Review of European legislation/policies relevant to SUMPs

1. Summary of findings from review of European legislation and policies

The key policy statements at a European Union level that affect urban mobility planning are:

- EC Action Plan on Urban Mobility (2009 - 2013)

The key content of these policy documents is described in sub-sections 3.2 and 3.3, respectively. Other legislation and policy documents relevant to the subject area are described in subsequent sub-sections, but many of these have been superseded by these two more recent documents. Both the Action Plan on Urban Mobility and the White Paper are very new, and so it is difficult to make judgments as to their impact, either to date, or in the future. The Action Plan has not yet reached its mid-point, and so has not yet been subject to a mid-term review. Similarly, the Roadmap outlined in the 2011 White Paper sets out a policy vision that extends far into the future. Whilst it is to be anticipated that the financial incentives provided by the CIVITAS Plus and Intelligent Energy Europe (IEE) funding mechanisms will encourage local authorities to implement the White Paper’s long-term policies, it is too early, at this stage, to state whether this has been the case. The same also applies to more detailed recommendations, such as the use of a European urban mobility scoreboard to encourage policy implementation.

As described in the following sub-sections, guidance provided by the Commission is detailed, and targeted at providing practical assistance for practitioners engaged in implementing sustainable mobility action plans. Furthermore, Action 2 of the current EC Action Plan aims to raise awareness of the funding opportunities that are available. The Action Plan was derived from a thorough and wide-ranging process of consultation with practitioners who are responsible for implementation, so the advice and guidance provided should be tailored to the needs of these practitioners. The advice given is also very practical, and directly relates to SUMPs. There is also an emphasis on the dissemination of knowledge, through training and the showcasing of good practice, and this is supported by the availability of funding for both practitioner training and demonstration projects. A specific example of support for improving sustainable urban mobility planning is provided by the ELTIS portal, which is a networking platform through which local authority practitioners can informally benchmark, and learn from one another.

A common thread that runs through policies and guidance relating to SUMPs is the issue of integration. This refers to the importance of the integration of policies from different sectors (most importantly transport and land-use planning), at different levels (i.e. European, National, regional and local) and across geographical boundaries. There is encouragement for linking energy & climate change and transport policy domains, and encouragement also for transport & mobility issues to be incorporated into Sustainable Energy Action Plans (SEAPs).

The new White Paper’s Roadmap towards a single transport area is closely aligned to the Roadmap for Moving to a Low-Carbon Economy. In summary, it uses three broad mechanisms for reducing the environmental impact of the transport sector: increasing the efficiency with which current transport systems provide mobility, encouraging the use of more sustainable vehicles, and promoting modal shift to more sustainable modes of transport. The White Paper includes specific targets for emissions reduction, specifically a 60% decrease in CO2 from transport by 2050. This goal is supported by the Resource Efficient Europe Initiative’s target of an 80% overall domestic reduction in Greenhouse Gas emissions (GHG) by 2050, compared with 1990 levels.

The current EC Thematic Strategy on the Urban Environment, which covers environmental issues in general, also includes a section on transport. It lays emphasis on the importance of both stakeholder consultation, and the training of local authority personnel who are charged with the task of implementing sustainable mobility policies.
This section also describes the contribution made by the EU’s Strategy for Sustainable Development, the Adapting to Climate Change White Paper, the 2011 Energy Efficiency Plan, the current Ambient Air Quality Directive, the Action Plan for the Deployment of Intelligent Transport Systems (ITS) in Europe, and current policies on the Promotion of Clean and Energy-Efficient Road Transport Vehicles.

2. EC Action Plan on Urban Mobility (2009 - 2013)

The Action Plan on Urban Mobility was adopted on the 30th of September 2009, and follows the 2007 Green Paper “Towards a New Culture for Urban Mobility”. It also follows the EC’s Communication document “A Sustainable Future for Transport: Towards an Integrated, Technology-led and User Friendly System”, which calls for coordination of actions at a local, regional and national level. The detailed recommendations of the Action Plan are the result of feedback received during the stakeholder consultation exercise that was initiated by the aforementioned Green Paper.

This document is directly relevant to the work of the QUEST Project, in as much as it provides a comprehensive package of support for helping local, regional and national authorities to achieve urban mobility sustainability targets. The Action Plan makes specific reference to Sustainable Urban Mobility Plans (SUMPs).

