

Bellona Europa response to the consultation on the revision of Directive 2009/33/EC on the promotion of clean and energy-efficient road vehicles (Clean Vehicles Directive)

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The Bellona Foundation is an independent non-profit organisation that aims to meet and fight the climate challenges, through identifying and implementing sustainable environmental solutions. We work towards reaching a greater ecological understanding, protection of nature, the environment and health. Bellona is engaged in a broad spectre of current national and international environmental questions and issues around the world.

Pollution knows no borders, thus Bellona works with and against anyone and everyone relevant to our work, both nationally and internationally. Bellona has a solution-oriented approach to the environmental challenges and has since 1998 had extensive cooperation with a number of companies in different industries and businesses. Our approach is that to achieve results one must jointly work out the best social and environmental solutions, and make these financially profitable and viable. Bellona has always been and remains an independent watch dog that investigates, scrutinises and reports any environmental crime we uncover.

The Bellona Foundation was founded in 1986. We are currently 65 employees, working at the main office in Oslo and our three international offices in Brussels (Belgium / EU) Murmansk (Russia) and St. Petersburg (Russia). Bellona has been established with an office in Brussels since 1994.

Introduction

Meeting the EU's target of reducing CO₂ emissions from transport by 60% and eliminating the use of fossil fuels in cars by 2050 will necessitate a significant uptake in zero emission vehicles (ZEVs). Public authorities are a powerful purchaser on the market and as such are key actors in driving the transition to a zero-emission, electric transport system. World-wide 557,000 cities and communities spend roughly €4 trillion per year; the equivalent of 10% of global GDP'. Green public procurement (GPP) is therefore a key tool public authorities can use to build trust in and stimulate demand for low- and zero-emission vehicles.

The EU Clean Vehicles Directive (CVD), which sets criteria to orientate public procurement, has however been excessively complex and unclear, which in turn has resulted in its marginal transposition at the Member State level as well as a limited stimulus to public authorities for the procurement of ZEVs.

This calls for a comprehensive revision to address its weaknesses as well as to provide more clarity to public authorities. Firstly, the CVD has suffered from the absence of a definition for a 'clean vehicle' and an excessively complex monetisation methodology: these have made it possible to satisfy procurement requirements by the majority, if not all, vehicles on the market. What is more, the methodology has been disproportionately focused on fuel consumption and has thus favored the purchase of efficient diesel vehicles, at the expense of zero emission, electric vehicles.

In light of this, Bellona calls for the replacement of the monetisation methodology by a more simple system based on a clear definition of a 'clean vehicle' and the inclusion of a target specifying the minimum share of low- and zero-emission vehicles in public fleets. It is important that the revised CVD differentiates between ZEVs and low-emission vehicles while favouring ZEVs, such as pure battery electric vehicles. Giving priority to ZEVs can be implemented by setting a specific procurement target for ZEVs or giving these vehicles a 'multiplier' (i.e. greater weight) to help public authorities to reach their targets.

The CVD's level of ambition clearly needs to be raised to reflect the growing market for- and advances in battery and electric vehicle technology. Bellona sees pure battery electric vehicles as representing the most promising technology for cutting CO₂ emissions, improving local air quality and addressing noise levels in cities. According to the IEA three-fourths of global car sales will need to be in EVs or plug-in hybrids by 2050 if the transportation sector is to do its part in keeping global average temperature rise below the 2 °C target of the Paris Agreement. In view of this, and in order to circumvent risks arising from reliance on tailpipe CO₂ or pollutant emissions as shown by the Dieselgate scandal, Bellona is strongly supportive of defining clean

vehicles as those producing 'zero tailpipe emissions', i.e. electric vehicles. When it comes to heavy duty vehicles, where electrification is still constrained by battery and range, it may make more sense to consider a CO₂ metric when specifying procurement targets, on the basis of the VECTO tool (which in turn is expected by the end of 2017).

That being said, we are continuously seeing tremendous improvements in battery technology, and in countries like Norway a number of cities are now moving beyond pilot projects to deploying fully operational urban duty e-trucks. Last year for example the country introduced its first electric food delivery truck, driving from the storage facilities on Oslo's outskirts to nearby towns and Oslo city center. Despite its initial purchase price being the double of a conventional truck, it results in savings amounting to 0.5 million NOK (the equivalent of € 564,100.00) during its lifespan, while delivering significant CO₂ and air pollutant cuts. What is more, the county of Sarpsborg in Norway last month introduced two fully electrified waste collection trucks, which will be in operation from September 2017. These electric waste collection trucks will result in the reduction of approximately 60 tons of CO₂ emissions per year¹.

