

POSITION PAPER

Brussels, 2 December 2019

A EUROPEAN GREEN DEAL OF STRATEGIC FORESIGHT: Reinvigorating Europe and driving an industrial renaissance for a clean planet for all

EXECUTIVE SUMMARY

Orgalim envisions a **European Green Deal that reinvigorates Europe and drives an industrial renaissance for a clean planet for all**. Orgalim supports enshrining the objective of climate neutrality by 2050 in a new Climate Law under the Green Deal to be presented by the incoming von der Leyen Commission. **A Green Deal with strategic foresight combines the target, a roadmap and measures** for delivering on climate neutrality by 2050 in the EU and globally, and thereby ensures the necessary confidence in the market that the target will be met. It should be **an enabling framework** combining legislative and non-legislative measures, incentivising and rewarding in a coherent and coordinated manner the development and deployment of clean tech to the benefit of EU citizens, the planet and EU industry and global tech leadership.

Core implementation measures in the next decade, which is critical to deliver on the Paris Agreement and for turning decarbonisation challenges into opportunities for a renewed, sustainable and competitive EU industry 2030, should include the following:

- **A timely and ambitious implementation of the clean energy package is the backbone:** National energy and climate plans set the foundations for a successful clean energy transition – the existing 6% energy efficiency and 2% renewables gaps need to be closed. Citizens and cooperatives should be empowered for the take up of renewables, energy efficiency, energy management and other clean tech solutions. The following no-regret measures should be implemented: Putting energy efficiency first; substituting the most polluting energy carriers; ensuring more electrification and alternative fuels deployment in the transport, buildings and industry sectors; supporting more sector coupling including power-to-x solutions; unlocking investment in high-tech infrastructures; and massively promoting research and development.
- **Giving carbon a meaningful and impactful price** that creates the right market signal for carbon reduction in a revenue neutral manner targeting high impact areas.
- **A thorough evaluation of the best way forward on a carbon border adjustment mechanism** that is in line with WTO requirements and ensures fair and free trade at all levels of the supply chains. The implementation of article 6 of the Paris Agreement should lay policy foundation for an emissions trading system leading to a global price on carbon.
- **Aligning technology, financing and objective** - the EU's climate ambitions need to be mainstreamed throughout the EU budget, the newly announced green financing strategy, and existing and new innovation, just transition, development and investment funds.

Orgalim represents Europe's technology industries: companies that innovate at the crossroads of digital and physical technology. Our industries develop and manufacture the products, systems and services that enable a prosperous and sustainable future. Ranging from large globally active corporations to regionally anchored small and medium-sized enterprises, the companies we represent directly employ 11 million people across Europe and generate an annual turnover of around €2,000 billion. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.

- **Energy taxation should reflect carbon content** - the Energy Taxation Directive should be revised and aligned with EU energy and climate directives.
- **Building strong acceptance with all stakeholders**, including industry
- **Embracing and tapping into the opportunities of digitalisation** for the climate, clean energy and circular economy transition
- Pursuing a **Circular Economy that supports Europe's climate ambition by driving systemic change and the sustainable use of resources throughout the economy** ("doing more with less")
- **Creating conditions for sustainable and connected mobility and buildings** that are equitable, efficient, safe and climate responsive
- **A European (Green) Hydrogen Strategy** that strengthens the EU's commitment for power-to-X in areas where it is evidenced to be the most efficient way to reduce greenhouse gas emissions

Since global challenges require global responses, **the EU should lead international negotiations to increase the level of climate neutrality ambition of other emitters by 2021**. Securing competitive and fair conditions for EU industry in a global context is essential.

The **EU long-term industrial strategy** should boost innovative framework conditions for a renewed, sustainable and competitive European industry 2030 in the digital age.

Strategic value chain initiatives and Important Projects of Common European Interest (IPCEIs) as an exemption to EU state aid rules must, where qualifying, drive investment into evidence based, future-proof, innovative areas and be guided by strategic considerations as outlined in [Orgalim's position paper of May 2019](#).

