

JAMA Reply

to the European Commission's consultation on the renewed strategy to reduce CO₂ emissions from passenger cars and light-commercial vehicles

1. Introduction

- JAMA members have worked assiduously to minimise the environmental impact of their products and promote measures to curb global warming. At the EU level specifically, JAMA, alongside ACEA and KAMA, signed a voluntary agreement with the European Commission to cut the average CO₂ emissions of passenger cars marketed in 15 EU Member States to 140g/km by 2009. JAMA members have since placed vehicles on the market that were more CO₂-efficient.
- JAMA members are today actively pursuing the introduction of increasingly CO₂-efficient vehicles while contending with the provisions of other EU legislation and with market changes.
- The European Commission presented its new CO₂ regulatory strategy in February 2007. Although JAMA members support the Commission's objective to further reduce CO₂ emissions, they believe that the proposed new target application year and value should be reconsidered.

JAMA's comments to the Commission in this regard are as follows.

2. Postponement of the 2012 target application year

- The development of a new car model from the earliest design stage to its entry in the market is a very long process. Time is required, first, for design and the introduction of environmental and safety technologies, and, second, for trial production and adjustment and assessment, among other tasks. Following that, application to individual models must be carried out. These essential development and product cycles require a total lead time of at least seven years prior to regulatory application.
- For the purpose of comparison, Japan has introduced new fuel-efficiency standards whose target values will be enforced in 2015, providing manufacturers a realistic lead time of eight years.
- In addition to the problem of inadequate lead time, manufacturers will, meanwhile, be further burdened by cost-effectiveness issues as they also strive to comply with other EU emissions regulations, including EURO 6. In consideration of all these factors, JAMA requests that the target application year for the new CO₂ regulation be postponed from 2012 to 2015 at the earliest.

3. Target values

- JAMA supports the achievement of the European Commission's overall target of 120 g CO₂/km. It believes, however, that this goal can only be met through a combination of efforts, including the adoption of an integrated approach involving all the stakeholders concerned. Moreover, improvements in vehicle technologies can more realistically be expected to reduce CO₂ emissions to 135 g/km, while complementary measures should be required to contribute a further reduction of 15 g/km.

4. Legislative framework

- Social responsibility requires that automobile manufacturers continuously offer to consumers a broad range of vehicles in order to meet different user needs. JAMA members believe that, in the process of formulating the new regulation, it is necessary to examine fairly its total framework: not only in relation to all manufacturers, on the basis of such factors as the actual cost of incorporating improved fuel-efficiency technologies in new vehicles and the anticipated future introduction of more advanced technologies, but also in terms of the related cost burden on users.
- The fuel-efficiency target values to be enforced in Japan in 2015 were formulated using a system of "segmentation" based on vehicle weight. In this system, individual manufacturers' fleets are broken down into vehicle inertia weight-based segments (or categories) that have been harmonised with the EU's inertial weight classification. A fuel-efficiency target value is determined for each segment on the basis of the weighted average of sales volumes for all models in the given segment. JAMA members would like to recommend that the EU adopt this system, because it determines with a high degree of accuracy the interrelationship between vehicle weight and fuel efficiency, and also because of its viability in terms of emissions testing.

Note: This system, furthermore, incorporates a credit mechanism whereby non-achievement of a target value in one segment can be compensated by a performance that exceeds the target value in another segment.

- To help ensure the achievement of target values, it will be necessary both to mitigate (ie, make less stringent) the target value for lightweight vehicles and to strengthen (ie, make more stringent) the target value for heavyweight vehicles, so as to encourage the use of lighter vehicles. CO₂-related taxation would also contribute significantly to the greater use of lighter vehicles and, by extension, to CO₂ reduction.
- To avoid the risk of target non-achievement resulting from changes in the

marketplace, JAMA also requests that a credit-banking scheme be applied, whereby an individual manufacturer could earn credits when the average fuel efficiency of a vehicle for a particular model year exceeds the regulatory value, and whereby the manufacturer could then apply (or “carry”) those credits for no more than a period of three consecutive years prior and subsequent to the model year in which the credits are earned.

- JAMA is firmly opposed to any measures that would prohibit the certification or marketing of automobiles that do not meet regulatory values.
- In the interest of providing some flexibility to the compliance effort, and while in principle the regulation is to be applied to auto manufacturers individually, JAMA asks that the Commission examine the possibility of group compliance based on reasonable requirements.

5. Complementary measures

- N1 light-commercial vehicles (vans), in JAMA’s view, should not be included in the complementary measures. The reasons behind this position are (1) that the introduction of target values for N1 vehicles is arbitrary when no data on average CO₂ emissions from such vehicles is available, and (2) that N1 vehicles are, especially in terms of use and ownership, very different from M1 vehicles. JAMA hopes to be included in future consultations with the Commission on this issue. Such consultations should be based on an initial determination of real-life emissions so as to facilitate the establishment of a realistic target value and target date.
- With respect to the adoption of an alternative refrigerant for mobile air conditioners (MACs), JAMA asks that the Commission postpone any decision in this regard until completion and evaluation of the currently ongoing assessment studies of the candidate alternatives.
- JAMA supports the introduction of bio-fuels. However, ethanol and bio-diesel blend rates should be determined on the basis of a comprehensive evaluation of their impact on emissions, drivability, and so on.
- Further CO₂ reductions in the road transport sector will require improved road infrastructure and more effective traffic management (for smoother traffic flow) as well as improved driver behaviour (eco-driving). JAMA asks the Commission to consider the possibility of preparing data and establishing targets for CO₂ reduction in these areas as well.

N1 vehicles excluded, the combined impact on CO₂ reduction of all of the complementary measures would correspond to at least 15 g/km if the estimated impacts of road infrastructure improvements (including better

traffic management) and eco-driving are also taken into account. For the sake of comparison, achievement of the CO₂ reduction target for Japan's road transport sector under Japan's Kyoto Protocol commitment calls for a reduction of 54.9 million tonnes of CO₂; of that, 48% is to be achieved through vehicle technologies (greater fuel efficiency, vehicles powered by alternative fuels, etc.), while 52% is to be achieved through road infrastructure upgrades and enhanced traffic management.

6. Other

- Regulatory impact assessment was conducted by the Commission in connection with the voluntary commitments. JAMA respectfully requests that a further assessment be made taking into account the impacts of other EU emissions regulations such as EURO 5/6.

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