

TO : European Commission

Secretariat-General

Consultation "Reducing CO₂ emissions from cars"

BERL 6/262

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The RAI Association represents the interests of enterprises in the area of mobility. From cars to bicycles and from heavy trucks to garage equipment and parts. The RAI Association was created more than a century ago when the makers of bicycles and automobiles in the Netherlands joined together to guide the development of the new sector created by these revolutionary machines. The RAI Association still plays a leading role in the fast evolving mobility sector in the Netherlands.

**STAKEHOLDER CONSULTATION
ON
THE IMPLEMENTATION OF THE CO₂ AND CARS STRATEGY**

In the communication from the commission to the council and the European parliament with the results of the review of the community Strategy to reduce CO₂ emissions from passenger cars and light-commercial vehicles¹ the Commission announces that she will adopt in 2007 an amending proposal to improve the effectiveness of the fuel efficiency labelling directive 1999/94/EC. This proposal will harmonise the design of the label and introduce energy efficiency classes in order to better raise consumer awareness at the time of car purchase.

RAI Association welcomes this initiative of the Commission and ask the Commission to harmonize also the calculation method, or at least the starting-points, which member states should use for calculating the fuel-efficiency class of a particular vehicle.

No discrimination between different kinds of fossil fuels

Bio-fuels must be judged separately according to its own merits

In our opinion discrimination between different kind of fuels (i.e. Petrol, Diesel, CNG) should not be allowed; the only focus should be on the tailpipe emission CO₂. according to the type-approval figures based on directive 80/1268/EC².

Fuel-efficiency classes should be fixed for long periods (10-15 years)

It should be prevented that the way a fuel-efficiency class is calculated, is changing very often; it should be fixed for such a long period that the industry can anticipate on the fuel efficiency classes in the up-coming 10-15 years. Parameters shouldn't change every year as it does now in the Dutch system of fuel-efficiency labeling.

System must be based on simple parameter(s) that customers understand

Furthermore, when the EU is introducing a comparison system with energy efficiency classes for passenger cars, such a system should be based on one (or more) clear and simple parameter(s). The Netherlands are using the footprint (length x width) as the main parameter, but such a parameter is not connected to the acquisition experience of the buyers and retailers of passenger cars. In simple words: the customer should always understand the fuel efficiency label. In our opinion the footprint is not clear and simple enough for using in a comparison system with energy efficiency classes for passenger cars. Moreover it could lead to confusions when a relative comparison (with the footprint as the main parameter) is compared with the absolute CO₂ emissions from passenger cars.

***RAI Association supports also the proposals and positions submitted by
the Association of European Car Manufacturers (ACEA) and
the European Association of Automotive Suppliers (CLEPA).***

¹ COM(2007) 19 final of 7.2.2007

² as amended with directives 89/491/EC, 93/116/EC, 1999/100/EC and 2004/3/EC