

## IRU CONTRIBUTION TO THE EC CONSULTATION ON REDUCING CO2 EMISSIONS FROM ROAD VEHICLES

# Consultation on reducing CO2 emissions from road vehicles

**This document is purely consultative — it does not commit the European Commission to, or announce, any action on the issues covered.**

### What's this consultation about?

The European Commission would like your views to help us prepare initiatives to cut greenhouse gas emissions from road vehicles. Your responses will feed into the Commission's Impact Assessments and its other work in this field.

### Background

We need to limit the rise in average global temperature caused by human activity to no more than 2°C above pre-industrial levels. According to science, this requires deep cuts in greenhouse gas emissions. The EU is committed to cut such emissions by 80-95%, compared to their level in 1990, by 2050.

To achieve this reduction at the lowest cost, the Roadmap for moving to a competitive low carbon economy in 2050 estimates that transport-sector emissions should be cut by 50-70% by 2050.

### How to answer the questionnaire

- In some places you may add comments. Please keep these as clear and concise as possible, as there is a limit on the number of characters you can enter.
- You can also e-mail any additional views to [CLIMA-CO2-VEHICLES@ec.europa.eu](mailto:CLIMA-CO2-VEHICLES@ec.europa.eu) (preferably only in exceptional cases if you experience problems with this questionnaire)
- Results will be published online, so please read our specific privacy statement to see how your **personal data** and contribution will be dealt with.
- If you are replying on behalf of an organisation, please register with the Transparency Register, if you haven't already done so. Registering commits you to a Code of Conduct. If you don't wish to register, your contribution will be treated and published together with those received from individuals.

## A - General information about you

A.1 Please, enter your name and, where relevant, the name of the organisation you represent. Please include also an e-mail address for contact purposes for use only if we need clarification about your response. *(compulsory)*  
*.(between 3 and 1000 characters)*

International Road Transport Union (IRU)  
 Marc Billiet  
 Marc.billiet@iru.org

A.2 I am replying as / on behalf of: *(compulsory)*  
*.(at most 1 answer)*

- individual/citizen
- organised stakeholders**

A.3 Please enter your registration number in the [Transparency Register](#). It is Commission policy to treat submissions from organisations that choose not to register as individual contributions (see [exceptions](#)). Please check the validity of your entry via the search function in the Transparency register — invalid entries will by default be regarded as unregistered. *(optional)*  
*.(between 1 and 50 characters)*

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A.4 Please specify the category that most closely describe your organization\* *(compulsory)*  
*.(at most 1 answer)*

- company / professional association
- trade union
- law firm / public affairs consultancy
- non-governmental organisation / association of NGOs**
- think-tank / research institution
- academic organisation I association of academic organisations
- public authority I public administration
- representative of religions, churches or faith communities
- political party
- other

A.5 Please indicate your country or, where relevant, the geographical area you represent *(optional)* - *.(at most 1 answer)*

- Austria
- Belgium
- Bulgaria
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia

- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- EU wide
- **Worldwide**
- Others

A.6 We may publish your response, together with your identity, on the Commission website, where it will be publicly accessible. Though if you request it, publication will be anonymous. How would you prefer your contribution to be published, if at all?\* (Compulsory)

.(at most 1 answer)

- **under the name indicated - I consent to publication of all information in my contribution and declare that none of it is under copyright restrictions that prevent publication.**
- anonymously - I consent to publication of all information in my contribution and declare that none of it is under copyright restrictions that prevent publication.
- not at all — keep it confidential - my contribution will not be published, but it will be used internally within the Commission.

## B - Overview – EU policy on road-vehicle greenhouse emissions

The EU aims to reduce its greenhouse gas emissions by 20% below 1990 levels by 2020. Road transport will contribute towards this reduction as a result of a number of pieces of EU legislation.

### Current EU legislation in this field

- [Regulation \(EC\) No 443/2009](#) — mandatory CO<sub>2</sub> emission requirements for new cars (to 2015)
- [Regulation \(EC\) No 510/2011](#) — mandatory CO<sub>2</sub> emission requirements for new vans (to 2017)

Both also set CO<sub>2</sub> targets for 2020 (although the implementation details are to be proposed by the Commission by end 2012).

