

Position paper

Prise de Position – Stellungnahme

MAY 12

Proposal for a Directive on Energy Efficiency

UITP (Union Internationale des Transports Publics) is the international organisation of public transport, it is based in Brussels and covers all urban, suburban and regional public transport modes (bus, metro, light rail, regional rail and waterborne public transport). It gathers over 3.100 members worldwide, public transport operators, their authorities and suppliers.

In the European Union, the UITP EU Committee (EUC) represents the views of the public transport undertakings of the 27 member countries. It is closely following and participating in the elaboration of the different European policies and initiatives that have an impact on urban, suburban and regional public passenger transport.

Key facts for public transport in the EU 27:

Passenger journeys: 60 billion/year, more or less equally shared between road modes (mainly bus) and rail modes (urban, suburban and regional rail)

Economic value of public transport services: € 130 - 150 billion/year or 1 – 1.2% of GDP

Employment: direct employment 1.2 million and indirect employment 2 - 2.5 indirect jobs for each direct job on average

1. Executive Summary

In view of impending discussions between the European Parliament and Council on the Energy Efficiency Directive, European Union (EU) public transport undertakings represented by UITP would like to highlight the following:

- The Transport White Paper is the best placed mechanism to deal energy efficiency in the transport sector.
- A purely technology driven approach to improving energy efficiency in the transport sector will not be sufficient to deliver the EU's goals in the timescale required. Taking advantage of readily available solutions and shifting towards transport modes producing less carbon dioxide (CO₂) emissions by consuming less energy will be crucial.
- Travelling by public transportation uses at least three times less energy than comparable travel in private vehicles. This is achieved despite average vehicle space occupancy of 20 per cent over a full day. Increasing the load factor of public transport through modal shift would dramatically improve the energy efficiency of transport as a whole while enhancing mobility.
- UITP is conscious of the potential administrative and financial burdens with certain aspects of the draft text in the Energy Efficiency Directive. The complex and unmanageable proposals would place disproportionate burdens on a sector that is already under substantial cuts to funding could result in these tight budgetary times lead to reduced public transport services. Pushing public transport ridership away to single-occupancy cars will have adverse CO₂ emissions implications.
- Public transport operational buildings and infrastructure have unique characteristics that are not comparable with other buildings. The Directive should not impose impractical measures to try and improve their energy efficiency.
- Ensuring the Directive's compatibility with recent proposals to modernise European public procurement rules would help to reduce the administrative burden of the procurement process and lead to the best possible outcomes.
- Public transport undertakings continually seek to improve their energy efficiency through various voluntary actions. The Directive should promote and build on these initiatives rather than impose a mandatory approach which would place an unnecessary administrative cost burden on participants.

2. Introduction

Launched on 22 June 2011, the Energy Efficiency Directive is designed to achieve the EU's goal to save 20 per cent of its primary energy consumption by 2020 through improvements in energy efficiency. The European Commission estimates that the EU is currently only on track to achieve half of that target. UITP welcomes the Commission's efforts to close the gap between ambition and action.

UITP is conscious of the potential administrative and financial burdens that this Directive may have on EU public transport undertakings with public ownership. These principally concern targets for the renovation and auditing of public buildings and the promotion of energy efficiency

through public procurement. UITP is also apprehensive over recent calls to include transport in the utilities energy savings target. Placing disproportionate burdens on a sector that is already facing substantial cuts to funding could result in these tight budgetary times affecting frontline public transport services. Pushing public transport ridership to single-occupancy cars will have adverse CO₂ implications.

3. Renovation Target for Public Building

Article 4 of the draft Directive would require public bodies, including EU public transport undertakings with public ownership, from 1 January 2014, to annually renovate three per cent of the total useful floor area of the buildings they own over 250m². Renovation would need to meet at least the minimum energy performance requirements set in current building regulations. An inventory of each and every building's performance would also need to be undertaken.

