



European  
Automobile  
Manufacturers  
Association

# Low Emission Zones

## ACEA Position Paper

**MAY 2015**

## BACKGROUND

1. The European Commission White Paper “Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system”<sup>1</sup>, adopted on 28 March 2011, included a chapter on urban mobility. Announced under initiative 32, the Commission is considering proposing a framework for urban road user charging and access restriction zones, including **EU Guidelines on Low Emission Zones (LEZs)**.

## A SUSTAINABLE URBAN POLICY

2. A sustainable urban transport policy needs to meet the economic, social and environmental needs of cities. Sustainability requires a balance between its economic, social and environmental pillars. The importance of transport to urban social and economic structure must have a relevant position in the discussion. Such a balanced approach is the only way to treat complex interrelationships and trade-offs that are involved in urban transport. The fact that measures to restrict traffic may have economic and social consequences must be weighed into the discussion. Access restriction schemes (ARS) in general, and LEZs in particular, must not hinder mobility by increasing costs. Their implementation has to avoid disrupting businesses, increasing inequalities between city and suburban residents, singles and families, resident and non-resident.

## EFFICIENT TRANSPORT IS A REQUIREMENT FOR CITIES: POLICIES MUST FOCUS ON ITS CONTINUOUS IMPROVEMENT

3. Efficient transport is a basic requirement of cities in which economic and social activities are carried out. Urban congestion is caused by a variety of factors that differ for every city depending on the structure of the town. The solutions should not focus on penalising or reducing traffic but rather on improving its fluidity, in order to respond better to mobility needs.
4. This can be done effectively through simple solutions (development of collective use of cars, creation of parking near public transport stations, combined pricing offers for car parking and public transport, investment in infrastructure and the use of ITS) without resorting to complicated

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<sup>1</sup> [http://ec.europa.eu/transport/themes/strategies/2011\\_white\\_paper\\_en.htm](http://ec.europa.eu/transport/themes/strategies/2011_white_paper_en.htm)

and expensive measures. These should be encouraged first before more complex solutions are envisaged.

5. New motor vehicles are even cleaner and more energy-efficient. To make the most of the technology means getting these vehicles onto the roads. Renewal of the existing superannuated vehicle fleet, together with fundamental traffic management and infrastructure measures, could contribute more significantly to improving air quality and reducing CO<sub>2</sub> emissions, as well as noise, than the implementation of LEZ schemes in city centres.

## LOW EMISSION ZONE SCHEMES

6. Low Emission Zones are one of the many types of access restriction schemes. They consist of area licensing or entry permits schemes that are applied to restrict the access to specific areas, mainly to city centres. Compared to other types of access restrictions, they tend to be simpler to understand and straightforward to implement. As with any other ARS, LEZs cannot be condemned outright as unacceptable or ineffective. It much depends on the details of the scheme and how it is put into practice. Rather, each LEZ scheme should be assessed on a case-by-case basis, in accordance with certain criteria, to establish whether or not it is effective and acceptable.
7. ACEA supports the fact that the Commission proposes a common methodology and criteria for those cities that have introduced or may be considering introducing LEZs. The major issue is the respect for the principle of subsidiarity. The Commission should maintain a neutral role. It should refrain from promoting specific traffic management tools, including LEZ schemes.
8. In that sense, it is important that the EU concentrates on supporting a framework for LEZs that correctly incorporates a few essential methodological elements. The EU should provide cities that have decided to implement LEZs with methodological tools that will help them to set up sustainable measures:
  - Consistency, local mobility actions such as LEZs must be coordinated and coherent with other local mobility actions, as well as with national, regional and other urban mobility objectives.
  - Monitoring the implementation of the LEZ on a regular basis, reviewing it periodically. LEZ schemes need to be periodically adjusted to better achieve the objectives.
  - Integration of LEZs into other mobility policies.
  - Acceptance of stakeholders is crucial for success: all public and private stakeholders have to be

consulted and involved in the conception of the LEZ scheme. Plans have to be announced sufficiently in advance, so that citizens and companies can adapt to the restrictions.

9. Any LEZ scheme implemented needs to have clear and measurable objectives, and efficient control and monitoring systems. It has to follow the principles of better regulation, notably simplification, reduction of administrative burdens and impact assessment, including cost/benefit analysis. This is not currently the case in most of the cities where LEZs exist.
10. It is very important that authorities that decide to implement LEZ schemes have a vision for mobility and have a strategy that is not static. Rather, their schemes must be subject to regular monitoring and periodic reviews. Restrictions should be the last resort. They ought to have a clear objective and be removed as soon as the objective is reached. They need to be subject to a progress status of the targets and be adjusted if required. Solutions for optimising the use of infrastructure (i.e.: incentives if peak hours are avoided) should be preferred.
11. The increasing prevalence of traffic restrictions is creating a European patchwork, with transport becoming increasingly expensive because of wildly divergent regulations. Local authorities in the EU have approached access restrictions in general, and LEZs in particular, with an array of largely un-harmonised measures which are increasingly creating difficulties for citizens and for both local and international business. The various LEZ schemes currently implemented in the EU need to be further aligned along common principles.

