



Recommendation from the PSA on Fuel Price Comparison

Assisting Member States with the implementation of
Article 7.3 of Directive 2014/94/EU (Fuel Price
Comparison)

[Written by Ilias PASSIOS, Antonis PEPPAS, Chrysa POLITI]
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Directorate B Investment, Innovative & Sustainable
Unit B4 Sustainable & Intelligent Transport

Contact: Antonio Tricas Aizpún

E-mail: antonio.tricas-aizpun@ec.europa.eu

*European Commission
B-1049 Brussels*

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comparison in accordance with Directive 2014/94/EU***

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The recommendations set out in this report have been determined by the EU Member States participating in the Programme Support Action (PSA) "Assisting Member States in the implementation of the Article 7 (3) of Directive 2014/94/EU Fuel Price Comparison" and do not reflect the opinion of the European Commission.

AUTHOR

Author	Member States	Contact (e-mail, phone)
Ilias PASIOS	GREECE	h.pasios@yme.gov.gr
Antonis PEPPAS	GREECE	peppas@metal.ntua.gr
Chrysa POLITI	GREECE	chrysapol@metal.ntua.gr

CONTRIBUTORS AND/OR REVIEWERS TO THE DOCUMENT

Author	Member States	Contact (e-mail, phone)
Paulien OFFICIER	THE NETHERLANDS	paulien.officier@rvo.nl
Nienke SMEETS	THE NETHERLANDS	nienke.smeets@minienw.nl
Iulia DOLGANOVA	GERMANY	Iulia.Dolganova@bmwi.bund.de
Norman WENDT	GERMANY	Wendt@dena.de
Celestin PEEK	GERMANY	peek@dena.de
Anni HYTTI	FINLAND	Anni.Hytti@traficom.fi
Atte MELASNIEMI	FINLAND	atte.melasniemi@traficom.fi
Juhani LAURIKKO	FINLAND	juhani.laurikko@vtt.fi
Rui BORGES	PORTUGAL	Rui.Borges@dgeg.gov.pt
Cecile DUMAS	FRANCE	cecile.dumas@developpement-durable.gouv.fr
Mathilde TANNOUS	FRANCE	mathilde.tannous@developpement-durable.gouv.fr
Anastasia GEORGARAKI	CYPRUS	ageorgaraki@mcit.gov.cy
Tomislav ZIDOV	CROATIA	Tomislav.Zidov@mmpi.hr
Isidoro ROMERO	SPAIN	ijromero@miteco.es
Carlos ORTIZ	SPAIN	cjortiz@miteco.es

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Representative	Member States	Status
Ilias PASIOS	GREECE	Approve
Tomislav ZIDOV	CROATIA	Approve
Anni HYTTI	FINLAND	Approve
Anastasia GEORGARAKI	CYPRUS	Approve
Cecile DUMAS	FRANCE	Approve
Iulia DOLGANOVA	GERMANY	Approve
Nienke SMEETS	NETHERLANDS	Approve
Rui BORGES	PORTUGAL	Approve
Isidoro ROMERO	SPAIN	Approve

INTRODUCTION

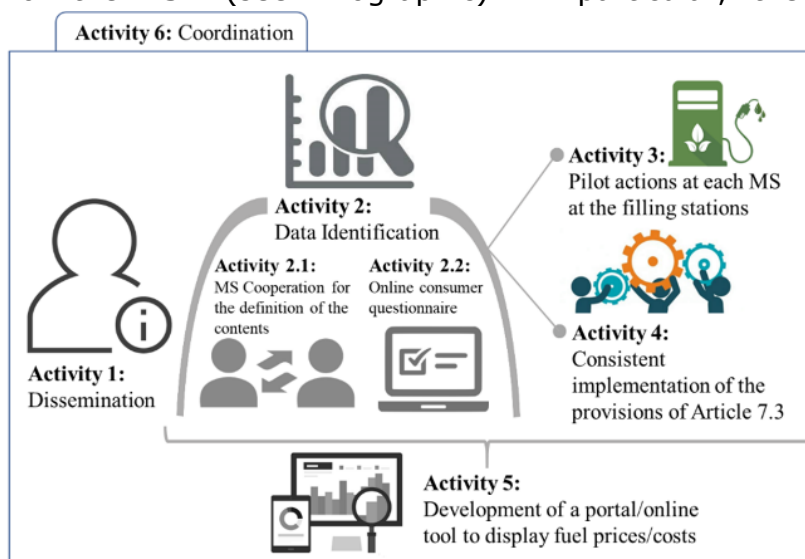
The "Multi-Annual Work Programme 2014-2020 for financial assistance in the field of the Connecting Europe Facility (CEF) - Transport sector" adopted by the Commission on 26 March 2014 (C(2014) 1921 offers technical assistance to the Member States (MS) for the implementation of Article 7.3 of Alternative Fuel Infrastructure Directive 2014/94/EU (AFID).

