Net Zero, Energy and Transport Tuesday 22 April 2025 14<sup>th</sup> Meeting, 2025 (Session 6)

# Note by the Clerk on rail and bus passenger and staff evidence session

### Introduction

- 1. The Net Zero, Energy and Transport Committee has agreed to take evidence from stakeholders on the challenges facing Scotland's rail and bus sectors over two meetings on 22 and 29 April. These will be 'stock-takes' on the main challenges for the rail and bus sectors in 2025.
- Some issues affect both sectors; for example, fare costs, service availability and gaps in provision, and anti-social behaviour. Some challenges may be distinct to one mode of transport.

#### Rail

- 3. The Committee has held evidence sessions on rail services annually since ScotRail entered public ownership in 2022. It most recently heard from railway stakeholders and operators at its meeting on 19 March 2024.
- 4. While the Scotland Act 1998 defined the provision of rail services as a reserved matter, the Scottish Government is responsible for the letting and management of Scottish passenger rail franchises currently ScotRail and Caledonian Sleeper.
- 5. Since 1 April 2022, ScotRail services have been provided within the public sector by ScotRail Trains Ltd, under the auspices of its holding company, Scottish Rail Holdings Ltd. Both organisations are private limited companies owned by, and operated on behalf of, the Scottish Ministers. The boards of both companies are appointed by the Scottish Ministers. Details of this management structure are set out in a Framework Agreement.
- 6. Caledonian Sleeper is also operated by franchising arrangements having been brought into public control in June 2023. Services are operated by Caledonian Sleeper Ltd as a private company wholly owned and managed by Scottish Rail Holdings Ltd on behalf of the Scottish Government. Further details can be found on Transport Scotland's website.
- 7. The national rail infrastructure across Great Britain is owned by Network Rail, a public owned body of the UK Department for Transport. The Scottish Government are responsible for setting a high-level strategy and providing funding for the maintenance and enhancement of Network Rail infrastructure in Scotland over multi-year "control periods" which are established through a "periodic review" process.

- 8. The Scottish Government trialled removing peak fares from ScotRail services between October 2023 and September 2024. However, the 2024 <u>Transport Scotland analysis</u> of the pilot said that "while there has been a limited increase in the number of passengers during the pilot, it did not achieve its aims of encouraging a significant modal shift from car to rail.' and the Cabinet Secretary for Transport ended the scheme as a result.
- 9. Members may ask questions on any matter relating to the topic, however, themes to be discussed may include conditions for staff, passenger experience, service reliability, ticket prices, decarbonisation of the fleet, ticket offices, the establishment of Great British Railways, and the role of rail freight. The Office of Road and Rail provide annual summaries of key statistics for operators, the most recent of which are available below:
  - ScotRail
  - Caledonian Sleeper

#### Buses

- 10. Bus services have been considered by the Committee in recent scrutiny of subordinate legislation:
  - the National Bus Travel Concession Schemes (Miscellaneous Amendment) (Scotland) Order 2025 on <u>25 February 2025</u>. As highlighted in the <u>Committee</u> report, the issues raised included access to services, behaviour change, and reimbursement rates.
  - And the Local Services Franchises (Traffic Commissioner Notices and Panels) (Scotland) Regulations 2024 on <u>29 October 2024</u>. As highlighted in the <u>Committee report</u>, the issues raised included the risk of legal challenge to franchising schemes and concerns about delays to franchising.
- 11. The Scottish Government currently provide funding for the National Bus Travel Concession Scheme for Older and Disabled Persons (ODPS) and for National Bus Travel Concession Scheme for Young Persons (YPS). The Scottish Government budget has over £400 million on concessionary bus travel in 2025-26.
- 12. The Scottish Government, through Transport Scotland, also fund the Network Support Grant (NSG), which is a discretionary grant available to eligible commercial and community bus operators. The NSG is paid at 14.4 pence per kilometre per bus and is intended to contribute to the costs of running services, with a focus on 'keeping fares more affordable and networks more extensive than [they] would otherwise be'.
- 13. Members may ask questions on any matter relating to the topic, however, themes to be discussed may include conditions for staff, passenger experience, service reliability and availability, ticket prices, decarbonisation of buses, franchising, Bus Service Improvement Partnerships, bus priority measures and smart ticketing. The Confederation for Passenger Transport commissioned a

report produced by KPMG in 2024 on <u>Trends in Scottish bus patronage</u> which covers several of these issues.

