

Consultation on Community Strategy to reduce CO₂ emissions from passenger cars and light-commercial vehicles

Response from the Mayor of London

1. The Mayor of London welcomes the opportunity to comment on the Community Strategy to reduce CO₂ emissions from passenger cars and light-commercial vehicles. The Mayor of London welcomes the Commission's intention to take action on this issue.
2. Climate change is one of the biggest challenges facing humanity and the highest priority for the Mayor of London. Transport is a major source of climate change gases, including carbon dioxide, CO₂.
3. The Mayor of London strongly supports a robust strategy at EU level and in particular urges the European Council and Parliament to agree stringent mandatory targets to reduce CO₂ from cars and light goods vehicles.
4. Given the stark nature of the economic and environmental warnings in the UK's Stern Review on the Economic Impacts of Climate Change, now is the time for a step change in the level of measures to reduce greenhouse gas emissions. Market forces are failing to deliver the required levels of carbon emission reduction. The policy context for vehicle emissions should reflect this step change requirement.
5. Mandatory targets to reduce CO₂ emissions from passenger cars and light-commercial vehicles are needed urgently. The Mayor strongly urges the European Commission to take bold ambitious action to reduce the threat of catastrophic climate change. This includes measures proposed in the recent climate change and energy package and associated controls on emission sources, such as cars.
6. It is also crucial that measures to reduce CO₂ do not have negative consequences on other issues, such as local air pollution. It is therefore vital that emissions of CO₂ and other pollutants from cars are considered holistically, and fully assessed in the development of policies and legislation, to avoid unwanted negative consequences. The Mayor would therefore like to see CO₂ standards proposed for other vehicles in the very near future and serious consideration given to integrating such standards into the EURO emissions standards.
7. It is important to remember that CO₂ is not the only pollutant which contributes to climate change. Other contributors include well-known climate change gases, such as methane, N₂O and ozone and lesser known global pollutants such as particulate matter (PM) from diesel vehicles (as highlighted in a recent report prepared by the Air Quality Expert Group advising the UK Government¹).

¹ Department for the Environment Food and Rural Affairs's Air Quality Expert Group, "Air Quality and Climate Change: A UK Perspective", 2007

8. It is also important to consider the total emissions, such as “well to wheel” emissions rather than just exhaust CO₂ emissions. The Air Quality Expert Group’s report highlighted that the climate change benefits of diesel over petrol are compromised once other impacts are considered, such as increased CO₂ emissions at refineries and the contribution of diesel PM to climate change.

Achieving the EU objective of 120 g CO₂/km

9. Voluntary agreements have not proved to be effective, and the Mayor strongly opposes their use here. The associations participating in the existing Voluntary Agreement are not on track to achieve the targets they set out. Voluntary Agreements do not impose a penalty if signatories don’t deliver, so there is little incentive to act.
10. The introduction of mandatory targets in the form of EU legislation would have the benefit of delivering consistency across all EU member states. These need to be set to deliver the most environmental benefit.
11. Mandatory targets need to be challenging, to achieve the necessary reductions in CO₂, and to encourage the industry to be innovative and deliver real improvements within the new vehicle fleet. Vehicle standards should also take into account small volumes of a particular class of vehicle manufactured and designed to fulfil specific social needs. This would ensure a smooth transition from the existing voluntary agreements for those vehicles.
12. The legislation should also be flexible enough to allow the standards to be tightened, without a long legislative process, when the technology is available. This will allow the industry to roll out effective technologies and encourage continued innovation in this area.
13. To achieve the overall target of 120 g CO₂/km, the Mayor believes that a target of 130g/km for the average new car fleet by 2012 by means of improvements in vehicle motor technology is appropriate and achievable. It is important that the technical improvements are not outweighed by a continued trend to bigger more powerful cars. Manufacturers should be encouraged to promote smaller, more efficient cars, especially in urban areas.

Supply oriented measures

14. It is important that the legislative framework ensures that the further reduction of 10 g CO₂/km is delivered. These softer measures are often harder to monitor, and it is vital that these emission reductions are delivered in reality. Therefore, the Mayor urges the EC to include hard penalties on this element of the proposals too.
15. In addition, the Mayor has serious concerns about the use of unregulated biofuels as there is a wide range in the quality of biofuels, and some can have considerable negative environmental and societal impacts. The Mayor therefore strongly urges that an accreditation system is set up on the sustainability of biofuels. This needs to consider the emissions that contribute to climate change and air pollution, at the point of use, and through production, processing and transportation of the biofuels and components. It also needs to consider wider sustainability issues, such as the impact of water use, habitat destruction, food shortages, displacement of local peoples, and impact on local economy.

Demand/behaviour oriented measures

16. The Mayor of London, through the Greater London Authority, Transport for London and the other Functional Bodies, has been developing policies and initiatives to reduce London's contribution to climate change from transport. The Mayor's Climate Change Action Plan² is London's contribution to what must be a global response to climate change and which therefore must include action at EU level and by cities around the world³. London's Action Plan includes the use of low-carbon vehicles and technologies, and consideration of an emissions based congestion charge, where the charge is proposed to be related to vehicle emissions of CO₂ (and local air pollutants).
17. London has achieved a modal shift (of 5%) away from private cars, and is the only major city in the world to have done so. We have achieved this through improved public transport, travel demand management initiatives - such as, promotion of walking and cycling (including to businesses and schools) - and pricing mechanisms, such as the congestion charge.
18. The Mayor welcomes in this context the work being undertaken to develop an EU methodology for infrastructure charging covering externalities and is happy to provide any information or assistance as a result of London's experience of the congestion charge. However, it is essential that any proposals arising from this work do not restrict the ability of cities to introduce or change pricing systems depending on the policy objectives being pursued and according to local circumstances.
19. Proposals to reduce CO₂ from passenger cars and light-commercial vehicles with technical improvements link in well with other initiatives such as clearer labelling for vehicles and consumer information.
20. On the Commission's proposal for a Council Directive on passenger car taxation, the Mayor sees the potential benefits of Member States adopting this as soon as possible in order to promote the purchase of fuel efficient cars. However, we would point out that including a CO₂ element in the UK's Vehicle Excise Duty has led to increased demand for diesel cars and increased emissions of other pollutants, including local air pollutants and some which cause climate change. This is a further example of the need to consider CO₂ impacts holistically with other pollutants.
21. The Mayor of London is happy to provide further information on London's experience of implementing a range of policy measures on sustainable transport.

**Greater London Authority
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² Mayor of London, "Action Today to Protect Tomorrow: The Mayor's Climate Change Action Plan", 2007

³ The C40 cities are a group of the world's largest cities committed to tackling climate change. Further information can be found at www.c40cities.org.