

Directorate-General for Mobility and Transport (DG MOVE)  
Rue Demot / Demotstraat 28  
1040, Brussels

Brussels, 12 January 2023

Dear Mr. Henrik Hololei,

As the European Commission increasingly turns its attention to “new mobility”, we must express our deep concern about the growing exclusion of the car rental sector from formal discussions and proposed solutions relating to urban mobility at an EU-level. As leading car rental companies in Europe – Avis Budget Group, Hertz International and Europcar Mobility Group – we form an important share of the vehicular mobility landscape and can bring expertise and solutions to these discussions.

In particular, we believe the Commission’s decision not to award our companies, or our trade association, Leaseurope, full member status in the Commission’s new Expert Group on Urban Mobility ([EGUM](#)) overlooks important contributions that we can make to the debate. Our experience and expertise in this area cannot be replicated by other accepted stakeholders such as ride-hailing association MOVE EU or car manufacturers association ACEA.

Our sector represents one of the earliest forms of mobility as a service (MaaS) and expects to play an important role in the shift from a vehicle “ownership” to a vehicle “usage” model, helping to reduce urban congestion and pollution. We have great experience in management of large fleets of shared vehicles, including ever increasing numbers of electric vehicles. Excluding our industry’s views in discussions on the future of urban mobility therefore represents a **missed opportunity for the Commission to benefit from our expertise and ideas** on issues such as the current and future role of shared vehicles as part of urban mobility solutions, new service models for provision of shared electric vehicles, and the specific challenges of Urban Vehicle Access Regulations (UVARs) for shared vehicles.

We are also finding a perception that car rental companies are part of the “traditional” transportation model and not part of the “solution” for urban mobility, whereas car sharing is seen as something new and progressive and is therefore typically considered and accommodated in discussions related to urban mobility at an EU-level. In reality, of course, these are **variations of essentially the same service, each facilitating the shift from a vehicle ownership model to one of consumption** with rental companies rapidly

evolving to play a key part in the wider, sustainable mobility solution for our cities, alongside and complementary to other modes of transport. We offer on-demand, app-based access to a wide variety of vehicles for short term use and believe we should be considered, as car sharing is, on an equal footing with ride-hailing and bike/scooter sharing.

Against this background, we would like to **organize a meeting in Q1 2023 to discuss how the European Commission could involve car rental companies in discussions on urban mobility and in scoping innovative solutions in this important area.** Updating the Car Rental Coalition's status in the EGUM would be a positive first step, but we are also keen to engage in a broader discussion on the issues that our sector specifically faces, i.e. in terms of UVARs.

We remain available to set this meeting up and answer any questions you may have.

Yours sincerely,

The Car Rental Coalition:

Inderpal Lall, Legal Director, International, Avis Budget Group

John Finch, Vice-President, Legal & Corporate Affairs, Hertz Europe

Jehan de Thé, Public Affairs Director, Europcar Mobility Group