

**AEGPL Response to Public consultation on the mid-term review of the
2011 White Paper on Transport**

AEGPL, the European LPG Association, welcomes the opportunity to contribute to the Review of the 2011 White Paper on Transport and is keen to work with the European Commission on the matters on which it can provide a valuable contribution. This consultation comes in a moment in which alarming levels of air pollution are being registered in all the European major cities and in which climate change is threatening our environment. AEGPL strongly agrees with the Commission that these challenges need to be addressed and shares its goals to promote a switch to cleaner fuels and to decarbonise the transport sector.

AEGPL believes that Autogas can play a strategic role in this process since it is a low-carbon, near-zero back carbon and low-polluting alternative to conventional fuels. In fact, Autogas offers well-to-wheel GHG emissions that are 23% lower than diesel and 21% lower than gasoline. Autogas, currently the most popular alternative fuel in Europe, already helps the EU to tackle climate change and to improve air quality, by fueling over 7.4 million vehicles in the EU, served by over 30.000 stations.

Below you can read AEGPL's response to the Public Consultation on the mid-term review of the 2011 White Paper on Transport.

Samuel Maubanc

AEGPL General Manager

B. Analysis of the situation

1. The aim of this section is to obtain stakeholders' views on the most important challenges affecting the transport sector in the EU.

	Not at all important	Slightly important	Fairly important	Very important	No opinion
Oil dependency	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oil and energy prices	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air and water pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
GHG emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Congestion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Market barriers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative and regulatory burden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Infrastructure development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Financing of infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Security	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Passenger rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Working conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social responsibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Internalisation of external costs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Affordability of transport services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility to transport services (availability and proximity)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition from third countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing competitiveness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Management and control of increasing traffic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border transport services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Technological change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Multimodal transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Please elaborate on your answers to the above statements and indicate any other challenges that should be taken into account.

AEGPL is the sole representative body of the LPG industry at the European level. LPG is Europe's most widely used alternative transport fuel, meaning that one area where it can provide useful content is on what concerns the role of alternative fuels in the European Transport Strategy.

It is revealing to note that LPG, which currently powers 2.7% of the passenger car fleet, is Europe's most widely used alternative fuel. AEGPL is convinced that (a) Europe's near total reliance on conventional fuels (petrol and diesel) is environmentally and strategically unsustainable and (b) the European Union should play a leading role in fostering the more widespread emergence of alternatives

As the voice of the LPG industry in Europe, AEGPL is keen on sharing its views on the contribution that LPG can bring to Europe's strategic approach to transport. We believe that the issues around Air Quality are of great importance, in particular in the urban context and would like to see this aspect receiving greater attention in future Commission initiatives.

C. Assessment of the approach taken

3. Do you think that the most urgent challenges are adequately addressed in the White Paper? Is the list of priorities in the White Paper well-balanced? Please explain.

AEGPL believes that there are urgent matters that are not being properly addressed in the White Paper. In our opinion, the issue of air quality deserves better consideration, in particular when discussing improvements to urban air quality. Autogas is currently Europe's most widely used alternative fuel and is best-placed to contribute to the pursuit of the EU's emission reduction objectives. We believe that one of the urgent challenges that the White Paper should address is to create conditions for citizens to fully benefit from the advantages of alternative fuel vehicles.

The issue of alternative fuels is of special concern to AEGPL, when taken in the overall context of the White Paper. While the Commission is rightly trying to provide active support to upcoming technologies in transport, we believe that the White Paper should also give due attention to available technologies that can provide immediate and incremental results in reaching the objectives of the White Paper. Therefore, in the context of this midterm review we believe that the Commission should also consider short and midterm perspectives.

AEGPL believes that it is more beneficial for the European Union and for its citizens to adopt a more pragmatic approach and support further uptake of existing economically viable alternative fuels. LPG plays a growing role in the current transport fuel mix and should be

considered of great importance as part of the EU's efforts of achieving its air quality and climate change targets.

5. Are the impacts resulting from the current implementation of the White Paper fairly distributed? Are there any regions, stakeholders, modes of transport that are affected differently than others? Please elaborate.

AEGPL concedes that the EU is in need of a strategic approach to the existing challenges in the transport sector, but believes that the scope of the White Paper is, in itself, too large for stakeholders to assess its impacts in a meaningful way. We believe that the European Commission should focus its energy and resources in developing specific strategies and roadmaps for each specific way of transport, thus assuring more accurate conclusions.

6. Are the White Paper initiatives and other European policies compatible with each other? Are the Member States policies compatible with the White Paper? Please specify.

The Alternative Fuels Infrastructure Directive has provided essential legal clarity at the European level on the definition of alternative fuels that the EU should support in order to remain consistent throughout its legislative activity. This definition is based on the principle of technology neutrality and also on a scientific assessment of the respective benefits of these fuels in achieving air quality and climate change policies in transport. We believe that the same definition should also be used in the context of goal number 1 of the White Paper.

D. Expected impacts and implementation

4. Are the ten goals useful benchmarks for the EU transport policy? Please explain.

AEGPL supports the political impetus placed in goal number 1 on supporting cleaner alternative fuels and technologies in urban areas. However, we regret that this goal is not fully in line with the definition used in the Alternative Fuels Infrastructure Directive, as well as in other recently adopted pieces of EU legislation. This Directive provided essential legal clarity at the European level on the definition of alternative fuels that the EU should support in order to remain consistent throughout its legislative activity. This definition is based on the principle of technology neutrality and also on a scientific assessment of the respective benefits of these fuels in achieving air quality and climate change policies in transport.

We believe that the same definition should also be used in the context of goal number 1 of the White Paper.

5. Do the current goals for transport respond to the strategy's overall objective of more sustainable and competitive transport? Please explain.

AEGPL believes that:

- EU policies should not be only looked through the prism of a simple dichotomy between fossil fuels and renewables: both can be combined and each energy source or technology comes with different pros and cons regarding energy efficiency, emission of pollutants, or cost-efficiency;
- Target number 1 of the White Paper is rightly focusing on urban areas for further use supporting cleaner alternative fuels and technologies. However, the main benchmark for success in this area should logically be the improvement of air quality rather than just CO2 emissions;
- Technology neutrality should remain a pillar of EU Transport Policies;
- Alternative Transport Fuels Policies should envisage environmental impact of transport in a more transversal way: not only tailpipe emissions should be covered by legislation, fuels should be assessed according to emissions from a well-to-wheel or lifecycle point of view (also for electric vehicles);
- Legal certainty is vital for innovation and investments in clean and efficient technologies: short term incentives or supportive policies for a given technology (“picking-winners”) are often counter-productive.

E. Way forward

1. What would best be done at the EU level to ensure that the strategy delivers results? What would best be done at the Member States level?

We believe that the Alternative Fuels Infrastructure Directive has set quite an interesting example of efficient coordination between Member States and the European Commission. This was achieved by mandating Member States to design and implement national policy frameworks, under guidance of the European Commission and the definition of common goals. This prompted action from the Member States while leaving them enough room to adapt to national specificities.

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