

Contribution to consultation:
Reducing CO2 emissions from road vehicles

9 Dec 2011

ETRMA – the European Tyre & Rubber Manufacturers' Association thanks the European Commission for organising this consultation.

ETRMA members are 12 leading tyre manufacturers with 91 plants in 18 EU Member States; and another 4000 manufactures (95% of which are SMEs) producing technical rubber products going into automotive, mining, construction, medical and baby care applications. Together, the tyre and rubber manufacturers have realised € 46 billion turnover in 2011, investments up to 4,3 % of their annual turnover in R&D and are employing directly 360.000 people in Europe.

B.1 Question: Setting greenhouse emission standards for road vehicles is an important aspect of EU action to reduce such emissions.

Answer:

Entirely agree. This approach is consistent with the EU efforts for overall reduction of greenhouse gases.

As a matter of fact, it is not an entirely new approach, as the EU has already been following it through the emission standards for vehicles¹, which partly address greenhouse gas emissions. What is more, to ensure a level-playing-field, the EU should look at curbing emissions also in the other transport modes.

Also, the European Commission (EC) should maintain a technologically neutral approach and act with due attention in order not to create cumulative legislation and pose a risk to the industry's competitiveness. In this regard, it is important to take into account the contribution that various parts of the automotive sector are already making to the reduction of emissions from road vehicles. In particular, we wish to point at the strengthened requirements to which the European tyre sector will start delivering from 2012 onwards². Through Regulation 661/2009/EC the European tyre sector will contribute to lowering CO2 emissions in two consecutive phases, therefore further legislative demands on the rolling resistance parameter before the deliverables of mentioned law are not realistic.

¹ Regulation (EC) n° 692/2008 implementing and amending Regulation (EC) n° 715/2007 on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information; and Regulation (EC) n° 595/2009 on type-approval of motor vehicles and engines with respect to emissions from heavy duty vehicles (Euro VI) and on access to vehicle repair and maintenance information and amending Regulation (EC) n° 715/2007 and Directive 2007/46/EC and repealing Directives 80/1269/EEC, 2005/55/EC and 2005/78/EC

² Regulation (EC) No 661/2009 of the European Parliament and of the Council concerning type-approval requirements for the general safety of motor vehicles, their trailers and systems, components and separate technical units intended therefore; and Regulation (EC) No 1222/2009 of the European Parliament and of the Council on the labelling of tyres with respect to fuel efficiency and other essential parameters

The EU legislation should look at a regulatory framework that fosters environmentally-friendly technologies and provides for positive incentives (for vehicles manufactures, fleets and users). Only under such circumstances will industry develop into the wanted direction of less greenhouse gas emissions and less fuel consumption, while also remaining competitive on the international level.

B.2 Question: These standards should be in line with the greenhouse targets in the EU's roadmap to a low carbon economy and Transport White Paper.

Answer:

Partly disagree. Further adjustment of the targets should be possible, taken into consideration the competitiveness of the automotive sector, the technological progress, as well as progress in other measures for reducing greenhouse gas emissions.

B.3 – Road vehicle greenhouse gas emissions standards should be set based on the average greenhouse gas emissions of new vehicles entering the vehicle fleet.

Answer:

No opinion.

B.4 Question: Standards for road vehicles should apply equally to different technologies used for powering road vehicles.

Answer:

Partly Agree. The Commission should maintain a technologically neutral approach in the policy-setting.

B.5 Question: EU regulation of road-vehicle emissions stimulates innovation in the automotive sector and helps keep Europe's automotive industry competitive.

Answer:

Partly Agree. If legislation is drafted carefully and correctly, yes. Otherwise such regulatory approach risks making damage on the European industry as the automotive sector is a very intensively competed sector internationally. In order for EU legislation on emissions from road vehicles to deliver on its objectives and have a beneficial impact on innovation, it is important that there is

- a proper impact assessment before any legislative proposal*
- a thorough consultation with industry*
- strict enforcement and compliance. EU and national authorities should put in place relevant bodies in charge of respect for the law, and this is essential also for compliance by imported vehicles and parts, including tyres.*

C.1 Question: Do you think the current legislation is working and delivering tangible benefits?

Answer:

Partly agree. It is expected that the current legislation will be delivering once it is effectively implemented and enforced.

A direct consequence of the current legislation is that the automotive sector is investing in clean technologies in order to meet the targets; in the tyre sector for example, the demand for low rolling resistance tyres from car manufacturers has increased as a direct consequence of the CO2 legislation. At the same time, we would like to remind of the importance between a balanced performance of vehicles for both road safety and the environment, translated into the need for a balanced approach to rolling resistance and wet grip of tyres.

