

POLIS POSITION ON THE CLEAN VEHICLES DIRECTIVE RECAST (2009/33/EU) AND THE COMMUNICATION ON ALTERNATIVE FUELS INFRASTRUCTURE ACTION PLAN

THE CLEAN MOBILITY PACKAGE

On the 8th of November 2017, the European Commission came forward with a set of proposals¹ aimed at accelerating the shift towards clean and efficient mobility for both passenger and freight transport, drive the transition to low-emissions vehicles as well as to stimulate manufacturers to innovate and integrate new technologies. The proposals are looking at CO₂ standards for cars and vans, alternative fuel infrastructure, combined transport, and international access to market for coach and bus services. The Clean Vehicle Directive, Alternative Fuels Infrastructure Action Plan, the emissions standards for cars and vans as well as the directive for coach and bus services are outlined below as relevant for the Polis members.

WHY THE CLEAN VEHICLES DIRECTIVE REVISION IS NEEDED

Polis welcomes the Proposal for a Directive of the EP and of the Council amending Directive 2009/33/EU on the promotion of clean and energy-efficient road transport vehicles (Clean Vehicles Directive Revision²). Following the initial impact assessment³, the revision simplifies the procedure for procuring new vehicles and widens the scope of application to include purchase, lease, rent or hire-purchase of road transport vehicles, and procurement of several transport services.

With EU air pollution limits currently being broken in at least 130 cities in 23 countries, exposing European citizens to health-harming emissions that threaten health, there is a responsibility for cities to take action the Directive brings in a needed incentive for Member States to support them and the European clean vehicle market with clear definitions and targets.

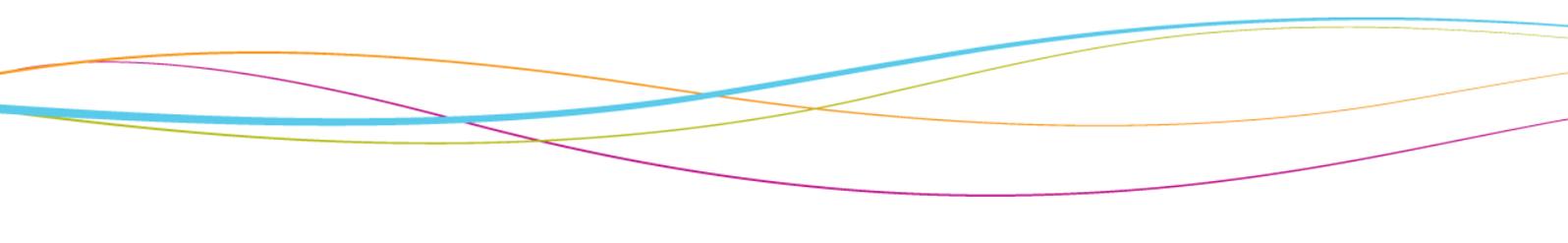
To ensure a cost-effective path towards achieving local and regional climate goals, a substantial and immediate deployment of zero-and low-emission vehicles will be needed at the beginning of the next decade. The renewal of public fleets brings huge numbers of new vehicles onto European streets each year – from buses to maintenance vehicles, from social services transport to office car pools. Currently, the large majority of these new vehicles are petrol or diesel driven – vehicles that will remain on our roads for the next 5-10 years, contributing further to CO₂ emissions, air and noise pollution.

In this sense, POLIS agrees with the minimum procurement targets at national level. It encourages Member States to “do better than the market” and cities to be ambitious in asking Member States to

¹ [Clean Mobility Package Press Release](#)

² [Revision of Directive 2009/33/EU on the promotion of clean and energy-efficient road transport vehicles](#)

³ [Impact Assessment preceding the CVD Revision](#)



comply with these targets. It is an important milestone which sends a strong signal to the market. Almost 80% of the current European public fleet composition still made up of Diesel fueled vehicles⁴,

The new elements of this Directive:

- A wider scope of the Directive covering purchase, lease, rent or hire-purchase of road transport vehicles, and procurement of several transport services.
- A clear definition for clean light-duty vehicles based on a combined tail-pipe (Tank-To-Wheel) CO2 and air pollutant threshold.
- No methodology is mandatory to use, but contracting authorities, contracting entities or operators should be able to choose any life-costing methodology in order to support their procurement processes.

