

Revision of the EU Green Public Procurement Criteria for Transport

**Joint comments from T&E and EEB to the 2nd draft
of the JRC technical report and criteria proposal**

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Summary

The European Commission (EC) is revising the EU Green Public Procurement (GPP) criteria for Transport. The Joint Research Center (JRC) organised in November 2016 a first stakeholder meeting to discuss their 1st draft technical report. Based on comments received, the JRC drafted a 2nd version. In June 2017, the JRC organised a series of webinars to discuss this 2nd draft.¹

On the basis of these discussions, this paper provides joint NGO recommendations and comments on the 2nd draft 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:

- Air quality criteria should explicitly focus on NO_x and PM, as these pollutants have the most detrimental effects on air quality.
- Criteria related to air pollutant and GHG emissions should be designed in a future-proofed way, taking into account technological developments and future improvements.
- Where appropriate, the criteria should include some guidance for public authorities, for instance regarding technological development in specific vehicle categories (e.g. battery electric vehicles) and legal obligations (e.g. drivers' training).

¹ <http://susproc.jrc.ec.europa.eu/Transport/documents.html>

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General comments

- The second draft simplifies the criteria set and makes it more easily applicable for public authorities. The creation of categories defining common criteria for vehicles and services categories further clarifies the whole criteria set.
- Air quality criteria should explicitly focus on NO_x and PM, as these pollutants have the most detrimental effects on air quality.
- Criteria related to air pollutant and GHG emissions should be designed in a future-proofed way, taking into account technological developments and future improvements.
- Where appropriate, the criteria should include some guidance for public authorities, for instance regarding technological development in specific vehicle categories (e.g. battery electric vehicles) and legal obligations (e.g. drivers' training).

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

1) GHG emissions

- We welcome the JRC's decision to measure CO₂ emissions at the tailpipe. The GPP should avoid being overly complex to encourage use by public authorities
- We recommend sticking to the initial approach for N1 Class III vehicles (criteria TS1). The threshold should be based on one single value, and not be a function of the vehicle mass.
- The targets mentioned in the TS1 for different vehicle categories should be adapted to technical progress. They should therefore be revised downward from 2021 on, following a 7% yearly reduction, in line with the range expressed for cars and vans by the European Parliament in two legislative acts in 2013.²

2) Air polluting emissions

- The TS2 comprehensive criterion is a good incentive for the use of zero emission vehicles in cities that can significantly improve air quality.
- We recommend aligning the NO_x max value for vehicles to the limit value set for gasoline fueled vehicles, in order to remove any bias in favour of diesel powered vehicles from the GPP criteria set.

² [Report 30 April on the proposal for a regulation of the European Parliament and of the Council amending Regulation \(EC\) No 443/2009 to define the modalities for reaching the 2020 target to reduce CO₂ emissions from new passenger cars;](#)
[Report 13 May 2013 on the proposal for a regulation of the European Parliament and of the Council amending Regulation \(EU\) No 510/2011 to define the modalities for reaching the 2020 target to reduce CO₂ emissions from new light commercial vehicles;](#)

3) Technical options to reduce GHG emissions

- The criteria on traffic information systems should not just simply be dropped but mentioned as an indication to public authorities, in order to make them aware of the benefits of enhanced traffic information.

4) Durability of the battery

- Criterion TS6 on minimum battery warranty should be moved to the core set of criteria, and include a note to the procurers inciting them to check the state of the art in term of battery warranty, because of the sector's rapid technological developments.

Category 2: Mobility services

1) GHG emissions

- The targets mentioned in the AC1 should be adapted to technical progress. They should therefore be revised downward from 2021 on, following a 7% yearly reduction, in line with the range expressed for cars and vans by the European Parliament in two legislative acts in 2013.³
- A comprehensive criterion with lower CO2 average should also be introduced, in order to allow procurers to go beyond the core criteria mentioned in AC1.

