

Public consultation
on the implementation of the renewed strategy to reduce
CO2 emissions from passenger cars and light-commercial vehicles

Position of the European Transport Safety Council

The European Transport Safety Council (ETSC) has continuously promoted vehicle technologies and vehicle legislation, which improve both safety and environmental protection. ETSC has, thus, followed the public consultation of the European Commission on the implementation of the renewed strategy to reduce CO2 emissions from passenger cars and light-commercial vehicles.

With regards to the question of how the standards should apply and how they should be distributed, ETSC is strongly in favour of promoting the vehicle footprint (i.e. the product of multiplying a vehicle's wheelbase by its track width) as the car attribute to base CO2 standards on.

The vehicle footprint would help to achieve lower CO2 levels without having a potential negative impact on safety. According to the US National Highway Traffic Safety Administration, a standard based on vehicle footprint encourages compliance strategies that decrease rollover risk. Manufacturers are encouraged to maintain track width because reducing it would subject the vehicle to a more stringent CO2 standard. Maintaining track width would allow some degree of weight reduction without a decrease in overall safety.

Also, using footprint as the car attribute in CO2 policy would give strong incentives to reduce vehicle height. Vehicle height is known to be associated with higher risks for vulnerable road users. Studies have consistently shown higher rates (up to four times greater) of severe injury and death for pedestrians in collisions with SUVs (that distinguish themselves from normal cars primarily through their height).

Other alternative car attributes, such as vehicle weight or vehicle power, have strongly negative safety repercussions.

We hope the European Commission will pay due attention to these considerations and introduce CO2 legislation that has simultaneous safety benefits. Compromising safety would go fully against the integrated approach to car regulation as formulated in the CARS21 report.