



The Position of the Local Councils' Association on e-scooters.

The Local Councils Association takes note of the **Preliminary Abridged Guidelines for the Regulation of the Micro mobility Class** document issued by the Sustainable Mobility Unit within Transport Malta on the 2nd September 2019 for public consultation and express its position as follows;

The Local Councils Association supports and encourages all initiatives, policies and regulations which promotes, incentive and support the increase of sustainable mobility in its localities. For the first time, the Association and its Local Councils, will present a comprehensive vision proposal for 2020 -2024 on the 27th October 2019 at its annual plenary meeting. The vision sets Sustainable Mobility as one of its five main pillars upon which policies, guidelines and priorities will be set. More information will be available to its stakeholders, NGO's and the general public in due time.

E-scooters require less effort than a bicycle, are more convenient than buses and less polluting than cars. However, the increasing use of e-scooters on our islands will have a far-reaching effect on our residents, their quality of lives, the use of our public open spaces, accessibility for all and the safety of our residents, tourists and drivers alike. It makes use of our pavements and pedestrian infrastructure, and it takes away the already restricted parking spaces. These aspects coupled with the proposed prohibition of use in tunnels and underpasses, arterial and distributor roads make this mode of transportation a purely local matter. It is for these reasons that the Association of Local Councils invites Transport Malta to engage in discussion with the Association before pressing ahead with these regulations.

Vehicle traffic congestion on our main roads is a national problem. This challenge is partly addressed thanks to an unprecedented investment in our country road infrastructure designed for a growing population and increasing economic activity. While this is essential, considering a more extensive choice of transportation is the long-term sustainable solution. Walking, the most straightforward and oldest form of human transportation remains the cheapest and most sustainable transport for all people. Despite its apparent benefits, walking through a few blocks or crossing a street in our localities has become inconvenient and unsafe. In the coming months, and as part of the local councils' overall vision, the Association will be publishing its proposals for better planning of pedestrianised paths and spaces in our localities. Given this, the Association is firmly against the use of PLEV on our footpaths and pedestrian areas unless such use properly segregated where space allows.



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Dedicated cycling paths and limited traffic zones are the safest zones to ride e-scooters. Admittedly these areas are few and far between. The Association will work alongside with the Local Councils and Transport Malta to identify areas where the use of sustainable last-mile personal light electric vehicles can be safer. The Association will also advocate for the increase of cycle paths in our local residential areas.

The document includes several safety measures to protect the users of e-scooters and the general public. The Association agrees with all regulatory standards which protect lives including the use of helmets and protective wear. The requirement of headlamps, tail lamp and speed limits proposals are justified.

On the other hand, the document fails to make the necessary distinction between the individually owned light vehicles and sharing service companies. Here, the Association's position differs significantly. The following are the main changes the Association would like to see in this regulation;

1. Annual Road License

More licenses will decrease our limited stock of parking vehicle spaces. While this is inevitable, the Association is proposing an additional license type aimed to encourage private ownership of scooters not making use of public parking.

- Given their portable nature, individual PLEV owners may choose not to make use of on-street public parking facilities. Most owners carry the light vehicle home or to their workplace, make use of private charging, storing and parking facilities. As an incentive, the Association proposes that the fee of this license type should be lowered (if not free of charge). Insurance requirement should be limited to a public liability policy, and the age limit reduced to 16 years of age. The lowering of age will contribute to the change in the travelling habits of future transport users. The use of safety helmets and protective gear should be compulsory to drivers below 18 years of age.

- The other PLEV road license fee, required mostly by shared service companies, using local public infrastructure to service and store their vehicles is understandably higher. Insurance policy should cover third-party liability.



2. Operating License for Shared Service Companies

Operating Licenses for shared PLEV services go beyond traffic regulation and road safety. It makes use and takes away open public spaces, increase the safety risks of its residents and affects the daily lives of the local inhabitants.

The Local Councils Association will be formally requesting that operating licenses to shared service operators will be issued and managed by the Local Councils under the following considerations;

A. The Operational License

- Shared service companies will be allowed to operate in a specific locality subject to an operating license permit issued by every individual Local Council at its discretion.
- Local Councils should reserve the right to limit the number of companies operating in its locality as well as limit the overall number of PLEV vehicles parked and stored in their locality. The Council may set operating zones and fine companies for PLEV equipment found outside the designated areas.
- Local Councils should reserve the right to revoke an operating license from specific companies, especially if they fail to comply with the license terms.
- Licenses and permits should be renewed every year and require all companies to re-apply for each renewal. The operators will be made aware that Local Councils may update their terms and fees over time.
- Operating license fees will reflect the real cost of regulating, overseeing, and managing these shared schemes.
- Local Councils should require shared service companies to hold insurance and indemnify their localities.
- The locations for charging docks will be set by the Local Councils. Charging docks able to service several operators will be preferred. The design, quality of materials, technology, space-efficient structures and solar-powered chargers would be other determining factors for licensing.

B. Operational Requirements

- Local Councils will require the operators to remove or relocate their equipment according to operating terms and conditions in the same license and assess penalties for non-compliance.
- Local Councils will require the operators to abide with the locality's existing and future policies and procedures in case of extreme weather, emergencies, special local events, maintenance and cleaning schedules, etc.
- Local Councils will require companies to assign a locally based manager who can immediately and efficiently respond to the local Council's requests and emergencies.



C. Communications

· Local Councils will require all operators to create and maintain locality specific information on their website and social media platform. Information shall include terms of service, including user instructions, privacy policies, including all fees, costs, penalties, and unexpected charges, in all languages required by the Local Councils. It requires the operator to place a customer service contact number, answered 24/7 on all its vehicles which connects the public to the operational team.

D. Data Provision

· Operators must provide local councils and local government with accurate, complete, and timely data about the use of such shared schemes.
· Local Councils shall have the right to request and retain aggregated reports on system use, compliance, and other aspects of operations.

As the landscape of shared transportation is rapidly changing, the Association believes that policy guidelines and regulations should be actively monitored and frequently updated.

**Mario Fava
President**

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