We specify our view in detail hereafter:

1. **Orgalim envisions a Green Deal that reinvigorates Europe and drives an industrial renaissance for a clean planet for all**

The future of Europe's technology industries is inextricably linked with the future of Europe and vice versa: In the next ten years, technological innovation can create change at a pace never seen before and open up immense opportunities for Europe if the right choices are made now. Orgalim has a [2030 industry vision for a renewed Europe](#) that is centred on three strategic imperatives:

- embracing the innovation-led transformation of European industry
- enabling European industry's long-term global leadership
- transforming societal challenges into future drivers of prosperity

Recommendation:

Orgalim calls for a reinvigorated Europe and industrial renaissance for a clean planet.

The European Green Deal to be presented by the incoming von der Leyen Commission and intended to become Europe's hallmark is an opportunity to set Europe on this track in a coherent, comprehensive, internationally aligned and well-coordinated manner.

2. **Environmental, social and economic sustainability go hand in hand and create benefits for all**

For Orgalim, economic prosperity, global industrial competitiveness and climate policy are mutually reinforcing. Europe's technology industries are a strategic partner for innovation led transformation, enabling EU leadership in achieving global climate neutrality and transforming societal challenges into drivers of future prosperity and competitiveness for a reinvigorated, reindustrialised Europe. The Green Deal and implementation of the EU's energy and climate goals are vital for such a reinvigorated, reindustrialised Europe, our future prosperity and global technology leadership.

Recommendation:

- *We call on the incoming Commission, the new Parliament and all Member States to join forces and focus all efforts on turning this global challenge into an opportunity and competitive advantage for EU citizens and EU industry alike: green, local, sustainable jobs and sustainable growth in line with the UN Sustainable Development Goals will drive new prosperity and welfare in Europe while protecting our planet. In line with Paris agreement and the 2018 IPCC 1,5° special report, EU carbon neutrality should be made an industrial opportunity bringing the benefit of the clean energy and climate transition to EU citizens.*

3. On the road to climate neutrality by 2050 - the next decade is critical

The incoming Commission and new European Parliament have a key responsibility as policy choices and decisions made in the five coming years will define the roadmap of the transformation across all sectors, and the shape of the EU energy system in 2050 in particular.

Recommendation:

- *The EU Green Deal should be an enabling framework combining legislative and non-legislative measures, incentivising and rewarding in a coherent and coordinated manner the development and deployment of clean tech to the benefit of EU citizens and EU global tech leadership.*
- *The Green Deal should focus on combining target, roadmap and measures for delivering on climate neutrality by 2050 in the EU and globally.*

4. Building strong acceptance with all stakeholders

Implementing the EU's climate ambitions requires profound transformation of the entire economy and society, which can only be managed in an inclusive, transparent, continuous and comprehensive stakeholder dialogue and consultation mechanism.

Recommendation:

- *Citizens and businesses should be at the core of the energy transition process, to ensure public support for the EU's energy and climate targets towards 2030 and beyond as well as public acceptance regarding the measures to be taken. The new Climate Pact to install Europe's climate culture should drive all efforts in building this acceptance with all affected stakeholders, including industry.*
- *Citizens and cooperatives should be empowered for the take up of renewables, energy efficiency, energy management and other clean tech solutions*

5. Implementing the Paris Agreement and laying out Europe's roadmap for 2050 means more than setting targets

Targets are important to set a common understanding and direction of travel, the envisioned EU climate neutrality target by 2050 and subsequent increase of its 2030 milestones included. The current 2030 policy framework and full implementation of the clean energy package in particular, would lead to -45% greenhouse gas (GHG) reduction in 2030 and -60% GHG reduction in 2050. However, any target is only as effective as the concrete measures that come with it and provide the necessary legal and regulatory certainty for EU tech industries to continue investing in clean tech innovation and deployment.

Recommendation:

- *Determined action and concrete measures in the next decade, and in particular an ambitious implementation of the clean energy package in Member States, are critical to setting us on the right path.*
- *Putting energy efficiency first and setting up and rolling out timely national energy and climate plans based on concrete national steps and contributions, are among the no regrets measures. Others include driving systemic change to promote the sustainable use of resources and 'do more with less'; substituting the most polluting energy carriers; ensuring more electrification and alternative fuels deployment in the transport, buildings and industry sectors; supporting more sector coupling between energy, buildings and transport systems, including power-to-x solutions*

and coupling between thermal heating, thermal storage and electricity; supporting energy storage solutions; unlocking investment in high-tech infrastructures; and massively promoting research and development.

