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Reference: Consultation "Reducing CO₂ emissions from cars"

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

The Finnish Association of Nature Conservation (FANC, in Finnish Suomen luonnonsuojeluliitto, in Swedish Finska naturskyddsförbundet) is the biggest environmental NGO in Finland with about 30 employees and 30 000 members. Our comments are public.

FANC's views on the implementation of the Commission's proposed strategy

The Finnish Association of Nature Conservation is disappointed with strategy that aims only to 130 g/km target for energy-efficiency for new cars. The target should be 120 g/km and this target should be achieved by vehicle technology improvements (policy option 2). Additional to this, the integrated approach (policy option 3) including e.g. legislation, economic incentives should be used for further emission cuts.

EU's transport policy is not in line with combating climate change.

In the EU transport CO₂ emissions grew by 32 % between 1990 and 2004. Emissions from passenger cars and vans are responsible for approximately half of this. Instead of current growth trend, emission restriction targets for transport sector should be in line with general EU emission targets, cut of 30 % by 2020 and by 80 % by 2050.

Voluntary agreements with car industry are not effective.

The 120 g/km target was first set for 2005. The target has been delayed for seven years. Making alternative policies 'count' towards the 120 g/km target effectively weakens it. Now the weakened 130 g/km limit for carmakers will cause an additional 100 million tonnes of CO₂ to be emitted between 2012 and 2020. The trend of new cars being bigger and more powerful is highly unsustainable. Car industry should have energy efficiency much higher on their agenda. Manufacturing of SUV's (sport utility vehicles) should be banned in short term.

Agrofuels (biofuels) should not be calculated in for achieving 120 g/km target.

Agrofuels are not substitutes for energy efficiency. Agrofuels should be used as means to reduce CO₂-emissions and oil dependency and to promote sustainable agriculture - not a target as such. Agrofuels can only deliver to these three targets if

they are produced on environmentally and socially sustainable manner. Fuels made of waste must fulfill same kind of criteria for sustainable waste management.

FANC's ideas for designing the future legislative framework

Long term targets

Strong targets for 2016 and 2020, and beyond are needed. Reduction target of 80 g/km by 2016 would give the car industry signal of the way forward. Doubling fuel efficiency over the next decade is a feasible target. This target would fit with the strategy to protect the climate by reducing the EU's emissions by 30 % by 2020.

Regulation for advertisement for cars, need for speed limiters and ban for SUV's

FANC supports European Parliaments proposals for changes in the ways cars are advertised, obligatory speed limiters and a ban on cars that emit 100 % or more than the 120 g/km target.

Taxation based on CO2 emissions

FANC suggests that transport taxation in all member states should be based on carbon emissions, including taxation for cars and for fuels.

Congestion charges and road tolls

Congestion charges should be introduced in all cities with more than 100 000 inhabitants. Road tolls should be taken in use in all member states. Road tolls should be on level which encourages cargo traffic to use railways instead of motorways.

Need for railway-TEN

EU should stop supporting fossil fuel industry and instead support much more public transport. EU should encourage member states to develop light transport, e.g. with examples of best practices from Denmark and the Netherlands. Instead of developing TEN motorway network or airports EU should start developing European wide high-speed railway network.

EP's example

European Parliament could show example in reducing emissions for transport by having all its sessions in Bryssel instead of roadshow between Belgium and France.

On behalf of the Finnish Association of Nature Conservation,

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Sources:

<http://www.transportenvironment.org/Article427.html>
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