The objective of this Programme Support Action (PSA) was to assist MS with the implementation of Art. 7.3 of the AFID. In specific, MS shall provide information on fuel prices to enable consumers to compare the fuel/running costs of vehicles with different fuels in a common unit (€/100km). In this regard, the Commission Implementing Regulation on Fuel Price Comparison (FPC) defined a methodology for calculating the FPC values related to the Art. 7.3 of the AFID.

Accordingly, the Commission has decided to award a grant for the action entitled "Programme Support Action (PSA): Assisting Member States in the implementation of a common methodology for alternative fuels unit price comparison following Directive 2014/94/EU" ("FPC4Consumers"). The FPC4Consumers consortium consisted of Greece (the Coordinator), Cyprus, Germany, Finland, France, Croatia, Netherlands, Portugal and Spain. The aims of the PSA were:

- to support the consistent implementation of the provisions of Art. 7.3 of the AFID in the MS;
- to define the format, contents and location of the information to be displayed at the filling stations based on the Commission Implementing Regulation;
- to carry out pilot actions to assess consumer perspective concerning FPC displays at the filling stations and to provide recommendations/guidelines for a harmonized implementation of Art. 7.3 of the AFID;
- to support MS in making information available to the consumers at the filling/charging stations and also via digital tools to ensure consumers/users can make a straightforward comparison between the fuel costs of vehicles with different fuel types;
- to disseminate the common methodology for FPC calculations and raise awareness of alternative fuel suppliers, media and consumers.

For this purpose, the participating MS to the PSA planned and performed actions to fulfil the requirements of the PSA (see infographic). In particular, the consortium initiated by **disseminating** the aims of the PSA, the common methodology and the necessity for display the FPC at filling stations (*Activity 1*). Then, an online questionnaire was conducted in order to **assess** the consumers' understanding and perception in relation to the Alternative Fuels (AF) and their preferences about the format, content and location of the FPC at



filling stations (*Activity 2*). In the course of *Activity 2*, a total of 7612 responders participated in the online survey. The results of this survey were used to design variable display options, which were **tested** at pilot filling stations (*Activity 3*). The pilot actions were performed at 88 filling stations across the participating MS with a total of 5120 responders. In parallel, online tools were **developed** in national and overall level for enabling the FPC via digital platforms customized to achieve high viewers' acceptance (*Activity 5*). Nevertheless, the acquired experience and results from the abovementioned activities were **evaluated** in order to conclude to recommendations/guidelines for a harmonized implementation of Art. 7.3 of the AFID across MS (*Activity 4*).

Activity 6 included the Coordination actions needed for managing these activities on FPC on the national level and delivering the outcomes of the PSA to the Commission. In this regard, the recommendations for implementing the Art. 7.3 of the AFID were prepared and delivered in two stages, as described in the Grant Agreement (GA) of the FPC4Consumers. After the completion of the online survey and several technical workshops of the involved MS with the related stakeholders (fuel suppliers in particular), the consortium evaluated the collected results and delivered the first draft of recommendations on February 28th, 2020 to the Commission. Then, the pilot actions were implemented in parallel with the launch of the completed versions of the online tools. These actions allowed the consortium to assess the consumers' reactions on-site as well as to investigate potential limitations on implementing the AFID at the different MS. In fact, the diversity of the participating MS in correspondence with deviations on the national regulations led the consortium to propose recommendations, which provide alternative options of implementation. Therefore, this multi-option approach for the Art. 7.3 of the AFID implementation aims to be efficient, effective (MS select the most appropriate options for its case) and applicable to all MS.