- *Since global challenges require global responses, the EU should lead international negotiations to increase the level of climate neutrality ambition of other emitters by 2021.*

6. Many of the needed technologies are available now and their cost is declining - measures to accelerate deployment of mature technologies are needed

Over the period, costs for renewables and specifically renewable electricity generation went down very significantly, as is evidenced in the 2018 report on Electricity Generation Costs of the International Renewable Energy Agency (IRENA). Notwithstanding the need to further evolve in terms of their performance and costs, the Commission's Clean Planet For All Communication concludes that decarbonisation of the European economy is possible with existing technologies.

The Paris implementation process however needs to provide a true EU and global market perspective for Orgalim industries to remain in a position to keep the high investments made of the sector in this area.

Recommendation:

Creating the EU and global market for innovative, sustainable, clean tech and a fair level playing field should be a priority throughout EU policies.

7. The Green Deal should align “technology, financing and objective” – the EU’s climate ambitions need to be mainstreamed throughout the EU budget, the newly announced green financing strategy, and existing and new innovation and investment funds

The EU economy is expected to more than double by 2050 compared to 1990 even as it fully decarbonises. Together with a coherent enabling framework net-zero greenhouse gas emission is expected to have a moderate positive impact on GDP with benefits of up to 2% by 2050. EU citizens will reap multiple benefits from decarbonisation, such as better health or cleaner air.

Implementing the UN Sustainable Development Goals and the Paris Agreement to keep global warming to well below 2 degree Celsius requires profound transformation and massive investment. The Paris Agreement in particular includes the commitment to align financial flows with a pathway towards low-carbon and climate-resilient development. To achieve the EU's existing 2030 targets, including today's 40% cut in greenhouse gas emissions, the current investment gap of estimated 180 billion EUR annually has to be closed. According to the OECD, the world needs about €6.2 trillion of investment by 2030 to limit global warming to 2 degrees and more ambition will be needed on the road to climate neutrality by 2050. For a just and cost-efficient transition, a holistic, coherent and integrated approach that aligns technology, (public and private) finance and EU and global climate objectives and support for a renewed EU industrial strategy will be essential.

Recommendation:

- *EU funds need to be consistently aligned with the EU's 2050 climate neutrality objective and 2030 framework.*
- *An overall climate-proof multiannual financial framework that mainstreams at least 25% of the EU future budget (MFF) into climate action and a usable sustainable finance taxonomy are in our view essential for successfully implementing the Paris Agreement and the EU's energy and climate targets.*
- *The new energy lending policy and climate strategy of the European Investment Bank are an important market signal. By 2025, at least half of the financing of the EIB should be dedicated to climate action projects.*
- *Prioritise infrastructure investment in modern sustainable energy (smart grids), digital (5G, fibre, broadband), mobility and waste management infrastructures as a prerequisite for bringing the benefits of the ongoing transitions to consumers.*

- *The new Just Transition Fund should support win-win areas that clean tech creates for citizens, the planet and industry alike, such as energy efficiency of buildings projects: large renovation projects of social housings, schools or other public buildings mandating PVs on rooftops of industrial and commercial buildings or setting financing schemes that support residents in upfront financing are among such win-win measures.*
- *The new Sustainable Investment Fund should scale up investment in innovative, clean energy technology and close existing funding gaps, such as in the area of smart distribution grids. Investment funds should look beyond asset management to for example energy and resource management solutions.*
- *European state aid rules should be adapted to the new energy system and not only focus on direct CO₂ reducing technologie but also consider indirect CO₂ reducing technologies, such as energy storage or flexibility technologies.*

8. Carbon has a cost and needs a meaningful price to incentivise the market - an EU that leads international negotiations and carefully evaluates the best way forward on a carbon border adjustment mechanism in line with WTO rules and free, fair trade rules

Carbon has a cost and needs a meaningful price that rewards clean technology innovation and deployment. Clear and consistent policy objectives, targets and frameworks in this direction will be best suited to support market driven innovation while leaving concrete technology choices to the market. Today, the market does not sufficiently incentivise carbon reduction.

Climate policies have to guarantee a level playing field between materials and products manufactured in the EU and imported materials and products to secure Europe's short and long term global competitiveness.

How to best address carbon emissions embedded in materials and products imported from countries that do not share Europe's climate ambitions, however, requires careful reflection and evaluation to prevent undesired, potentially far reaching consequences and knock on effects in the entire economy. Orgalim urges caution in the selection of the precise measure, which needs to be in line with WTO rules and ensure free and fair trade at all levels of the supply chains.

