

Revision of the EU Green Public Procurement Criteria for Transport

Joint comments from T&E and EEB to the 3rd draft of the JRC technical report and GPP criteria proposal

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Summary

The European Commission (EC) is revising the EU Green Public Procurement (GPP) criteria for Transport. Following two previous rounds of comments from various stakeholders, a third draft technical report and criteria proposal was published by the Joint Research Centre (JRC) in February 2018 for a final written consultation.¹

This paper provides joint NGO recommendations and comments on the 3rd this latest version of the JRC's technical report on behalf of T&E and EEB. EU GPP criteria are formulated either as Selection criteria (SC), Technical specifications (TS), Award criteria (AC) or Contract performance clauses (CPC). For each set of criteria there is a choice between two levels of environmental ambition: core criteria and comprehensive criteria.

Both T&E and EEB have consulted the draft criteria set for Transport together with its member organisations and other environmental NGOs. We recommend that the proposal should be improved with regard to the following points of concerns which are outlined in further detail in this position paper:

- The transition to the WLTP test cycle will allow test figures to be closer to the real world emissions, and therefore constitutes an improvement. However, the JRC will have to ensure that the estimated NEDC/ WLTP correlation corresponds to the real world.
- Accounting for biomethane supply of natural gas vehicles is key to ensuring their environmental performance. The GPP criteria for transport should therefore increase minimum requirements for biomethane supply in sections related to buses and trucks.
- Criteria on air pollution should be technology neutral between petrol and diesel vehicles, to incentivise public authorities to procure the best performing vehicles.
- Public authorities should make use of the EU labelling scheme for green batteries, once this scheme is ready based on an agreed Life Cycle Assessment (LCA) methodology.

¹ Relevant documents can be accessed here: <http://susproc.jrc.ec.europa.eu/Transport/documents.html>

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General comments relevant for categories 1-7

- The GHG emission criteria for LCVs take into account the transition from NEDC to WLTP, based on an estimate of the correlation between the two test cycles. It is crucial to ensure the accuracy of this estimate once real world data is available (in 2022 at the latest).
- Public authorities procuring natural gas powered heavy duty vehicles need to demonstrate a sufficient biomethane supply to ensure these vehicles bring substantial GHG emission reduction benefits.
- Once the Commission has finalised its methodology for the Life Cycle Assessment (LCA) of batteries and related labelling, GPP criteria should refer to it for both light and heavy duty vehicles. This is important especially because improved battery manufacturing leads to a better environmental footprint for electric vehicles (EV).

Category 1: Purchase, lease or rental of cars, LCVs and L-category vehicles

1) GHG emissions

- The JRC should update the correlation between the NEDC and WLTP values in case of deviation between the actual NEDC/ WLTP correlation and the JRC estimates, as this is critical to ensure the target stringency remains identical.
- For battery electric vehicles and plug-in hybrid electric vehicles (PHEVs), the GPP criteria for transport should make a reference to the Commission's battery LCA and labelling, once it has been finalised. Battery LCA performance is a key indicator for EV's environmental footprint.

2) Air polluting emissions

- We regret that the JRC chose not to align the NO_x max value for vehicles to the limit value set for gasoline fuelled vehicles, as this would have removed any bias in favour of diesel powered vehicles from the GPP criteria set.

3) Technical options to reduce GHG emissions

- The criterion should be kept as it is.

4) Durability of the battery

- We welcome the inclusion of Criterion TS6 on minimum battery warranty in the core criteria set.

Category 2: Mobility services

2) Air polluting emissions

- In the AC2 criterion, natural gas buses should not be awarded the same amount of extra points than zero emission ones, because their performance in terms of air pollutant emissions is worse.

3) Combined mobility services

- We welcome the formulation of the AC4 criterion as an award criteria, that could draw procurers' attention to the benefits of Mobility as a Service

Category 3: Purchase or lease of buses

1) GHG emissions

- The threshold of renewable biomethane supply required ranking all natural gas buses as B and A should be at least 25% for B and 50% for A. A sufficient biomethane supply is crucial to ensure relevant GHG emission reduction compared to an equivalent Euro VI diesel bus.
- For battery electric buses, the GPP criteria for transport should make a reference to the Commission's battery LCA and labelling, once it has been finalised. Battery LCA performance is a key indicator of electric buses environmental footprint

2) Air polluting emissions

- This criterion should be kept as it is.

3) Exhaust pipe location

- This criterion should be kept as it is.

Category 4: Bus services

1) GHG emissions

- Threshold levels for renewable biomethane supply are too low, as already pointed out in our comments on the second draft.
- For battery electric buses, the GPP criteria for transport should make a reference to the Commission's battery LCA and labelling, once it has been finalised. Battery LCA performance is a key indicator of electric buses environmental footprint.

2) Air polluting emissions

- This criterion should be kept as it is.

3) Noise emissions

- This criterion should be kept as it is.

4) New vehicles

- This criterion should be kept as it is.

Category 5: Purchase or lease of waste collection vehicles

1) GHG emissions

- The threshold of renewable biomethane supply required ranking should be at least 25% for the core and 50% for the comprehensive criteria. A sufficient biomethane supply is crucial to ensure relevant GHG emission reduction compared to an equivalent Euro VI diesel bus.
- For battery electric vehicles, the GPP criteria for transport should make a reference to the Commission's battery LCA and labelling, once it has been finalised. Battery LCA performance is a key indicator of electric vehicles' environmental footprint.

2) Auxiliary unit

- Criterion should be kept as it is.

3) Air pollutant emissions

- In the AC3 criterion, natural gas buses should not be awarded the same amount of extra points than zero emission ones, because their performance in terms of air pollutant emissions is worse.

Category 6: Waste collection services

1) GHG emissions

- Threshold levels for renewable biomethane supply are too low, as already pointed out in our comments on the second draft.
- For battery electric buses, the GPP criteria for transport should make a reference to the Commission's battery LCA and labelling, once it has been finalised. Battery LCA performance is a key indicator of electric buses environmental footprint.

2) Air pollutant emissions

- This criterion should be kept as it is.

3) Noise emissions

- This criterion should be kept as it is.

4) Route optimisation

- Given the potential for emission reduction route optimisation has, we recommend to create an award criterion for both the core and comprehensive set of criteria.

5) New vehicles

- This criterion should be kept as it is.

Category 7: Post, courier and moving services

1) GHG emissions

- We welcome the inclusion of cycle-logistic in both the comprehensive and the core criteria sets.

2) Air pollutant emissions

- This criterion should be kept as it is.

Common criteria for vehicle category

- These criteria should be kept as they are.

Common criteria for services category

- These criteria should be kept as they are.

ENDS.