

STATEMENT

Brussels, 20 June 2017

FUEL PRICE COMPARISON (FPC)

UPEI, the voice of Europe's independent fuel suppliers, believes that the interest of the consumer is primordial in drawing up a common methodology for a fuel price comparison system. The system must demonstrate added value. It should be introduced in such a way as to avoid confusion and unnecessary financial and administrative burden on the 100,000 plus retail stations across the EU that will be required to implement it.

The overall purpose of the FPC¹ is to expose consumers to easily comparable information on the price of alternative fuels in order to promote the switch to such vehicles. Whilst fuel price is a consideration, it is only useful when provided in the context of how far the fuel will allow you to travel. For this reason, UPEI believes that the chosen methodology must not be over-simplified. It must be easy to understand and comprehensive, including information on other parameters such as energy content and vehicle costs and performance, in order to provide real value to the consumer. It must be implemented in a proportionate manner.

The €/100km methodology is therefore the most appropriate in meeting the needs of the consumer and keeping implementation costs to a minimum.

RECOMMENDATIONS

1. To provide consumers with information that is complete and comprehensive, it is necessary to ensure that the FPC is based on full transparency of all the relevant price components which are considered when purchasing a new vehicle: vehicle prices and efficiency as well as fuel costs (including taxation) and energy content. This could be implemented through a website in each Member State², providing information based on EU wide average data from official sources such as:
 - a. Fuel prices (including taxation rates): Member States authorities
 - b. Energy content of fuels: EU default rates from the European Commission
 - c. Vehicle costs and efficiency: vehicle manufacturers.
2. In order to comply with article 7.3, a visual display of the fuel price comparison is required at the retail station. The most feasible and practicable display option would be a generic poster at an appropriate location like the shop window pane, providing a comparison of the total cost of each fuel, indicated as €/100km (based on EU wide average data and updated on a quarterly basis). This poster could include a reference to a website (hyperlink/QR code) where details on the price components for fuels (energy

¹ Article 7.3 of Directive 2014/94/EU

² E.g. [Ecoscore Belgium](#)

content/product cost/excise duty/ etc.) and vehicle efficiency can be provided in more detail.

3. Ensure that existing regulations in Member States with regards to price displays at retail stations are respected. To avoid any changes to existing technical/electronic devices such as totems, which are high cost and required to inform the consumer of the price of the fuels that are sold at a given retail station.
4. UPEI represents fuel suppliers in the whole supply chain (excluding production). The *independent* retail sector has a high proportion of SMEs. Market structure varies from country to country. In drawing up the guidelines, it must be considered that in some cases a retailer may own only one or a handful of retail stations. It is, therefore, recommended to limit the application of the FPC to fuel stations with a throughput over 3 million litres. Smaller stations would be exempt from the measure. Specific measures for stations in remote areas may be required, to take account of the proportionately higher costs that are incurred due to accessibility.
5. Whilst, in principle, the FPC should only apply to retail stations which sell the alternative fuels in question, the proposed approach (recommendation 1&2) could be implemented more broadly given its low cost.
6. It is essential for the European Commission to include in its guidelines recommendations to Member States on how the FPC is to be implemented and displayed at the fuel station. This is in order to achieve a harmonised approach as well as: (1) in order to avoid confusion with existing displays of fuel prices sold on the forecourt and (2) to limit the administrative and financial burden on retail stations (the obligated party).

UPEI represents European importers and wholesale/retail distributors of refined petroleum products and their alternatives, supplying Europe's customers, independently of the major petroleum producers.

Independent suppliers, covering more than a third of Europe's demand, play a crucial role in an evolving market by bringing competition which is vital to the economy. Their independence enables them to respond rapidly to changes in terms of market structure, products and services, contributing to security of supply on a local, regional and national level.

UPEI was created in 1962 with the aim of ensuring a level playing field for the supply of energy on the European market and safeguarding a competitive approach. The organisation brings together national associations and suppliers across Europe.

Today, **UPEI** also acts as an informed and responsible partner to Europe's decision-makers on the risks and opportunities involved in the transition to a genuine European Energy