# **Evidence sessions and next steps**

- 14. On 22 April the Committee will hear from two panels of witnesses. The first panel has representatives from rail and bus passenger groups and the second panel has witnesses representing rail and bus sector staff. Witnesses will be from:
  - Panel 1:
    - i. Transport Focus
    - ii. Bus Users UK
    - iii. Scottish Youth Parliament
  - Panel 2:
    - i. UNISON Scotland
    - ii. UNITE
    - iii. National Union of Rail, Maritime and Transport Workers (RMT)
    - iv. The Associated Society of Locomotive Engineers and Firemen (ASLEF)
- 15. Following this, on 29 April, the Committee will take evidence from bus and rail operators, companies and sector representatives across two panels.
- 16. The Committee gave witnesses the opportunity to provide written evidence in advance of the meeting and received two responses:
  - Transport Focus (Annexe A)
  - RMT (Annexe B)
- 17. The 22 and 29 April meetings focussing on the bus and rail sectors form part of the Committee's rolling scrutiny of these areas over this session. The Committee may use the evidence heard to follow up with witnesses, Scottish Government and other stakeholders after the meeting, or consider the evidence heard in future scrutiny, including of the <a href="Scottish Government's draft Climate Change Plan">Scottish Government's draft Climate Change Plan</a> later in 2025.
- 18. The Committee will discuss the evidence at the end of the meeting.

# Clerks to the Committee April 2025

# Annexe A – Written evidence submission from Transport Focus

#### Bus

Around 334 million passenger journeys were made by bus in Scotland in 2023-24. This is an increase of 13 per cent on 2022-23 and a 31 per cent fall from a peak in 2007-08.

That's over four times more journeys than were made by train. Buses matter to people. Understanding the experience of bus passengers is fundamental in encouraging more people to travel by public transport for work, study and leisure, and satisfaction with services is key to doing this.

# **Your Bus Journey Survey**

Transport Focus conducts The Your Bus Journey Survey<sup>1</sup> providing valuable insights for Transport Scotland and the bus sector in Scotland more generally.

The Your Bus Journey survey provides independent insight on 48,000 journeys in England, Scotland and Wales, building understanding across the three nations for benchmarking and comparison. It provides a comprehensive measurement of what it's like to travel on buses across Great Britain. Through the survey, passengers themselves give structured feedback about all aspects of the bus journey, from waiting at the stop, to being on board, the driver, and overall timeliness.

These results should inform the decisions made by governments, local transport authorities, bus partnerships and bus operators.

In Scotland overall satisfaction with the bus journey is at 86 per cent, in Wales overall satisfaction is at 84 per cent and in England at 83 per cent.

Punctuality is the most commented upon factor regarding the journey, both positive and negative. Timeliness is an important driver of overall journey satisfaction and considers waiting time, punctuality, journey time and the time spent waiting at the bus stop where passengers get on. Road congestion and road works are the biggest reason given for hampering bus journeys.

While satisfaction with bus travel has improved on average across Britain, there are variations. For example, passengers aged 16-25 overall satisfaction is at 85 per cent in Scotland, 79 per cent in Wales and 77 per cent in England.

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<sup>&</sup>lt;sup>1</sup> Your Bus Journey – the independent bus user survey – 2024 results (March 2025)

There is inconsistency across Scotland, however. The best – and improving – experiences tend to be concentrated in the central belt, where facilities, information and the environment at stops and on board are all typically rated better. Many aspects of service are also felt to have improved in the Highlands.

Passengers in other parts of the country are typically less satisfied. In particular, the quality of bus travel in the South West appears to have declined; this is felt across all areas of service, but bus stops appear to be a key issue here, with poor ratings for their condition, and reported lack of seating, lighting and information.

# Designing the bus shelter of tomorrow

A well-designed bus shelter is an essential part of any successful bus network. We asked 3276 frequent bus passengers across Great Britain for their views on the priorities and improvements that must be considered in delivering a well-designed bus shelter<sup>2</sup>.