In light of the rapidly evolving EV and battery market it is crucial that the CVD is regularly reviewed and flexible enough to cope with continuous technological improvement in clean and zero emission mobility technologies.

Furthermore, the directive's scope should be expanded to cover private companies contracted by public authorities to provide various transport services, such as waste management and delivery trucks as well as elderly transport services: this sector represents a substantial number of vehicles, but is currently omitted by the directive. What is more, the CVD could induce public authorities to choose the smallest, lightest and least powerful vehicle that meets their needs. Today the scope of the CDV is limited to M- and N-vehicles, whilst clean L-vehicles may sometimes represent a viable alternative. Bellona would thus support the inclusion of L-category vehicles in the CVD as well as the Clean Vehicles Portal.

Last but not least, fostering the wider uptake of ZEVs will require, in addition to GPP, a more comprehensive approach to fleet management to be adopted. EU Member States should establish national and regional capacity building centres to provide free advice and training to public authorities. This wider mobility management approach should also encourage public authorities to rethink their mobility needs, and ensure thorough assessment of whether the purchase (or lease) of a vehicle is necessary in the first place, and the consideration of car sharing, and employee incentive schemes.

¹ <http://bellona.org/news/transport/2017-02-norways-first-electrified-waste-collection-truck-uncovering-the-potential-of-decarbonising-urban-duty-vehicles>

I. The main problem to address

Q1. In your view, how important is it that public procurement is effectively used to stimulate the market for clean vehicles in the EU?

Very important

Public authorities are a powerful purchaser on the market and are therefore key actors in driving the transition to a zero-emission electrified transport sector. World-wide 557,000 cities and communities spend roughly €4 trillion per year; the equivalent of 10% of global GDP'. Green public procurement (GPP) is a key tool public authorities can use to build trust in and stimulate demand for low- and zero-emission vehicles.

Q2. Currently, the Clean Vehicles Directive has a very limited effect on reducing CO₂ and other air pollutant emission from publicly procured road transport vehicles, as noted in the ex-post evaluation of the Directive. To what extent do you agree with the following root causes?

	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
The Directive limits the scope to contracts falling under the procurement thresholds as set out in horizontal procurement legislation of the EU. This limitation results in too few vehicles falling under the scope of the initiative.				X	
The Directive does not include a definition of what a "clean vehicle" is. Often, procurement requirements are set that can be met by the majority, if not all, vehicles on the market.				X	

The Directive lacks minimum procurement targets for clean vehicles that orientate procurement planning.				X	
The Directive allows for different options for transposition into national law, which has caused fragmentation in procurement rules that are hampering market impact.				X	
The methodology for calculating operational life-time costs is too difficult and can unintentionally benefit conventionally fueled diesel vehicles.				X	

Q3. The problem of limited impact of the Directive is due to another root cause.

The CVD is overly complex and lacks clarity which in turn has resulted in its marginal transposition at Member State level.

Q4. Do you have any general comment on the functioning and/or impact of Directive 2009/33/EC that you would like to share?

The CVD has had limited impact on the uptake of zero-emission, electric vehicles. This calls for a comprehensive revision to address its weaknesses listed in Q2 above, as well as to provide more clarity to public authorities and simplify it. Firstly, the directive's scope should be expanded to cover private companies contracted by public authorities to provide various transport services, such as waste management and delivery trucks as well as elderly transport services: this sector represents a substantial number of vehicles, but is currently omitted by the directive.

The CVD has also suffered from the absence of a definition for a 'clean vehicle' and an excessively complex monetisation methodology: these have made it possible to satisfy

procurement requirements by the majority, if not all, vehicles on the market. The monetisation methodology has been disproportionately focused on fuel consumption and has favored the purchase of efficient diesel vehicles, at the expense of zero emission, pure battery electric vehicles. When it comes to the procurement of buses for example, public transport operators have mostly used the CVD to compare offers based on the lifetime energy consumption of vehicles – with values stemming from SORT tests. This, together with constrained budgets, has led many public transport operators to opt for EURO 6 buses, which had a minor impact on CO₂ and other pollutant emissions.