The Communication emphasises the importance of local authorities taking measures to encourage sustainable mobility, but also emphasises the importance of there being a framework of policy and legislation at EU level to support them in achieving this. The EU’s approach is very much in line with the principle of subsidiarity, in that it pledges the necessary support for local authorities in creating effective Sustainable Urban Mobility Plans (SUMPs), whilst acknowledging that the detail of such SUMPs will necessarily be dictated by local conditions and resources. The EU provides support in the form of funding, and in encouraging the exchange of information on best practice. It proposes both short- and medium-term actions which authorities are invited to commit to on a voluntary basis. This document also claims that, at a higher level, the EU can facilitate the creation of more sustainable transport across the Single Market area by encouraging interoperability, and by providing uniformity in relevant standards, rules and technologies. The role of the authorities is to make funding available, and to provide a regulatory framework and a planning function, at a local, regional and national level.

The primary challenges addressed by the Plan are the need to make transport more sustainable in the environmental contexts of air pollution, CO2 emissions and noise, and the need to improve economic competitiveness by reducing traffic congestion. The document also acknowledges that other important priorities should be considered, such as public health, the needs of older and disabled people and their families, and social cohesion in general.

The stated aims of the Action Plan include:

- promoting integrated policies to deal with the complexity of transport systems
- optimising urban mobility to encourage effective integration between different transport networks, and
- sharing experience and knowledge.

The 20 numbered Actions are categorised within one of six themes:

- Theme 1. Promoting Integrated Policies
- Theme 2. Focusing on Citizens
- Theme 3. Greening Urban Transport
- Theme 4. Strengthening Funding
- Theme 5. Sharing Experience and Knowledge
- Theme 6. Optimising Urban Mobility.

The following Actions are of most relevance to the creation and evaluation of SUMPs:

- Action 1 (Theme 1): Accelerating the take-up of sustainable urban mobility plans. One means adopted by the European Commission for achieving this is the linking of energy and climate change policies with transport. For example, the EU encourages transport and mobility issues to be included in the Sustainable Energy Action Plans (SEAPs) prepared by cities participating in the Covenant of Mayors. This is covered by guidelines on the development of SEAPs. As of June 2011, five SEAPs had been approved, and 489 were under evaluation throughout...
Europe. This Action is also supported by the ELTIS Urban Mobility Portal (Intelligent Energy Europe Programme (IEE)), which was relaunched in March 2011. The Commission's pledge in the short term is to provide support for SUMPs covering freight and passenger transport in urban and peri-urban areas, in the form of guidance materials, the promotion of best practice exchange, the identification of benchmarks and support for education for urban mobility professionals. Longer-term support is defined in general terms as being through incentives and recommendations.

- **Action 2 (Theme 1): Sustainable urban mobility and regional policy.** This Action is evidence of the Commission's pledge to increase awareness, among authorities involved in SUMPs, of funding that is available from the Structural and Cohesion Funds, and from the European Investment Bank. The Commission will achieve this by emphasising the links between urban transport and the trans-European transport network, and between sustainable urban mobility measures and regional policy objectives.

- **Action 8 (Theme 2): Campaigns on sustainable mobility behaviour.** The Commission recognises the importance of education, information and awareness-raising in creating a culture that encourages sustainable urban mobility, and so will support such campaigns at all levels. An example of on-going support is European Mobility Week, and the related award scheme. Consideration is being given to introducing a special award relating to the adoption of SUMPs.

- **Action 14 (Theme 4): Optimising existing funding sources.** The Structural and Cohesion Funds, mentioned in Action 2, are the main source of funding for investment in infrastructure and rolling stock, which is crucial for creating the conditions for more sustainable urban mobility. The Action Plan describes how the Commission will, in addition, fund RTD and Demonstration activities within the sustainable urban mobility priority area of FP7's "Transport" Theme. Action 14 also includes the continuation of EC support for Intelligent Energy Europe's STEER Programme, the CIVITAS Initiative, URBACT and the Information & Communication Technologies Policy Support Programme. CIVITAS funds projects which demonstrate sustainable urban mobility locally. Since 2002, through CIVITAS I, CIVITAS II and CIVITAS Plus, €180m has been provided for 58 European cities, and an indicative budget of €18m is being considered for proposals for CIVITAS Plus II funding. The indicative budget for the 2011 round of proposals under the STEER Programme is some €12m.

