



Ministero delle Infrastrutture e dei Trasporti
DIPARTIMENTO PER I TRASPORTI TERRESTRI
Direzione Generale per la Motorizzazione

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**European Commission
Directorate-general for Environment
Directorate C – Climate Change and
Air - C.3 Clean Air and Transport
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Subject: Commission concept paper on the proposal to reduce CO2 emissions from light duty vehicles

With reference to the above-mentioned concept paper the Italian Ministry of Infrastructure and Transport would like to bring to your attention the following considerations:

Consultation process

We believe that an initiative so complex and important, such as the CO2 emission legislation for light commercial vehicles, requires a formal consultation of the Member States and other stakeholders to ensure the highest level of transparency and the collection of all the necessary inputs, suggestions and concerns.

It is our understanding that the present concept paper and the stakeholders meeting held on the 2nd of September is only the first step of this process and that the Commission will take the necessary time to perform an extensive and proper debate on this subject.

General issues

The Community objective to achieve the reduction of CO2 emissions from light duty vehicles is fully shared; however, Italy doubts that the best way to do so is to duplicate the legislation proposed for passenger cars.

In the case of passenger cars, there is a value in discouraging the trend of the market toward cars emitting high level of CO2, which, in most of the cases, perform tasks perfectly compatible with the ones emitting low amount of CO2. On the contrary in the case of light commercial vehicles the characteristics of vehicles are function of their specific missions.

The identification of vehicle parameter to refer CO2 objective should take into account the construction requirements necessary to fulfil the specific mission for which the vehicle has been designed.

To measure the CO₂ emission simply per run kilometre (g/km) without taking into account the work done introduces a distortion which even risks to generate perverse effect in terms of CO₂ emissions.

Bearing in mind the variety of missions covered by vans and minibuses the assumption that the proposed CO₂ regulation for passenger cars represents a legislative model for light commercial vehicles seems to be oversimplified.

In relation to the consequences that the CO₂ legislation on light commercial vehicle may have on the whole economy of the Union it seems preferable to stop this initiative at least until the CO₂ legislation for passenger cars is and applied for a sufficient time to gain experience on its effectiveness.

Instead of the proposed CO₂ legislation, for the short term, it should be useful to set a monitoring system to assess the transfer of low CO₂ technologies from passenger cars to light duty commercial vehicles. Such a monitoring would allow to verify whether the CO₂ legislation for cars provides a positive impact on the fuel efficiency of light commercial vehicles. The quantification of this benefit allows to check whether the contribution of light commercial vehicles is in line with the expectation indicated in the Commission Communication dated 07.02.2007 as complementary measures (contribution to fill the gap between 130 and 120 g/CO₂ km).

Scope

Considering that the measurement of CO₂ emissions for M2 and N2 vehicles with reference mass not exceeding 2.610 kg will be fully mandatory only from the application date of Euro VI standard, which according to the Commission proposal is planned from October 2014, at present we believe inappropriate the inclusion of vehicles in the M2 and N2 categories in the scope of the measures to reduce the CO₂ emissions.

No vehicle category should be included in such a legislation before full availability of robust database of official type-approval CO₂ emission values.

Long term target and slope

No convincing argumentations are reported in the concept paper to support that the preferred solution would be setting a common target for passenger cars and light commercial vehicles. On the contrary for the reason expressed above it appears necessary to set different approaches inside the family of light commercial vehicles in order to take into account the high specialisation of these vehicles and the consequent spread of their characteristics.

In particular, the slope must be cautiously examined to avoid perverse effect, such as to favour the use of two or more small vehicles for a mission that could be performed by a single bigger one. The overall result being higher CO₂ emissions, more cost and more congestion to perform the same mission.

Penalties

Although it seems correct to have a dissuasive sanction system, to ensure the correct enforcement of the legislation, the proposed penalty scheme (same of passenger cars) risks simply to transfer an extra cost from the vehicle manufacturer to the transport operator and from the transport operator to the final customer, without generating significant change in the light commercial vehicles fleet. The fleet of commercial vehicles is driven by the needs of the various transport mission and the fuel efficiency is already a key aspect in the choice of the vehicle.

Therefore, before defining the penalty system it should be understood the criteria and priorities used by professional operator to select a vehicle in order to act on those elements where a margin of choice exist. Otherwise, the final result risk to be higher cost for the society with no benefits for the environment.

Thank you in advance for considering our comments

Regards

Antonio Erario

Head of Division