### Complementary legislation

- [Regulation \(EC\) No 661/2009](#) — gear shift indicators
- [Regulations \(EC\) No 1222/2009](#) and [661/2009](#) — tyre rolling resistance and their labelling
- [Directive 1999/94/EC](#) — car labelling
- [Directive 2009/33/EC](#) — public procurement
- [Directive 2009/30/EC](#) — fuel greenhouse gas intensity.

The Commission is also developing a strategy for reducing greenhouse emissions from [heavy duty vehicles](#).

### Background

Transport accounts for around a quarter of all EU greenhouse emissions — most of that from road vehicles. The Commission 2011 Transport White Paper foresees a 60% reduction in greenhouse emissions from transport below 1990 levels by 2050.

The main greenhouse gas emitted from road vehicles at present is carbon dioxide (CO<sub>2</sub>) — though others include methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), black carbon or particulate matter (PM) and HFCs from air-conditioning and refrigeration units.

B.1 Setting greenhouse emission standards for road vehicles is an important aspect of EU action to reduce such emissions. (optional)

(at most 1 answer)

- Entirely agree
- Partly agree**
- Neutral
- Partly disagree
- Totally disagree
- No opinion

B.2 These standards should be in line with the greenhouse targets in the EU's roadmap to a low carbon economy and Transport White Paper. (optional)

(at most 1 answer)

- Entirely agree
- Partly agree**
- Neutral
- Partly disagree
- Totally disagree
- No opinion

B.3 Road vehicle greenhouse gas emissions standards should be set based on the average greenhouse gas emissions of new vehicles entering the vehicle fleet. (optional)

(at most 1 answer)

- Entirely agree
- Partly agree
- Neutral**
- Partly disagree
- Totally disagree
- No opinion

B.4 Standards for road vehicles should apply equally to different technologies used for powering road vehicles. (optional)

(at most 1 answer)

- Entirely agree
- Partly agree
- Neutral**
- Partly disagree
- Totally disagree
- No opinion

B.5 EU regulation of road-vehicle emissions stimulates innovation in the automotive sector and helps keep Europe's automotive industry competitive. (optional)

(at most 1 answer)

- Entirely agree
- Partly agree**
- Neutral
- Partly disagree

- Totally disagree
- No opinion

## C - Light-duty vehicles (cars and vans)

The EU approach in this field is based especially on [Regulations \(EC\) No 443/2009](#) and [510/2011](#), which cap average CO<sub>2</sub> emissions for new passenger cars (for 2015) and vans (for 2017), and also contain targets for 2020.

The Commission is currently assessing how these 2020 car and van targets can be implemented, in particular how the reduction effort is to be spread over all models of vehicle

C.1 Do you think the current legislation is working and delivering tangible benefits? (optional)

(at most 1 answer)

- Yes
- No
- **No opinion**

C.2 Please specify why not ? (optional)

(maximum 1000 characters)

Regulation 510/2011 is a positive step forward in the reduction of CO<sub>2</sub> emissions of Light Duty Vehicles, but unfortunately, it is too early after adoption and entry into force to measure the impact of the legislation.

One aspect which is missing from the regulation is clear and transparent information to the operators about the gains in fuel consumption reduction which can be obtained by investing in these vehicles. This would have been a positive incentive to operators to invest in such vehicles.

C.3 If the Commissions analysis demonstrates that the 2020 target of 147 gCO<sub>2</sub>/km for light-commercial vehicles is technically achievable, at reasonable cost, should the target be confirmed?

optional)

(at most 1 answer)

- Yes
- **No**
- No opinion

C.4 Please specify why not (optional)

(maximum 1000 characters)

It is important to express the target in terms of the reduction of fuel consumption reduction as the reduction of fuel consumption automatically leads to a reduction of both CO<sub>2</sub> and toxic emissions. This in turn could encourage commercial road transport operators to invest in such vehicles.

## D - Light-duty vehicles (cars and vans)

The Commission is currently working on a CO<sub>2</sub> emissions strategy for heavy-duty vehicles (HDVs) and has published a [preparatory study](#).