During the PSA pilot actions were performed, focusing on testing the various options concerning the format, content and location of fuel prices comparison display on consumers. It is critical their results as well all the learnings arising from other actions performed in this PSA, are taken up in the evaluation of the AFID.

The aim of this document is to present the recommendations of the FPC4Consumers PSA regarding the implementation of Art. 7.3 of the AFID to the MS of the European Union. These recommendations originate from the cooperation of the consortium, the interactions with the related stakeholders, as well as the results derived from the pilot actions and the online questionnaire survey. In specific, these recommendations are based on the results of the PSA concerning the following elements:

- the content of the information to be displayed at the filling stations,
- the format in which the information is displayed,
- the locations of displaying the fuel prices at the filling stations,
- the definition of the type of filling stations where the information should be displayed (Art 7.3 states "where appropriate"),
- establishment of an online tool/website.

This deliverable serves as a roadmap for consistent implementation of article 7.3 of the AFID based on the results of the PSA.

1. CONTENT OF THE INFORMATION TO BE DISPLAYED AT THE FILLING STATIONS

In this section, a short description of the common methodology is presented as well as guidelines for facilitating the implementation of this methodology by the MS. To begin with, **the principal formula for the price calculations in €/100km**, which is described in the Implementing Regulation (EU) 2018/732 and is tested during this PSA, **is the following**:

$$FPC \text{ price} \left(\frac{\text{€}}{100\text{km}} \right) = \text{Vehicle Consumption} \left(\frac{\text{fuel unit}}{100\text{km}} \right) \cdot \text{Average Fuel Price} \left(\frac{\text{€}}{\text{fuel unit}} \right)$$

The *first factor* refers to the reference WLTP consumption for the compared fuel types and the *second factor* refers to the average price of the compared fuel types.

1.1. Vehicle consumption

To perform the calculation, the first step is to select the vehicles to be considered. **The fuel prices are shown for at least one segment** (and maximum of 3 segments). To keep as close as possible to the mind-set of consumers, the bestselling segment is selected yearly (calendar). In that segment, at least a top 3 of bestselling vehicles are identified per fuel type. This is done on type level (including all models).

The FPC prices are calculated and are displayed for the fuel types available in the MS. This can vary per vehicle segment. When a MS does not have a certain fuel type (commonly hydrogen) at all, then this fuel type is left out of the calculation, and is not displayed on the price comparison. If a MS however does have a fuel type in the market, but no vehicles selected using that fuel type (commonly hydrogen in segment A), then the price is left empty on the price comparison.

The reference vehicle consumption is calculated as the sales-weighted average WLTP combined consumption of at least a top three of best-selling vehicle types (based on data availability), **considering the previous calendar year.** Optionally, a MS can use the top five of best-selling vehicle types, if data is available. This calculation is performed for at least one segment in the MS, for all 6¹ fuels if available. Per selected vehicle type, a sales-weighted average WLTP consumption of the available fuel versions is calculated. Based on these averages the sales-weighted average WLTP is calculated per fuel per segment. **In certain cases** (such as hydrogen vehicles) **due to the lack of models, this sample can be smaller than three models.** Thus, the vehicle consumption calculated is the sales-weighted average of at least the top 3 best-selling cars in one segment

Example calculation WLTP:

A vehicle (named A) is in the top three for segment C. This vehicle A is available in the market in four models (A1, A2, A3, A4), which corresponds to different sizes, engine volume and drivetrain (RWD, FWD, AWD). The WLTP value representing vehicle A is calculated as the sales-weighted average of its models' WLTP consumption. Then on the basis of this average and the average of the other two vehicles, the sales-weighted average for segment C is calculated.

¹ See under 1.2

based on the average per selected vehicle type in that segment. See the Figure 1. FPC Common Methodology.