- **Action 16 (Theme 5): Upgrading data and statistics.** To facilitate planning for sustainable urban transport and mobility, the Commission undertook to fund a study on how the collection of relevant data could be improved. This is due to a perceived lack of data and statistics in this area.

- **Action 17 (Theme 5): Setting up an urban mobility observatory.** Related to Action 16, the Commission pledged to support urban transport professionals by providing a "virtual platform" which would enable the sharing of data and statistics, the exchange of best practice, and the ready availability of training and educational materials. This has been realised in the form of the ELTIS (European Local Transport Information Service) portal, which provides practitioners with an on-line resource that is specifically focused on SUMPs.

- **Action 19 (Theme 6): Urban freight transport.** The issue of the place of freight transport in SUMPs is not overlooked in the Action Plan, in particular the importance of maximising the efficiency of “last mile” delivery. Action 19 aims to provide assistance on how freight transport can be incorporated in local plans and policies, and how the flow of goods can be better managed and monitored. This aspect of sustainable urban mobility planning is linked to the Freight Logistics Action Plan. One output from this Action was the “Conference on Urban Freight Transport and Logistics: Innovative and Sustainable Solutions for Europe”, which was held in Brussels in November 2010.

The ELTIS portal, mentioned under Action 17, describes itself as “Europe's main portal on urban mobility”. It facilitates the exchange of information, knowledge and experience regarding urban mobility, and is aimed at individuals working in transport. ELTIS also provides access to a separate website about SUMPs, at [http://www.mobilityplans.eu/index.php](http://www.mobilityplans.eu/index.php).

The SUMP website provides information about the benefits of SUMPs, and guidelines on the different stages of developing and implementing SUMPs. These guidelines include support with such practical issues as assessing the baseline, setting targets, developing measures, allocating responsibilities and funding, and evaluation. The guidelines also incorporate examples of good practice.
Among the 20 Actions that are itemised in the Action Plan, those which have less relevance to the SUMPs at a local level, but nevertheless have an important role to play in facilitating more sustainable urban mobility, are “Action 5 (Theme 2): Improving accessibility for persons with reduced mobility”, “Action 6 (Theme 2): Improving travel information” and “Action 20 (Theme 6): Intelligent transport systems (ITS) for urban mobility”. These three Actions all address issues which make more sustainable modes of transport easier and more pleasant to use for all members of the travelling public. In relation to Action 20, the Commission pledges to provide assistance on ITS applications for urban mobility, as a complement to the ITS Action Plan. This will include consideration of support for electronic ticketing and payment, the use of smart cards in urban transport, the interoperability of ticketing and payment systems, traffic management, travel information and travel demand management.


This White Paper was published in March 2011. It has succeeded the existing EC White Paper on Transport, “European Transport Policy for 2010: Time to Decide”, and the EC Communication “A Sustainable Future for Transport: Towards an Integrated, Technology-Led and User-Friendly System”, which was the first step in defining future European transport policy. The White Paper also complements the “EC Roadmap for Moving to a Low-Carbon Economy in 2050”.

The earlier White Paper, which included an action programme up to 2010, comprised some 60 measures to be taken at a European Commission level, but none of these related to SUMPs. The most relevant section of this earlier document was a sub-section, (IV of Part 3), relating to the rationalisation of urban transport. This emphasised the importance of placing users at the heart of transport policy, and promoted good practice.

The EC Communication “A Sustainable Future for Transport: Towards an Integrated, Technology-Led and User-Friendly System”, published by the DG for Energy and Transport, reflects upon future directions and priorities for transport policy. The content of this Communication is based upon a specific evaluation study of European transport policy, the findings from focus groups, output from “Transvisions” study (which considered some possible low-carbon scenarios for transport), and the results of a stakeholder consultation exercise that featured a high-level stakeholder conference held in March 2009. The stated objective of the document was to stimulate further debate, to identify policy options that might be considered in the later 2010 White Paper.

The high-level EC Roadmap for Moving to a Low-Carbon Economy is part of the Europe 2020 Strategy for a Resource Efficient Europe, and comprises a plan to meet the long-term target of reducing 1990 levels of domestic emissions by 80%-95%, by 2050. Transport is one of a number of sectors addressed by this roadmap. Means for the transport sector to make the transition to a low-carbon economy include improved operational efficiency through better information and communication, pricing schemes, improved vehicle efficiency and the expansion of public transport.