From a global perspective, article 6 of the Paris Agreement aims at promoting integrated, holistic and balanced approaches that will assist governments in implementing their National Determined Contributions through voluntary international cooperation. This cooperation mechanism, if properly designed, should make it easier to achieve reduction targets and raise ambition. In particular, Article 6 could also establish a policy foundation for an emissions trading system, which could help lead to a global price on carbon.

Recommendation:

- *Orgalim calls for creating the right market signal for carbon reduction in a revenue neutral manner targeting the areas where carbon emissions happen.*
- *Giving carbon such a meaningful price can in our view hardly be achieved through the EU Emission Trading System (ETS) alone (see entry 10 on energy taxation).*
- *However, any carbon border mechanism requires thorough assessment during the next legislative term to ensure that it is in line with WTO requirements and free and fair trade. Such an impact assessment needs to cover all relevant aspects, and in particular up- and downstream effects next to direct and indirect costs, and it needs to demonstrate a profound understanding of all value chains.*
- *At this stage, linking ETS systems globally seems an important starting point for creating a level playing field. Negotiations on article 6 of the Paris Agreement on "cooperative approaches" at COP25 should pave the way for global action in this direction. In concrete terms, international negotiations on implementing article 6 should establish the policy foundation for an emissions trading system to help leading to a global price on carbon.*
- *With a view to 2050, Europe should strive for convergence of carbon prices at world level in different policy instruments, including cap and trade systems or carbon taxes.*

Orgalim believes in a structured dialogue with its trading partners to promote the exchange of know-how on carbon price trading systems and sequentially fair free trade of clean technologies. It is crucial to push for a global level playing field for European companies, to promote environmental protection and EU global technology leadership. European technology manufacturers need a robust international playing field, including for trade and for carbon dumping.

- *Decarbonisation will have a positive effect on industry's carbon footprint. However, a fair, measurable and verifiable mechanism is essential for a level playing field between products manufactured in the EU and imported goods. The Ecodesign and Energy Labelling frameworks provide such a framework for our sector. We remain committed to its successful implementation, through which our industry has to date contributed to realising almost half of the EU's 2020 energy efficiency target.*
- *A globally standardised carbon reporting system for industry to track emissions would be helpful. EU industry should be supported in the transition. A shift of EU industry outside the EU should be avoided.*

9. Implementing the clean energy package is a precondition for a successful Green Deal

Considering that the energy sector accounts for more than 75% of the EU's greenhouse gas emissions, the energy sector has an important role to play.

Recommendation:

With the adaptation of the Clean Energy Package the EU put in place a robust and ambitious energy and climate framework for 2030. Member States must now implement this framework in the most ambitious way. In this regard:

- *The National Energy & Climate Plans (NECPs) are crucial – they set the foundation for the clean energy transition and translate the new 2030 framework into individual national contributions. The identified ambition gap of 6% for energy efficiency and 2% for renewables needs to be closed. The final NECP due by end of this year should not only raise the ambitions but provide more clarity and predictability for businesses and financial sector to stimulate the necessary investments. The final NECPs should identify and quantify given investments needs and financing sources with concrete figures. The Commission's assessment highlights best practices, which can be a good source of benchmark, experience sharing, and potential collaboration.*
- *Where the Commission concludes that the draft plans are insufficient in terms of meeting the EU energy and climate targets, and when the Commission makes use of the possible Union measures as set up under the Clean Energy Package, those additional measures should be based on a horizontal approach (notably via the Energy Efficiency Directive or the Energy Performance of Buildings Directive) as most of the savings potentials lie at systems level while those at the product level have already been tapped.*
- *Preserving the overall coherence and consistency is crucial for the next decades and future legislative frameworks. The future legislative files must be put in a coherent and coordinated framework which is in line with the many interlinked and mutually dependent issues.*

10. Energy taxation rules should be aligned with Europe's climate and clean energy ambitions

The Energy Taxation Directive has initially made a positive contribution to the internal market, however current rules do not contribute to the new EU regulatory framework and policy objectives in the area of climate and energy, where technology, national tax rates and energy markets have all evolved considerably over the past 15 years. Also, there is a high divergence in national energy tax rates, which is not in line with other policy instruments and can lead to fragmentation of the internal market.