A mandatory annual target as currently defined represents an inflexible and impractical way of seeking to deliver cost effective energy efficiency improvements, nor does it take into account energy efficiency improvements already made. Public transport's infrastructure and operational buildings - such as stations, depots, maintenance centres and signalling buildings - have unique characteristics that are not comparable with other buildings. Such buildings are production sites with many entrances and open spaces. Due to such specific design issues, the ability to renovate is extremely limited nor cost effective and risks interfering with the provision of public transport services.

Recommendation:

- Any binding target to improve the energy efficiency of public buildings should exclude public transport infrastructure and operational buildings.

4. Promotion of Energy Efficiency through Procurement

Article 5 of the draft Directive would require public bodies to further meet high energy efficiency standards when procuring energy using works, products and services. These include benchmarked IT equipment, tyres and services from third party providers as well as the purchase and rent of buildings.

UITP would like to point out that the public transport sector already applies specific legislation on green procurement: Directive 2009/33/EC on the promotion of clean and energy efficient vehicles. This Directive obliges that any entities (public transport undertakings or authorities) purchasing public fleets or buses used in public transport have to take into account energy consumption, CO₂ emissions and local emissions. UITP has supported this legislation through various initiatives such as the development of further recommendations on how to specifically apply the Directive when tendering buses.

Any further requirements on procurement of high energy efficient products and services should be clearly aligned with the current ongoing general initiative on the modernisation of European public procurement rules. In this context, UITP supports that environmental or social criteria are taken into account in public procurement decisions – on a voluntary basis. UITP would not favour requirements which would make it binding to procure “...only the products that comply with the criterion of belonging to the highest energy efficiency class” (Annex III, a) as currently debated in the European Parliament.

Recommendation:

- The Energy Efficiency Directive should be aligned with the recent proposal to modernise European public procurement rules.
- There should be no binding requirements to only procure products / services with the highest energy efficiency class.

5. Energy Efficiency Obligation Scheme

UITP supports the proposed energy efficiency obligation scheme on retail energy sales companies or energy distributors to achieve 1.5 per cent annual savings (Article 6). The Commission's proposal to exclude suppliers to the transport sector from the Directive is the right one so as to avoid conflicting regulation which is inefficient and unduly burdensome.

Recommendation:

- UITP considers the Transport White Paper as the best placed mechanism to deal with energy efficiency in the transport sector.

6. Energy Audits and Energy Management Systems

The requirement under Article 7 that large companies undertake an independent audit by 30 June 2014 and then every three years thereafter is in UITP's view, unnecessary. Energy audits and energy management systems are not energy efficiency measures themselves but tools to help organisations seek continuous improvement.

In the public transport sector, high energy costs add significantly to overall operational efficiency costs. As a result, public transport undertakings make significant efforts to improve their energy efficiency. In the last decade alone, passenger rail transport has succeeded in increasing its energy efficiency by 22 per cent.

The sector is continually seeking to improve its energy efficiency, for example by using lighter weight and composite materials on its vehicles, optimising regenerative braking and train operational management. Eco-driving schemes have also proved to be a useful tool to increase efficiency by five to 10 per cent. Furthermore, EU public transport undertakings have long been advocating measures to improve the energy efficiency of city buses through the development of SORT (Standardised On-Road Tests) cycles which accounts for real-life driving conditions and provide much more accurate information on energy consumption, CO₂ and local emissions.

In addition to all these efforts, many of UITP's members already carry out energy audits of buildings, for instance through ISO certification and certified BREEAM assessment ratings. UITP's Sustainable Development Charter also provides its members with a practical framework to measure their energy performance. Recognising such schemes, without being prescriptive about their implementation, would remove duplication and unnecessary cost burdens associated with mandatory audits.

Recommendation:

- The Directive should promote and build on current initiatives that organisations use to monitor and manage their energy usage, rather than impose a mandatory approach.