The new White Paper calls for a reduction in CO2 emissions from transport of at least 60% by 2050, but a key element of the overall strategy is ensuring the growth of the transport system and the maintenance of mobility levels whilst emissions reduction targets are achieved. The document describes various targets relating to different types of journey, including those within cities. This includes a proposal for a substantial shift to cleaner cars and fuels, public transport and active travel, entailing a 50% shift away from conventionally fuelled cars by 2030, phasing them out in cities by 2050. Other goals specified include the establishment of a framework for a European multi-modal transport information and payment system, and the achievement of “close to zero” fatalities in road transport by 2050, with road casualties in the EU halved by 2020.

The White Paper identifies the need for mixed urban strategies to reduce congestion and emissions, involving land-use planning, pricing schemes, more efficient public transport services, infrastructure for non-motorised modes and charging/refuelling facilities for clean vehicles. The document stipulates that cities above a certain size should be encouraged to develop urban mobility plans which bring all of these elements together. These plans should be fully aligned with integrated urban development plans.
The White Paper presents a set of measures to be used for achieving specific targets. Some of these are directly relevant to the creation and evaluation of SUMPs at a local level; for instance:

- initiatives for sustainable urban mobility, such as Smart Mobility Partnerships and Demonstration Projects, which include initiatives on urban road pricing and access restrictions
- the introduction of procedures and financial assistance, at a European level, for urban mobility audits and urban mobility plans that are undertaken by local authorities on a voluntary basis.
- the setting up of a European urban mobility scoreboard based on common targets
- consideration of the possibility of introducing a mandatory approach for cities of a certain size, according to national standards, and based on EU guidelines
- the linking of regional development and cohesion funds to cities and regions that have submitted current, independently validated urban mobility performance and sustainability audit certificates
- examination of the possibility of a European support framework for progressive implementation of urban mobility plans in European cities
- development of integrated urban mobility in a possible Smart Cities Innovation Partnership
- encouragement for large employers to develop corporate mobility management plans.

4. Other important legislation and policy documents


“Europe 2020” is the European Union's high-level strategy for smart, sustainable and inclusive growth for the ten-year period up to and including 2020. The strategy has five headline targets at a European level; one of these relates to climate change and energy, and it has several sub-targets. The most relevant of these sub-targets is for greenhouse gas emissions (GHG) to be 20% lower than they were in 1990, by 2020. (A desire is expressed for GHG emissions to be reduced by up to 30%, if conditions allow). The sub-targets are translated into national targets for each EU Member State, reflecting the level of contribution each is able to make to the overall EU reduction. National targets are set in each country’s Annual National Reform Programme.

The Europe 2020 strategy refers to the use of existing tools to boost growth. These include investment via the European Regional Development Fund, European Social Fund and Cohesion Fund to support “smart transport”, among other activities. The overall strategy comprises several flagship initiatives, including Resource Efficient Europe, under the category of Sustainable Growth, which aims to work towards a resource efficient, low carbon economy. The objective, here, is to provide a long-term framework for policy actions, including actions relating to transport. The key components of this long-term framework are a series of co-ordinated roadmaps. The roadmaps most relevant to SUMPs are the “Roadmap for Moving to a Low-Carbon Economy” and “Roadmap to a Single Transport Area: Towards a Competitive and Resource Efficient Transport System (EC White Paper)”, which have both been described in the previous section.

The essential link between this high-level strategy document, and local and regional authorities, is the Europe 2020 Monitoring Platform. This Platform was set up, with more than 150 regions and cities involved, by the European Union’s Committee of the Regions, an advisory body representing regional and local authorities in Europe. This enables members to contribute to the EU debate on Europe 2020, and facilitates the exchange of good practice between local and regional policy makers. The Monitoring Platform provides,

- an interactive website: http://cor.europa.eu/europe2020
- policy focused workshops with Europe 2020 members, experts and observers
- an annual questionnaire for collecting data from members on the implementation of the Europe 2020 agenda.

