

# Review of the Clean Vehicles Directive

## *Revision of Directive 2009/33/EC on the promotion of clean and energy-efficient road vehicles (Clean Vehicles Directive)*

Fields marked with \* are mandatory.

### Introduction

---

[Directive 2009/33/EC](#) on the promotion of clean and energy-efficient vehicles (known as "the Clean Vehicles Directive") requires public bodies to take account of lifetime energy and environmental impacts when purchasing road transport vehicles. In December 2015, an [ex-post evaluation](#) concluded that the Directive was still relevant, but overall insufficiently effective and efficient. It was recommended to revise the Directive. The European Commission is now inviting the opinions of the general public and key stakeholders on possible policy measures and potential impacts of a revision of the Clean Vehicles Directive. Information received will support the Impact Assessment that the European Commission is currently carrying out.

Respondents are welcome to expand on their answers in the text boxes foreseen for this purpose. At the end of the questionnaire, it is also possible to upload supporting evidence documents to complement the contribution.

### A. About you

---

1. You are welcome to answer the questionnaire in any of the [24 official languages](#) of the EU. Please let us know in which language you are replying.

English

\*2. You are replying

- as an individual in your personal capacity
- a public authority (ministry, agency, other form of public administration, at national, regional or local level)
- a contracting authority (procurer)
- a company
- a non-governmental organisation
- other (please specify)

2.1. Please specify "other"

Trade association

3. First name

European Biogas Association (EBA)

4. Last name

5. Email address

If you do not have an email address, please write "Not available".

trombetta@european-biogas.eu

## 6. Country of residence

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other (Please specify)

## \* 7. Your contribution,

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N° 1049/2001](#)

- can be published with your personal information** (I consent the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that you remain anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

8. Name of the organisation of which behalf you reply

European Biogas Association (EBA)

9. Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- Yes
- No
- Not applicable

\* 9.1. If so, please indicate your Register ID number.

18191445640-83

10. Please specify which interests you (the organisation on behalf of which you respond) represent:

- National public authorities (transport ministries, agencies)
- Regional or local public authorities
- Public contracting authorities (procurers)
- Public transport operators (in case of not being a contracting authority)
- Vehicle and equipment manufacturers/ suppliers
- Fuel producers and retailers
- Infrastructure operators or suppliers
- Logistics supplier
- Private fleet operator
- Interest organisations representing societal interests, particularly on environmental and social topics
- Other (please specify)

11. In addition to this general consultation, targeted follow-up will be organised with key professional stakeholders on certain topics. If you are a **professional stakeholder** would you be interested in participating in this targeted consultation?

- Yes
- No

## B. Main problem to address

---

1. In your view, how important is it that public procurement is effectively used to stimulate the market for clean vehicles in the EU?

- Not important
- Somewhat important
- Important
- Very important
- Do not know

2. Currently, the Clean Vehicle Directive has a very limited effect on reducing CO2 and other air pollutant emission from publicly procured road transport vehicles, as noted in [the ex-post evaluation of the Directive](#). To what extent do you agree with the following root causes?

	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
The Directive limits the scope to contracts falling under the procurement thresholds as set out in horizontal procurement legislation of the EU . This limitation results in too few vehicles falling under the scope of the initiative.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The Directive does not include a definition of what a "clean vehicle" is. Often, procurement requirements are set that can be met by the majority, if not all, vehicles on the market.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The Directive lacks minimum procurement targets for clean vehicles that orientate procurement planning.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The Directive allows for different options for transposition into national law, which has caused fragmentation in procurement rules that are hampering market impact.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The methodology for calculating operational life-time costs is too difficult and can unintentionally benefit conventionally-fuelled diesel vehicles.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3. The problem of limited impact of the Directive is due to another root cause.