Recommendation:

In our view, energy taxation should reflect carbon content.

The Energy Taxation Directive should be revised and aligned with EU energy and climate directives.

11. Digitalisation is an important enabler and accelerator of the clean energy and climate transition

Digitalisation brings benefits throughout the existing top down energy value chain, from generation to transmission, distribution and end-use, primarily through productivity increases and improved asset management. In addition, digitalisation accelerates the clean-energy-for-all transition on the road to global climate neutrality where a centralised and decentralised energy system will coexist and fairly compete with each other. In this new energy landscape, new products and services altering electricity demand and new digital marketplaces will transform the existing market more fundamentally, bottom up and more long term. Embracing and accelerating digitalisation is in our view a prerequisite for achieving the climate goals: it allows new services and business models to develop and enables a clean energy transition to climate neutrality that is cost-efficient.

Europe has an opportunity to lead in the race to digitalise the business-to-business sector, including in developing the proper policy response to new challenges, such as cybersecurity or data management.

Recommendation:

- *Embrace and tap into the opportunities of digitalisation for the climate, clean energy and circular economy transition throughout the economy in the Green Deal.*
- *Improve connectivity and set in place the relevant physical (clean energy, digital and waste management) infrastructure.*
- *Build trust and credibility for enabling new partnerships: an EU data framework that ensures both, fair access to data ("data sharing") and fair protection of data ("data privacy") in the Business-to-Business as much as in the Business-to-Consumer sphere should be established.*
- *Allow technology innovation to happen in Europe and make EU regulation smarter, dynamic and consistent to be fit-for-purpose, such as by allowing sandboxing.*
- *As regards the energy sector:*
 - *Ensure that distribution system operators (DSOs) operate as neutral market facilitators and align network tariffs and DSO remuneration with the new situation to stir investment in smart grids – particularly at distribution level*
 - *Give price signals reflecting actual scarcity, and value flexibility at a fair price through well-designed dynamic retail tariffs*
 - *Increase trust and confidence by tackling data privacy and cybersecurity and grant fair access to data for new market entrants*
 - *Encourage integrated system planning and operation*
 - *Ensure interoperability and common standards*
 - *Substitute the most polluting energy carriers and opt for more electrification and alternative fuels deployment in the transport, buildings and industry sectors*

12. A Circular Economy that supports Europe's climate ambition drives systemic change and the sustainable use of resources throughout the economy ("doing more with less")

Optimising the use of resources throughout the economy makes environmental and economic sense and contributes to climate mitigation. The co-benefits of achieving energy efficiency in a wider resource efficiency agenda should contribute to meeting the goals in a faster and cost-efficient manner. Coupled with the possibilities of digitalisation and data analysis, Circular Economy creates space for new business models and enables the optimisation of energy and resource use throughout the life cycle.

Recommendation:

- *It is important that concrete implementation remains open, market driven and globally connectable.*
- *Creating the market through coherent policy objectives coupled with incentives throughout all strands of policies need to be prioritised since retail markets do not reward for circularity today; removing existing conflicts between EU waste, product and chemicals policy objectives and public authorities leading by example by buying sustainable products would be important first steps. The life cycle costing principle should be applied in public procurement.*
- *Promote industrial symbiosis.*

