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NAPCORE Statement Paper on the Revision of the ITS Directive

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This NAPCORE Statement Paper conveys a joint view from the whole NAPCORE project in regard to the revision of the ITS Directive. The NAPCORE Statement Paper is not a political statement, but merely a project statement. The purpose of this Statement Paper is to declare NAPCORE's support to the revision of the ITS Directive. Moreover, to raise concerns and to pinpoint challenges in relation to subject matters that has a direct or indirect impact on the work done in the NAPCORE framework.

NAPCORE Statement Paper on the Revision of the ITS Directive

NAPCORE is the coordination mechanism to improve compatibility of the National Access Points (NAPs) as the public cornerstone of European mobility data exchange. It is a project supported by the Connecting Europe Facility (CEF) of the European Union, the European Commission and a partnership of NAP operators and National Body representatives of all European Member States (and beyond). NAPCORE's goal is to improve the interoperability of mobility services related data in Europe through mobility data standard harmonization and alignment. NAPCORE sets out to empower NAPs by defining and implementing common procedures and strategy, strengthening their position and supporting steps towards the creation of European-wide ITS solutions to better facilitate the use of EU-wide data and fostering collaboration on compliance and enforcement between the National Bodies of Member States.

NAPCORE supports the intentions and aims of the suggested revision of the ITS Directive and its focus on making better use of data to create a more sustainable, efficient and resilient European-wide transport network, and to improve data sharing in the mobility, transport and logistics sectors with a multimodal perspective. In fact, NAPCORE is an enabler of the ITS Directive and plays a crucial harmonization role, meaning that lessons learned could be harvested from the project which would contribute to the improvement of any future revision of the ITS Directive or its Delegated Regulations.

From a technical and practical perspective, NAPCORE embraces the direction of increasing the availability, accessibility and use of data types and ITS services for an extended geographical area, while focusing on a balanced cost-benefit ratio, in particular for rural areas and minor roads. By increasing the availability of data on NAPs and simplifying the re-use of data in accordance with GDPR, NAPs will in the future contribute to the common European Mobility Data Space and, in fact, act as the backbone of it.

NAPCORE acknowledges that mandating the availability of crucial data will improve the functioning of ITS services but emphasizes that the rights of data holders and users need to be defined and guaranteed, including the conditions for reuse of data. While the mandates for data types and services offer many benefits, NAPCORE also raises attention to the significant investment needed to make the relevant data available and accessible, and to deploy the relevant services with a sufficient level of quality. As such, it is important to consider the costs and administrative burden that will be carried by public authorities and private operators.

NAPCORE is fully aware of the importance of data quality, hence NAPCORE devotes effort in this field. NAPCORE recognizes the importance of data accessibility and encourages full transparency on data quality in order to enable NAP data users to find the data adequate for their own purposes. This focus will contribute to an overall improvement of data quality in the ITS ecosystem.

Based on experience with the current version of the ITS Directive and the related Delegated Regulations, NAPCORE foresees challenges in achieving the potential benefits through the actual implementation and enforcement.

Experience from National Bodies and NAP operators across Europe shows that it can be difficult to ensure compliance with the requirements, especially in relation to large multinational market players. It would not be efficient for every National Body to individually approach these players. Therefore, NAPCORE will work on the alignment of compliance assessment across Member States and coordinate action between National Bodies. Additionally, it aims to provide a public-private table to discuss how NAPCORE can help to increase the provision, exchange and usage of data, as well as the provision of services.

For interoperable data provision and usage, and provision of interoperable services, a harmonized enforcement approach across Europe is important. This way NAPCORE foresees that the intended

benefits can be achieved and that harmonized and interoperable ITS services can be deployed across Europe in the near future.

As the coordinated European network of NAPs, NAPCORE is now working on the creation of guidelines and recommendations for NAP strategies, governance and architecture, data standards and data quality, interoperability and accessibility, all of which contribute towards more harmonized NAPs.

With the revision of the ITS Directive, the tasks and roles of NAPs in general will grow, therefore it is important to align and balance expectations, goals, financing and available resources.

NAPCORE endorses the revision of the ITS Directive as a further step towards the creation of European-wide ITS solutions and looks forward to contributing to the important work in the subsequent delegated acts.