



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR ENVIRONMENT

DIRECTORATE C – CLIMATE CHANGE AND AIR  
Clean Air and Transport

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## MINUTES

### **Stakeholder meeting on the Proposal to reduce CO<sub>2</sub> emissions from light commercial vehicles, 02.09.2008**

Chairman: Philip Good, DG Environment

The chair from the Clean Air and Transport unit in DG Environment opened the meeting and outlined the context for the stakeholder consultation. The revised strategy on CO<sub>2</sub> emissions from light duty vehicles announced that the Commission would propose legislation to reduce CO<sub>2</sub> emissions from light commercial vehicles. The aim of this workshop was to give industry and NGO stakeholders to express their views on the proposed legislation and in particular the issue paper circulated by the Commission.

#### **Introduction**

The chair gave an introductory presentation, highlighting the main aspects of the proposed regulation on light commercial vehicles. These included following:

- Proposed regulation on CO<sub>2</sub> from light commercial vehicles should follow in general the structure of the proposal on passenger cars;
- To be consistent with the scope of Euro 5 and Euro 6 standards (Regulation (EC) No. 715/2007) the proposed regulation should cover vehicles of categories N<sub>1</sub>, N<sub>2</sub> and M<sub>2</sub>;
- The Communication from the Commission sets two targets for light commercial vehicles: 175 g/km target in 2012 and 160 g/km target in 2015. The proposed legislation should include these targets;
- With regard to long term targets it is possible to proceed in two ways, i.e. to set separate targets for passenger cars and light commercial vehicles, or to set a single long term target;
- It is considered appropriate to apply a utility curve based target in the proposed regulation. Utility parameters under consideration are vehicle pan area and vehicle mass;
- For manufacturers producing both M and N type of vehicles it is possible to allow pooling between cars and vans targets. Possibility for pooling between manufacturers is also being considered;
- It is considered to have a similar compliance mechanism to that for cars;
- The possibility of including a derogation for small scale manufacturers will be considered.

The Commission aims to make a proposal before the end of 2008. The full consultation paper is available at:

[http://ec.europa.eu/environment/air/transport/co2/co2\\_cars\\_regulation.htm](http://ec.europa.eu/environment/air/transport/co2/co2_cars_regulation.htm).

### **ACEA Presentation**

Mr. Rolf Stromberger from ACEA provided their opinion on some of the key questions in the issue paper. He highlighted that:

- LCVs have a wide range of different designs and are more varied in terms of vehicle configuration and body styles than passenger cars. Functionality is one of the key purchase considerations for LCVs.
- ACEA considered that CO<sub>2</sub> savings potential for LCVs were limited, as the vast majority of the light commercial vehicles fleet is already equipped with diesel engines.
- ACEA considered that there was a lack of CO<sub>2</sub> emissions data for light commercial vehicles, making it difficult to set targets.

With regard to the specific questions posed by the Commission he noted that:

- They do not consider that an immediate merger of the proposals on CO<sub>2</sub> emissions from passenger cars and that for light commercial vehicles is appropriate.
- They do not support a common target for passenger cars and light commercial vehicles.
- They agree that an increase in fuel price makes technologies more cost-effective.
- They consider that retail price increase would require the first owner to keep the vehicle longer to get the investment back. Small and medium enterprises may postpone investments in new vehicles.
- ACEA supports a utility based approach, but it raised a question whether a single utility parameter is sufficient to cover the range of segments of vehicles. They emphasised that bigger vans carry significantly more load than smaller vans and that this should be taken into consideration.
- ACEA is supportive to the pooling between manufacturers,
- They did not support pooling within a manufacturer between the targets for cars and vans due to competition concerns.
- They support the possibility to grant derogations to small scale producers.
- They stated that the level of excess emissions premium should be similar those in the EU Emissions trading scheme.

### **Summary of discussion**

ACEA was asked to clarify the statement that retail price increase will cause a slowdown of fleet renewal. It was quite possible that any increase in price of the vehicle would be offset by the reduced fuel cost, so it could have little or no overall effect. ACEA thought that in order to get back the extra purchase cost, users will drive the same vehicle for longer.

ACEA proposed to exclude vehicles of category M<sub>2</sub> from the scope of legislation, arguing that this segment of vehicles is specialised, and that increased retail price of the vehicle may cause the increase in costs of transportation of passengers so was not socially desirable. Other stakeholders thought that the rationale for this exclusion was not at all clear as these vehicles are based on N<sub>1</sub>, and that it would not be correct to exclude one particular segment of vehicles.

Industry representatives were concerned about a long product cycle of 10 years, due to which manufacturers will have difficulties in reaching the target in 2012. They also stressed that all new technologies being developed now have to undergo long testing procedures before implementing them in the vehicles. The assertion that it was not possible improve vehicle fuel efficiency in a shorter time period was disputed, as for example emissions requirements tended to change every 4- 5 years.

Industry representatives stated that it may not be enough to apply a single utility parameter, due to the large segmentation of light commercial vehicles. However, no preference was expressed for a specific utility parameter at this stage.

The issue of multi-stage vehicles was also raised. It was noted that these vehicles are sold incomplete, so there is an issue of who should be responsible for emissions from these vehicles. ACEA was asked to provide information on what is the share of sales of these vehicles and the type approval arrangements for vehicles which have been completed by a coachbuilder.

There were questions as to why ACEA opposed pooling between the cars target and the vans target. Their opposition was because of competition concerns between different manufacturers. JAMA and KAMA did not have a common position regarding the pooling yet.

Other questions and comments:

- A comment was made that a maximum weight limit can cause loop holes and perverse incentive to produce heavier vehicles that will be outside of the scope of this regulation.
- A question was asked about the strategy if there will be a fleet wide non-compliance with the target due to shift to heavier vehicles.
- A comment was made that all derogations in the legislation should not be permanent and need to be regularly reviewed.
- A comment was made that different policies between  $M_1$  and  $N_1$  classes could cause a distortion in the  $M_1$  and  $N_1$  markets.

At the end of the meeting stakeholders were informed that the presentations of DG Environment and ACEA will be circulated via e-mail. Stakeholders were asked to provide their additional comments by 30 September 2008.