Key recommendations from the survey, include:

- Co-design shelter design with users make sure people are included with mobility and sensory impairments and people with prams/buggies. Ensure user views are involved in every stage of the design and build processes so models and options can be tested and choices made with user input.
- Review the design of shelters to ensure they protect bus users from wind and rain.
- Review the size of shelters based on usage. Some shelters may need to be bigger, for example when they serve multiple routes in town centres and outside schools and colleges, hospitals and supermarkets.
- Comfortable seating should be provided.
- Retain paper timetables. Consider adding information about other connecting modes and services.
- Real-time next bus information display should be provided.
- Install effective lighting to make people feel safe in the evenings/dark and enable them to see and read timetables. Introduce CCTV and help points wherever possible.
- Ensure every shelter has a bin and that it is regularly emptied. Maintain and clean shelters regularly. Provide contact details for reporting damaged or dirty shelters.

We hope the results from this comprehensive survey contributes to making a positive impact for passengers, ensuring passenger priorities are considered when amending

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<sup>&</sup>lt;sup>2</sup> Designing the bus shelter of tomorrow (April 2025)

bus shelter guidance or in the development of a minimum set of standards. Having a good experience at the bus shelter environment while waiting, that is accessible and safe with good quality, accurate information to hand can make this a better experience.

#### Rail

Our Rail User Survey<sup>3</sup> asks a representative sample of 2,000 people across Great Britain about their public transport use. Those who used rail in the last seven days are asked about their overall satisfaction with their most recent rail journey and with aspects such as value for money, punctuality and cleanliness.

#### ScotRail

The results for the main twenty-two train companies on overall satisfaction and satisfaction with six key aspects of the journey, indicate that ScotRail score relatively highly with other operators on four key aspects:

- overall satisfaction (90%)
- punctuality/reliability (83%)
- level of crowding (76%)
- train overall (84%)

Scores on value for money and station overall are relatively average when compared with other operators.

#### **Ticket Offices**

The ticket office opening hours consultation began on 12 January 2022 and closed on 15 February 2022. Being mindful of the regulatory process Transport Focus had no objection to the proposals based on the sales data submitted as part of the consultation.

ScotRail announced plans (31 October 2024) to implement the previously consulted upon changes to ticket office opening hours to deliver more visible customer support at stations, reflecting changing travel and ticket purchasing patterns. The implementation of the changes came into effect in March 2025.

As over two years have elapsed since the consultation closed, we took the opportunity to review the responses received, to reiterate concerns expressed at the time, regarding ticket office opening times and wider concerns voiced by passengers.

<sup>&</sup>lt;sup>3</sup> Rail user survey – Scot Rail scorecard (March 2025)

We wrote to ScotRail<sup>4</sup> on 20 December 2024 and ScotRail responded on 28 January 2025.

We note the mitigations that ScotRail propose to implement as part of the changes to ticket office opening times. We will now monitor what happens when the proposals are implemented and raise any concerns identified.

We will be seeking further detail on the planned mitigations. Monitoring needs to be more than identifying and responding to concerns raised. It requires active testing how the arrangements work in practise (generally but also specifically for disabled passengers with different accessibility needs) and if it may be deterring anyone from using the railway who previously relied upon the ticket office being open for longer.

# Caledonian Sleeper

In conjunction with Transport Scotland and Caledonian Sleeper, Transport Focus set up a guest satisfaction survey<sup>5</sup> which has been used to set the benchmarks against which customer satisfaction with the service will be measured.

The survey is continuous and reports on the booking process, boarding and station facilities, accommodation and train facilities and the overall experience.

The trend in overall journey satisfaction stands at 76% satisfied. However, overall satisfaction with the Highlander service is 83 percent and 67 percent with the Lowlander service.

#### **Network Rail**

Train performance (punctuality/cancellations) continues to be a top priority for passengers.

The Scottish Ministers' High Level Output Specification (HLOS) for Control Period 7 (CP7) 2024- 2029 requires the outputs of the network to be maintained in such a manner as to enable ScotRail to meet a Public Performance Measure (PPM) target of 92.5%.

PPM is the percentage of planned trains arriving at their final scheduled destination early or less than five minutes after their scheduled arrival time having called at all their planned station stops.

<sup>&</sup>lt;sup>4</sup> ScotRail Ticket Office Changes (March 2025)

<sup>&</sup>lt;sup>5</sup> Caledonian Sleeper guest satisfaction survey (January 2025)

This target applies for every year of CP7. The Scottish Government allows Network Rail and ScotRail a specific derogation from the 92.5% target.

In this derogation, trains are excluded from the PPM calculation where:

- delays are caused by the need for speed restrictions during periods of severe weather; or
- trains have been delayed enabling connections from other modes of transport.

The current Moving Annual Average PPM figure stands at 89.71 per cent.

