

European Commission proposal for a Directive amending the Clean Vehicles Directive

Eurelectric amendments

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2018/12.105/17

Electro-mobility WG

Contact:
Henning HÄDER, Manager - Energy Policy, Climate &
Sustainability - hhader@eurelectric.org
Sarah HERBRETEAU, sherbreteau@eurelectric.org

Introduction

Europe is at a crucial moment in time, where in order to deliver on the Paris Agreement the transport sector has to drastically increase emission reduction efforts. Emissions from transport are both in absolute and in relative terms higher than in 1990.

Electrification is one major driver to reduce greenhouse gas emissions and energy consumption in road transport. Electrified transport will have to be integrated in the wider power system. If this is done well, electric vehicles can provide a valuable resource for the power system, while improving energy efficiency and air quality (and thus public health). With electrified transport, cities are also one step further on their journey to smart cities.

The power sector is ready to become a key enabler for the transport sector to reduce emissions drastically with the help of decarbonized electricity. We are committed to becoming carbon - neutral well before 2050. Regulatory frameworks which enable zero emission mobility to develop are needed now to drive this transition.

The Clean Vehicles Directive sets rules for the public procurement of vehicles. Public authorities can be a driver and early adopter of clean vehicles and thus lead by example – however it should be ensured that the financial impact on public authorities is not disproportionately high. In this context, both financial support for clean vehicles procurement and additional measures on vehicle suppliers to produce a sufficient number of clean vehicles can be considered.

Even if the share of cars procured by public authorities is about 2% of the car market, this can still have important impacts in the early stages of EV deployment. For the bus market, public authorities are currently the most important customers. In this sector the impact of the Directive will be decisive.

The second key aspect of the proposed Directive refers to the improvement of air quality in cities. One in three Europeans living in cities today endure air quality deemed illegal under EU air quality standards. Public transport by bus is usually running on diesel, thus considerably contributing to city air pollution. The same is true for other large vehicles delivering public services, like garbage collection vehicles. Cleaner technologies, like electric vehicles, can bring a considerable improvement here.

The amendments presented below are tackling the key shortcomings of the Commission's proposal and seek to move Europe toward a trajectory in which the transport sector can successfully play its part in achieving the EU's ambitions for the Paris Agreement.

Amendment Proposals

Amendment 1

Text proposed by Commission

Amendment proposal by Eurelectric

(new) Article 1 – Definitions

“Zero-emission vehicle” means zero-emission vehicle as referred to in Article 2 of [Eurovignette Directive recast]

Justification

“Zero-emission vehicle” is mentioned several times in the recitals but not clearly defined. Adding this definition would avoid any misunderstanding and make the Clean Mobility Package more consistent.

Amendment 2

Text proposed by Commission

Amendment proposal by Eurelectric

Article 2

1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by XXXX [*Please insert the date 24 months following the date of entry into force*] at the latest. They shall immediately communicate to the Commission the text of those provisions.

1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by XXXX [*Please insert the date **18 months** following the date of entry into force*] at the latest. They shall immediately communicate to the Commission the text of those provisions.

Justification

The Clean Vehicles Directive should start producing effects as soon as possible.

Amendment 3

Text proposed by Commission

Amendment proposal by Eurelectric

Article 4a – Delegation of powers

The Commission shall be empowered to adopt delegated acts in accordance with Article 8a in order to update Table 3 in the Annex with CO₂ tail-pipe emission and air pollutants thresholds for heavy duty vehicles once the related heavy-duty CO₂ emission performance standards are in force at the Union level.

The Commission shall be empowered to adopt delegated acts in accordance with Article 8a in order to update Table 3 in the Annex with CO₂ tail-pipe emission and air pollutants thresholds for heavy duty vehicles once the related heavy-duty CO₂ emission *measurement methodology is available*. ~~performance standards are in force at the Union level~~. *The CO₂ tail-pipe emission and air pollutants thresholds chosen should be compatible with the list of technologies previously considered as “clean”.*

(new) The Commission shall ensure that the definition of clean heavy duty vehicles is equally strengthened from 2025 to 2030.

Justification

The Clean Vehicles Directive can stimulate the market for clean vehicles, provided it delivers a clear and predictable framework for public authorities and industries alike.

To make sure that vehicles purchased in the early 2020s do not become stranded assets, the directive should make clear that the CO₂ tail-pipe emission and air pollutants thresholds chosen at a later stage should be compatible with the list of technologies previously considered as “clean”.