2) Air polluting emissions

- In the TS1 comprehensive criterion, make sure 60% of cars **and** LCVs are covered.
- The euro class targets mentioned for different vehicle categories should be adapted to technical progress. By 2021, all cars used in the service should be euro 6. 40% of car and LCV shall meet at least euro 6d.

3) Combined mobility services

- We welcome the formulation of the AC4 criterion as an award criterion because it could draw procurers' attention to the benefits of Mobility as a Service.

³ [Report 30 April on the proposal for a regulation of the European Parliament and of the Council amending Regulation \(EC\) No 443/2009 to define the modalities for reaching the 2020 target to reduce CO2 emissions from new passenger cars;](#)
[Report 13 may 2013 on the proposal for a regulation of the European Parliament and of the Council amending Regulation \(EU\) No 510/2011 to define the modalities for reaching the 2020 target to reduce CO2 emissions from new light commercial vehicles;](#)

Category 3: Purchase or lease of buses

1) GHG emissions

- The technology based approach is a good solution to indicate to public authorities in a simple manner what clean solutions for buses exist. This solution should be used until the VECTO tool enters into force. VECTO is a simulation tool developed by the commission to support the certification, monitoring, and reporting of CO₂ emissions from Heavy Duty Vehicles.
- Public authorities should be given the opportunity to classify fuel cell hydrogen buses, which have a great potential to reduce emissions, as category A or B, depending on the carbon intensity of the electricity used to produce hydrogen. The maturity of the technology should not impact its classification within the TS1 criterion.

2) Air polluting emissions

- This criterion should state explicitly the pollutants that should be measured within AC 3. We recommend focusing on NO_x and PM, as those are the main pollutants responsible for poor air quality in cities.

3) Exhaust pipe location

- This criterion should be kept as it is.

Category 4: Bus services

1) GHG emissions

- Since the use of renewable methane is a crucial precondition for the environmental performance of natural gas powered vehicles, we recommend in TS1 the following thresholds: at least 50% renewable methane to classify a vehicle as A, 30% for class B, and 20% for class C.
- In AC1 criterion, double points compared to class C should be awarded to class **B** vehicles.

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

- We recommend that CPC1 requires new vehicles in service fleets to lead to an improvement of the overall environmental performance of the fleet (both in term of GHG and air pollutant emissions)

Category 5: Purchase or lease of waste collection vehicles

1) GHG emissions

- See our comments for category 3.

2) Auxiliary unit

- Criterion should be kept as it is.

3) Air pollutant emissions

- See our comments for category 3.

Category 6: Waste collection services

1) GHG emissions

- See our comments for category 4.

2) Air pollutant emissions

- See our comments for category 4.

3) Noise emissions

- See our comments for category 4.

4) Route optimisation

- Given the potential for emission reduction route optimisation has we recommend extending the AC6 criterion to the core set of criteria.

5) New vehicles

- See comments for category 4.

Category 7: Post, courier and moving services

1) GHG emissions

- As electric bikes become mainstream, topography loses relevance. The TS1 on cyclelogistics can therefore apply to both the comprehensive and the core sets of criteria.

2) Air pollutant emissions

- This criterion should be kept as it is.

Common criteria for vehicle categories

- The award criteria on tyre noise and vehicle emission should be maintained as comprehensive criteria, because of the market availability of phase 3 compliant tyres for HDVs, that have a noise limit range between 76-79dB.⁴

Common criteria for services categories

- In the CPC1 criterion of the section on competence of tenderer and staff training, drivers should be given 8 hours of training per year and be monitored in addition to these training in order to get feedback on the way they drive.
- We welcome the technical specification TS1 for environmental management measures, especially the proposal for implementing an emissions reduction plan with measures aimed at reducing the GHG emissions and air pollutants emissions.

ENDS

⁴ A [TNO report](#) indicates that the market penetration of phase 3 compliant tyres is still very limited.