To increase the accuracy of estimations and to ensure the comparability of data, the vehicle categories, which are taken into account for the FPC price calculations, are the following:

- Mono-fuel vehicle (liquid, gas)
- Pure electric vehicle (PEV)
- Fuel cell vehicle (FCV)

In the case of limited data of mono-fuel gas vehicles, bi-fuel gas vehicles may be used for calculating the reference consumption, if the relevant WLTP data is available. Hence, flex-fuel vehicles, hybrid electric vehicles and converted vehicles are not considered for the FPC calculations.

1.2. Average fuel price

The calculation of FPC prices requires an estimation of the average prices of the diverse fuel types measured in euros/national currency per conventional fuel type unit for the previous calendar quarter, based on the implementing regulation (EU) 2018/732. Accordingly, the FPC is updated quarterly (March, June, September and December) based on these updated prices. For this purpose, the consortium identified contingent data sources considering the organisations and agencies involved in this PSA and the specific characteristics of the participating MS. Possible data sources include (1) official national fuel observatories, (2) automotive fuel retailers, (3) NAPs and (4) national statistic agencies.

The data from these sources allows the estimation of the average prices of both conventional and alternative fuels. In general, conventional fuels are considered the petrol and the diesel, while alternative fuels are determined by the Art. 2 of the AFID to be the following:

- electricity,
- hydrogen,
- biofuels, as defined in point (i) of Article 2 of Directive 2009/28/EC,
- synthetic and paraffinic fuels,
- natural gas, including compressed natural gas (CNG) and
- liquefied petroleum gas (LPG).

Fuels consumption in the WLTP are established for conventional fuels which contain a limited amount of biofuels. Thus, the highly blend biofuels, as well as synthetic and paraffinic fuels, cannot be included in the FPC when the obligation will come into force due to the lack of data availability. However, these fuels will certainly have to be displayed when market penetration is adequate. Consequently, fuel price comparison under the same unit (€/100km) applies (at least initially) to the following fuel types:

- petrol,
- diesel,
- electricity,
- hydrogen,
- natural gas, including CNG and
- LPG.

Special attention should be paid at the units of the fuel prices in correspondence with fuel consumption units. For instance, the official fuel consumption figures for NG/biomethane are in m³/100km instead of kg/100km which was the case in NEDC. In parallel, the CNG price at filling stations is currently in €/kg. To enable calculations in the same units, the CNG values will have to be multiplied by 0.717 (the density of methane).

Regarding liquid fuels, the majority of the MS has already developed digital infrastructures (i.e. websites, databases) and observatories, which collect and display prices of **petrol**, **diesel** and **LPG** from all the available filling stations at MS level. Therefore, the average prices are calculated as an average of the retail prices of all the available filling stations in the MS for the previous calendar quarter.