The CVD's level of ambition needs to be raised to reflect the growing market for- and advances in battery and electric vehicle technology. It should also be made more flexible to cope with continuous technological improvement in clean mobility technologies.

Last but not least, fostering the wider uptake of EVs will require, in addition to GPP, a more comprehensive approach to fleet management to be adopted. EU Member States should establish national and regional capacity building centres to provide free advice and training to public authorities. This wider mobility management approach should also encourage public authorities to rethink their mobility needs, and ensure thorough assessment of whether the purchase (or lease) of a vehicle is necessary in the first place, and the consideration of car sharing, and employee incentive schemes.

II. Policy Measures

The Commission published an Inception Impact Assessment of the revision of the Clean Vehicles Directive in August 2016. It specifies key objectives for the revision of the Directive:

- *impact of public procurement in all categories of clean vehicles should be*
- *current provisions for the purchase of clean vehicles in the Clean Vehicles Directive should be adjusted to provide adequate incentives*
- *the current methodology for the calculation of operational life-time cost of vehicles should be revised to remove inappropriate incentives.*

Policy measures identified in the Inception Impact Assessment include

- *Policy measure 1: expanding the scope of the Directive, with different sub-options*
- *Policy measure 2: changes to the provisions for purchasing clean vehicles, including:*
- *Policy measure 2a: mandatory requirement to follow a revised methodology for calculating operational life-time costs when using energy and environmental impacts as award criteria;*

- *Policy measure 2b: introduce a definition of clean vehicles and minimum procurement targets for public bodies*
- *Policy measure 2c: keep both measures 2a and 2b with a mandatory choice for Member States*

Q1. In your opinion, how important is it to revise the following parts of the Clean Vehicles Directive?

	Not important	Somewhat important	Important	Very important	Do not know
Scope (Art. 3)				X	
Provisions on the purchase of clean vehicles (Art. 5)				X	
Methodology for the calculation of operational lifetime costs (Art. 6)				X	
Adaptation to technical progress (Art. 7)				X	

Policy measure 1: Expanding the scope

The Clean Vehicles Directive covers the purchase of road transport vehicles by contracting authorities, contracting entities and operators discharging public service obligations as defined by [Regulation 1370/2007](#) on public passenger transport services by rail and road. Furthermore, the [Clean Vehicles Directive](#) sets a threshold for service and supply contracts (of up to €414,000). The way in which public authorities procure vehicles is changing with an increasing proportion of vehicles being leased, rented or indirectly procured through the procurement of services, e.g. bus or waste collection services. In addition, concessions can be tendered or granted. Also, public services provided by private operators are not fully covered in the Directive. Moreover the threshold below which the Clean Vehicles Directive does not need to be applied limits its scope.

Q2. In your opinion how relevant are the following options for a possible expansion of the scope of the CVD?

	Not relevant	Somewhat relevant	Relevant	Very relevant	Do not know
Remove the procurement threshold, thus ensuring that all vehicles purchased by public authorities are covered.				X	
Extend the scope of the Directive to vehicles rented, leased and hire-purchased by public authorities				X	
Extend the scope of the Directive to provide operators providing public services transporting passengers or goods				X	
Extend the scope of the Directive to all contracts that have a major transport element (including for example contracts on major infrastructure works and the vehicles used to deliver these)				X	

Q3. If you do not agree, please elaborate your answer briefly

In addition to these proposed measures, the Directive could require public authorities to choose the smallest, lightest and least powerful vehicle that meets their needs. Today the scope of the CDV is limited to M- and N-vehicles, whilst clean L-vehicles may sometimes represent a viable alternative. Article 4.3 and table 3 to the Annex should be amended to include L-category vehicles. Furthermore, clean L-category vehicles should be included in the Clean Vehicles Portal.

Policy measure 2a: Revising the methodology for calculating operational life-time costs

The evaluation of the Clean Vehicles Directive found that the methodology for calculating the operational life-time costs was perceived by many public bodies to be too complex and difficult. It can unintentionally benefit conventionally-fuelled diesel vehicles.

Q4. From your point of view, how important are the following objectives for a potential revision of the methodology for calculating the operational lifetime cost?