Another on-line networking platform that is provided by the European Commission is Regio Network 2020: https://webgate.ec.europa.eu/regionetwork2020/. This is also intended to help regional and local authorities to contribute to achieving Europe 2020 goals.
Local transport projects may receive support from the funds referred to above. For example, the European Regional Development Fund (ERDF) finances the INTERREG Initiative (Innovation and Environment Regions of Europe Sharing Solutions). INTERREG IVC, which is part of the current initiative, which covers the period 2007-13, has provided €15m of funding for seven projects related to sustainable urban transport.

**4.2 EC Thematic Strategy on the Urban Environment (2006 onwards)**

As the title of the document suggests, this Strategy considers the environmental challenges of Europe's urban areas in general, so has a wider scope than the domain of transport. However, transport related issues feature prominently, with the discussion featuring air quality, traffic levels & congestion, greenhouse gas emissions and urban sprawl. SUMP are featured in as much as the Strategy contains some strong recommendations for local authorities to develop and implement such Plans, and it proposes some key actions relating to the production of guidance to assist in this process. The Strategy notes the importance of long-term transport planning, in order to ensure that financial arrangements are in place for procuring the necessary infrastructure and vehicles for the creation of an attractive and efficient public transport network, and to ensure coordination with land-use planning. It is noted that transport plans should take account of safety & security issues, access to goods & services, air pollution, noise levels, greenhouse gas emissions and energy consumption, and that both passenger and freight transport should be included.

A particularly strong recommendation is that effective consultation with all stakeholders should be a key feature in the implementation of environmental legislation at a local level, and the SUMP is the appropriate vehicle for such consultation. There is also a response to calls from “many local authorities” for training. This refers to training for transport personnel in the specific skills that are required for adopting an integrated approach to management. Such training should cover environmental legislation, effective public participation, changing people’s choices & behaviour, and cross-sector cooperation. The Strategy specifies face-to-face training as being the most effective method of learning, and identifies exchange programmes for local authority officials, possibly supported by the LIFE+ Regulation, as being an option.

The Strategy has something to say on the relationship between the local authorities and the European Union, emphasising that it is the former that have a decisive role in improving the urban environment. It states that local authorities should be encouraged to adopt increasingly integrated approaches to managing the urban environment, guided by long-term and strategic action plans. It adds, however, that action needs to be taken at European, national and regional levels, and that the EU has a role to play in supporting Member States and local authorities by promoting best practice and encouraging networking between cities.

The document concludes by quoting two examples of good practice – these are from Copenhagen and Nantes. The former relates to the City of Copenhagen’s adoption of a “Local Agenda 21 Strategy”, which is a requirement under Danish law. This involves the environmental management system for the entire city, together with more specific strategies for traffic, waste, CO2 and risk management. The City reports the identification of early benefits in relation to air quality, greenhouse gas emissions, energy use and ecological footprint. An additional positive impact has been improved social inclusion and better community relations as a result of work carried out with ethnic minorities on the development of local solutions to environmental issues.

The example from Nantes features the conurbation’s “Plan de Déplacements Urbains (PDU)”, which is a sustainable urban mobility plan that is required under French law. This Plan sets out to meet statutory targets that have been set for controlling demand for the use of private cars (specifically, a reduction to 50% of all journeys made, from a starting-point of 62% in 2002), reducing CO2 emissions, air pollutants and noise, managing car parking supply, promoting cycling and supporting the development of travel plans by private businesses and public bodies. The document lists progress that has been made in Nantes to date, in the form of a completely renewed and clean bus fleet, extensions to the public transport network, integrated ticketing for all public transport modes, voluntary travel plans developed by major employers in the city, improvements to the city’s cycling network, and the creation of Park and Ride services.

This Communication consists of a second progress report on the Sustainable Development Strategy of the European Union (EU SDS), in response to a request for such a report from the European Council in December 2007. The Review reports EU policy to have progressed in all of the Strategy’s priority areas, but also notes the persistence of some unsustainable trends, such as a continued rise in energy consumption within the transport sector. Whilst there is no specific reference to SUMP in this document, reference is made to recent policy developments, including the launch of new actions as a follow-up to the Green Paper “Towards a New Culture for Urban Mobility”, published by the DG for Energy and Transport in 2008.