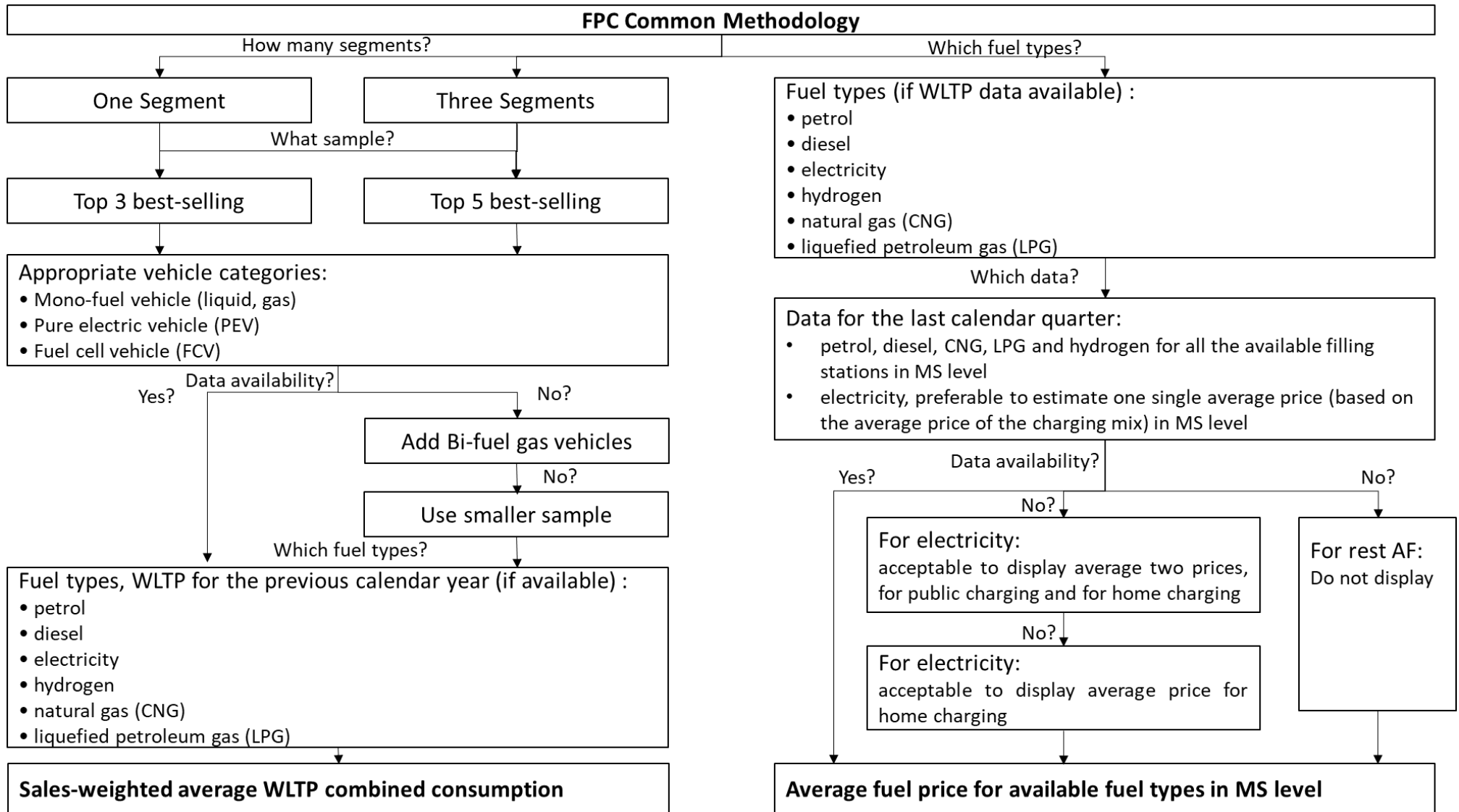
For **CNG**, the providers are not currently obliged to update the CNG prices in for instance national observatories. Depending on the MS, they sometimes apply a uniform price for all the filling stations, thus the average price in those cases may be an average of this uniform price for the previous calendar quarter of the year. This can be done by agreeing with the sector that they provide their prices on a voluntary basis. However, when the market becomes more diverse, this can become burdensome. In some MS, pilots are done with Statistics to see what possibilities exist. In cases where there is data availability, an average estimation of the different CNG prices is calculated similarly to the liquid fuel price estimations.

For the case of **hydrogen**, few MS provide appropriate infrastructure at filling stations and an accountable market share of hydrogen vehicles. The price of hydrogen is not volatile. In most cases, the average price is provided by the sector.

Lastly, concerning the average price of **electricity**, the participating MS have identified the main constraints to define a precise price, which are the following:

- Unavailability of information about the charging mix across the EU,
- Lack of harmonized price reporting mechanisms in relation to electricity price,
- Electricity is billed in different ways including €/kWh, €/minutes, €/charge, €/night,
- Electricity charging data is not collected nationally and therefore public pricing info is not necessarily available in all MS

In this context, **the average electricity price is preferred to be calculated as one single price** (based on the relevant charging mix). In some MS, pilots are done with Statistics to see what possibilities exist to base the price calculation on real time data as is the case for liquid fuels. **Furthermore, for those MS that cannot provide one single price, it is recommended to display two average prices, one for public charging and one for home charging. In this regard, if public charging is not available, the average price of the home charging only will be displayed.** These alternatives are recommended in order to facilitate MS with limited data for electricity charging to include the electricity in the FPC.

**Figure 1. FPC Common Methodology**

2. FORMAT IN WHICH THE INFORMATION IS DISPLAYED

At the beginning of the project, the consortium decided to focus on developing the FPC display in a table format. The design of the table and the colouring is up to the MS. In this framework, during the pilot actions, three options were tested, which were the following:

- Display FPC prices (€/100km) of one segment,
- Display FPC prices (€/100km) of three segments,
- Display of both one and three-segment prices (€/100km).

