

20 June 2007

Re: Submission to the European Commission consultation on the implementation of the renewed strategy to reduce CO2 emissions from passenger cars and light-commercial vehicles.

We welcome the opportunity to express our views on this crucial issue.

The European Union has recently made some key decisions on its long-term climate policy. In this climate protection context, harmonised EU-wide measures on cars are required. For the EU to reduce energy waste by 20% and greenhouse gas emissions by 30% by 2020, in line with the objective of keeping global temperature rise below 2 degrees Celsius, road transport's growing carbon dioxide emissions have to be urgently curbed and its fuel efficiency dramatically improved.

The environmental benefit of such an EU move, if designed correctly, could create a knock-on effect on the global automobile market.

Binding limits on carbon dioxide emissions from road transport are long overdue. Greenpeace welcomes the Commission's recognition, as contained in its February 2007 communication, of the need for action in this sector.

We now urge the European Commission to put forward a legislative proposal by the end of 2007, at the latest, which contains the following elements:

- A binding fleet-average for new cars placed on the EU market by 2012 of 120 grams of carbon dioxide per kilometer driven (gCO₂/km).
- Longer-term mandatory fuel efficiency standards, which are more ambitious than 80 gCO₂/km by 2020, also need to be set.

The voluntary approach has failed. European car manufacturers have made very little progress since the voluntary targets were set, for over a decade now. Mandatory standards need to enter into force as soon as possible so that they can take effect by 2012.

We disagree with the Commission's proposal to have measures other than fuel efficiency (such as biofuels) count towards the 120 gCO₂/km target – in our view, other emission improvements should be additional to this target. In particular, an inefficient car running on biofuels, of which available quantities are *de facto* constrained by environmental concerns, is still inefficient.

Furthermore, mandatory fuel efficiency standards for light commercial vehicles must be set in this new legislation.

We also support a strong compliance mechanism as an important element of the legislation. Car manufacturers should bear monetary fines, per car placed on the market, in the case of non-compliance.

➤ Other measures:

- ◆ The revision of the 1999 car-labelling Directive should follow the format of the existing labelling scheme for the energy performance of household appliances and should be regularly updated.
- ◆ We also support EU-wide and national fiscal measures that favour the least polluting vehicles and penalize the least efficient ones.

- ◆ Measures need to be put in place that prompt a shift of the transport of goods from road to rail and changes in mobility-related behaviour patterns. Spatial planning and taxation should be considered in this respect.
- ◆ We do not think that the EU emissions trading scheme is the most effective nor an appropriate tool for addressing emissions from cars and we are therefore opposed to the inclusion of road transport in this scheme.
- ◆ Although we think that biofuels can contribute to reducing emissions from the transport sector, their promotion must be conditional upon fulfillment of sustainability standards, guaranteeing that their overall environmental impact is not a negative one. Additionally, Greenpeace would be strongly opposed to the cultivation or distribution of biofuels where this would lead to the release of genetically modified organisms into the environment.

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