Amendment 4

Text proposed by Commission

Amendment proposal by Eurelectric

Article 5 – Minimum procurement targets

[...]

[...]

3. (new) To reach the procurement targets, contracting entities shall base the award of contracts on the most economically advantageous tender ('MEAT') as described in Art. 82 of Directive 2014/25/EU. Tender specifications should be defined not only with a focus on Total Cost of Ownership (TCO) but also on other vehicle characteristics such as accessibility, insertion in urban landscape, noise levels, energy efficiency recyclability of batteries and vehicle components, etc.

4. (new) The minimum procurement targets for heavy-duty vehicles referred to in Table 5 in the Annex should be combined with possibilities of financial support for the less wealthy public authorities.

Justification

Tender specifications should be defined not only with a focus on Total Cost of Ownership but also on other vehicle characteristics.

It should be ensured that the financial impact on public authorities is not disproportionately high.

Amendment 5

*Text proposed by Commission**Amendment proposal by Eurelectric*

Annex Table 1 : Common Procurement Vocabulary codes referred to in Article 3

CVP code	Description
60112000-6	Public road transport services
60130000-8	Special-purpose road passenger-transport services
60140000-1	Non-scheduled passenger transport
60172000-3	Hire of buses and coaches with driver
90511000-2	Refuse collection services
60160000-7	Mail transport by road
60161000-4	Parcel transport services

CVP code	Description
60112000-6	Public road transport services
60130000-8	Special-purpose road passenger-transport services
60140000-1	Non-scheduled passenger transport
60172000-3	Hire of buses and coaches with driver
90511000-2	Refuse collection services
60160000-7	Mail transport by road
60161000-4	Parcel transport services
<i>60120000-5</i>	<i>Taxi services</i>
<i>60170000-0</i>	<i>Hire of passenger transport vehicles with driver</i>
<i>60171000-7</i>	<i>Hire of passenger cars with driver</i>
<i>60181000-0</i>	<i>Hire of trucks with driver</i>
<i>60180000-3</i>	<i>Hire of good-transport vehicles with driver</i>
<i>90511100-3</i>	<i>Urban solid-refuse collection services</i>
<i>90511200-4</i>	<i>Household-refuse collection services</i>
<i>90511300-5</i>	<i>Litter collection services</i>
<i>90511400-6</i>	<i>Paper collecting</i>

	<i>services</i>
<i>43211000-5</i>	<i>Bulldozers</i>
<i>43260000-3</i>	<i>Mechanical shovels, excavators and shovel loaders, and mining machinery</i>
<i>43262000-7</i>	<i>Excavating machinery</i>
<i>43300000-6</i>	<i>Construction machinery and equipment</i>

Justification

One key aspect of the proposed Directive refers to the improvement of air quality in cities. One of three Europeans living in cities today endures air quality deemed illegal under EU air quality standards. Public transport by bus is usually running on diesel, thus considerably contributing to city air pollution. The same is true for other large vehicles delivering public services, like garbage collection or construction vehicles.

Conventionally fuelled road transport is the largest source of NOx (46% of total EU emissions) and particulate matter. This pollution is mainly emitted in cities where industries and intense traffic are concentrated. To improve the impact of this directive, a greater number of transport services, included private one, should be covered by clean vehicles procurement obligations.

Amendment 6

Text proposed by Commission

Amendment proposal by Eurelectric

Annex Table 2 : Emission-thresholds for light-duty vehicles

Vehicle categories	2025		2030	
	CO2 g/km	RDE air pollutant emissions* as percentage of emission limits**	CO2 g/km	RDE air pollutant emissions* as percentage of emission limits**
M1 vehicles	25	80%	0	n.a.
M2 vehicles	25	80%	0	n.a.
N1 vehicles	40	80%	0	n.a.

Vehicle categories	2025		2030	
	CO2 g/km	RDE air pollutant emissions* as percentage of emission limits**	CO2 g/km	RDE air pollutant emissions* as percentage of emission limits**
<i>L vehicles</i>	<i>25</i>	<i>80%</i>	<i>0</i>	<i>n.a.</i>
M1 vehicles	25	80%	0	n.a.
M2 vehicles	25	80%	0	n.a.
N1 vehicles	40	80%	0	n.a.

Justification

Type L vehicles should be included in the Directive as they can be suitable for specific public services such as postal delivery.

