

FUEL PRICE COMPARISON

Programme Support Action for the implementation of a common methodology for alternative fuels unit price comparison in accordance with Directive 2014/94/EU

JULY 2019

UPEI, the voice of Europe's independent fuel suppliers, believes that the interest of the consumer is primordial in implementing the common methodology for alternative fuels price comparison. New display options must demonstrate added value. It should be introduced in such a way as to avoid confusion and unnecessary financial and administrative burden on the estimated IOO,OOO retail stations across the EU.

The overall purpose of the Fuel Price Comparison (FPC) is to expose consumers to easily comparable information on the price of alternative fuels in order to promote the switch to such vehicles. UPEI welcomes the establishment of the Programme Support Action (PSA) as a way to guarantee a harmonised approach to the implementation of the common methodology across European Member States.

RECOMMENDATIONS

It is essential for Member States to take a harmonised approach to implement the common methodology as well as:

- avoid confusion with existing displays of fuel prices sold on the forecourt
- limit the administrative and financial burden on retail stations, especially the smaller ones.



Avenue de la Renaissance 1 • B-1000 Brussels Phone: +32 2 740 20 20 • Fax: +32 2 740 20 23

info@upei.org • www.upei.org



COMPREHENSIVE PRICE INFORMATION

To provide consumers with complete and comprehensive information, it is necessary to ensure that the FPC is based on full transparency of all the price components considered when purchasing a new vehicle.

A website in each Member State¹ could inform the consumers about the total cost of ownership based on EU wide average data from official sources such as:

- fuel prices (including taxation rates):
 Member States authorities
- energy content of fuels: EU default rates from the European Commission
- vehicle costs and efficiency: vehicles manufacturers.

¹ E.g. Ecoscore Belgium

DISPLAY

A generic poster at an appropriate location (such as a shop window panel at the retail station) is a feasible and practicable display option to provide:

- a comparison of the total costs of different alternative fuels/100 km driven with an average vehicle.
- a reference to a website where additional details on the price components for fuels (energy content, product cost, excise duty, VAT etc.) and vehicle efficiency can be easily found.

The FPC should only apply to retail stations which sell alternative fuels, and in particular hydrogen and CNG. However, the proposed approach could be implemented more broadly given its low cost as an attempt to raise consumers' awareness.

DISSEMINATION

For the dissemination of the common methodology, Member States should prioritise online tools, as recommended in the Commission Implementing Regulation. Indeed, online platforms and mobile/tablet applications are increasingly popular sources of information, especially among younger generations.

The Regulation further states that "such tools should provide the opportunity to obtain individual information for all or most models of vehicles existing in the market. Such tool would also offer the possibility to add other information", providing flexibility that static tools cannot offer.

COMPLIANCE

Member States shall ensure that existing regulations and technical standards with regards to price displays at retail stations are respected, guaranteeing compliance with legal obligations related to product pricing. Current practices shall be maintained while the display of the fuel price comparison shall come as an additional measure for consumers information purposes.

EXEMPTIONS

The independent retail sector has a balanced mix of SMEs and larger companies. 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, most likely in remote areas.

It is recommended to limit the application of the FPC to fuel stations with a throughput over 3 million litres. Very small stations would be exempt from the measure.

It is also recommended to exempt unmanned stations from certain display obligations.