

To:

Frans Timmermans, Executive Vice-President, European Green Deal  
Adina-Ioana Valean, Commissioner for Transport

Brussels, 2 December 2019

**Subject: Green deal, need for clean bus market evolution**

Dear Madam, dear Sir,

As associations advocating the interests of cities, regions and transport authorities working on a sustainable future in Europe, EMTA and POLIS are writing you to express our concerns in terms of the way procurement of clean buses is evolving. The deployment of low and zero emission buses in the transport market is obviously hampered as prices of electric buses in the EU remain high in spite of a growing demand. The implementation of clean buses could be further incentivised by a policy to accelerate a scaled production of energy efficient, clean buses. This is needed to enhance air quality by the reduction local emissions in our cities and metropolitan areas.

For both associations, the transition towards clean fleets is crucial to achieve ambitions in view of energy use, and the mitigation of local pollutive substances and noise. Clean bus systems allow cities and regions to offer citizens public transport services without environmental nuisance.

EMTA in this view has established with its members the Paris Declaration of intent for the promotion of a scaled transition to zero emission buses<sup>1</sup> in which it calls on the European Union to provide financial support to transport authorities for the replacement of diesel buses with low and zero emission vehicles. Polis is an active partner in the APOLLO-EU clean bus accelerator programme, and is working with its members on innovation in this area. Both networks have been strong advocates for the recently adopted Clean Vehicle Directive.

European cities, regions and transport authorities are aware of the pressure this transition puts at Europe's system manufacturers, also with regard to the fierce international competition. And while Polis and EMTA members are very fond of European made vehicles and systems, as these support European innovation, competitiveness and value creation, it must be noted that the situation is still very difficult for local and transport authorities.

Even with the current legal and financial instruments in place, purchasing clean buses requires a very significant financial effort of around 250.000 Euros per vehicle additionally to the price of a diesel bus. Not considering necessary investments in infrastructure for charging, etc., at all. Polis and EMTA members specifically notice that the price of the battery remains too high despite the various calls for tender already launched – even for larger volumes of fleets. The notion of 'average prices falling' as stated in the EC's own Declaration of intent on promoting large-scale deployment of clean, alternatively fueled buses in Europe<sup>2</sup>, can be questioned – thus also expanding the return on investment timeline mentioned in that document.

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<sup>1</sup> [The Paris Declaration of intent for the promotion of a scaled transition to zero emission buses is available for download from emta.com via link.](#)

<sup>2</sup> <https://ec.europa.eu/transport/sites/transport/files/2017-05-05-european-clean-bus-deployment-initiative-declaration.pdf>

Thanks to the CVD, the bus manufacturers can now rely on a structurally stable and expanding market. On the demand side, Polis and EMTA members engage in large procurement schemes for clean buses, and with this we expect that the unit price will be decreasing over time when the technological solutions and the industry in this field matures.

However, to enable transparency in this market evolution and allow for support for Europe's cities, regions and transport authorities in case this expectations do not materialize, we would like to ask the European Commission to monitor availability and cost of clean bus systems throughout the implementation of the Clean Vehicle Directive and - together with associations such as EMTA and Polis – take stock of the developments in the coming years.

With this letter we hope to testify to our genuine interest to make the transition to deploy clean buses a success for the years to come, to our determination to remove barriers and to enable regions, transport authorities and cities to push their weight in contributing to the ambitions the European Union has set and will commit to in the Green Deal strategy that the Commission will present on December 11.

If needed, we are happy to further explain our position in a meeting.

Your sincerely,



Karen Vancluysen,  
Polis

Secretary General



Ruud Van Der Ploeg  
EMTA

Secretary General

POLIS is the leading network of European cities and regions working together to promote sustainable mobility through the deployment of innovative transport policies and solutions. Polis unites 80 European local and regional authorities invested in urban mobility innovation. Our members work on daily basis with the transitions, innovations and disruptions the transport sector is facing: automation, new and shared mobility services, active travel, Urban Freight and Logistics (UFL), access regulations, electrification, hydrogen propulsion solutions, digitalisation, etc. Cities and regions are incubators and living labs for transition, solving problems, and aiming at achieving EU and local sustainable development policy goals also through urban mobility.

EMTA (European Metropolitan Transport Authorities) is an association that unites 29 larger metropolitan areas to share knowledge and experience and to jointly address challenges in urban mobility and transport. EMTA brings together executives from its member authorities to facilitate a discussion amongst peers on topics European transport authorities see themselves confronted with. EMTA joins public bodies endowed with expert competences in public transport and mobility to facilitate in-depth elaboration of topical issues and respond to immanent needs and resolve pressing policy challenges. EMTA is currently running collaboration efforts on Decarbonization and Air Quality and annually benches progress of its members on achieving their targets on procuring bus running on renewable fuels.