JAMA Comments on EU CO_2 strategy at Public Hearing

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11 July 2007

1. Introduction

JAMA members have worked assiduously to minimise the environmental impact of their products and promote measures to curb global warming.

JAMA members are today actively pursuing the introduction of increasingly CO_2-efficient vehicles while contending with the provisions of other EU legislation and with market changes.

Although JAMA members support the Commission's objective to further reduce CO_2 emissions, they believe that the proposed new target application year and value should be reconsidered.

2. Postponement of the 2012 target application year

The development of a new car model from the earliest design stage to its entry in the market is a very long process.

Essential development and product cycles require a total lead time of at least seven years prior to regulatory application.

Japan has introduced new fuel-efficiency standards whose target values will be enforced in 2015, providing manufacturers a realistic lead time of eight years.

Manufacturers will strive to comply with EU emissions regulations EURO 6 .

JAMA requests that the target application year for the new CO2 regulation be postponed from 2012 to 2015 at the earliest.

3. Target values

JAMA supports the achievement of the European Commission's overall target of 120 g CO_2/km.

It believes, however, that this goal can only be met through a combination of efforts, including the adoption of an integrated approach involving all the stakeholders concerned.

4. Legislative framework

JAMA members believe that, in the process of formulating the new regulation, it is necessary to examine fairly its total framework.

JAMA members would like to recommend that the EU adopt a “segmentation” system based on vehicle weight categories.

To help ensure the achievement of target values for vehicle categories, it will be necessary both to mitigate the target value for lightweight vehicles and to strengthen the target value for heavyweight vehicles, so as to encourage the use of lighter vehicles.

CO_2-related taxation would also contribute significantly to the greater use of lighter vehicles and, by extension, to CO_2 reduction.

JAMA members also believe that flexibilities are required, including group averaging, a banking scheme, and consideration of regulatory impact.

5. Complementary measures

N1 light-commercial vehicles (vans) should not be included in the complementary measures. JAMA hopes to be included in future consultations with the Commission on N1 CO_2 reduction.

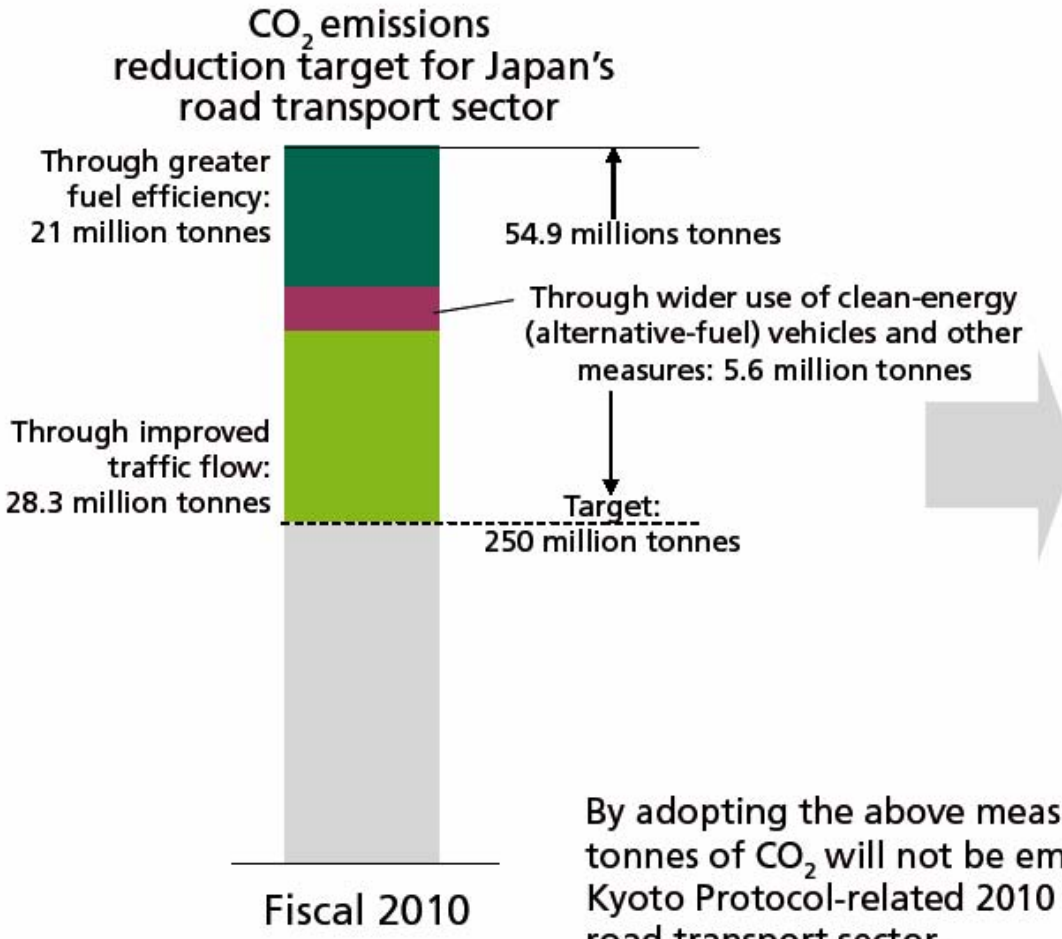
With respect to the adoption of an alternative refrigerant for mobile air conditioners (MACs), JAMA asks that the Commission postpone any decision in this regard until completion and evaluation of the currently ongoing assessment studies of the candidate alternatives.

