The Consumer Voice in Europe

BEUC response to the EESC concerning the review of the Transport White Paper

Contact: **Chris Carroll – environment@beuc.eu**

Ref.: BEUC-X-2015-022 - 25/02/2015

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND
Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • Fax +32 (0)2 740 28 02 • consumers@beuc.eu • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45

BEUC The European Consumer Organisation

Background

In this paper, BEUC provides its response to the European Economic and Social Committee's request for comment on the mid-term review of the European Commission's White Paper on Transport. The response given relates to the following three questions posed by the European Economic and Social Committee, ahead of their hearing *'White Paper on Transport: Where do we Stand?'*:

- *Which are the success stories of EU's transport policy?*
- *Which areas failed to achieve the desired results?*
- *Summum bonum, which WP actions need to be prioritized from now on?*

Energy efficient cars

One of the goals set out in the White Paper is to reduce GHG emissions from the transport sector within the EU. In this, the White Paper sets out a 60% CO_2 emissions reduction target in the transport sector by 2050, compared to 1990 levels. The EU has taken action that supports this aim and the mandatory passenger car EU CO_2 emissions targets of 130 CO_2/km to be met by 2015 (adopted prior to the 2011 White Paper), and the 95 g CO_2/km to be achieved by the year 2021 (adopted in 2014) were welcomed by BEUC. The effect of these targets[1] should lead to reductions in CO_2 emissions of passenger vehicles, protect consumers from long term fuel price increases, reduce the dependence on foreign oil imports, and prevent further air pollution.

Existing evidence indicates that these CO_2/fuel economy targets are having a positive effect on the fuel efficiency of new cars[2]. However, it must be recognised that the well documented weaknesses in the monitoring of CO_2 emissions and the fuel consumption of new passenger cars, indicates that the reported improvements are not being captured entirely in the real world[3] (see under 'fuel consumption testing' for further detail).

As a key instrument to achieve further market penetration of more energy-efficient cars and new powertrain technologies in order to reduce CO_2 emissions and lower the cost of driving, we support setting mandatory CO_2 emission targets for passenger vehicles for the period after 2021. We therefore have high expectations that the Commission will come forward with an ambitious proposal in 2015 for tighter CO_2 standards for cars for 2025.

- **Ambitious 2025 CO_2 emissions targets** for cars should be set as this is the smart route towards cutting fuel costs and achieving overall CO_2 targets.

[1] BEUC (2012): Good for the environment and good for your pocket: Consumer benefits of CO_2 emissions target, short version: http://www.beuc.org/publications/2012-00461-01-e.pdf

[2] Ricardo AEA (2014) Evaluation of Regulations 443/2009 and 510/2011 on the reduction of CO2 emissions from light-duty vehicles: http://ec.europa.eu/clima/events/docs/0103/evaluation_en.pdf

[3] BEUC (2014) http://www.beuc.eu/great-fuel-consumption-scam

Another of the goals set out in the White Paper is to *'Halve the use of 'conventionally-fuelled' cars in urban transport by 2030; phase them out in cities by 2050; achieve essentially CO2-free city logistics in major urban centres by 2030'*. In order to achieve this goal substitution strategies including the development of new technologies such as electric vehicles will play a fundamental role in the transition. However, in order to successfully transform our future transport system swapping conventional cars for electric cars should not be portrayed as "silver bullet solutions". Many problems such as congestion in cities will not disappear in thin air – after all, "green congestion still remains congestion".

Nevertheless, it is vitally important that charging systems for electric vehicles across Europe are fully standardised (e.g. in terms of paying systems, charging plugs, charging points etc.). This would allow consumers to charge their vehicles easily if they are driving across borders or when travelling within their own Member State. In turn, this approach would improve interoperability and ensure against fragmented market developments across Europe. Although the White Paper lacks detail in this regard, the overarching message of achieving *'coherence at EU level'* when it concerns electric vehicles clearly sends an important signal in achieving a standardised approach in this area.

- A **common standard for charging electrified vehicles** across the EU should be developed as a priority.
- **Research and development programmes** and **demonstration projects** on ultra-low carbon vehicles should be supported in order to improve some of the performance characteristics of those vehicles and increase public awareness, to receive first hand feedback from drivers and to test consumer acceptance and market readiness.

Fuel consumption testing

As alluded to, existing European rules and regulations concerning the monitoring and testing of a car's fuel consumption are open to abuse. This is because there are flexibilities that car manufacturers can exploit and provide claims about a vehicle's fuel consumption and carbon footprint that do not reflect what consumers observe under real life conditions. Not being able to know the real carbon emission reductions from the automobile sector makes it difficult to understand the performance of the car industry in cutting its carbon footprint, and for that matter Member States' own performance. Hence, it undermines the very CO_2/EU fuel economy targets that have been a success of the EU's transport policy, and likewise feeds distrust amongst consumers in the system. It is also the case that prospective car buyers are frustrated with car manufacturer's advertising fuel economy performances that cannot be replicated in the real world and are paying far more on fuel costs than otherwise expected.

Under the list of Initiatives proposed in the White Paper included is the following: '*Ensure that CO_2 and pollutant emissions are reduced under real-world driving conditions by proposing at the latest by 2013 a revised test cycle to measure emissions*'. This objective has not been achieved for both CO_2 and air pollutant emissions. BEUC has high expectations that the European Commission will rectify this current impasse in order to see the adoption of a new testing protocol, the Worldwide Harmonised Light Vehicles Test Procedure (WLTP) under EU law in 2015, for it to become operational by 2017.

