

Klaus Mundil
10 July 2007

To: European Commission,
Secretariat-General

Re: Consultation "Reducing CO2 emissions from cars"

I refer to the 7 Feb 2007 Communication COM(2007) 19 final.

Paragraph 3.3.1, Taxation, defines a Light Duty Environmentally Enhanced Vehicle (LEEV) which to begin with should be defined as staying below the Community objective of 120 g CO2/km.

Rapid progress toward this goal could be better achieved by adding another category, Light Duty Environmentally Advanced Vehicle, LEAV, at a CO2 level of for example 80 g CO2/km for a four seat vehicle. Current technology permits building such a vehicle with acceptable safety only at the expense of comfort and performance. Substantial tax incentives might make such vehicles attractive in the market place.

A parallel light duty commercial vehicle tax incentive, for example for a minivan / taxi based on the same platform as the LEAV, could be introduced for example at 100 g CO2/km to speed up progress in this area as well.

I am willing to share more details of how a LEAV could be constructed if the Commission wishes, either with the Commission or with one of the automotive industry associations should they be interested.

Yours, Klaus Mundil

(The author has 25 years experience in the energy industry. I am currently employed by a Swiss mid stream oil company. The above suggestion is my personal point of view and is offered as my personal contribution to the consultation, not in my role as an energy industry employee)