

Position on Clean Road Vehicles Directive

I. INTRODUCTION

EPTO is the association of European Passenger Transport Operators and represents one of the leading transport services organisations in Europe, whose members are the nine largest public transport companies in Europe: Arriva, First Group, Grupo Barraqueiro, Keolis, National Express, Stagecoach, Transdev, Transdev-Connexion and Veolia Transport.

We operate a fleet of nearly 75.000 vehicles, employ nearly 230,000 people and carry 10.6 billion passengers every year We provide an extensive range of services including buses, trains, commuter coaches, taxis, water buses and fully accessible demand responsive vehicles.

Members of EPTO operate public transport services in many European countries: Belgium, Czech Republic, Denmark, France, Germany, Ireland, Italy, The Netherlands, Poland, Portugal, Spain, Sweden, and United Kingdom. These services are provided across the spectrum of regulatory regimes from deregulation to competitive tendering.

II. POSITION

General Remarks

EPTO has read with great interest the second European Commission proposal on a Directive on the promotion of clean road vehicles COM(2007) 817.

EPTO has identified a number of aspects concerning the application of the proposed Directive for the purchase and procurement of vehicles by public transport operators or by authorities.

EPTO

- **supports in general and full-hearted the idea behind the proposal to reduce emissions from road transport vehicles**, since it serves a sound overall purpose and provides operators the opportunity (in a fair way) to differentiate vis-à-vis competitors, and as such contribute to the development of the sector.
- supports also the idea that public transport should be efficient und as a sustainable transport mode also environmentally friendly.
- understands that the directive has been designed to create a framework for the achievement of more environmentally-friendly purchases.
- understands that the directive proposal is not obliging and prescribing fixed rules but is intended for the stimulation of ecologically-oriented purchases and this leaves the utmost flexibility to local authorities.
- understands that the directive is mainly looking at buses, but it could also affect the purchase of other road vehicles such as business cars, service and maintenance vehicles.
- **looks with concern at some measures being proposed in the directive**, especially at those potentially putting another financial burden to it and which will be counter-productive for the development of public transport being part of the solution for problems in urban areas.

Public transport is contributing to the aims of the Lisbon Agenda. In comparison to other transport modes it also offers the lowest emission rates in road transport per passenger km or per seat km. Surveys have also shown that public transport contributes only very little to the whole amount of CO₂ emissions in cities (e.g. in Nice, 0,4%). Although already being a green transport mode **the members of EPTO have focused on the**

environmentally-friendly development of their fleets and achieved high standards in many places. It is important for EPTO to stress that this development will continue amongst the private sector.

Thus the approach of the EU to force the manufacturing industry to offer even more environmentally-friendly vehicles at an even lower price is supported.

The message that transport operators should consider the lifetime cost of vehicles is supported in a positive way by EPTO, but as a matter of fact, it has not been new since the majority of the branch and especially the members of EPTO use to do this since a long period of time.

The proposed internalisation of the external cost in the lifetime cost review related to air pollution is welcomed in general. The proposed approach is in line with the measures proposed in the Green Paper on Urban Transport. EPTO has commented on the Green Paper on Urban Transport and stated that the internalisation of external cost is a key measure to promote modal shift.

At the same time EPTO has stated that the external benefits by public transport should be taken into account.

Nevertheless EPTO would like to point to the fact that the “handbook on estimation of external cost in the transport sector”, published by the EU in the end of January, should carefully be reviewed with regard to the external cost quoted for public road transport vehicles.

Local situations

Local transport authorities and organisers of public transport are facing limited budgets and have to spend public money in the most efficient way. Due to these reasons **the procurement of rolling stock can and should not only regard ecological but necessarily has to regard economical reasons.**

Thus a comprehensive strategy should not only include the purchase of new clean vehicles, but should also allow the modernisation and retrofitting of older vehicles. Other measures do also contribute to the reduction of emissions (training of drivers for energy efficient driving, dedicated lanes and priority at stoplights).

From the proposal **we have understood that with regard to the different local situations local and regional authorities and operators may be free to choose the most appropriate measures to tackle urban problems**, to reduce greenhouse gas emissions and local pollutants and they should also have the choice to determine how to use their (limited) budgets best in order to achieve an overall clean urban transport.

Costs and Coverage

It is necessary to state that the proposed **approach to clean road vehicles as part of the green public procurement discussion should not impose higher costs onto the system** (buying, maintenance, operation, second-hand market).

Thus operators generating benefits for the society by buying the best available most environmental-friendly technology (in terms of reduced CO2 emissions as well as local pollutants) **should receive compensations if they face higher LCC through measures as tax incentives or special funding.**

Practicability

EPTO welcomes the creation of a framework for environment-friendly purchases and its non-prescriptive character in the directive proposal. To underline this position **the directive should more clearly quote that the local and regional authorities have the freedom to define their needs and requirements.**

EPTO welcomes that the directive states **if there is no binding EU norm to apply, but “reasonable standards”** – be it those of branch organisations, be it of the manufacturers to be used as standards.

EPTO would like to state that **additional bureaucratic burden and in consequence additional costs for public transport operators and authorities should be avoided** when applying this proposed Directive.

We understand that **the application of the directive should not lead to higher costs caused by the preparation and evaluation of the procurement processes.**

III. Proposals of EPTO

EPTO strongly suggests

- To **leave the spirit of the directive mainly as it is** and not to change any further text parts, and to even stress the freedom of the authorities to define their local needs
- To **refine which vehicles should be concerned**. EPTO asks to limit the scope of the directive in the field of public transport only to buses and not to other vehicles procured/purchased by public transport operators/authorities.
- Additionally it should apply to buses operated by or on behalf of public authorities (ie not to wholly commercial operations). For EPTO it is vital that the directive is implemented in a way that will **secure equal terms between public and private operator**
- To state that **all vehicles new and second-hand rolling stock can be used** for an acceptable period of time, or may be upgraded under acceptable terms if the authorities decide this
- To include **mandatory provisions for the additional compensation of extra costs**. The higher ecological standards should be financed from different sources as the existing public transport budget. This should clearly be stated.
- **To clarify and clearly define on what is to be regarded as public procurement**, and thereby covered by the directive. I.e. would it also cover activities in deregulated and commercial bus markets, operating under public license, permit or authorisation?
- **To position all stakeholders equally.**