Polis believe that the European Parliament and Council should take into account the following:

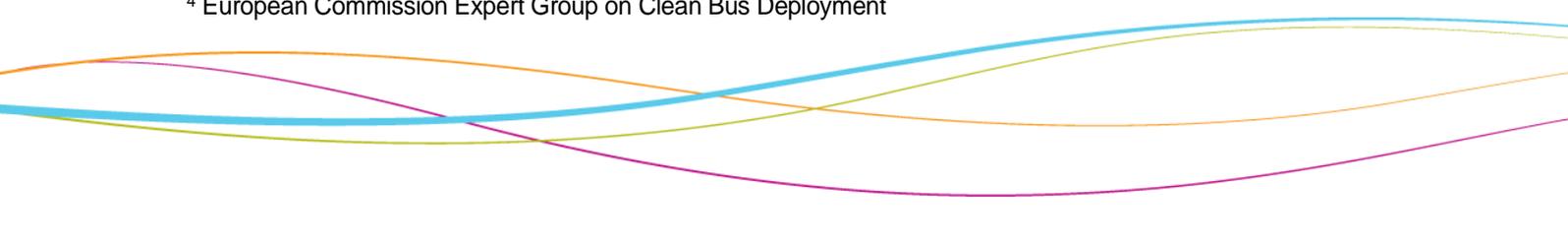
- Cities will have to comply with the national legislation implementing the Directive and comply to requirements to renew their fleet and parts of their transport-related procurement with clean vehicles, a clear link between public transport and inclusion of clean fleet renewal should be made with the Alternative Fuel Infrastructure Action Plan.
- It is important to ensure that cities receive the right information on emissions from vehicles to be able to choose the least emitting alternatives possible.
- The Directive does not address the issue of noise. Establish the necessity for noise measuring in cities, currently the proposal does not address this topic.
- Minimum procurement targets for Member States (by 2030 and interim targets by 2025 for light commercial vehicles).
- Polis welcomes the mechanism by which Member States will have to report on the implementation of the Directive every three years, starting with an intermediate report in 2023 and full reporting in 2026 on the implementation of the target for 2025.
- Some of the minuses of this proposal could come from considering tail-pipe emissions in the clean vehicle definition and application of the binding targets, which, without a national framework developed in collaboration with cities and regions could translate into economic constraints for small-medium size cities.

Two city-led networks of public procurers of innovative mobility solutions currently work in this field with Horizon2020 funds: BUYZET and SPICE.

ALTERNATIVE FUELS INFRASTRUCTURE ACTION PLAN

Since 2014 Polis has encouraged the setup of National policy frameworks for deployment of clean fuel infrastructure and argued that these should outline targets, objectives and supporting actions for the market development of alternative fuels, including the necessary infrastructure to be put into place. Most importantly Polis recommended that the NPFs should be done in close cooperation with regional and local authorities and with the industry concerned.

⁴ European Commission Expert Group on Clean Bus Deployment



Polis commends the European Commission for the pursuit of decarbonizing transport and welcomes the Communication on an action plan for Alternative Fuels Infrastructure. Despite this, the communication fails to properly address the issue of financing and involvement of local and regional authorities in the development of NPFs.

The action plan contains:

- **An assessment⁵ of the national policy frameworks (NPF)** and their coherence at Union level, including an evaluation of the level of attainment of the national targets;
- **An Action Plan, for the implementation of the Alternative Fuel Infrastructure Directive⁶**

The assessment notes the low level of ambition of some NPFs leading to rather small impacts in terms of air quality. The report also notes that urban and suburban agglomerations are currently at highest risk to violate EU air quality targets. These areas are disproportionately influenced from air quality improvements as a result of the NPFs.