- *The Ecodesign Directive 2009/125/EC provides the EU harmonised framework for the setting of ecodesign requirements on energy related products and as such ensures the functioning of the EU internal market for these products. Upholding the Ecodesign Directive as the environmental product policy tool for our sector is essential from this point of view. The given criteria of "minimising life cycle impacts", "based on scientific evidence", "at least life cycle cost" and "setting measurable, enforceable requirements case by case" in "big savings areas" are the key criteria for continued implementation success and acceptance, including on circular economy related product parameters.*
- *Secure on the ground market surveillance and enforcement hand in hand with any new implementation measure, especially in the area of product policy.*
- *As regards waste policy, apply strict landfill and recycling targets, set minimum quality criteria for secondary raw materials and complete producer responsibility with "shared responsibility obligations" for all actors in all steps of the waste management chain. Harmonised EU and international waste treatment standards should be promoted and waste shipment rules should live up to circular economy objectives.*
- *As regards buildings/construction, a full and timely implementation of the Energy Performance of Buildings Directive 2018/844/EU is essential for delivering on Europe's climate goals. The focus should be on tapping into the opportunities of technical buildings systems and further digitally enabled technologies, such as digital twinning or building information modelling (BIM) for promoting sustainable buildings from a life cycle perspective.*
- *As regards the sustainable use of water, strive for zero-water leakage and digitally enabled water technology solutions in support of Europe's climate ambitions– public authorities should lead in upgrading water and waste water infrastructure in (increasingly smart) cities.*
- *As a global industry with many technology champions, European technology industries require an EU raw material policy that:*
 - *Ensures easy and fair access to competitive, affordable and quality raw materials (primary and secondary) that satisfy technological needs and safety.*
 - *Pursues a "proactive international cooperation strategy" and smooth trade relationships of the EU with its global partners considering Europe's trade intensity and that 70-85% of resource efficiency potentials lie outside the EU.*
 - *Associates the definition of critical raw materials not only with high economic importance and high supply risk, but with resource efficiency efforts in the broadest sense: focusing on recycling alone is not enough. The EU should for example also support research and deployment of substitution or further energy and resource management solutions.*
 - *Fully taps into the opportunities of digitalisation for resource efficiency: IoT, process monitoring, data capture and analytics and allied services, digital twinning, digital manufacturing, automatisisation and monitoring, robotization or 3D printing, all can support Europe in "doing more with less" and simultaneously increase sustainability and competitiveness.*

13. Sustainable mobility and buildings as a priority for delivering on Europe's net-zero ambition: Create conditions for sustainable and connected mobility and buildings that are equitable, efficient, safe and climate responsive

For Orgalim, the future of mobility is multimodal, clean, safe and increasingly (inter-)connected. In particular, Europe still has a chance to become a first mover in cooperative intelligent transport systems ("C-ITS"), gain global leadership and create major business opportunities for Europe in this area while increasing the safety, security, health and convenience for passengers and drivers. Cooperative Intelligent Transport Systems (C-ITS) will allow to adjust traffic operations on a continuous basis and further improve efficiency. C-ITS play a crucial role in reaping the benefits of digitisation of the transport sector for both public and private stakeholders, including improved road safety or comfort of driving.

As regards buildings, modernising Europe's building stock will be essential for delivering on climate ambitions considering that the building sector accounts for 40% the EU's energy consumption and 36% of the EU's CO₂ emissions, while significant energy efficiency potential in this sector remain untapped. Two thirds of our buildings were built before energy performance standards even existed and roughly 80% of today's existing building stock should still be there in 2050. And as the energy sector undergoes fundamental transformation, buildings are turning into virtual power houses that consume and produce electricity at the same time to the overall satisfaction of their occupants and that increase the overall energy efficiency of the grid.

- Recommendations regarding buildings:

The ongoing implementation of Directive 2018/844/EU (EPBD) should:

- *Implement on time the new requirements of non-residential buildings are equipped with building automation and control systems by 2025 according to articles 14.2 and 15.2.*
- *Set in place timely and determined long term strategies that live up to the commitments made at EU and international level; particular emphasis should be laid on prioritising renovation of the existing buildings stock and the roll out of technical buildings systems.*
- *Properly link the long-term strategies to the new Governance Regulation.*
- *Think "actual performance" and "part load" for renovations and for new-built, at least for larger buildings.*

- Recommendations regarding sustainable mobility:

- *Swiftly implementing article 8 of the amended Directive 2018/844/EU (EPBD) regarding the installation of recharging points and ducting infrastructure in buildings and facilitate the deployment of smart charging from the outset.*
- *Setting in place clear requirements and measurable targets during the upcoming review of Directive 2014/94/EU on the deployment of alternative fuels infrastructure (DAFI): in particular, setting recommendations on the level of deployment of smart charging and power-to-x technologies and requiring this information in National Policy Frameworks during the next DAFI review*
- *Maximising synergies between transport, energy and telecommunications through the integration of smart grid technologies*
- *Supporting the acceleration of the deployment of alternative fuels infrastructure in the future EU Multiannual Financial Framework*
- *Making use of the EU's energy taxation framework to incentivise the uptake of innovative technologies*
- *Set the first specifications for the short term deployment of the "Day1 C-ITS services" through article 7 of the ITS Directive 2010/40/EU.*

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