## **FAIR, JUSTIFIED AND OBJECTIVE CRITERIA**

12. New technology implemented in vehicles brings environmental benefits once the new vehicles actually replace the older ones. As incentives are always more effective than regulations, so existing and planned LEZs should be reassessed to ensure that they are based on objective criteria, are fair and justified.

LEZ schemes:

- a. should not be used to avoid necessary and appropriate infrastructure improvement or provision;
- b. should not increase the overall cost of mobility;
- c. should be, in combination with other local pollution control measures, effective and proportionate in relation to the objectives of the measure;

- d. should be the object of widely and easily available, detailed information about the working of the scheme;
  - e. should be safe, secure, clean, and acceptably priced alternatives should be provided;
  - f. should not mean that undue burden is placed on those living, working or doing business in the area;
  - g. should be clear, transparent and easy to use and understand;
  - h. should not be socially or economically discriminatory.
13. In order to be sustainable, a LEZ needs sound justification, and has to respond to clear objectives: ACEA recommends that future EU Guidelines allow for the implementation of LEZ schemes especially as a tool cities can use to help them meet EU air quality legislation.

## **A TECHNOLOGY NEUTRAL APPROACH: BASED ON EXISTING EURO STANDARDS**

14. There will be an increased diversity of fuels and powertrains in the automobile market as innovations are made by energy suppliers and vehicle manufacturers to reduce emissions. The European automotive industry is developing and investing in many technologies at the same time. It is impossible to say today which technology will prove to be the most viable. Most likely, the future will see a number of technological combinations entering the market, tailored for different uses, circumstances and consumer preferences.
15. The increased diversity in the medium term is part of the process of innovation which may, over time, go through a period of rationalisation, reducing to a few mainstream solutions. Knowing that technological developments are by definition not completely predictable, ACEA believes that at this point none of the options should be discarded, and that no 'winners' should be prematurely selected. Technological progress made by using one technology sometimes reduces the progress made with another one. This reduces the potential for overall technological advance.
16. Current Euro standards classify vehicles depending on their environmental performance. A large proportion of existing LEZs use the Euro standards as a basic criterion for granting access or determining the size of the fee. In order to respect the neutral approach to technology, the Commission should take them into account when developing guidelines for LEZs.

17. Local authorities should use the compliance with the latest Euro standards as a basis for access to LEZs. However, LEZs schemes should not penalise the investments made by consumers and by operators: a differentiation between standards applicable to PCs and to CVs may be justified, depending of the circumstances in which the scheme is set up: national, regional and local circumstances, specific objectives and social considerations.

## STANDARDISE INFORMATION

18. As already suggested by the 2010 study by ISIS<sup>2</sup>, a common vocabulary for defining concepts, mechanisms and instruments is the basis for any European framework. A standard nomenclature should be established to designate signalling systems. Symbols need to be developed, so that a European citizen or operator, travelling from one country/city to another, when confronted with the same signs, should be capable of fully understand their significance.

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<sup>2</sup> ISIS, Study on Urban Access Restrictions, Final Report, December 2010  
[http://ec.europa.eu/transport/themes/urban/studies/doc/2010\\_12\\_ars\\_final\\_report.pdf](http://ec.europa.eu/transport/themes/urban/studies/doc/2010_12_ars_final_report.pdf)



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## ABOUT ACEA

ACEA's members are BMW Group, DAF Trucks, Daimler, Fiat Chrysler Automobiles, Ford of Europe, Hyundai Motor Europe, IVECO, Jaguar Land Rover, Opel Group, PSA Peugeot Citroën, Renault Group, Toyota Motor Europe, Volkswagen Group, Volvo Cars, Volvo Group. More information can be found on [www.acea.be](http://www.acea.be).

## ABOUT THE EU AUTOMOBILE INDUSTRY

- Some 12.7 million people - or 5.8% of the EU employed population - work in the sector.
- The 3.1 million jobs in automotive manufacturing represent 10.3% of EU's manufacturing employment.
- Motor vehicles account for €388.8 billion in tax contribution in the EU15.
- The sector is also a key driver of knowledge and innovation, representing Europe's largest private contributor to R&D, with €32.3 billion invested annually.

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