This White Paper sets out an EU-wide strategy for reducing the vulnerability to climate change of Member States. It builds on consultation launched in 2007 by the Green Paper “Adapting to Climate Change in Europe”. Four actions are emphasised: 1. Building a knowledge base; 2. Integrating adaptation into key policy areas; 3. Delivering adaptation using a combination of policies; 4. Encouraging international cooperation, (although there is an emphasis on cooperation at all levels, including the EU and national, regional and local authorities). Issues of water scarcity and the impact on farming are discussed, but there is no specific reference to urban mobility.

4.5 Renewed EU Strategy for Sustainable Development (2006 onwards)

This Renewed EU Strategy was produced following a review in 2005 of the 2001 EU SDS, and is an over-arching Strategy on sustainable development for all EU policies. Sustainable transport is one of seven key challenges listed in this Strategy. Among the various actions proposed is that local authorities should develop and implement SUMP, taking into account EC technical guidance from 2006, and taking steps towards closer cooperation between cities and their surrounding regions. Such proposals are in line with the EC’s Thematic Strategy on the Urban Environment, which is described above.

4.6 Energy Efficiency Plan (2011)

The Energy Efficiency Plan aims to secure smart, sustainable and inclusive growth, as a contribution to the development of a resource efficient economy, and the enhancement of the security of energy supply. Transport is identified as the sector having the second-largest potential for contributing to energy saving, (after buildings), and reference is made to the (then) forthcoming White Paper on Transport.

4.7 Ambient Air Quality Directive (2008 - On-going)

This Directive relates to ambient air quality and cleaner air in Europe’s agglomerations, and has a focus on assessing, and then preventing or reducing, the harmful effects of poor air quality on human health and the environment. The planning document relevant to this Directive is the Air Quality Plan (AQP), which is analogous to the SUMP. The AQP is required should air quality levels fall below a defined threshold. The Directive specifies assessment regimes that relate to the measurement of specific emissions, such as NOx and PM10, at the level of individual agglomerations and urban zones.
4.8 Energy End-use Efficiency and Energy Services Directive (2006 - On-going)

This Directive relates to the commitment to control demand for energy sources through improvements to the efficiency of energy use by the end-user. The main objective is to contribute to reducing primary energy consumption, in order to mitigate CO2, and other greenhouse gas, emissions, so contributing to meeting Kyoto climate change commitments. The main focus of the Directive is the use of energy in the home, but it is also stated that the transport sector has an important role to play in energy efficiency and energy savings.


This Directive was adopted in 2010, to accelerate the deployment of ITS throughout Europe. It is supported by the EC Action Plan for Deployment of ITS in Europe, which is described below.


This Action Plan outlines six priority areas for action, including “European ITS co-operation and coordination”, and “The continuity of traffic and freight management ITS services on European transport corridors, and in conurbations”. Under the priority area of the continuity of traffic and freight management ITS services, it is proposed to define an ITS framework architecture for urban transport mobility. On the priority relating to European ITS co-operation and coordination, it was proposed to set up an ITS Collaboration Platform, from the Summer of 2010, to promote ITS initiatives in the area of urban mobility.

4.11 Promotion of Clean and Energy Efficient Road Transport Vehicles (2009 – On-going)

This Directive requires public authorities, and some operators, when procuring road transport vehicles, to take account of the lifetime energy and environmental impacts of these vehicles. Such considerations should include the energy consumption and emissions characteristics of the vehicles. It is intended that contracting authorities should, by their actions, promote and stimulate the market for clean and energy efficient public transport vehicles.


This overarching package of strategies seeks to improve the sustainability of the transport sector in Europe. It seeks to do this, partly, through encouraging the price of transport to the consumer to more accurately reflect the real cost of transport to society as a whole, by considering environmental impacts and congestion. There are five parts to the strategy package:

- Greening Transport Communication – which summarised the whole package, and described new initiatives that the European Commission was to introduce from 2009 onwards.
- Greening Transport Inventory – which described EU actions currently in place for greening transport.
- Strategy to Internalise the External Costs of Transport – which described how transport prices could be made to more accurately reflect the true cost to society of transport.
- Proposal for a Directive on Road Tolls for Lorries.
- Rail Transport and Interoperability Communication – which addressed the issue of noise levels associated with rail freight trains.

This summary is produced in the framework of the QUEST project’s State of the Art Analysis.

The full document is available from [www.quest-project.eu](http://www.quest-project.eu) and is titled ‘State of the Art of Urban Mobility Assessment’.

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