

C.E.C.O.D.

COMITE DE FABRICANTS EUROPEENS D'INSTALLATION ET DE DISTRIBUTION DE PETROLE
 COMMITTEE OF EUROPEAN MANUFACTURERS OF PETROLEUM MEASURING AND DISTRIBUTING EQUIPMENT
 KOMITEE DER EUROPÄISCHEN HERSTELLER VON EINRICHTUNGEN ZUR MESSUNG UND VERTEILUNG VON FLÜSSIGEN BRENNSTOFFEN

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Mr. D. JOHNSTONE
 D.G. Environment (BU9 6/174)
 European Commission
 Rue de la Loi 200
 B-1049 BRUXELLES (Belgique)

Courbevoie, April 14th, 2008

Consultation on Stage 2 Petrol Vapour Controls at service stations during the refuelling of passenger cars

Dear Mr Johnstone

May we first express our thanks for being invited to contribute to this initial consultation, a consultation that might lead to European legislative proposals for Stage 2 controls. We are aware that in the current situation some Members States have no controls and the controls in the other Member States are such that they may not provide the same air quality protection. This variability in control measures across the Member States also has an effect on the internal market which is a concern to CECOD members who supply equipment to service stations throughout the European Union.

At this stage in the process our response is restricted to answers to the specific questions set out in Section 5 of the consultation document, these answers are provided below:-

5.1	Would minimum/harmonised technical requirements at the EU level, facilitate the functioning of cross border trade and services in Stage 2 PVR equipment? YES. Any proposed legislation should be in the form of a directive compatible with the internal market 'New Approach and Global Approach' such that only the essential technical requirements are contained in the directive. In support of any such essential technical requirements CEN should be mandated to develop any necessary standards for manufacture and testing of products designed to meet these essential technical requirements.
5.2	Should Stage 2 PVR controls only be applied to new stations and those which are substantially refurbished? No. All petrol filling stations with an annual petrol throughput in excess of 3000m ³ should be captured by the legislation.
5.3	Should there be a minimum size/throughput of petrol below which there is no need to fit Stage 2 PVR controls to new and refurbished service stations?

	YES. Petrol filling stations whose monthly petrol throughput does not exceed 42m ³ may be exempt from the legislation. This requirement is derived from an annual petrol throughput of not greater than 500m ³ but serves to prevent unwelcome peaks in, for example, the summer months.
5.4	Should Stage 2 PVR controls also be applied to existing stations? If so, what is the minimum throughput/size of existing service stations which should be covered by any new legislation?
	YES. All petrol filling stations with an annual petrol throughput in excess of 3000m ³ should be captured by the legislation.
5.5	Should service stations be required to install automatic monitoring of Stage 2 equipment to ensure that the equipment functions and the environmental benefits are delivered?
	YES. Experience in some Member States suggests that automatic monitoring systems are the most appropriate method of providing a high level of protection to the environment, and to consumers.
5.6	As part of ensuring good air quality for benzene in ambient air, should Stage 2 PVR equipment be fitted to all service stations built underneath or as part of residential dwellings irrespective of how much petrol they sell?
	YES. For the protection of the health of local residents there seems to be a compelling requirement for Stage 2 PVR as part of all such installations.

To ensure clarity in our reply it is perhaps helpful to also set out in a different way what we believe should be achieved by any legislation.

Existing sites: all sites with an annual petrol throughput in excess of 3000m³ should be required to install Stage 2 immediately. If a site has an annual petrol throughput equal to or less than 3000m³ and is part of, or underneath, residential dwellings then it should be required to install Stage 2 immediately.


New sites and substantially refurbished sites:

Sites up to 500m³ annual throughput - where the throughput is substantially constant month by month, without any real peaks above 42m³, should not be required to include Stage 2 unless the site is part of, or underneath, residential dwellings.

All sites equal to, or above, 500m³ annual petrol throughput should be required to include Stage 2.

Should you require any additional information at this stage in the consultation process please feel free to contact CECOD via the Secretariat whose details are as provided. We look forward to the early introduction of legislative proposals for Stage 2 PVR and again being part of the consultation process.

Yours faithfully


Patrick Antoine
General Secretary