



Fédération Internationale des Véhicules Anciens comment on the Green Paper "Towards a new culture for urban mobility"

Introductory comments

The Fédération Internationale des Véhicules Anciens (FIVA) was founded in 1966 as the international federation of historic vehicle clubs. FIVA has over one million members in 50 countries (www.fiva.org).

FIVA's principal objective is to further the preservation and use of historic vehicles and does so by identifying and classifying all historic vehicles; by providing links between clubs and groups of enthusiasts internationally; by promoting "regularity" rallies (i.e not racing), concours and touring events around the world; by stimulating public interest in preserving our motoring heritage; and by ensuring that legislation does not impact the preservation and use on public roads of historic vehicles.

By their nature, historic vehicles are owned by enthusiasts and preserved in historically correct condition. They are kept for their technical, cultural and historical contribution to our common heritage. Those which are in road-use are well maintained and not generally used as everyday transport. A recent FIVA survey indicates that within the EU the most commonly accepted age threshold for historic vehicles is 30 years.

The Green Paper outlines many possible actions designed to improve urban mobility. FIVA and its members may agree that the broad range of these actions are laudable, however, this paper will only address the specific issue of interest/concern to the preservation and use of historic vehicles.

Vehicle use in urban areas

One of the foci of the Green Paper is vehicle-use in urban areas – with the objective to identify means to better manage traffic, and promote clean transport modes or clean vehicles to the overall benefit of the urban environment. The issues which motivate this debate are the desire to reduce traffic congestion; reduce road accident and to improve air quality.

Older vehicles in the debate on improving urban mobility

Within this debate, older vehicles are often singled out as "culprits" of pollution. As a result some policy makers have expressed the view that older vehicles should be removed from traffic or that they should be targets for reduced road/traffic access in order to improve air quality – for example: the Green Paper notes that "...A gradual tightening up of these (minimum performance) standards over time could lead to a

continuous process of upgrading or phasing out of old heavily polluting vehicles.” Additionally, as pointed out by the Green Paper, some local authorities “restrict access to city centre on the basis of EURO standards.”

Historic vehicles

As noted above, the special characteristics of historic vehicles are recognisable not only by age but also by the way the vehicles are used and maintained. There is therefore a real distinction between an “old” vehicle and a historic vehicle – this is that:

1. historic vehicles are well maintained: historic vehicle owners have almost exclusively purchased their vehicle because of their interest and attraction to that vehicle. It is therefore not bought primarily as a vehicle for “transport” purposes but because the individual has specifically decided to preserve a piece of motoring heritage. They will therefore undoubtedly also take great care of the vehicle which means that they will devote time, energy and money into ensuring that the vehicles and their engines are well preserved and maintained.
2. historic vehicles make up only a small fraction of road vehicles and road traffic: a comprehensive research project undertaken by FIVA in 2005-06 showed that historic vehicles account for 0.8% of the total vehicles on the road – additionally, because they are not used as day-to-day transport, their use is minimal – the same research found that historic vehicle use accounted for only 0.07% of the distance travelled by modern vehicles. Moreover, as they are rarely used for purposes other than pleasure transport, they are generally used at weekends – and more importantly, rarely in urban areas in peak transport times.
3. historic vehicles are driven carefully: again in order to preserve and maintain well their vehicles, historic vehicles owners drive their vehicles with great care – this is reflected in the very low insurance premiums which are offered to historic vehicles owners – the premiums being based on their excellent safety record.

The cultural value of historic vehicles

Of course, an additional effect of the FIVA members’ actions is that our motoring heritage is maintained for the public at large. The fact that the vehicles are used means that the general public undoubtedly occasionally see historic vehicles on public roads and as a result, historic vehicle owners are in effect providing a free museum to the general public of technical and cultural heritage.

The economic value of the historic vehicle movement

The value of the historic movements is not just measured in terms of preserving heritage. The research project noted above also showed that:

- within the EU more than 9000 businesses employing 55,000 people generate their income by the provision of services and products to the historic vehicle movement - these businesses generated €16.66 billion in trade;
- Over €4.9 billion was spent by club members on insurance, purchase of vehicles, fuel, maintenance, and other related items (magazines, books, models, clothes, etc.);

- Private sales of historic vehicles by members totaled almost €760 million;
- Overall expenditure by historic vehicle clubs was approximately €39 million.