#### Conclusion

The above insight we have conducted with public transport users over the last twelve months, demonstrates the value of public transport in everyday life.

This reaffirms that what matters most to passengers is a punctual and reliable public transport network that delivers on the timetable's promise at an acceptable price.

Passengers" other key priorities also reflect an emphasis on getting the basics right. Passengers want sufficiently frequent trains/buses and accurate and timely information about times and any delays.

Waiting facilities that provide relevant information, are well lit and comfortable. They want a seat onboard and of course they need to feel safe.

These are not the only things that matter, but passengers will judge public transport on how effectively it delivers its core product.

# Annexe B – Written evidence submission from RMT

#### Scotland's Rail Services

#### **Ticket offices**

RMT remains opposed to ScotRail's decision to implement cuts to the hours of nearly 100 of its 143 staffed ticket offices, which were being implemented from March 31st this year. RMT opposed the proposals on the grounds that they would worsen passenger safety, security and accessibility. This position was supported by a range of disabled peoples', women's and environmental organisations in a joint letter to the Cabinet Secretary for Transport Fiona Hyslop MSP.<sup>6</sup> Under ScotRail's plans, at a number of stations, ticket office staff will no longer be present at the station at the times the ticket offices are closed. At the remaining stations, whilst the company says that staff will be present at the station for the same hours (whilst the ticket office is closed), crucially, because ticket office hours are the only form of regulated station staffing there is nothing to hold them to this in the future. This means that ScotRail would be able to reduce station staffing in the future, including through not filling vacancies, without the need to hold a public consultation or even notify passengers. This clearly risks a de-staffing of stations by stealth.

The company implemented these cuts on the basis of a public consultation by former operator Abellio in January 2022, despite the plans being opposed by 98% respondents.

Furthermore, since the 2022 consultation, the process via which passenger watchdog Transport Focus responds to operator proposals has changed significantly and it is now required to take a wide range of criteria into account, such as the impact on access to rail products, safety, accessibility and access to facilities into its decision making. If ScotRail were to hold a new public consultation, it would be under this new process.

RMT believes it is highly disappointing that the Scottish Government gave its permission for ScotRail to implement these cuts, without at the very least, having to hold a new public consultation under the current process.

The passenger watchdog Transport Focus wrote to ScotRail in December 2024<sup>7</sup> to raise a number of concerns about the potential impact on passengers, but under current arrangements it has no powers to intervene or require ScotRail to hold a new public consultation. This exemplifies the limited scope that Transport Focus has to influence decision making. In our response to the UK Government's GBR

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<sup>&</sup>lt;sup>6</sup> https://www.rmt.org.uk/news/rmt-demands-scottish-government-scrap-scotrail-ticket-office

<sup>&</sup>lt;sup>7</sup> https://www.transportfocus.org.uk/publication/scotrail-ticket-office-changes/

consultation, RMT made the case for why the new passenger voice function under GBR (which like Transport Focus will cover Scotland, Wales and England outside London) has stronger powers to deliver for passengers and prevent decisions being taken (like reductions in ticket office hours or staffing) that would worsen the passenger experience. We have also argued that alongside ticket office hours, station and on-train staffing should also be regulated, as well as ticket office window provision as currently train operators can reduce ticket office windows, and thus staffing levels, without any consultation as long as overall hours remain the same.

The cuts at ScotRail are in complete contradiction to the recent findings of the House of Commons Transport Select Committee inquiry into Transport Accessibility which found that the most frequently raised issues in their survey of disabled people, 'by some distance' included the availability of public transport staff and found that the presence of staff 'is often a crucial determinant of whether safe and independent travel is possible at all' and that 'Turn Up And Go' basis in particular becomes much more difficult to deliver when there are fewer staff either at stations or on board trains'.8

Alongside various groups and politicians we have called on the Scottish Government to reverse its decision and retain ScotRail's existing ticket office opening hours.

#### Anti-social behaviour and violence

RMT has well documented and long-standing concerns<sup>9</sup> about the prevalence of violent and anti-social behaviour on Scotland's rail network, affecting both staff and passengers, and tackling this issue nationally is a priority for RMT. BTP figures published earlier in the year highlight a significant increase in violent crime on the Scottish rail network compared to before the pandemic.<sup>10</sup>

Evidence, such as the Scottish Government's own research into women and girls' safety on public transport<sup>11</sup>, shows the importance of staff at ticket offices, stations and on-trains for passengers' feelings around personal safety.

