



30th September 2009

Response of the Low Emissions and Environment Zones in Europe Network (LEEZEN)

to the consultation on the

Communication "A sustainable future for transport: Towards an integrated, technology-led and user friendly system", adopted by the Commission on 17 June 2009

Introduction

Low Emission Zones (LEZs) are an important tool to achieving the EU air quality limit values and often the most effective measure at a local level, building on the vehicle Euro standards. There are over 185 LEZs in operation and planning in Europe in 11 countries and more are likely to follow – over 1500 municipalities in Italy alone.

This is a joint response from LEEZEN. LEEZEN is a network of cities, ministries and regions operating or planning Low Emission or Environment Zones which work together to spread information on LEZs across Europe and to share information between themselves. Our public website spreading LEZ information across Europe can be found on www.lowemissionzones.eu. Our members activities include sharing experiences and best practice, through which this response is collated.

The Communication asks for comments. We comment in two parts. Firstly taking on the questions asked by the Commission. Secondly how the commission can support these aspects in more detail.

Section 1 of the response - the Commission's specific questions.

(3) Technology

LEZs help the technological shift towards lower and zero-emission vehicles. It is important that the EU supports LEZs, both to encourage further zones and make their implementation more transparent for vehicle operators. Further details on the support needed is given in section 2 of this response.

(4) Legislative framework

LEZs help improve the health of vehicle drivers in particular – who often breathe the worst air at the seat of their vehicle in highly polluted parts of the EU.

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(5) Behaviour

LEZs help improve transport habits and sustainability. Support of the LEEZEN Network helps improve accessibility.

(6) Coordinated action

The aspects below help coordinate action on LEZs at different levels of government.

Section 2 of the response – further details on the Commission's actions required.

1. The Commission can help support a level playing field by assisting **enforcement of foreign vehicles** across national boundaries for schemes such as Low Emission Zones. This is a particularly difficult issue for LEZs as well as congestion charging, parking restrictions and other sustainable transport policies. It is also an issue that only the EU can fully resolve. Action on this issue needs to be rapid and not delayed.

The recent EU work on road safety cross-border enforcement need to enable enforcement of LEZs and similar policies. A European registry of all vehicles and cross-border enforcement as mentioned in the recent EU Green Paper on Urban Transport could help.

2. Introduce an **EU-wide diesel particulate trap certification scheme** or framework would help harmonise LEZ emissions standards. Lack of such certification is a key reasons why the emissions standards are often set with different wording. Current EU work on joint certification needs to be completed soon, so that it is able to be used, rather than being completed after it could be usefully used. An EU-wide certification scheme would make the situation simpler and more transparent for vehicle operators and also mean that the more effective full filters (95+% PM reduction) could be required in future or extended LEZs, without the preclusion of other technology that can achieve the same ends.
3. **Commission support of the LEEZEN Network** to spread information on LEZs throughout Europe can also support the aims set out in the Commission document. The LEEZEN Network helps transport operators know about LEZs to help reduce any potential barriers; helps cities coordinate their sustainable transport measures; raises awareness of sustainable transport policies; supports new LEZs and helps converge emissions standards for future LEZs.
4. **A system for identifying vehicle emissions standard** irrespective of their country of registration. This would add to transparency and acceptance of LEZs as well as help to facilitate administrative work of implementing LEZs

and reduce costs for transport operators. This would be best combined with point 1 above.

5. Ensure that **increasingly strict Euro standards** deliver real benefits in urban environments would help the aims of the Commission here and harmonise LEZ emissions standards. Emission-testing and the drive cycles used need to be amended to ensure that vehicles deliver benefits under real-world urban driving conditions, where the emissions reduction is most needed.
6. **Guidance giving clear and consistent advice on how LEZs can be implemented** without infringing the freedom of movement or other EU principles. Also make it clear that LEZs, correctly implemented are not a barrier to freedom of movement.
7. The setting of harmonised emissions standards to LEZs should not be given. Implementing harmonised LEZ standards is not only too late, given the large number of LEZs already in operation, but against the subsidiarity principle which allows appropriate decisions to be made at the appropriate administrative level. The measures outlined in this document would however allow convergence of the LEZ standards around Europe.

In summary

LEZs are a very effective tool towards improving air quality towards the EU air quality limit values in cities. They support the aims of the EU 'Future of Transport' document, including encouraging a technological shift towards lower and zero-emission vehicles and standard setting that converge 'upwards', relevant to half of the issues raised as questions by the Commission. The EU should do all it can to help support them, and the most important aspects are outlined here.

The key issues we raise are the enforcement of foreign vehicles, diesel particulate filter certification, support for the LEEZEN Network, a system for identifying vehicle emissions standards and increasingly strict Euro standards. These would help provide the necessary framework conditions to set standards to give a level playing field to policies designed to encourage a technological shift towards lower emission vehicles, whilst retaining subsidiarity at a local level.

The freedom of movement is an important EU principle. It is important that the needs of the transport industries are balanced with the need for clean air for all – particularly for the drivers themselves. While LEZ implementors do what they can to ensure things are as easy as possible for foreign operators, it is essential that the EU take up their part and enable enforcement of foreign operators on the other side of the coin.

We trust that you are able to take these views sufficiently on board. Please do not hesitate to contact us if you have any queries, want more details or we can help in any other way.

A handwritten signature in black ink, appearing to be 'LS' followed by a stylized flourish.

Lucy Sadler
Secretariat of LEEZEN