- The **outdated test** to measure CO_2/fuel consumption of cars (NEDC) must be **replaced** by the newly developed Worldwide harmonized Light vehicles Test Procedure (**WLTP**).

Vehicle labelling for CO2 emissions and fuel economy

The EU strategy to reduce CO_2 emissions from passenger cars partly relies on the requirement that information on fuel consumption and CO_2 emission values of new cars is easily accessible for consumers. The EU Directive 1999/94/EC outlines the requirements concerning the way information must be displayed but is now out of date and its implementation in several countries has simply confused prospective car buyers. Studies by the European Parliament in 2010 and the Commission itself in 2013 have supported these claims and without amending the Directive, it is unlikely that the full potential of measures designed to improve fuel/energy efficiency of new passengers will be realised[4].

The list of initiatives included in the White Paper includes reviewing '*the labelling Directive to make it more effective.* This will, inter alia, consider the extension of the scope to light commercial and L-category vehicles, *and the harmonisation of the label and vehicles fuel efficiency classes throughout the Member States*'. As long ago as 2007 the Commission committed itself to proposing amendments to improve the effectiveness of the fuel economy labelling directive (Directive 1999/94/EC) and yet eight years later there is still no proposal to revise a directive that is failing motorists and progressive car manufacturers and undermining European efforts to tackle climate change and energy security.

With the implementation of the WLTP, which in turn should ensure more reliable figures for fuel consumption and CO_2 emissions declared by car manufacturers, it would be essential that such a change goes hand in hand with a much-needed reform to the car CO_2 labelling Directive.

- The **car labelling Directive** must be revised in order to provide consumers with **better information** at the point of sale and in advertisements.

Noise and air pollution limits

The White Paper highlights how the transport sector is a major source of noise pollution and that measures are needed to tackle this problem. Despite an encouraging European Commission proposal to tackle noise pollution from vehicles in 2011, and which would have meant a deadline for compliance by 2021, the final adopted EU regulation means that vehicle noise limits will now only fully apply to all new vehicles from 2027 onwards. Being that the European car fleet turns over every 10-15 years, it is likely that the full benefits of these noise pollution reduction measures could take another 30 years to come to fruition[5].

[4] See BEUC position paper on car labelling: http://beuc.eu/publications/beuc-x-2014-053_cca_cars_co2_labelling-2014_anec-beuc_position_paper_long_version.pdf

[5] For more information, see the BEUC position paper on sustainable mobility: http://www.beuc.org/publications/beuc-x-2014-056_cca_beuc_vision_on_mobility_long_version.pdf

Despite the encouraging air pollution emissions standards agreed at the European level, most European cities still suffer from air pollutant concentrations that exceed the legal requirements. Like with the testing of CO_2 emissions, there are problems here with regard to the monitoring of vehicle's emissions as flexibilities exist in the current testing protocols. BEUC supports ambitious targets for noise and air pollution for cars and should be set in order to reduce the negative impact due to growing transport demands on the quality of life of European citizens.

- **Future targets for noise and air pollution** for cars should be set in order to reduce the negative impact due to noise and air pollution.

- The **outdated test** to measure fuel air pollution of cars (NEDC) must be **replaced** by the newly developed Worldwide harmonized Light vehicles Test Procedure (**WLTP**).

Passenger rights and interoperability

The White Paper recognises that in order for different modes of transport to become better integrated with each other and in turn for each and every transport mode to become more accessible there are several advances that need to occur. It is clear today in the European Union, that the advances needed include both logistical improvements but also strengthening of passenger rights.

Improving the interoperability of different transport modes will require joint planning of networks and coordinating timetables between different modes of transportation in order to allow for the seamless interchange of passengers between different modes of transport. Travellers need to be able to rely on integrated trip services, which include better information provision and the use of common reservation systems and ticketing systems for the entire trip. Integrating and enhancing the combination of different public transport modes, whilst also investing in their performance, would also have the effect of incentivising more consumers to forego the use of their private car. And without the offer of equally attractive alternatives, private cars as the principal mode of passenger transport will clearly play a dominant role in the life of many European citizens for many years to come. The White Paper's aim of establishing a '*framework for a European multimodal transport information, management and payment system*' by 2020 would be an important development in this regard.

The White Paper also mentions the establishment of a '*legislative framework on passenger rights with measures covering passengers on multimodal journeys with integrated tickets under a single purchase contract as well as in the event of transport operator's bankruptcy*'. This is vitally needed because passenger rights differ depending on the means of transport used, which in turn can trigger difficulties in multimodal trips. Passengers need the guarantee to travel to the final destination without bearing any financial or associated risks concerning transport delays. While we acknowledge that each means of transport has its specificities, it is essential that the rights of passengers in all means of transport are codified so as to ensure that a coherent and passenger friendly framework is established.

- Passenger transport services should be encouraged to provide **non-discriminatory access** to **integrated ticketing systems.**
- A legal framework for a **European multimodal transport information, management and payment system** should be established.
- European legislation should require that **travel planning data** must be made **accessible in a standardised way**.
- **Passenger rights** for all modes of transport (and their implementation) must be strengthened and enlarged to encompass multimodal forms of transport.