We are concerned that policies pursued by the Scottish Government, such as the cuts to ticket office hours, and the 2024 attempt to extend Driver Only Operation on

<sup>8</sup> https://publications.parliament.uk/pa/cm5901/cmselect/cmtrans/770/report.html

<sup>&</sup>lt;sup>9</sup> See, for instance - https://www.rmt.org.uk/news/publications/women-and-girls-safety-on-scotlands-railway/

<sup>&</sup>lt;sup>10</sup> https://www.scotsman.com/news/crime/british-transport-police-scotrail-crime-labour-rail-scotland-5003260

<sup>11</sup> https://www.transport.gov.scot/news/women-and-girls-safety-on-public-transport/

the Barrhead line (which was defeated by RMT) are at odds with the need to make the railway safer for passengers and staff.

RMT believes that there should be an expansion of staffing across the rail network, and as detailed above, regulation of staffing levels on trains and at stations in addition to ticket office hours.

In addition, RMT is supportive of the creation of a specific offence of abusing or assaulting a public transport worker. In Scotland this is a devolved matter, and existing legislation exists for the blue light and retail sectors. In correspondence, the Scottish Government has previously said that the Protection of Workers (Retail and Age-restricted Goods and Services) (Scotland) Act 2021 would apply to public transport workers involved in retailing tickets or catering, but further correspondence and meetings since have not established a clear picture over exactly how this legislation could cover transport workers. We would welcome the Committee seeking clarity on this matter from the Scottish Government.

# Rolling stock procurement

ScotRail is currently in the process of replacing much of its fleet on the suburban and high- speed routes. In correspondence and in meetings, RMT has set out that any attempt to use this process to extend Driver Only Operation (DOO) would be wholly unacceptable to us. RMT firmly believes that guard operation, which guarantees that all services have a safety critical guard on board, is the most safe, secure and accessible method of operating trains.

Similarly, RMT does not support the outsourcing of maintenance of any rolling stock and have set out to the Scottish Government that this must remain in-house. We also believe that the procurement process should be used to expand the catering offer on ScotRail, which would help improve the passenger experience and hence support modal shift to rail.

We understand that in a previous NZET session in March 2024 in discussion about financing for the new rolling stock, Alex Hynes stated:

"We are the buyer, so we are free to decide how we want to finance our trains.

Alternatives are available. For example, the Scottish National Investment Bank might be interested—I do not know."

A number of RMT reports have detailed the profiteering of the rolling stock leasing companies<sup>12</sup>, and RMT believes that the Scottish Government should develop

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<sup>&</sup>lt;sup>12</sup> See, for instance https://www.rmt.org.uk/news/publications/the-rosco-racket-why-its-time-to-take-control-of-uk-rolling/

options for publicly owned rolling stock and would welcome the Committee exploring this matter further with the Scottish Government.

### Modal shift and climate change

As a low carbon and sustainable form of transport, rail obviously has a significant role to play in meeting Scotland's carbon reduction targets. The Scottish Government set a goal of reducing car km by 20% by 2030, but it is yet to set out how it will achieve this. We also note that in recent publications, the Scottish Government has referred to a 20% reduction in car usage (rather than km travelled) and believe it would be beneficial if questions were put to the Scottish Government about whether this signifies a shift in their goal. In addition, RMT believes the Scottish Government should go further and legislate to establish targets for modal shift to rail.

We are concerned that there appears to be a disconnect between the Scottish Government's stated goals for public transport, including in the recently published draft Just Transition Plan for Transport<sup>13</sup>, and the reality of the policies it pursues via its publicly owned rail operator.

For instance, one of the goal outcomes of the Plan is that public transport is affordable, and the Plan recognises that the cost of rail has risen at a much faster rate than the cost of driving. This is at odds with the Scottish Government's decision to reintroduce peak fares last year, in addition to this year's above inflation fare rise. The Plan notes that peak fares were reintroduced because demand only increased by 7%. However, RMT believes this was a significant increase in demand and given that behaviour change takes time, it was short-sighted and premature to reintroduce peak fares. The Scottish Government said that demand would needed to have increased by 10% to be cost neutral, but this ignores that ultimately delivering modal shift to public transport will likely require an expansion in investment, but there are well documented economic benefits of this investment.