As these figures show, the historic vehicle movement is not just a passion for enthusiasts, but is also a significant contributor to the EU's economy and economic growth and is based almost entirely on small and medium sized enterprises.

Historic vehicles and urban policy

Historic vehicles are therefore clearly not a part of the general transport mix in the context of the policy discussions on improving urban mobility. However, they should definitely be a part of the debate because the broad term "older vehicle" is so often used to describe the vehicles targeted as one of the key culprits of pollution.

Because the distinction between the two is not always made, historic vehicles are still in some cases being singled out by local authorities as having to pay higher charges in Low Emission Zones (LEZs) or being banned from entering certain areas. FIVA believes that such action is unnecessary and more importantly, unwarranted, because their minimal use means that their contribution to air pollution is proportionately negligible. Moreover, higher charges for, or bans on, historic vehicle use in LEZs would be especially unfair on owners living within the zones.

FIVA is therefore keen to protect against historic vehicles being unfairly and unnecessarily impacted by any such future measures.

FIVA members have made these points in discussions with local authority decision makers across the EU over past years when challenging potential bans or the imposition of disproportionate penalties on the use of their vehicles as a part of urban mobility policy measures. In many cases, the arguments have been well received and the potential threats have been avoided. Examples are:

1. A decision by the **German** Federal Parliament at the end of 2007 to the First Regulation on the Amendment of the Regulation on Low-Emission Vehicle Labeling with the effect that historic vehicles (in Germany they are classified with either an "H" licence plate or a red "07" historic vehicle license) are now allowed unrestricted access to any LEZ established by any local authority in Germany. This provision also applies to any vehicle over 30 years old from another EU Member State. The provision was agreed by the Parliament because it recognised that historic vehicles are not used enough to have an impact overall emissions footprint of a city.
2. The **Danish** Environment Protection Law of 22 December 2006 set in place provisions for the Community boards in Copenhagen, Frederiksberg, Aarhus, Aalborg and Odense to establish Environmental Zones for trucks and buses. The law explicitly states that these LEZs will not apply to vehicles registered in Denmark for veteran driving or which are registered elsewhere and are more than 30 years old.
3. The recently introduced LEZ of **London, UK** currently applies to all Euro III diesel trucks over 12 tonnes, and will gradually be extended to cover coaches and buses, and Euro IV medium and heavy trucks. However, all historic trucks and buses (defined as being made before 1973) are exempted from the charging applying to the affected vehicles.

4. Many **Italian** cities and towns are implementing LEZs and/or vehicle use restrictions. Of these some have exempted historic vehicles from the provisions including the Regione Veneto and the Regione Toscana.

Many towns and regions across the EU are imposing or planning to impose vehicle restrictions or are aiming to implement charging regimes which may have a disproportionate and unfair impact on historic vehicles. Therefore, FIVA welcomes that fact that the European Commission has acknowledged the view that:

“there is a risk of creating a fragmented patchwork of urban areas with new border lines across Europe. For example some authorities restrict access to city centres on the basis of EURO standards, others on a different basis”,

and hopes that the European Commission does take action to limit the development of a wide range of different measures across the EU. FIVA believes the European Commission could do so by issuing guidance to the Member States and their local authorities with the objective to help to “harmonise” urban traffic control measures, including devising systems designed to monitor results to the benefit of EU citizens.

Within that context FIVA urges the European Commission to recognise the merits of the positions taken by the German and Danish Governments, Transport for London and the Italian cities listed and hopes that the European Commission will include in those guidelines the recommendation that Member States/local authorities make provisions for historic vehicles to the effect that they are not

1. banned from entry to Zones/urban areas; or
2. penalised with excessive charges for entry to Zones/urban areas.

In so doing, the European Commission will be taking a proactive step which will not only ensure that historic vehicle owners are not unnecessarily impacted or disproportionately treated by measures designed to improve urban mobility but which will also further both the preservation of Europe’s motoring heritage and the prospects of the small and medium sized enterprises across the EU which support the historic vehicle movement.

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