Amendment 7

Text proposed by Commission

Amendment proposal by Eurelectric

Annex Table 3 : Alternative fuel requirements for heavy-duty vehicles

Vehicle categories	Alternative fuels
M3, N2, N3 vehicles	Electricity*, hydrogen, natural gas including biomethane, in gaseous form (compressed natural gas (CNG)) and liquefied form (liquefied natural gas (LNG))

*For use in a vehicle as defined in Art. 2 (2) of Directive 2014/94/EU, provided that electricity is used for a relevant part of the operational use of the vehicle.

Vehicle categories	Alternative fuels
M3, N2, N3 vehicles	Electricity*, hydrogen, natural gas <i>including</i> biomethane, in gaseous form (compressed natural gas (CNG)) and liquefied form (liquefied natural gas (LNG))

*For use in a vehicle as defined in Art. 2 (2) of Directive 2014/94/EU, provided that electricity is used for a relevant part of the operational use of the vehicle.

Justification

Only carbon-neutral alternatives should be considered clean fuels, also for trucks. Technologies using gas such as biomethane have a role to play in bringing down emissions from these vehicle types.

Amendment 8

Text proposed by Commission

Amendment proposal by Eurelectric

Annex Table 4 : Minimum target for the share of light-duty vehicles in accordance with table 2 in the total public procurement of light-duty vehicles at Member State level*

Member State	2025	2030
Luxembourg	35%	35%
Sweden	35%	35%
Denmark	34%	34%
Finland	35%	35%
Germany	35%	35%
France	34%	34%
United Kingdom	35%	35%
Netherlands	35%	35%
Austria	35%	35%
Belgium	35%	35%
Italy	35%	35%
Ireland	35%	35%
Spain	33%	33%
Cyprus	29%	29%
Malta	35%	35%
Portugal	27%	27%
Greece	23%	23%
Slovenia	20%	20%
Czech Republic	27%	27%
Estonia	21%	21%
Slovakia	20%	20%
Lithuania	19%	19%
Poland	20%	20%
Croatia	17%	17%
Hungary	21%	21%
Latvia	20%	20%
Romania	17%	17%
Bulgaria	16%	16%

*Vehicles with zero-emissions at tailpipe shall be counted as 1 vehicle contributing to the mandate. All other vehicles that meet the requirements of Table 2 in this annex shall be counted as 0.5 vehicle contributing.

Member State	2025	2030
Luxembourg	50%	100%
Sweden	50%	
Denmark	50%	
Finland	50%	
Germany	50%	
France	50%	
United Kingdom	50%	
Netherlands	50%	
Austria	50%	
Belgium	50%	
Italy	50%	
Ireland	50%	
Spain	50%	
Cyprus	50%	
Malta	50%	
Portugal	50%	
Greece	50%	
Slovenia	50%	
Czech Republic	50%	
Estonia	50%	
Slovakia	50%	
Lithuania	50%	
Poland	50%	
Croatia	50%	
Hungary	50%	
Latvia	50%	
Romania	50%	
Bulgaria	50%	

*Vehicles with zero-emissions at tailpipe shall be counted as 1 vehicle contributing to the mandate. All other vehicles that meet the requirements of Table 2 in this annex shall be counted as 0.5 vehicle contributing.

Justification

Public authorities should lead by example. Thus, the Clean Vehicles Directive should require public authorities to only procure clean vehicles as of 2030, with national midway-targets for 2025.

For clean cars and vans, the procurement targets should be at 100% for all Member States. Taking into consideration expected cost reduction by falling battery costs and approaching economies of scale, the financial burden should be manageable.

Amendment 9

Text proposed by Commission

Amendment proposal by Eurelectric

Annex Table 5 : Minimum target for the share of heavy-duty vehicles in accordance with table 3 in the total public procurement of high-duty vehicles at Member State level*