#### Rail infrastructure

RMT has long-standing concerns about the underfunding of Scotland's rail infrastructure, which is leading to job losses and redundancies in the wider supply chain. For instance, in March last year, Babcock Rail, which is a sub-contractor of Network Rail in the Rail Systems Alliance Scotland made a number of redundancies<sup>14</sup> which it said was as a result of a reduction in workbank volume from Network Rail, and the company announced further redundancies in December 2024. At the same time, Network Rail has a significant vacancy rate in the maintenance

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<sup>&</sup>lt;sup>13</sup> https://www.gov.scot/publications/transition-draft-transition-plan-transport-scotland/

<sup>&</sup>lt;sup>14</sup> https://www.rmt.org.uk/news/rmt-slams-network-rail-cuts-after-redundancies-announcement

sector, which RMT believes risks impacting rail safety, and asset and train performance.

These issues also reflect wider problems with the ongoing outsourcing of renewals work by Network Rail. RMT estimates that across the UK, sub-contracted renewals accounted for around £3 billion of Network Rail's 'procurement' spending in 2022 and given that sub- contracting firms estimate renewals margins at 6% this suggests an aggregate profit figure of £180million annually. Bringing this work in-house would provide greater certainty and skills retention for the workforce and put an end to this profit leakage to private sub-contractors.

# **Great British Railways**

The UK Government recently held a consultation over its plans for Great British Railways (GBR), a publicly owned and unified GB rail network. Legislation to establish GBR is expected to be tabled in around July 2025.

This follows the passing of the Rail Passenger Services (Public Ownership) Act in November 2024. The purpose of this initial piece of legislation was to reverse the presumption about who can run rail services to mean that the default position is that all rail passenger operators run by the Scottish, UK and Welsh Governments must be run in the public sector. As ScotRail and Caledonian Sleeper are already run in public ownership by the Scottish Government, the Bill made provision for these rail services to remain permanently in public sector operation without the need for these services to be retendered in the future. This was supported by the Scottish Government, and as the Committee's report for the legislation consent memorandum on the Bill stated, Scottish Ministers were content with not being able to award rail services to private operators in the future and had 'made clear their commitment to retaining public ownership'.

RMT supports the Scottish TUC's policy, which is to campaign for the creation of a single, unified, integrated GB rail network, with significantly enhanced powers for the Scottish Parliament and Scottish Government over rail services in Scotland. It is vital that any integration is made through agreement with the Scottish (and Welsh) Governments. RMT also supports the GBR consultation's proposals of legislating to preserve options for future agreement over integration.

With Scottish Government agreement, there are opportunities that could come from greater integration which could result in fewer contractual interfaces and smoother rail paths. For instance with the Scottish Government retaining its existing powers over ScotRail and the Sleeper (keeping their existing company branding) including

<sup>&</sup>lt;sup>15</sup> https://www.rmt.org.uk/news/new-research-shows-rail-reform-can-pay-for-freezing-passenger/

day to day responsibility for rail operation and planning for infrastructure but with additional powers, for example around how expenditure is allocated and for raising revenue for rail. There is also clearly a strong and logical case for Scottish Government representation on the GBR board.

Open access remains one of the contractual interfaces on the railway that RMT believes does not have a role in an integrated and publicly owned rail network. Open access rail operators are privately owned train operators that exist outside any contractual relationship with Governments. Of the existing open-access operators, Lumo is cross-border between London and Edinburgh and there are further cross-border services either which have been granted access rights or applications sitting with ORR awaiting a decision.

Despite the claims from the private open access operators that they are cost neutral to Governments and tap into 'spare' capacity, the converse is true. Open access operators abstract revenue from the public purse, unlike publicly owned and managed operators, do not properly contribute towards the long-term maintenance of the railway and put pressures on capacity and hence overall rail service performance.

In our response to the GBR consultation, RMT has stated that the UK Government should absorb open access services and staff into GBR, whilst protecting and expanding employment and service levels and we have a separate briefing on open access <sup>16</sup> which may be of interest to the Committee.

Likewise with freight, which under current plans for GBR remains in the private sector, thus enabling contractual interfaces and potentially operational inefficiencies to persist. In line with STUC policy, RMT supports the creation of a nationalised freight operator to increase freight traffic in Scotland, optimise efficiency, develop the economy and improve sustainability. A nationalised freight operator would allow decisions over growing freight volumes and path allocation to be internalised.

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<sup>&</sup>lt;sup>16</sup> https://issuu.com/rmtunion/docs/why open access rail is incompatible with the gove