Since 2013 Polis has been supportive of mandatory targets for 2020 for the number of charging points to be installed if those targets were set up through ongoing cooperation and consultation with local and regional authorities, which is not the case for a certain number of Member States.

POLIS welcomes the fact that the Action plan alternative fuels infrastructure includes a separate section for the charging infrastructure. Also commends the European Commission that the Action Plan acknowledges the relevance of urban nodes for multi-modality especially in the year of multi-modal travel, as declared by the European Commission.

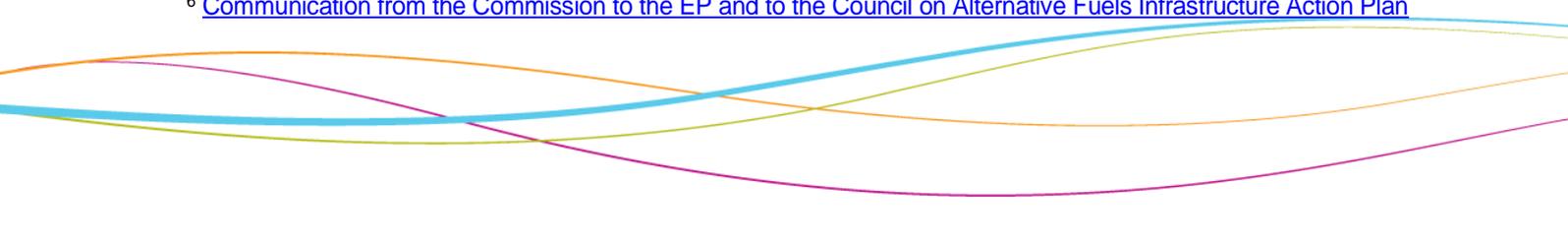
According to the Communication, "infrastructure needs to be ramped up in urban and sub-urban areas, where vehicles are being used for most of the time" and this is expected to produce knock-on effects for the deployment of infrastructure in other areas. It also notes that by 2025, around five times more or some 2 million publicly-accessible recharging points would be needed. If the share of fast-charging infrastructure increases to 5-15% of the overall charging infrastructure, investments in the order of in between EUR 2.7 to 3.8 billion could be required per year, as of 2021. The majority of these investment needs would fall into in urban areas.

The approach of the 2014 Directive had clear value added for the TEN-T core network (incl. urban nodes) with cross-border effects and interoperability. The Directive also expressly designed the CEF as a major tool to trigger a European market for alternatively fueled mobility. The project VitalNodes looks into urban nodes as a key component for developing multi-modality.

One of the key actions of the Action plan published in November 2017 for urban areas was the upgrade of the guidelines for SUMP. Polis welcomes this action particularly as integrating alternative fuels and clean vehicles should result in a sub-plan or sub-strategy that strengthens the role of these vehicles as part of a multimodal system. The Commission says that it will use the annual SUMP forum to work with

⁵ [Detailed Assessment of the National Policy Framework](#)

⁶ [Communication from the Commission to the EP and to the Council on Alternative Fuels Infrastructure Action Plan](#)



public authorities on adapting SUMPS by spring 2018. However, this is not enough to strengthen and deploy the existing network of charging points.

Two European CIVITAS projects: Eccentric and Prosperity are currently working on defining guidelines and recommendations for the integration of alternative infrastructure in the planning process. We urge the European Commission to take these into consideration when drafting new guidelines.

Finally, POLIS believes that the AFID Action plan communication fails to deliver and open a debate on related challenges such as transport energy taxes and vehicle registration taxes.

Additionally, it should:

- Open up a European debate on related challenges such as transport energy taxes and vehicle registration taxes;
- POLIS would also like to outline the need for a single entry point for information on this topic and encourage the promotion of the European Alternative Fuels Observatory.
- Foresee funding for initiatives installing charging points
- Include recommendations and guidelines for the financing of charging infrastructure in coordination with European Investment Bank.
- Alternative fuels, being at the cross-road between energy and transport, represent a unique opportunity for a positive change in consumption patterns towards the sustainability. Thus, their deployment along TEN-T should be regarded also from this perspective and with this aim

