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LEVA-EU Feedback on the Commission's Roadmap for an EU Strategy for Sustainable and Smart Mobility

LEVA-EU is the only trade association in Europe that works exclusively for light electric vehicles. LEVA-EU currently represents around 50 companies, active in various parts of the LEV-business.

The term light, electric vehicle (LEVs) includes a range of vehicles with one, two, three or more wheels that offer affordable, accessible, healthy and clean transport. These vehicles are included in the L-category or excluded through Article 2.2 of Regulation 168/2013.

The objectives for the future Sustainable and Smart Mobility Strategy include:

- Increasing the uptake of zero-emission vehicles
- Making alternative solutions available to the people and businesses
- Supporting digitalisation and automation
- Improving connectivity and accessibility

To what extent are LEVs at the forefront of the Commission's mind in achieving these objectives?

And yet, COVID-19 has clearly shown to what extent LEVs effectively offer a solution for sustainable transport. Thousands of cities throughout Europe, literally gave way, not only to pedestrians and cyclists but also to electric bicycles, electric cargo bikes, e-scooters, electric mopeds, light electric three and four-wheeled vehicles: affordable, accessible, healthy and clean transport.

And yet, the EU and its member states either ignore or marginalize LEVs, or both. With the UK and the Netherlands, we only quote 2 examples of countries that are still not allowing e-scooters on public roads. In other member states, millions of citizens use them for short trips ... trips, a large percentage of which previously would have been done by car. Fifty percent of all car trips in the EU are less than 5 km and 30 percent even less than 3 km. And still, the Commission is focussing to a very large extent on alternative fuels and on charging infrastructure, in other words on cars. In the meantime, millions of people have taken up commuting by e-scooter, e-bike, speed pedelec, ... whilst a growing number of businesses deliver their goods and services by electric cargo bikes.

The growing shortage of road space for pedestrians, bicycles and LEVs stirs up a public and political debate, not about pushing back big, polluting, noisy, dangerous, expensive vehicles and giving back space to affordable, accessible, healthy and clean travel. The debate is about how to continue to squeeze all that sustainable transport onto little strips on the side of the road.

LEVs do not need alternative fuels, nor charging infrastructure. They all work on small amounts of electricity, which they can get from just plugging them into any power point. LEVs first and foremost need the right regulatory framework. Their uptake is very seriously hampered by European and national regulatory bottlenecks, which the Commission refuses to solve.



The roadmap promises to set the right regulatory and non-regulatory framework for a leading European transport industry, both in clean and connected mobility. The plea for taking LEVs out of the legislative framework for ICE mopeds and motorcycles to give them their own accurate framework is now more than 20 years old. The LEV market still consists for 95% of electric bicycles with pedal assistance up to 25 km/h and 250W. These electric bicycles are the only LEVs to enjoy their own regulatory and non-regulatory framework. The market needs new solutions, a wider variety of vehicles but Regulation 168/2013 remains untouched, causing no type-approvals in L1e-A, huge constraints for electric cargo-bikes and speed pedelecs and many people with physical impairments being denied access to electric bicycles.

Furthermore, LEVs need exchange of good practice, research and regulatory support for:

- sufficient and safe on and off-road infrastructure for LEVs
- the modernisation and update of national traffic codes, which today or still based on outdated vehicle concepts
- the integration of LEVs in MaaS
- the development of the most effective fiscal incentives
- the integration of LEVs as full-fledged transport solution in public procurement

Under the title *“Problem the initiative aims to tackle”* the Commission writes: *“Investments in sustainable alternative fuels and clean technologies as well as renewals of transport fleets by public authorities and companies are essential to achieve the transition that is needed.”*

This clearly shows the lack of awareness among the Commission as to the potential of LEVs in *“delivering a 90% reduction in transport-related greenhouse gas emissions by 2050 to support the EU’s aim to become the first climate neutral continent.”*

LEVA-EU herewith calls upon the Commission to study light, electric vehicles, to research their potential for providing affordable, accessible, healthy and clean transport and to start a dialogue with LEV-businesses and users.

If the future Mobility Strategy aims at giving LEVs a primary role, the citizens in the European Union will enjoy, next to affordable, accessible, healthy and clean transport, a wealth of additional benefits: congestion reduction, improvement of public health, safer transport that remains available during pandemic crises, huge savings on external costs in exchange of huge external benefits, creation of green jobs whilst greening the economy. LEVA-EU calls upon the Commission to give LEVs a prominent role in the Strategy since they will play a key role in delivering the 90% less GHG emissions.

A Strategy that aims at establishing affordable, accessible, healthy and clean transport, cannot afford to ignore and overlook means of transport, which already are affordable, accessible, healthy and clean. LEVA-EU is at the Commission’s disposal for any further details on LEVs and for assisting in liaising with the LEV community.

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