

Dear Madam,
Dear Sir,

The new legislation should primarily focus on energy efficiency. A better vehicle energy efficiency would automatically imply a lower CO2 emission, as well as a more rational use of (limited) resources.

The "meter" for such an efficiency driven legislation would have to take into account the driven miles. Therefore a "quantitative + qualitative" fuel-based taxation would represent a much more direct and simple (to understand, to apply, to pay) calculation mode. To make it perfect, an additional -indeed difficult to introduce- aspect such as the relation to the transported people or goods would be envisageable.

The second -and even more important- remark, is that the new legislation does not face the real problem (from a global warming point of view), which is represented by the necessity to consider the total Well-to-Wheel figures. It does not make sense (neither in terms of CO2, neither in terms of overall efficiency and also not in terms of dependence of imported oil) to consider only Tank-to-Wheel aspects, leaving -at best- only 10 g/km to the Wheel-to-Tank contribution. On top of this: the figures for applying Well-to-Wheel numbers do already exist, and have been obtained by a joint public-private effort of car industry & petrol-guys & EU (here I refer to the JRC/Eucar studies). Please, take a look at www.optiresource.org in order to see how you can deal with this figures, instead of limiting yourself to a conceptually wrong Tank to Wheel legislation !

Finally, 130 g/km - or 13 kg (kilograms !) / 100km - (the double of the weight you put into a car, in terms of liquid fuel !) are still a too much high figure for our planet !

Best regards

Marco Piffaretti
Managing Director

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