C.2 – See previous response.

C.3 and C.4 Questions: If the Commission's analysis demonstrates that the 2020 target of 147gCO₂/km for light-commercial vehicles is technically achievable, at reasonable cost, should the target be confirmed? Please specify why not?

Answer:

No. Article 13 (1) of the Regulation (EC) 510/2011 states that on the basis of a review of the specific emissions targets, which the Commission is due to undertake by 1 Jan 2013, the Commission "shall, if appropriate, make a proposal to amend this [510/2011] Regulation, in accordance with the ordinary legislative procedure, in a way which is as neutral as possible from the point of view of competition, and which is socially equitable and sustainable." In other words, the Commission should adhere to the initial proposal for a full impact assessment and a co-decision procedure involving the European Parliament and the Council should it restate its position on the 147 g CO₂/km target.

D.1 Question: The EU should have a strategy for reducing HDV greenhouse gas emissions.

Answer:

Yes. If we talk about greenhouse gases in general, the EURO standards already address some of them (e.g. NO_x, methane and CO which in a way is a precursor for CO₂). However, focusing on CO₂ emissions, HDVs represent an important part of those emissions from the road sector and there is no reason for limiting CO₂ legislation only to passenger cars and light commercial vehicles.

D.2 Question: Additional regulation (as opposed to non-regulatory measures) is needed for this purpose.

Answer:

Partly agree. See the answer to the question D1. However, the EU strategy should not be limited to regulatory measures and should include other tools like green procurement, incentives for R&D and fiscal incentives.

Furthermore, to reduce further CO₂ from HDV, the EU should consider promoting certain technologies in consistency with the approach to passenger vehicles. Tyre pressure monitoring systems, which are with a proven benefit to both road safety and CO₂ reduction, are already mandatory for new passenger vehicles by virtue of Regulation 661/2009/EC. The European Commission should extend the demand for this technology also to commercial vehicles (trucks and buses).

D.3 Question: If the Commission proposes a HDV greenhouse gas strategy, which types of HDVs should it cover?

Answer:

All newly type approved and newly manufactured HDVs (with a realistic lead time). Nevertheless, some exception could be done for vehicles with low speed or for specific purposes.

D.4 Question: And what sort of measures should be considered for inclusion?

Answer:

A combination of measures from all areas (e.g. the use of the European Modular System, measures affecting purchase decisions, etc.). See also the answer to the question D2.

E.1 Question: Road-vehicle emissions may be reduced by changes in other policies, such as taxation. Should targets for road vehicles continue to be set, regardless?

Answer:

Partly agree. As long as a careful impact assessment demonstrates that they are not to undermine the competitiveness of the European industry.

E.2 Question: In your opinion, which are the policies in which changes might affect the setting of greenhouse gas targets for road vehicles?

Answer:

Support for research and development; consumer information and behaviour campaigns; public procurement strategy; to some extent positive tax initiatives.

E.3 Question: Should the approach to regulating road-vehicle emissions consider emissions from the whole energy lifecycle?

Answer:

Entirely agree. A lifecycle analysis is a holistic approach and brings the needed level playing field and clarity among various technologies.

E.4 Question: Should other road-vehicle greenhouse emissions also be measured, alongside carbon dioxide?

Answer:

Yes

E.5 Question: Should longer-term indicative targets (for after 2020) be set?

Answer:

Yes. It is important for manufacturers to have long-term regulatory visibility, however, a mid-term review and assessment in view of technical progress should be undertaken.

E.6 Question: Please specify for what time period (following adoption of the related legislation)?

Answer:

10 years. The EU Transport Policy should be reviewed in 2015/2016 and a possible re-evaluation for example every five years should be undertaken in order to allow for possible adjustments. Although for example in urban planning 10-30 years time line is normal, we have to bear in mind that transport needs are based on current real-world conditions. Therefore, a 40-years time line for transport policy is unpredictable at best and might be irresponsible at worst. For this reason we suggest as time period for longer-term targets 20 years (10 years from 2020).

E.7 -

E.8 Question: The current legislation contains vehicle-based targets until 2020. For post 2020, should we consider alternatives to vehicle-based greenhouse gas regulation?

Answer:

Yes

E.9 Question: Please specify which alternatives?

Answer:

Vehicles as a whole, and tyres as specific automotive components are already extensively regulated in terms of technology. It should be examined to what extent other measures, such as, improving eco-driving behaviour, educated purchasing choices, and incentives for new technologies and improved infrastructure would further support the overall objective.

For further contact:

Mrs. Fazilet Cinaralp, Secretary General
+32 2 218 49 40, f.cinaralp@etrma.org