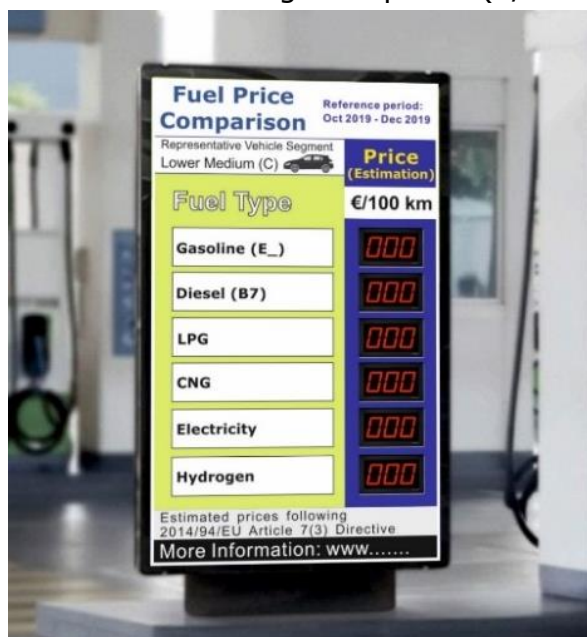


Figure 2. Display of one segment

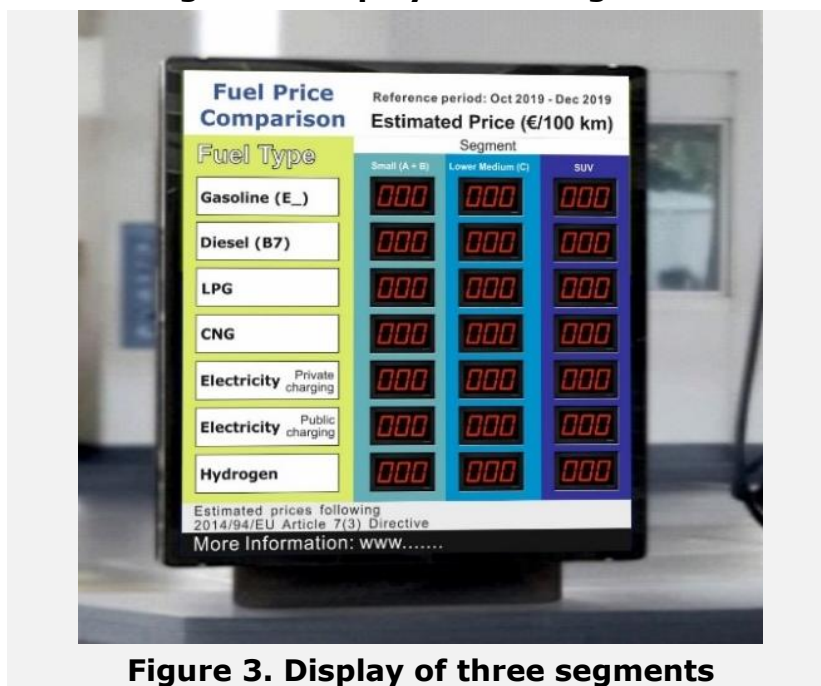


Figure 3. Display of three segments

The selection of segments is based on market sales. In specific, the **nationally most sold vehicle segment** or segments were displayed at filling stations. Consumers' understanding and perspective regarding the aforementioned options were evaluated during pilot actions. In addition, these options were discussed

with the related stakeholders including fuel retailers, filling station owners, considering that they will have to comply with the obligation.

The FPC displays are recommended to be in a table form, and contain the information of at least one vehicle segment. However, MS can present up to three segments.

Furthermore, it is suggested to include a link to a website with further information to the FPC display (e.g. possibly using a QR code) in case the consumers wish to have explanatory information regarding the FPC. This suggestion was firstly introduced by the related stakeholders and it was supported by the results of the online survey. In addition, the PSA made clear that in some MS the FPC needed to be placed in context to avoid misleading consumers. This led in some cases to additional information on the posters, which does not work when showing the FPC on screens. MS are therefore advised to inform consumers on the FPC at the start of the implementation and on the website.

