



Submission to the European Commission consultation on the implementation of the renewed strategy to reduce CO₂ emissions from passenger cars and light commercial vehicles

**The Royal Society for the Protection of Birds
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The RSPB

Royal Society for the Protection of Birds (the RSPB) is the charity that takes action for wild birds and the environment. We are the largest wildlife conservation organisation in Europe with over one million members. We own or manage approximately 135,000 hectares of land for nature conservation on 200 reserves throughout the UK. The RSPB is part of the BirdLife International partnership, a global alliance of independent national conservation organisations working in more than 100 countries worldwide.

The climate change context and wildlife impacts

The RSPB welcomes the Commission's acknowledgement of the serious nature of climate change. Indeed, we believe that human-induced climate change is the greatest long-term threat to global biodiversity. A recent paper in *Nature* by a large group of scientists (including one from the RSPB) indicates that in sample regions covering about 20% of the Earth's land surface approximately one-third of land based species will be 'committed to extinction' as a result of mid-range climate warming scenarios for 2050.¹ We therefore support policies and measures that reduce the anthropogenic GHG emissions that cause climate change. Global CO₂ pollution needs to peak by 2015 and decline steeply thereafter to stay within the 2°C average global temperature increase beyond which it is widely believed we will suffer catastrophic climate change.

Achieving emissions reductions in the transport sector

Significant emissions reductions in the transport sector are crucial to deliver on EU targets for greenhouse gas reductions of at least 20% by 2020. As part of this, we see a significant role for improving the fuel efficiency of vehicles. Efficiency measures are a cost effective way of minimising emissions from the transport sector, without the environmental risks associated with alternative approaches such as widespread reliance on biofuels.

¹ Chris D. Thomas et al, Extinction risk from climate change, *Nature*, 8 January 2004.

Targets for vehicle efficiency

We welcome mandatory targets for vehicle efficiency. We believe that vehicle fleet averages should be achieving 120g/km by 2012 through fuel efficiency measures alone. Additional measures such as introducing accurate tyre pressure monitoring systems and setting maximum tyre rolling resistance limits should also be introduced with a view to improving this performance still further.

We do not wish to see a delay in introducing targets e.g. 120g/km by 2015 as this leaves a regulatory gap during which the industry is not obliged to take action thereby slowing down innovation and performance improvements. The technology to meet the targets exists already and can be implemented immediately. For example, stop/start technology, which conserves energy by shutting off the gasoline engine when the vehicle is at rest, such as at a traffic light, and automatically re-starting it when the driver pushes the gas pedal to go forward.

In addition, we support long-term mandatory fuel efficiency targets of 80g/km by 2020, which provide certainty for the car industry and encourage innovation. These targets reflect the grave threat posed by climate change and the length of time the vehicle industry has had to meet emissions reduction targets agreed through the Voluntary Agreement a decade ago on which little progress has been made.

Burden sharing

We would like to see the regulations affecting each car sold to incentivise manufacturers to improve across their whole product range. We thus prefer a regulation that does not distinguish between car classes. However, if the regulation is designed to distinguish targets for different classes of cars, the standard should be tougher for bigger and more powerful cars and classes should be differentiated by the footprint or surface area of the car, not on the grounds of height, weight or power.

Compliance

In order for legislation on mandatory targets to be successful and effective, it is essential that a strong compliance mechanism is developed and that car manufacturers who do not comply are penalised at a level at which this is the more costly option.

The role of biofuels

We have serious concerns about the role of biofuels in delivering the additional 10g to meet the 120g/km target through "other measures" as currently proposed. In order to avoid wider environmental consequences, it is essential that the carbon reduction capabilities and sustainable production of biofuels are guaranteed by certification and accreditation schemes. For example, without these the knock-on effects of importing biofuels from areas of deforested rainforest land to meet EU targets can be grave: substantial releases of carbon and serious losses of biodiversity can result. However, certification schemes have not yet been established and we would like to see these in

place before further legislation encouraging biofuels is enforced. Although we believe biofuels can play a role in delivering emissions reductions in the transport sector, we believe that the primary focus should be on achieving maximum savings through technological efficiency in order to lessen the need for aggressive biofuel production. This also helps deliver on EU energy efficiency targets. In addition, we feel issues around the growth and promotion of biofuels should be addressed through one piece of legislation only such as the Biofuels Directive. This avoids double counting of emission savings arising from their use across legislation and provides clarity to the industry on their role and use. Further information on our position on the role of biofuels in the EU is included in a BirdLife International (of which RSPB is a member) position paper on biofuels in the EU included with our response to this consultation.

Labelling

We would like to see car labelling, as developed in the revision of the 1999 Car-labeling Directive to follow the format of the existing banded label for the energy performance of white goods. This should be regularly reviewed.

Fiscal measures

We would support concrete fiscal measures being adopted EU wide and at the national level to drive consumer demand towards fuel-efficient cars. This would foster a more sustainable car market where manufacturers can compete on grounds of environmental performance. For example, in the UK, the Vehicle Excise Duty (VED) is an annual road tax that depends on the CO₂ emissions of the vehicle (with the same bands as those of the coloured car label) and on the vehicle's fuel type. This model could be rolled out across Europe.

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