

Dear Ladies and Gentlemen,

the proposal in my opinion reaches to short.

Quite many items that would improve CO2 emissions are not included. Besides improvements in the vehicle technology items like traffic guidance, traffic jam avoidance strategies and so on are absent and it seems the government as usual urges others to move forward and to spend a lot of effort and money but does nothing when it comes to action from their side.

For quite a long time no regulation was developed and now "all of a sudden" it becomes necessary so find a regulation and it has to be implemented immediately.

The design and development of vehicles as I know from personal experience takes quite a lot of time so this needs to be considered when setting target values. As in other cases the regulation should first be implemented for new vehicle types and after a certain time carried over to existing vehicles.

Setting a single emission target doesn't seem to be justified as it would not reduce the consumption of small vehicles in any way but lead to a ban of larger cars that are needed by for example larger families or farmers.

Instead a target value based on model size or model weight should be selected ( my suggestion is weight as the biggest influence on fuel consumption is weight).

This target should not be a steady target but follow a strategy to ban exceptionally bad vehicles from the market within some timeframe. The average fuel consumption in a year and class should be selected as maximum value for a five years later period. In this case vehicle with fuel efficiency lower than average will be removed from the market and with each year the maximum consumption is reduced without asking too much from the industry and without permanent redesign of the regulations.

Best Regards

T. Schwarz