Member State	Trucks		Buses	
	2025	2030	2025	2030
Luxembourg	10%	15%	50%	75%
Sweden	10%	15%	50%	75%
Denmark	10%	15%	50%	75%
Finland	9%	15%	46%	69%
Germany	10%	15%	50%	75%
France	10%	15%	48%	71%
United Kingdom	10%	15%	50%	75%
Netherlands	10%	15%	50%	75%
Austria	10%	15%	50%	75%
Belgium	10%	15%	50%	75%
Italy	10%	15%	50%	75%
Ireland	10%	15%	50%	75%
Spain	10%	14%	50%	75%
Cyprus	10%	13%	50%	75%
Malta	10%	15%	50%	75%
Portugal	8%	12%	40%	61%
Greece	8%	10%	38%	57%
Slovenia	7%	9%	33%	50%
Czech Republic	9%	11%	46%	70%
Estonia	7%	9%	36%	53%
Slovakia	8%	9%	39%	58%
Lithuania	9%	8%	47%	70%
Poland	7%	9%	37%	56%
Croatia	6%	7%	32%	48%
Hungary	8%	9%	42%	63%
Latvia	8%	9%	40%	60%
Romania	6%	7%	29%	43%
Bulgaria	8%	7%	39%	58%

** Vehicles with zero-emissions at tailpipe or vehicles using natural gas provided they are fully operated on bio-methane, which should be demonstrated by a contract to procure bio-methane or other means of accessing bio-methane, shall be counted as 1 vehicle contributing to*

Member State	Trucks		Buses	
	2025	2030	2025	2030
Luxembourg	50%		66%	
Sweden	50%		66%	
Denmark	50%		66%	
Finland	50%		66%	
Germany	50%		66%	
France	50%		66%	
United Kingdom	50%		66%	
Netherlands	50%		66%	
Austria	50%		66%	
Belgium	50%		66%	
Italy	50%		66%	
Ireland	50%		66%	
Spain	50%	100%	66%	100%
Cyprus	50%	%	66%	%
Malta	50%		66%	
Portugal	35%		45%	
Greece	35%		45%	
Slovenia	35%		45%	
Czech Republic	50%		66%	
Estonia	35%		45%	
Slovakia	35%		45%	
Lithuania	35%		45%	
Poland	35%		45%	
Croatia	35%		45%	
Hungary	35%		45%	
Latvia	35%		45%	
Romania	35%		45%	
Bulgaria	35%		45%	

** Vehicles with zero-emissions at tailpipe shall be counted as 1 vehicle contributing to the mandate. All other vehicles that meet the requirements of Table 2 in this annex shall be counted as 0.5 vehicle contributing.*

the mandate. This counting is abandoned in case of those Member States where the minimum procurement mandate exceeds 50% of the overall volume of public procurement, with a cut-off at the 50% mark. All other vehicles that meet the requirements of Table 2 in this annex shall be counted as 0.5 vehicle contributing.

Justification

Contrary to purchasing decisions for passenger cars, trucks purchasing decisions are first and foremost driven by economic calculations and anticipation of future regulation. As a consequence, McKinsey energy insights forecasts a 25%-30% market share for light e-trucks in Europe by 2025. It also sees that light e-trucks will reach cost parity in Europe by 2021, and medium trucks shortly after. Only the heavy duty trucks market is expected to reach cost parity after 2027. As public companies usually rely on light or medium trucks in urban areas, they would have no economic reasons to procure other than clean vehicles by 2030.

Buses are operated on fixed routes, on a precise schedule, which make them prime candidate for electrification. Already today, their total cost of ownership is approaching the one of conventionally-fuelled buses.

If the current decline in battery cost continues, McKinsey expects electric buses to be at cost parity with diesel buses between 2020 and 2023.

Other stakeholders are also optimistic for the prospect of clean buses. For instance, the Zeeus project team and UITP anticipate a 90% market share for clean buses by 2030.

The proposed Directive states that for heavy-duty vehicles, those with zero tailpipe emissions or fully operated on biomethane should be counted as 1 to contribute to the mandate and that this counting should be abandoned if the minimum procurement mandate exceeds 50%. We believe that only those alternatives with zero tailpipe emissions should be counted as 1 and this system should be kept no matter the minimum procurement mandate of the Member State. In addition it is important to note that sustainability criteria should be taken into consideration when giving any benefit to biomethane.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

Growth, added-value, efficiency

Environmental Leadership

■ Commitment, innovation, pro-activeness

Social Responsibility

■ Transparency, ethics, accountability



Union of the Electricity Industry – eurelectric aisbl
Boulevard de l'Impératrice, 66 – bte 2 – 1000 Brussels, Belgium
Tel: + 32 2 515 10 00 – VAT: BE 0462 679 112 • www.eurelectric.org
EU Transparency Register number: [4271427696-87](https://ec.europa.eu/transparency/regexp1/index.cfm?do=entity.entity_details&entity_id=4271427696-87)