- Yes  
 No

3.1. If yes, please explain your position shortly.

*1000 character(s) maximum*

In order to steer the transition towards less pollutant fuels public authorities need to modernise themselves, becoming the promoters of a cleaner and sustainable transport sector - especially after the VW scandal. Yet liquid fuels dominate renewable and non-renewable transport, while gas is used at a small scale, and road transport is still heavily reliant on fossil fuels. Conversely, biomethane is cleaner, less pollutant than other fuels, and has the social-environmental advantage of contributing towards a more circular economy. Cleaner technologies should thus be supported: efficiency of fuels should not be the main criterion, as some among the "efficient" fuels may not provide environmental benefits (e.g. diesel), whereas biomethane - being also less expensive - can be supplied in blends with natural gas both in CNG and LNG form, providing higher GHG emissions savings and particles reduction. Additionally, a well to wheel approach should be adopted, through a LCA methodology.

4. Do you have any general comment on the functioning and/or impact of Directive 2009/33/EC that you would like to share?

*1000 character(s) maximum*

Public authorities need to raise public awareness and show the full decarbonisation path. The scope should not be limited to fuel efficiency, but give more consideration to fuel cleanliness and the socio-economic goals. This could also support the Energy Union objectives, as RES-T is a necessary pillar for the process of full decarbonisation. The CVD should therefore broaden its scope, including water and maritime ways, as well as new waste management provisions according to other European legislations (RED and the Circular economy package). According to the alternative fuels infrastructure, biomethane is considered as a gaseous fuel, can come from different sources (fermentation or gasification) and be used everywhere similarly to natural gas: creating the infrastructure required would support a clean vehicles- and fuels - market, benefiting from the one hand European consumers from a health and financial perspective, and companies on the other, leading to clean technology exports.

**The following sections of the consultation are open to all participants, but address particularly expert views and more detailed, technical input from key stakeholders.**

## C. Policy measures

---

The Commission published an Inception Impact Assessment of the revision of the Clean Vehicles Directive in August 2016. It specifies key objectives for the revision of the Directive:

- impact of public procurement in all categories of clean vehicles should be improved
- current provisions for the purchase of clean vehicles in the Clean Vehicles Directive should be adjusted to provide adequate incentives
- the current methodology for the calculation of operational life-time cost of vehicles should be revised to remove inappropriate incentives.

Policy measures identified in the Inception Impact Assessment include

- Policy measure 1: expanding the scope of the Directive, with different sub-options
- Policy measure 2: changes to the provisions for purchasing clean vehicles, including:
  - Policy measure 2a: mandatory requirement to follow a revised methodology for calculating operational life-time costs when using energy and environmental impacts as award criteria;
  - Policy measure 2b: introduce a definition of clean vehicles and minimum procurement targets for public bodies
  - Policy measure 2c: keep both measures 2a and 2b with a mandatory choice for Member States

1. In your opinion, how important is it to revise the following parts of the Clean Vehicles Directive?

	Not important	Somewhat important	Important	Very important	Do not know
Scope (Art. 3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Provisions on the purchase of clean vehicles (Art. 5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Methodology for the calculation of operational lifetime costs (Art 6)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Adaptation to technical progress (Art 7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*Policy measure 1: Expanding the scope*



The Clean Vehicles Directive covers the purchase of road transport vehicles by contracting authorities, contracting entities and operators discharging public service obligations as defined by [Regulation 1370/2007](#) on public passenger transport services by rail and road. Furthermore, the [Clean Vehicles Directive](#) sets a threshold for service and supply contracts (of up to €414,000).

The way in which public authorities procure vehicles is changing with an increasing proportion of vehicles being leased, rented or indirectly procured through the procurement of services, e.g. bus or waste collection services. In addition, concessions can be tendered or granted. Also, public services provided by private operators are not fully covered in the Directive. Moreover the threshold below which the Clean Vehicles Directive does not need to be applied limits its scope.

2. In your opinion how relevant are the following options are relevant for a possible expansion of the scope of the Clean Vehicles Directive?

	Not relevant	Somewhat relevant	Relevant	Very relevant	Do not know
A) Remove the procurement threshold, thus ensuring that all vehicles purchased by public authorities are covered.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
B) Extend the scope of the Directive to vehicles rented, leased and hire-purchased by public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
C) Extend the scope of the Directive to private operators providing public services transporting passengers or goods	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
D) Extend the scope of the Directive to all contracts that have a major transport element (including for example contracts on major infrastructure works and the vehicles used to deliver these)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.1. If you consider option C (very) relevant, please explain briefly how "private operators providing public services" should be defined?