	Not important	Somewhat important	Important	Very important	Do not know
Simplify the current methodology				X	
Put greater emphasis on reducing emissions from CO ₂ through changing values				X	
Put greater emphasis on reducing emissions of pollutants through changing values				X	
Enlarge the scope of environmental impacts covered (noise)			X		
Create a more effective mechanism for updates of the methodology			X		

Q5. In your view should there be a requirement to follow the methodology for calculating operational life-time costs when using energy and environmental impacts as award criteria?

Somewhat disagree

Q6. In your view, how important is it to require a regular evaluation and update of the methodology?

Important

Q6.1. If you find it (very) important, how should the methodology be best evaluated and updated? Please explain briefly your position.

The methodology should be evaluated once every two years by an independent EU body (e.g. the European Commission) to ensure it is up-to-date and reflects market and technological realities.

Q7. Do you have any general comment on the scope of a possible revision of the monetisation methodology? Please explain your position.

The monetisation methodology has proven to be an unpractical tool for public authorities to plan their public procurements. It should be replaced by a more simple system based on a clear definition of a 'clean vehicle' and should include the setting of a target specifying the minimum share of low-emission and zero-emission vehicles in public fleets. Such emissions target should be adapted to different categories of vehicles (L, M, N).

Policy measure 2b: introducing a definition of clean vehicles and minimum procurement targets for public bodies

The current provision on settling technical specifications leads in practice often to specifications that can be met by all vehicles. This problem could be addressed through setting minimum procurement targets on the basis of a definition of clean vehicles.

Q8. From your point of view, how important is it to introduce a definition of 'clean vehicles' in the CVD?

Very important

Q9. In terms of defining clean vehicles, different conceptual approaches could be considered. Please rate the adequacy of the following approaches.

	Completely inadequate	Somewhat inadequate	Somewhat adequate	Completely adequate	Do not know
a) Define clean vehicles on the basis of tailpipe CO2 emissions specified threshold			X		
b) Define clean vehicles on the basis of a life-cycle CO2 emissions specific threshold			X		
c) Define clean vehicles on the basis of a real world air pollutants emissions threshold			X		
d) Define clean vehicles on the basis of vehicles capable of using an alternative fuel (as defined by Article 2(1) of the AFI Directive (2014/94/EU))		X			
e) Define clean vehicles as vehicles with zero tailpipe emissions				X	

Q10. Do you have any general suggestion on thresholds that could be used for approaches a) to c) presented in the previous question?

Bellona sees zero emission, pure battery electric vehicles (EVs) as representing the most promising technology for cutting CO₂ emissions, improving local air quality and addressing noise levels in cities. According to the IEA three-fourths of global car sales will need to be in EVs or plug-in hybrids by 2050 if the transportation sector is to do its part in keeping global average temperature rise below the 2 °C target of the Paris Agreement. For this reason, Bellona is strongly supportive of specifying specific targets for the procurement of clean vehicles which in turn should be those with zero tailpipe emissions. The Dieselpgate scandal has exposed the risks of relying on tailpipe CO₂ or pollutant emissions.

For larger vehicles (N2, N3, M2, M3), the lack of a commonly agreed methodology for measuring tailpipe emissions is still an obstacle, which will be lifted when the VECTO tool becomes widely adopted (envisaged by the end of 2017). Once enough data is available, the European Commission could choose, in cooperation with the relevant stakeholders, the best tailpipe emission threshold for N-vehicles.

Q11. In your opinion, should elements of the above mentioned approaches be combined in a definition of clean vehicles?

Yes

Q11.1. If you agree, please explain which approaches should be combined and why:

The revised CVD should differentiate between zero-emission vehicles (ZEVs) and low-emission vehicles while favouring ZEVs, such as pure battery electric vehicles. Granting preferential treatment to ZEVs can be implemented by setting a specific procurement target for ZEVs or giving these vehicles a 'multiplier' (i.e. greater weight) to help public authorities to reach their targets. In the specific case of heavy duty vehicles, zero-emission electric buses and trucks are a promising technology particularly in urban areas, however, public transport authorities and operators will need some flexibility as well as additional financial support from Member States and/or the European Commission.