In total, HDVs account for around a quarter of EU road-vehicle CO<sub>2</sub> emissions and this share is likely to increase. The main HDV sectors and their share of emissions are shown in the table below:

<b>HDV sector</b>
Long haul lorries
Regional delivery lorries
Services and local delivery
Construction
Buses
Coaches
Utility vehicles
Urban delivery

As HDVs are used almost entirely for commercial activities, there is strong pressure on purchasers to buy fuel-efficient, low-CO<sub>2</sub> vehicles. However, it can be argued that additional action on CO<sub>2</sub> reduction is needed, given factors like:

- the need for vehicle manufacturers to invest
- purchasers' relatively short time horizon for fuel economy payback
- the external costs of CO<sub>2</sub> emissions that are not taken into consideration by manufacturers and operators.

D.1 The EU should have a strategy for reducing HDV greenhouse gas emissions. (optional)  
(at most 1 answer)

- Entirely agree**
- Partly agree
- Neutral
- Partly disagree
- Totally disagree
- No opinion

D.2 Additional regulation (as opposed to non-regulatory measures) is needed for this purpose. (optional)  
(at most 1 answer)

- Entirely agree
- Partly agree**
- Neutral
- Partly disagree
- Totally disagree
- No opinion

D.3 If the Commission proposes a HDV greenhouse gas strategy, which types of HDVs should it cover (as far as is feasible)? (optional)  
(at most 1 answer)

- Only passenger HDVs (buses and coaches)
- Only freight HDVs (trucks)
- Only long-distance HDVs
- Only urban HDVs
- All HDVs**
- No opinion

D.4 And what sort of measures should be considered for inclusion? (max 3 choices) (optional)  
(at most 3 answers)

- Measures affecting HDV design**
- Measures affecting HDV usage
- Measures influencing HDV purchase decisions**
- Measures influencing fuel or energy type used by HDVs
- A combination of measures from all areas
- No opinion

## E - Future developments – beyond 2020

Issues raised by current Commission work on vehicle emissions:

- For vehicles powered with internal combustion engines, most greenhouse emissions occur as the vehicle is used. With increasing use of different energy and powertrain technologies, the sources of emissions may change. For example, with hydrogen or electricity, all emissions occur away from the vehicle.
- The car and van regulations include targets for 2020 (subject to confirmation in the current reviews) but nothing after that.

For planning certainty, it is desirable to give vehicle manufacturers information about longer-term targets. However, there is considerable uncertainty over the cost and availability of technologies 10 or more years in the future. The further ahead, the greater the uncertainty.

E.1 Road-vehicle emissions may be reduced by changes in other policies, such as taxation. Should targets for road vehicles continue to be set, regardless? (optional)

(at most 1 answer)

- Entirely agree**
- Partly agree
- Neutral
- Partly disagree
- Totally disagree
- No opinion

E.2 In your opinion, which are the policies in which changes might affect the setting of greenhouse gas targets for road vehicles? (optional)

(maximum 1000 characters)

Competent authorities should:

- Facilitate and promote road transport and to work in partnership with the road transport sector so that it can achieve the full potential of its ambitious CO<sub>2</sub> emission reduction targets (30% reduction by 2030) as part of the whole logistic chain;
- Provide real business incentives to facilitate the penetration of innovative transport technologies, best practices and training;
- Stop suggesting new legislation aiming at the reduction of toxic emissions but rather to focus on legislation with the aim to reduce fuel consumption;
- Promote the change of fossil fuel to alternative energy/fuel sources, such as hydrogen fuel produced with electricity from renewable energy sources, where possible;
- Ensure that alternative energy sources are produced in an environmentally friendly way, remain affordable, cost-effective and available at the pump without any problems;
- Make best use of existing infrastructure and to invest adequately in new infrastructure to remove bottlenecks and missing links;
- Promote and increase by incentives the use of buses, coaches and taxis, along the lines of the IRU "Smart Move" initiative, as they are the most environmentally friendly part of the mobility chain and as such the best tool to reduce CO<sub>2</sub> in passenger transport;
- Develop international standards to allow the widest use of the modular concept by standardising and harmonising vehicles, transport units, weight and dimensions;
- Use international environmental Conventions to benefit the environment instead of as an excuse to introduce fiscal mechanisms to collect additional fuel taxes used for cross-subsidisation.
- Create a framework in which Member States are required to establish a sustainable energy policy instead of a simple fiscal policy for fuel taxation and other environment related taxes and charges;
- Create a level playing field for energy taxation between the different modes of transport;

