



09/12/2011

Position Paper

Introduction

This position paper is providing additional information to the questionnaire answered for the consultation on reducing CO₂ emissions from road transport.

Going-Electric, Association for Electric Vehicles and their Users in Europe, would like to thank policymakers for considering our comments at this initial stage of the process and we look forward to a continuous dialogue on this important subject.

In view of the review of Regulations (EC) No 443/2009 and (EC) No 510/2011, this position paper outlines key suggestions of Going-Electric in relation to the following points:

- I. Making 2020 Regulation more ambitious in order to maintain European competitiveness
 - A. Road vehicle greenhouse gas emissions standards should be set for each new vehicle entering the vehicle fleet
 - B. Emission reduction targets should facilitate 2050 objectives
- II. Being technology-oriented
- III. Setting EU legislation for electrically-powered vehicles production
- IV. Setting EU legislation for recharging infrastructure

I. Making 2020 Regulation more ambitious in order to maintain European competitiveness

A. *95gCO₂/km by 2020 is business-as-usual*

For passenger cars, the target of 95gCO₂/km by 2020 is business-as-usual and will endanger 2050 objectives and EU's automotive competitiveness.

B. *Need to set vehicle-based limit on car emissions in 2020 in addition to the 95gCO₂/km limit*

The current Regulation on CO₂ emissions from new cars sets limits for the road vehicle greenhouse gas emissions (GHG) based on the average GHG of new vehicles entering the vehicle fleet. Going-Electric calls on the European Commission to also set road vehicle GHG standards for each new vehicle entering the vehicle fleet.

Justification

Setting a target on the average GHG emissions of new vehicles entering the vehicle fleet is not ambitious enough.

As mentioned in the Boston Consulting Group report of July 2011, "Powering Autos to 2020", "ICE technologies alone can reduce emissions by approximately 40 percent". As CO₂ emissions from passenger cars in 2008 constituted 153,6gCO₂/km, a 40 percent reduction would be about 92gCO₂/km, meaning that manufacturers would not be pushed to invest into innovative technologies to comply with 2020's objectives.

However, the EU's target of 60% emission reduction from transport by 2050 will not be feasible with internal combustion engine (ICE) technologies only.

With the current regulation system, car manufacturers will focus on improving the ICE technology in the next 10-15 years in order to comply with the 2020's emissions objectives, and will only after that dedicate more resources in alternative powertrains such as electric vehicles.

Why should we wait? As financial and human resources are limited, it is crucial that manufacturers can already today devote their resources to further develop vehicles powered by alternative technologies such as electric-powered vehicles (Battery-Electric, Extended-Range Electric Vehicles and Fuel Cell Vehicles) which could be mass market technology in 10-20 years, and will substantially contribute to meet the 2050's objectives of the White Paper on Transport.

Therefore, Going-Electric calls on the European Commission to set road vehicle GHG standards on each new vehicle entering the vehicle fleet, in addition to the limits on the average fleet.

II. Being technology-oriented

Going-Electric calls on the European Commission to be technology-oriented by giving preference to the fuels and vehicle technologies that allow major improvement in GHG emissions reduction and oil substitution. These technologies include electric-powered vehicles (Battery-Electric Vehicles, Extended-Range Electric Vehicles and Fuel Cell Vehicles).

Justification

Based on its long-term emissions reduction targets, European institutions are not and therefore cannot really claim to be “technology-neutral”. Indeed, already today, European institutions are setting regulations forcing European automotive manufacturers to invest in improving the Internal Combustion Engine (ICE) technology over the others (e.g. EURO 5, EURO 6). They therefore influence how resources are spent, and cannot claim to be “technology-neutral”.

Electrically-powered vehicles are best placed to achieve the 2050’s objectives outlined in the White Paper on Transport in terms of emissions reduction from passenger cars. The technology choice is not only a matter of car technology for the future. This is a matter of Europe’s competitiveness in the automotive industry in the global market. Europe needs to keep its technological and industrial leadership in the automotive industry, and therefore needs to prepare for the electric future.

Hence, Going-Electric urges the European Commission to be “technology oriented” so as not to endanger the future of the European automotive industry, which currently represents a significant part of the EU jobs. It would also hamper EU’s aim to reduce emissions from transport by 60% by 2050.

III. Setting EU legislation for electrically-powered vehicles production

Going-Electric calls on the European Commission to lay down a European legislation requiring minimum electrically-powered vehicles production (Battery Electric Vehicles, Extended-Range Electric Vehicles and Fuel Cell Vehicles) by the European automotive manufacturers.

Justification

In order to ensure that the EU is on track to reach the 60% emissions reduction from transport by 2050, it is crucial that the European Commission requires that each European automotive manufacturer produces a certain percentage of electrically-powered vehicles, including pure battery electric vehicles and series plug-in hybrids (or Extended-Range Electric Vehicles) as these represent a major step forward in CO₂ reductions, as compared to the incremental improvements that are found in ICE vehicles only. The minimum electrically-powered vehicle share on the total vehicle production would ensure that European manufacturers invest in new climate friendly technologies, which would facilitate EU's leadership in this field and maintain EU's competitiveness on a global scale.

It is crucial that such measures are taken to avoid endangering the future of the European automotive industry, which currently represents a significant part of the EU jobs.

Such measures are already in discussion in California, with regulation proposal to be put on vote in mid-2012.

California Air Resource Board (CARB) officials proposed Zero-Emission Vehicles regulations setting minimum production of alternative-powered vehicles. Starting in 2018, it includes a zero-emission mandate requiring manufacturers to produce a certain number of clean vehicles, which will be increased each year. According to the proposed rules, a total of 1.4 million zero-emission (including battery electric, fuel cell and plug-in hybrid electric vehicles) representing 15.4% of new car sales are envisaged in California by 2025. The California's proposal suggests that 87% of cars will be zero-emission vehicles by 2050.

(http://www.arb.ca.gov/msprog/clean_cars/acc%20summary-final.pdf)

Nine other states in the U.S.A currently enforce standards based on CARB's guidelines.

IV. Setting EU legislation for recharging infrastructure

Going-Electric calls on the European Commission to lay down a European legislation requiring the availability of recharging infrastructure in residential and urban areas.

Justification

It is crucial that the public sector enables the availability of charging infrastructure in public spaces such as residential and urban areas, for two reasons:

- To give the opportunity for people living in residential districts and apartment buildings to own an electrically-powered vehicle.
- To fight the “range-anxiety” effect.

It should be the duty of public institutions to enable the availability of charging infrastructure, since electric mobility provides benefits to the society, especially in urban areas, in terms of noise reduction and air quality improvement.



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About Going-Electric

Started in 2008, Going-Electric, Association for Electric Vehicles and their Users in Europe is an international non-profit association (AISBL) under Belgian law.

We promote all types of electrically powered vehicles in the European Union: cars, trucks, buses, motorcycles and bicycles, whether Battery Electric Vehicles, Extended Range Electric Vehicles or Fuel Cell Vehicles.

We are the leading Brussels-based organisation calling for a clear European legal framework to support European leadership in EV production and commercialisation.