Taking into consideration the outcomes of the pilot actions, it is shown that the use of **clear FPC display with intense colours and a plain font**, attracts the consumers to read the FPC display and facilitates the message understanding. In this regard, **the displayed information is proposed to be brief and direct** in order to ensure the engagement consumers and to avoid confusing them or drowning them in information.

3.LOCATION OF DISPLAYING THE FUEL PRICES AT THE FILLING STATIONS

During the project, the participating MS investigated the potential means and locations to display the FPC prices at filling stations. In terms of display means, the options include informative sheets, banners and posters as well as the utilization of monitors. According to the pilot results and interviews performed in this framework, **the FPC is proposed to be displayed on either posters/banners or monitors.** Each MS and in particular the filling station operators should be able to select the most appropriate means of display, based on the availability of equipment (i.e. monitors), filling station configuration, the legislation and regulation restrictions as well as the cost of implementation. During pilots, the tested locations included the following:

- At the pump
- Outside of the shop, located in the filling station
 - Outside entrance
 - On window
 - On a door
- Inside the shop, located in the filling station
 - Inside entrance
 - At the cashier/ money receiver
 - On a wall

It is mentioned that the imprinted material was placed near the pumps or/and in the shops of the filling stations while the monitors were placed mainly inside the shops. Also, each MS didn't test all of the abovementioned locations at pilot filling stations due to the different tested pilot schemes and the specific features and national regulation.

These options were selected from results of a cost-benefit analysis and stakeholders' opinion on MS level. In addition, the outcomes of the online questionnaire (Deliverable D2.2) were also taken into consideration. The majority of the online survey respondents stated that in a fuelling station environment, they would prefer to be able to compare fuel prices while they refuel or recharge their vehicle. However, some MS refrained from using this option, given the litter it might entail and local regulation.

According to pilot results, **the most appropriate locations to display the FPC (reach maximisation) are: (1) near/at the fuel pump, (2) near the station's shop entrance and (3) inside the shop, located in the filling station. The MS are recommended to select at least one of these locations to display the FPC at filling stations.** MS may leave the choice to the managers of the filling stations between one or more of these locations to limit financial burden on the one hand, and to fit the configuration of the filling station on the other hand.

It is noted that the main aim of this section is to provide a price comparison system within the EU, which is economically reasonable, practicable and compatible with national and regional rules. Thus, the FPC prices should not interfere with devices such as totems or receipts.

4. TYPE OF FILLING STATIONS (ART 7.3 INDICATES "WHERE APPROPRIATE")

According to Art. 7.3 of the AFID, the fuel comparison information shall be displayed "where appropriate" when fuel prices are displayed at a fuel station. This indicates the necessity for a proportionate approach, which allows a reasonable selection of filling stations able to comply with the AFID and undertake the display costs. The responsibility to show the FPC information should not impose unnecessary financial burdens, in particular on smaller retail stations or retail stations in remote regions.

Taking into account the requirements of both the GA and the AFID, as well as stakeholders' suggestions, **it is recommended to exempt unmanned filling stations from display obligations** due to the implementation costs and the requirement to update the displays frequently.

Two options, whose selection should be left to the discretion of MS, are provided for determining **where is appropriate** to display the FPC prices:

Option I:

At least the following manned filling stations should display the FPC prices (€/100km):

[1] **represent at least the 10% of the manned filling stations in the MS.**

Selection criteria are defined at MS level,

[2] **giving priority to filling stations which provide at least three different fuel types out of which at least one alternative fuel type** mentioned in Art. 2 of the AFID and it is measured by the WLTP protocol. In this line, the highly blended biofuels, the synthetic and the paraffinic fuels are not considered for the filling station selection and are not displayed due to lack of WLTP data.

Regarding criterion [1], a quantitative measure(s) to clarify the filling stations which are obliged to display the FPC are defined by each MS based on market data availability. Indicative measures can be:

- the volume sold during a reference period,
- the number of pumps in a filling station,

Regarding criterion [2], the fuel types are considered the following:

- petrol,
- diesel,
- electricity,
- hydrogen,
- CNG,
- LPG.