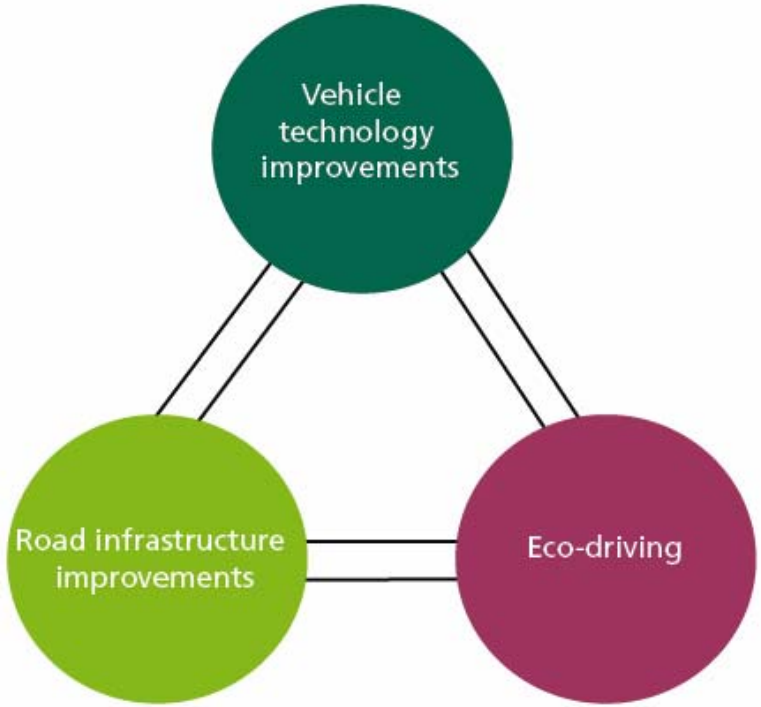
JAMA supports the introduction of bio-fuels. Ethanol and bio-diesel blend rates should be determined on the basis of a comprehensive evaluation of their impact on emissions, drivability, and so on.

Further CO_2 reductions in the road transport sector will require improved road infrastructure and more effective traffic management (for smoother traffic flow) as well as improved driver behavior (eco-driving).

The combined impact on CO_2 reduction of all of the complementary measures would correspond to at least 15 g/km.

An integrated, "three-in-one" approach is required.





By adopting the above measures, an estimated 54.9 million tonnes of CO_2 will not be emitted in order to meet the Kyoto Protocol-related 2010 CO_2 reduction target for Japan's road transport sector.