



**Friends of
the Earth**

CONSULTATION ON THE REVIEW OF THE COMMUNITY STRATEGY TO REDUCE CO₂ EMISSIONS FROM PASSENGER CARS AND LIGHT-COMMERCIAL VEHICLES

RESPONSE FROM FRIENDS OF THE EARTH ENGLAND, WALES & NORTHERN IRELAND

Friends of the Earth England, Wales & Northern Ireland (FOE EWNI) is pleased to respond to the Commission's consultation.

The scale of the threat posed by climate change, as recognised by EU Heads of State earlier this year, means that tough and urgent action is needed to tackle transport's contribution to carbon emissions. Road transport is the second largest contributor to EU emissions and one of the few sectors where emissions are still rising. Failure to address this sector's emissions will mean other sectors must make greater cuts to meet EU targets.

In terms of low carbon cars, this means that the community strategy must ensure that progress is more rapid than it has been to date. However, although reducing carbon emissions from new cars is vital to cutting transport's contribution to climate change, it is no substitute for behavioural change: we must also change how and how much people travel. We want to make clear that we believe this works the other way round too: the scope for making carbon reductions from behavioural change should not mean reduced ambition on cutting emissions through technology. The scale of the problem of climate change is such that full use of both approaches is needed.

Targets

We believe that any future target must be mandatory, as outlined in the Commission's communication of 7th February 2007. The slow rate of progress towards the 2008 / 2009 target of 140 grammes of carbon dioxide per kilometre (g/km CO₂) shows the failure of the voluntary approach. There are no penalties for non-compliance and the industry-wide nature of the target allows for free-riders. The research for Transport & Environment into relative performance by different car makers shows that although some are making reasonable progress, others are falling well behind the pace of change needed ¹.

On the level of future targets, we believe that:

- The Commission should stand by the long-agreed target of reducing average emissions from new cars sold to 120g/km CO₂ by 2012 from fuel efficiency measures alone. Within this parameter, we believe that it should be up to the industry as to how they deliver.
- Additional measures such as improved air conditioning, tyre pressure monitoring and gear shift indicators should also contribute to cutting emissions, but this contribution

¹ Transport & Environment (October 2006) 'How Clean is Your Car Brand?'
http://www.transportenvironment.org/docs/Publications/2006/2006-10_how_clean_is_your_car_brand.pdf

should be seen as in addition to, not as part of, meeting the 120g/km CO₂ target. There should be a full assessment of the possible impact of these measures.

- The Commission should set a longer-term target of doubling current fuel efficiency by 2020, so that new cars sold then emit on average no more than 80g/km CO₂. This will provide a clear signal for the motor industry of the rate of progress needed. Milestones should be set, at least for the midpoint year 2016, and maybe for each year between 2012 and 2020. These should assume a constant reduction rate of 5% a year.
- There should be full transparency of data with timely annual reports published by the Commission showing the rate of progress made by each manufacturer. This should involve the disclosure of the actual fuel efficiency levels achieved by each manufacturer, together with details of any credits gained and penalties paid.

Any emissions cuts to be made through the use of biofuels should also be seen as in addition to meeting the 120g/km CO₂ target, not as part of meeting it. We remain sceptical about the potential contribution that biofuels could make. A study by Wetlands International released in December 2006 revealed that palm oil which is sourced from an area where a peat forest has been destroyed and burned can lead to emissions which are ten times greater / tonne of palm oil compared to a tonne of conventional oil². There are also real concerns about negative social and environmental impacts; biodiversity loss and deforestation; and food security.

Burden-sharing

Any proposal from the Commission must ensure that manufacturers must reduce emissions across their model range, and cannot comply simply by producing a few high-profile 'green' cars.

We have a strong preference for a regulation that does not distinguish between different types or classes of car. However, if a class parameter is used, the choice of parameter is critical. We particularly reject the proposal made by ACEA that the weight of the vehicle should be used, for the reasons explained below, and also believe that power is not an appropriate parameter. We believe that the footprint of the car might be more appropriate

Reducing vehicle weight is one of the key ways of improving fuel efficiency and cutting carbon emissions. Manufacturers claim³ that recent trends towards larger and heavier cars are a response to consumer demands, but we believe this trend has been created, at least in part, by advertising - see below. Manufacturers also claim that additional weight is needed for safety reasons⁴ but this claim is rejected by safety experts⁵. Hence we dispute the assumption made in the Commission's Impact Assessment that the weight of cars will continue to rise. Indeed, we note that the main difference between the work done for the Impact Assessment and previous work done by the same organisations is the nature of the assumptions about weight gain, and that these different assumptions lead to big differences in terms of the cost of CO₂ reduction to the consumer.

² See <http://www.wetlands.org/news.aspx?ID=804eddfb-4492-4749-85a9-5db67c2f1bb8>

³ See http://www.acea.be/co2_emissions_old

⁴ *ibid*

⁵ Professor Claes Tingvall, the chair of the European Transport Safety Council's European New Car Assessment Programme, has stated that "Blaming safety is unfair, incorrect and just hides the fact that there are other issues responsible for industry's failure to meet its contract with society. The performance of smaller and lighter cars at Euro NCAP clearly shows that improved safety does not need additional weight". See <http://www.lowcvp.org.uk/news/523/motor-industry-challenges-eu-plans-for-mandatory-co2-car-targets/>

Mechanisms

We await with interest the Commission's proposals for the mechanism by which any future agreement will be delivered. Certainty of delivery is key: the mechanism must ensure that the overall target is met.

We believe that the mechanism must ensure compliance, rather than making it worthwhile for manufacturers to buy their way out of taking action. This means that the penalties for not meeting the target must be significantly more expensive than credits for achieving it and the abatement cost.

Advertising

The Commission's Impact Assessment reports FOE EWNI's survey of car advertising carried out in September 2005. We would like to bring to your attention a more recent survey, carried out in March 2007⁶. This found that there had been very little change in advertising patterns in the intervening 18 months:

- 55% of all car adverts were for vehicles in the UK's top three Vehicle Excise Duty (VED) bands, which cover cars emitting more than 166 g/km CO₂. This compares with 57.6% in the September 2005 survey.
- Only 4% of adverts were for cars emitting less than the target in the current voluntary agreement of 140g/km CO₂ target
- Only 3% of adverts were for cars emitting less than 120g/km CO₂. This compares to 3.1% in the earlier survey.

The car industry claims that consumers are to blame for the slow uptake of low carbon cars⁷ but this ignores the power of advertising to help create the market for low carbon cars.

We support calls for a binding code of practice on car advertising. This should cover all advertising media (print, broadcast and online) and should address:

- How vehicles are advertised - a certain percentage of the advertisement should be devoted to the carbon impact of the vehicle and its annual fuel costs. The UK's voluntary car label could form a basis for this⁸.
- Which vehicles are advertised - we believe that the Commission should consider restrictions on the advertising of vehicles which exceed the current CO₂ targets by a given percentage, and that this should change as targets change. In our recent survey, 22% of advertisements were for vehicles emitting more than 210g/km CO₂, ie 50% above the current voluntary agreement target.

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⁶ See http://www.foe.co.uk/resource/press_releases/green_cars_motor_industry_29032007.html

⁷ Christopher Macgowan, chief executive of the UK car industry's trade association the Society of Motor Manufacturers and Traders, has claimed that "We have also already produced and brought to market cars that can meet the 120g/km limit – the problem is that motorists do not buy them!" See http://www.smmt.co.uk/news/DetailedArticle_pop.cfm?login=1&articleid=14488&printfriendly=1

⁸ See <http://www.vcacarfueldata.org.uk/green-label/index.asp> for an example