For instance, when a manned filling station provides petrol with all possible blends (E5, E10, etc.), it accounts for just one fuel type. Consequently, this manned filling station has to provide at least three different fuel types to be obliged to display the FPC prices.

Option II:

The application of the AFID **should exempt unmanned filling stations and filling stations that have less than A* multi-product fuel dispensers (MPD)** from display obligations due to the implementation costs and the

requirement to update the displays frequently. **All remaining stations should display the FPC prices (€/100km)**

The number A^* is determined at MS level. It is recommended to select the average number of MPD at MS level. In any case, the number of filling stations that follow Art 7.3 should **not be less than 10% of the filling stations in the MS.**

5.A PORTAL/ONLINE TOOL FOR FUEL PRICE COMPARISON

The implementing regulation (EU) 2018/732 states the following: “Member States have the possibility to make use of the opportunities offered by digitalisation such as online tools. Such a tool offers the possibility to add other information on for instance other relevant costs. In the course of the PSA, the consortium investigated two alternatives for fulfilling the requirements of the GA and the AFID:

- Master online tool
- National online tools

The first option was to develop a master online tool, which would present information of all the MS regarding the fuel price comparison. This information would be available in both English and the national language of each MS. The second option was to develop national online tools, which would display fuel price comparison information of each specific MS. Even though both options would increase consumers’ possibilities to get information on the costs of alternative fuels, Master online tool presented difficulties in terms of implementation and maintenance. Accordingly, the MS are recommended to develop a national online tool to display nationwide fuel price comparison information. Each MS will be able to personalize the online tool in order to enhance surfers’ understanding. **Based on the experience of this, the online tool should comprise the following:**

- the **methodology** defined to calculate the average fuel costs for the vehicle samples in euros/national currencies per 100 km,
- the determination of the **average fuel costs** expressed in euros/national currencies per conventional unit (e.g. liter, kilogram, kWh),
- the **fuel consumption data** based on the WLTP for the national vehicles selected for the FPC,
- the **environmental performance** of the selected vehicles (CO₂ emissions) based on the WLTP,
- the **average fuel prices** expressed in **€/100 km**, for the selected samples of vehicles.

Apart from that, a short description of the segmentation in MS level is suggested to be included. Also, the integration of information related to the fuel prices, the energy content of fuels and the vehicle costs and efficiency is suggested where feasible (based on outcomes of Activities 2 & 3). The online tool must provide information at least in the national language. Therefore, **the online tool is proposed to include at least the abovementioned bullets, and each MS can provide additional information if needed.**

CONCLUSIONS

This deliverable presents the recommendations and guidelines for supporting MS with the implementation of Art. 7.3 of the AFID. The comparison of fuel prices in €/100km at filling stations is explained in terms of content, format and location. In this regard, detailed information is provided in relation to where it is appropriate to implement Art. 7.3 in order to accomplish optimum results and fulfil the purposes of the AFID. In parallel, the scope and core elements of developing a national online tool are presented.

The recommendations are based on the experience acquired in the course of the PSA and the provisions of the Art. 7.3 of the AFID. In particular, a significant share of consumers across the participating MS as well as several stakeholders from the mobility industry and fuel suppliers were involved in the PSA and their reactions and opinions were taken into consideration. This consistent interaction with all interested parties resulted in a holistic harmonised approach which allows an effective comparison among the available fuel types without misleading the consumers and imposing unnecessary financial burden to the filling station operators.

Nevertheless, the main principle of the proposed recommendations is to include alternative options for each implementation step, which will enable MS to apply the provisions of the AFID efficiently and achieve optimum results. Hence, **this document summarizes the recommendations for the consistent implementation of the Art. 7.3 of the AFID, fully complied with PSA contract requirements, related to AFI Directive and Commission Implementing Regulation.**

DEGREE OF PROGRESS

This document is in line with the work proposed in GA.

DISSEMINATION LEVEL

Public

The project has received funding from the European Union's Programme Support Actions, under Connecting Europe Facility (CEF) for Transport.

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