*Note that the Clean Vehicles Directive already covers 'operators discharging public service obligations', so this option refers to other 'public' transport.*

*1000 character(s) maximum*

2.2. If you consider option D (very) relevant, should the transport elements of contracts (such as for example major transport infrastructure works) be defined with reference to the Common Procurement Vocabulary (CPV codes) that has been developed by the European Commission?

- Yes  
 No

3. If you do not agree, please elaborate your answer briefly

*1000 character(s) maximum*

### *Policy measure 2a: Revising the methodology for calculating operational life-time costs*

The evaluation of the Clean Vehicles Directive found that the methodology for calculating the operational life-time costs was perceived by many public bodies to be too complex and difficult. It can unintentionally benefit conventionally-fuelled diesel vehicles.

4. From your point of view, how important are the following objectives for a potential revision of the methodology for calculating the operational lifetime cost?

	Not important	Somewhat important	Important	Very important	Do not know
Simplify the current methodology	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Put greater emphasis on reducing emissions of CO2 through changing values	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Put greater emphasis on reducing emissions of pollutants through changing values	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Enlarge the scope of environmental impacts covered (noise)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Create a more effective mechanism for updates of the methodology	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

5. In your view should there be a requirement to follow the methodology for calculating operational lifetime costs when using energy and environmental impacts as award criteria?

- Strongly disagree
- Somewhat disagree
- Somewhat agree
- Strongly agree
- Do not know

6. In your view, how important is it to require a regular evaluation and update of the methodology?

- Not important
- Somewhat important
- Important
- Very important
- Do not know

6.1. If you find it (very) important, how should the methodology best evaluated and updated? Please explain briefly your position.

*500 character(s) maximum*

Smog in cities is largely caused by buses and other vehicles burning diesel. The prioritisation of an efficiency criterion led to an increased use of non-clean technologies such as diesel. It is incorrect and unfair to consider the GHG produced by the tailpipe as the full emissions amount: a well to wheel approach should be adopted, through an in-depth LCA which takes both particles and NOx emissions of liquid fuels - especially diesel - into account.

7. Do you have any general comment on the scope of a possible revision of the monetisation methodology? Please explain your position.

*3000 character(s) maximum*

*Policy measure 2b: introducing a definition of clean vehicles and minimum procurement targets for public bodies*

The current provision on setting technical specifications leads in practice often to specifications that can be met by all vehicles. This problem could be addressed through setting minimum procurement targets on the basis of a definition of clean vehicles.

8. From your point of view, how important is it to introduce a definition of "clean vehicles" in the Clean Vehicles Directive?

- Not important
- Somewhat important
- Important
- Very important
- Do not know

9. In terms of defining clean vehicles, different conceptual approaches could be considered. Please rate the adequacy of the following approaches

a) Tailpipe emissions are those directly emitted at the tailpipe of the vehicle. Zero-emission vehicles are those having zero tailpipe emissions, such as all-electric vehicles. However, emissions may also be produced during fuel production (drilling, transport, refining) and electricity generation (power plants).

b) Life-cycle emissions refer to emission occurring across all stages of a product's life (incl. manufacturing, use phase, disposal).

c) Referring to emissions of vehicles measures on roads compared to emissions measures in laboratories.

	Completely inadequate	Somewhat inadequate	Somewhat adequate	Completely adequate	Do not know
a) Define clean vehicles on the basis of a tailpipe CO2 emissions specified threshold	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Define clean vehicles on the basis of a life-cycle CO2 emissions specific threshold	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
c) Define clean vehicles on the basis of a real world air pollutants emissions threshold	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
e) Define clean vehicles on the basis of vehicles capable of using an alternative fuel (as defined by Article 2(1) of the Alternative Fuels Infrastructure Directive (2014/94 /EU)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
d) Define clean vehicles as vehicles with zero tailpipe emissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Do you have any general suggestion on thresholds that could be used for approaches a) to c) presented in the previous question?

