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SUEZ ENVIRONNEMENT's position in the frame of EC consultation on reducing CO2 emissions from road vehicles

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SUEZ ENVIRONNEMENT takes note of the will of the European Commission to cut greenhouse gas (GHG) emissions from road vehicles and welcomes the opportunity to express its views on this topic through the public consultation launched by the DG CLIMA[1]. In addition to answering the EC questionnaire, SUEZ ENVIRONNEMENT would like to highlight the following points:

- Setting up GHG emissions standards is an important aspect of EU action to reduce emissions from road vehicles, but it is not sufficient to incentive the use of alternative clean technologies.

- In relation to alternative technologies, attention should be paid to their environmental impact throughout the life cycle, eg. whether the fuel used is really from sustainable and renewable source and how vehicles are handled at end-of-life stage. This is all the more important as the first generation of heavy-duty vehicles using GNV comes soon to end-of-life.

- With regards to policy drivers, taxation seems to be the most efficient tool to influence a change in consumption patterns as far as light-duty vehicles are concerned. Nevertheless, it should be completed by other policy measures, such as air quality legislation, including the Low Emission Zones initiative and the noise pollution component (a more stringent noise abatement policy would stimulate the purchase of "alternative" vehicles, hence reduce GHG emissions). Alternative options could be also encouraged such as smarter logistical solutions (eg reverse logistics between different type of loads), better inter-modal connections (particularly road-rail) and making more use of water-borne transport.

- In any case, legislation should not penalize the heavy-duty vehicles for the benefit of light-duty vehicles. C02 emissions of heavy vehicles should be considered with regards to the volume/weight carried, especially in urban zone (heart of SE's intervention field).

- In addition to addressing CO2 emissions, methane emissions ought to be better taken into consideration notably because of diffuse emissions for example during purging stage. Even if the volumes dealt with are lower, CH4 has a global warming potential 72 times that of carbon dioxide over 20 years.

- There is also room for improvement with regards to the recycling of heavy-duty vehicles, which are not covered by the ELV directive (> 3,5 t). Regulation should be

[1] http://ec.europa.eu/clima/consultations/0012/index_en.htm

put in place to facilitate - eg. through eco-design - and strengthen the recyclability of such vehicles, in order to ensure the heavy polluting gases (HFCs) contained in air-conditioning and refrigeration units are properly recovered and not released into the atmosphere.

SUEZ ENVIRONNEMENT owns a fleet of over 30.000 vehicles, 70% of which are used for waste collection services. Most of the fleet runs on diesel, while the proportion of vehicles using alternative fuels vary from 4,3% to 6,8% depending on its category and its application. There is no defined trend in this respect over the last five years.

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