Q12. In your opinion, are any of the approaches mentioned in question 9 not adequate for defining clean vehicles in the following categories of vehicles a) passenger vehicles; b) buses and coaches; c) light duty transport vehicles and d) heavy duty transport vehicles? Please explain your position.

In contrast to light duty vehicles, the application of zero emission heavy duty trucks is still limited. For this reason, it would make sense to allow for a CO₂ metric to be applied to heavy duty vehicles, on the basis of the VECTO tool (expected by the end of 2017).

That being said, we are continuously seeing tremendous improvements in battery technology, and in countries like Norway a number of cities are now moving beyond pilot projects to deploying fully operational urban duty e-trucks. Last year for example the country introduced its first electric food delivery truck, driving from the storage facilities on Oslo’s outskirts to nearby towns and Oslo city center. Despite its initial purchase price being the double of a conventional truck, it results in savings amounting to 0.5 million NOK (the equivalent of € 564,100.00) during its lifespan, while delivering significant CO₂ and air pollutant cuts. For the electric food delivery trucks, Asko in Norway has developed double-sided solar panels that the trucks utilise for charging when they return from duty. These are especially adapted to Norwegian light conditions, maximising the intake even of light that is reflected from the clouds and the ground. What is more, the county of Sarpsborg in Norway last month introduced two fully electrified waste collection trucks, which will be in operation from September 2017. These electric waste collection trucks will result in the reduction of approximately 60 tons of CO₂ emissions per year².

In light of the rapidly evolving EV and battery market it is crucial that the CVD is regularly reviewed and flexible enough to cope with continuous technological improvement in clean and zero emission mobility technologies.

Q13. To what extent do you agree to these approaches for setting minimum procurement targets for public bodies (based on a future definition of clean vehicles in the Directive)? Contracting authorities and entities should be required:

	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
To only procure vehicles that are defined as clean vehicles				X	
To ensure that a specified % of vehicles procured under each contract are			X		

² <http://bellona.org/news/transport/2017-02-norways-first-electrified-waste-collection-truck-uncovering-the-potential-of-decarbonising-urban-duty-vehicles>

clean vehicles					
To ensure that over a fixed time period a specified % of vehicles procured are clean vehicles			X		

Q14. In order to foster the transition to a low-emission mobility and account for diverging levels of ambition by different public bodies, a minimum target for the procurement of zero-emission vehicles could be included in addition to the overall minimum procurement target as noted in the previous question. To what extent do you agree with the approaches listed below?

	Strongly disagree	Somewhat disagree	Somewhat agree	Completely agree	Do not know
Public bodies should be required to procure a certain % of zero-emission vehicles under each contract				X	
Public bodies should be required to procure a certain % of zero-emission vehicles over a fixed time period				X	

Q15. In your view how important is it to require a regular reporting by Member States on minimum procurement targets?

[Very important](#)

Policy measure 2c: Combination of monetisation methodology and clean vehicles definition with minimum procurement targets with a mandatory choice for Member States

Q16. The policy measures presented below are not mutually exclusive and could thus potentially be combined. To what extent do you agree to the following approaches?

	Strongly disagree	Somewhat disagree	Somewhat agree	Completely agree	Do not know
The Directive should include a mandatory monetisation methodology (to be used when determining the life cycle costs as award criteria) and a definition of clean vehicles accompanied by minimum procurement targets. Member States must choose an option to apply.	X				
The revision of the Directive should establish only the requirement to follow the revised monetisation methodology when using determining the life cycle costs as award criteria	X				
The revision of the Directive should only require public bodies to meet minimum procurement targets set			X		

on the basis of a definition of clean vehicles.					
The revision of the Directive should only require public bodies to meet minimum procurement targets set on the basis of a definition of clean vehicles, and include a specific target for zero emission vehicles				X	

III. Impacts

The Inception Impact Assessment preliminary considered the identified measures to be proportionate for the problem to address. It does not expect any sizeable social impacts. Economic impacts are expected to vary among stakeholders, but are not expected to be significant on an overall economic scale. Environmental impacts are expected to be overall positive. Impacts on administrative burden and simplification are assumed to differ, with some policy measures probably initially adding to an increased administrative burden and others reducing administrative burden.