*1000 character(s) maximum*

In order to ensure consistency with the renewable energy directive proposal, 70% GHG emissions reduction should be the ideal threshold.

11. In your opinion, should elements of the above mentioned approaches be combined in a definition of clean vehicles?

- Yes  
 No

11.1. If you agree, please explain which approaches should be combined and why:

*1000 character(s) maximum*

The boundaries and the scope of the methodology should include the entire life cycle, including GHG, particles and NOx emissions. The vehicle performance, the cleanliness and efficiency of the fuel used and the GHG emissions throughout the chain should be combined to identify the set of vehicles and fuels that should be counted to meet the targets. Potential rebound effects should be prevented when defining the methodology, as giving priority to "efficient" vehicles, a higher amount of diesel vehicles may be purchased, leading for instance to an increased bulk of emissions and costs related to air pollution, especially in healthcare.

12. In your opinion, are any of the approaches mentioned in question 9 **not** adequate for defining clean vehicles in the following categories of vehicles: a) passenger vehicles, b) buses and coaches, c) light duty transport vehicles and d) heavy duty transport vehicles? Please explain your position.

*1000 character(s) maximum*

13. To what extent do you agree to these approaches for setting minimum procurement targets for public bodies (based on a future definition of clean vehicles in the Directive)? Contracting authorities and entities should be required:

	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
to only procure vehicles that are defined as clean vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
to ensure that a specified percentage of vehicles procured under each contract are clean vehicles.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
to ensure that over a fixed time period a specified percentage of vehicles procured are clean vehicles	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. In order to foster the transition to a low-emission mobility and account for diverging levels of ambition by different public bodies, a minimum target for the procurement of zero-emission vehicles could be included in addition to the overall minimum procurement target as noted in the previous question. To what extent do you agree with the approaches listed below?

	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
Public bodies should be required to procure a certain percentage of zero-emission vehicles under each contract	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Public bodies should be required to procure a certain percentage of zero-emission vehicles over a fixed time period	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15. In your view how important is it to require a regular reporting by Member States on minimum procurement targets?

- Not important
- Somewhat important
- Important
- Very important
- Do not know

*Policy measure 2c: Combination of monetisation methodology and clean vehicles definition with minimum procurement targets with a mandatory choice for Member States*

16. The policy measures presented below are not mutually exclusive and could thus potentially be combined. To what extent do you agree to the following approaches?



	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
The Directive should include a mandatory monetisation methodology (to be used when determining the life cycle costs as award criteria) and a definition of clean vehicles accompanied by minimum procurement targets. Member States must choose an option to apply.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The revision of the Directive should establish only the requirement to follow the revised monetisation methodology when using determining the life cycle costs as award criteria	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The revision of the Directive should only require public bodies to meet minimum procurement targets set on the basis of a definition of clean vehicles.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The revision of the Directive should only require public bodies to meet minimum procurement targets set on the basis of a definition of clean vehicles, and include a specific target for zero-emission vehicles	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## D. Impacts

The Inception Impact Assessment preliminary considered the identified measures to be proportionate for the problem to address. It does not expect any sizeable social impacts. Economic impacts are expected to vary among stakeholders, but are not expected to be significant on an overall economic scale. Environmental impacts are expected to be overall positive. Impacts on administrative burden and simplification are assumed to differ, with some policy measures probably initially adding to an increased administrative burden and others reducing administrative burden.

1. To what extent do you agree to the following statements on likely economic impacts? All policy measures noted above:

	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
will lead to growth and jobs in the manufacturing sector, particularly in the heavy-duty transport sector, due to stronger public demand for clean vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
will contribute to a bigger market in the EU that will improve international competitiveness of European industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
can lead to initially strains on investment budgets of local public authorities and/or transport operators due to higher purchase cost of clean vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
can reduce overall budget pressure of local public authorities and/or transport operators due to low maintenance cost and over time reduced investment cost due to falling vehicle prices	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. To what extent do you agree to the following statements on environmental impacts? All proposed policy measures:

	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
will reduce energy consumption from vehicle fleets providing public services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
will lead to less emissions of CO2 from vehicle fleets providing public services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
will lead to less emissions of air pollutants (as covered under the Directive) from vehicle fleets providing public services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
will have positive effects on human health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3. To what extent do you agree to the following statements on administrative burden and simplification?