- Implement an energy policy based on a diversification of energy usage where alternatives to oil exist, e.g. by increasing taxes on oil used for e.g. heating, electricity, steel, cement and paper production (increasing taxes where no alternatives exist will only increase costs but will not encourage diversification);
- Stop introducing measures which leads to increases of fuel taxes for commercial road transport in the EU Member States and which will do nothing to reduce CO<sub>2</sub> emissions nor effectively decrease oil consumption nor increase energy diversification in the way envisaged by the European Commission

E.3 Should the approach to regulating road-vehicle emissions consider emissions from the whole energy lifecycle? (optional)

(at most 1 answer)

- Entirely agree**
- Partly agree
- Neutral
- Partly disagree
- Totally disagree
- No opinion

E.4 Should other road-vehicle greenhouse emissions also be measured, alongside carbon dioxide (CO<sub>2</sub>)? (optional)

(at most 1 answer)

- Yes**
- Yes, especially methane (CH<sub>4</sub>)
- Yes, especially nitrogen oxides (NO<sub>x</sub>)
- Yes, especially black carbon
- No
- No opinion

E.5 Should longer-term indicative targets (for after 2020) be set? (optional)

(at most 1 answer)

- Yes
- No**
- No opinion

E.6 Please specify for what time period (following adoption of the related legislation)? (optional)

(at most 1 answer)

- 5 years
- 10 years
- 15 years
- 20 years

E.7 Please specify why not (optional)

(maximum 1000 characters)

Long-term targets should not be set by EU legislation until new EU procedures for the declaration of fuel consumption and CO<sub>2</sub> generation of complete transport units have been designed. Until then, voluntary targets as set by the road transport industry should be encouraged.

E.8 The current legislation contains vehicle-based targets until 2020. For post-2020, should we consider alternatives to vehicle-based greenhouse gas regulation? (optional)

(at most 1 answer)

- Yes**
- Not now, but this should be reconsidered in future
- No
- No opinion

E.9 Please specify which alternatives (optional)



(maximum 1000 characters)

As indicated earlier, vehicle-based targets may not be sufficient but should be accompanied by a wider range of initiatives in the field of transport, energy and fiscal policy. Not all emphasis should be placed on legislation; and at-source industry-lead initiatives to reduce fuel consumption, CO<sub>2</sub> and toxic emissions should equally be encouraged.

## F - Additional comments

Please include any additional comments you might have.

F.1 Please include any additional comments you might have (max. 5000 characters) or upload a document (max 1 document, if possible in MS Word, pdf or rich text format). In exceptional cases and only if you experience problems with this questionnaire; you can also send us documents by email ([CLIM-CO2-VEHICLES@ec.europa.eu](mailto:CLIM-CO2-VEHICLES@ec.europa.eu)) (optional)

(maximum 1000 characters)

You cannot introduce vehicle-based CO<sub>2</sub> performance targets without being able to measure in a standardized way CO<sub>2</sub> emissions and fuel consumption from the different types of Heavy Duty Vehicle (HDV) combinations involved in a wide variety of different duty cycles. Therefore, the IRU calls on the European Commission to develop a declaration and measurement procedure for CO<sub>2</sub> emissions and fuel consumption for HDVs. A different test cycle (realistic driving cycle) from the emission cycle should be elaborated to enable all actors in the road transport sector to use a tool for fuel efficiency calculation of the different heavy commercial vehicles (trucks, truck/tractor combinations, buses and coaches). A simulation-based system able to evaluate a large number of vehicle types should be preferred, taking into consideration the balance between the fuel used versus the work done, which means that the expected declaration would indicate grams of CO<sub>2</sub> per ton-km or per passenger/km, m<sup>3</sup>-km of goods.