**Q1. To what extent do you agree to the following statements on likely economic impacts?
All policy measures noted above:**

	Strongly Disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
will lead to growth and jobs in the manufacturing sector, particularly in the heavy-duty transport sector, due to stronger public demand for clean vehicles				X	
will contribute to a bigger market in the EU that will improve international competitiveness of European industry				X	

can lead to initially strains on investment budgets of local public authorities and/or transport operators due to higher purchase cost of clean vehicles ³		X			
can reduce overall budget pressure of local public authorities and/or transport operators due to low maintenance cost and over time reduced investment cost due to falling vehicle prices				X	

**Q2. To what extent do you agree to the following statements on environmental impacts?
All proposed policy measures:**

	Strongly Disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
will reduce energy consumption from vehicle fleets providing public services				X	
will lead to less emissions of CO ₂ from vehicle fleets providing public services				X	
will lead to less emissions of air pollutants (as covered under the Directive) from vehicle fleets providing public services				X	
will have positive effects on human health				X	

Q3. To what extent do you agree to the following statements on administrative burden and simplification?

³ Siemens and Volvo last year conducted a study looking into the most profitable and promising technologies in terms of CO₂ and air pollutant reduction potential for transport. The study looked at 460 buses operating on a total of 64 different bus routes within the city of Oslo. They found that if Oslo's bus fleet were to be converted to fully electric, the municipality would save 750 million NOK (or EUR 80 million) over 10 years, compared to today' diesel buses. And when compared to biofuels, these savings could exceed 600 million (EUR 65 million).

	Strongly Disagree	Somewhat disagree	Somewhat agree	Strongly agree	Do not know
Expanding the scope of the Directive will initially lead to an increased administrative burden incurred mostly by local public authorities		X			
Mandating a revised methodology for calculation of operational lifetime cost to follow when using impacts as award criteria in the procurement decision will increase administrative burden incurred by mostly local public authorities			X		
Simplification of the methodology can positively influence the overall increase in administrative burden				X	
Introducing a clean vehicle definition and minimum procurement targets will reduce administrative burden				X	
Socio-economic benefits of a higher share of clean vehicles (reduced public health impacts) will overcompensate costs related to increase in administrative burden				X	

Q4. Do you have any general comment on potential impacts of the proposed policy measures?

A simplification of the framework through the deletion of the monetisation methodology and the introduction of minimum procurement target could lead to a reduction of administrative burden and a better implementation of the directive throughout the EU.

Nevertheless, this will only work if targets are implemented and if progress towards them is regularly tracked. One way of mitigating any potential increase in the administrative or budget strains for public authorities is by setting minimum ZEV procurement targets at the national level, to be sub-divided between local authorities (a sort of ‘burden sharing’ at the national level). Moreover, public authorities and transport companies would be more likely to reach their targets if they were provided with clear incentives. Complementary to loans provided through the “Clean Transport Facility” set by the European Investment Bank, the European Commission could provide grants to clean transport projects (e.g. procurement of new vehicles, training,

infrastructure deployment, etc.), undertaken to fulfil the commitment of the Directive, building on existing initiatives such as the “low emission bus scheme” in the UK.

IV. Relevance of other action at European level

Q1. From your point of view, could the objectives that should be achieved through the revision of the Directive be better accomplished through deployment of non-legislative tools (e.g. action based on voluntary green public procurement criteria, use of life-cycle cost tools) based on guidance or recommendations by the Commission?

[Strongly disagree](#)

Q2. Please explain your answer

Voluntary GPP criteria are an important tool but cannot replace the directive. It is crucial to have a legally binding EU-wide framework to stimulate procurement of zero emission vehicles. Mere reliance on voluntary initiatives will lead to fragmented approaches across the EU and will undermine the attainment of an EU Single Market for Electro-Mobility.

Q3. From your point of view, could the objectives as stated for this initiative be achieved better if policy measures discussed for the revision of the Directive were implemented through a Clean Vehicles Regulation that would replace the current Clean Vehicles Directive?

Please note that a Regulation is directly applicable in Member States and does not need transposition into national law, which is required for Directives.

[Strongly agree](#)

Q3.1. If you agree to this possibility, please justify why you consider this approach best suited.

Being directly applicable in Member States and not requiring transposition into national law, by definition a regulation on clean vehicles would ensure more systematic and coherent approach to implementation, and address the issue of the CVD's limited implementation.