	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
Expanding the scope of the Directive will initially lead to an increased administrative burden incurred mostly by local public authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandating a revised methodology for calculation of operational lifetime cost to follow when using impacts as award criteria in the procurement decision will increase administrative burden incurred by mostly local public authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplification of the methodology can positively influence the overall increase in administrative burden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Introducing a clean vehicle definition and minimum procurement targets will reduce administrative burden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Scio-economic benefits of a higher share of clean vehicles (reduced public health impacts) will overcompensate costs related to increase in administrative burden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

#### 4. Do you have any general comment on potential impacts of the proposed policy measures?

*1000 character(s) maximum*

As suggested in the ex-post evaluation, at the moment administrative burden related to current Directive is low. Simplification due to new methodologies and definitions can easily be achieved, ensuring a progressive decrease in administrative burden in the mid- and long-term. Reducing negative externalities including pollution (hydrocarbons, carbon monoxide, nitrogen oxides and particulate matter) and related costs could balance the initial slight administrative burden increase, that would right after decrease once the methodology and the definitions will become clearer. As the transport sector is among the leading causes of climate change, for the EU to meet its 2020 targets for GHG emissions reduction, it is imperative that renewable transport fuels are deployed in a large scale. Moreover, the policy measures will allow to achieve more transparency, reliability of public authorities and a cleaner transport sector in Europe.

### E. Relevance of other action at European level

---

1. From your point of view, could the objectives that should be achieved through the revision of the Directive be better accomplished through deployment of non-legislative tools (e.g. action based on voluntary green public procurement criteria, use of life-cycle cost tools) based on guidance or recommendations by the Commission?

- Strongly disagree
- Somewhat disagree
- Somewhat agree
- Strongly agree
- Do not know

2. Please explain your answer

*1000 character(s) maximum*

Non-legislative tools can enhance market opportunities to produce a deeper penetration of the legislative measures, increasing public awareness and showing a commitment at the public authorities' level. Additionally, a positive behavioural change could be driven by non-legislative tools, and political directions are needed to overcome the current lack of infrastructures. For instance, in Sweden climate-investment grants for municipalities until the end of 2018 are driving a positive market change (IRENA, 2017), and initiatives to inform citizens have driven a positive change in the environmental sector.

3. From your point of view, could the objectives as stated for this initiative be achieved better if policy measures discussed for the revision of the Directive were implemented through a Clean Vehicles Regulation that would replace the current Clean Vehicles Directive?

*Please note that a Regulation is directly applicable in Member States and does not need transposition into national law, which is required for Directives.*

- Strongly disagree
- Somewhat disagree
- Somewhat agree
- Strongly agree
- Do not know

3.1. If you agree to this possibility, please justify why you consider this approach best suited.

*3000 character(s) maximum*

The scope of this piece of legislation should not be prescriptive: it should not only support a wide range of new clean technologies, but instead support the technological advancement of the existing ones as well. As legislative fragmentation has been among the main challenges of the current Directive, a Regulation could be more efficient in achieving market harmonisation, supporting the transition towards cleaner vehicles and ensuring legislative consistency across Member States. Increased sales will help reduce costs through economies of scale, resulting in a progressive improvement in the energy and environmental performance of the whole vehicle fleet. In a nutshell, a more Europeanised approach towards the energy transition would emerge with more defined rules.

## F. Final remarks

---

Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report.

Biomethane in transport (EBA), EBA Statistical report 2016, IRENA bioenergy in transport 2017, Global Bioenergy Partnership 2011.

You may also upload some files

### Useful links

[About this consultation \(https://ec.europa.eu/transport/themes/sustainable/consultations/2016-clean-vehicles\)](https://ec.europa.eu/transport/themes/sustainable/consultations/2016-clean-vehicles)

## Contact

MOVE-B4-CVD@ec.europa.eu

---