.

It is also supportive to the research and innovation policies in climate, energy and mobility under the Horizon Europe programme.

Both are important frameworks for our members too.

We shall use this opportunity within ITS scope to facilitate the availability of our members' data to the widest extent feasible to deliver effective and seamless multimodal transport.

Look forward to an opportunity to continue our coordination.

Your sincerely,

**Léa Bodossian,**

Secretary General and Executive Director

w. [www.eurogeographics.org](http://www.eurogeographics.org)

e. [lea.bodossian@eurogeographics.org](mailto:lea.bodossian@eurogeographics.org)

m. + 32 485 68 79 05