

Consultation on reducing CO2 emissions from road vehicles

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.

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)

A.2 I am replying as / on behalf of: (compulsory)

- individual/citizen
- organised stakeholders

A.5 Please indicate your country or, where relevant, the geographical area you represent (optional)

- | | | |
|-----------------------------------|----------------------------------|-----------------------------------|
| <input type="checkbox"/> Austria | <input type="checkbox"/> Greece | <input type="checkbox"/> Portugal |
| <input type="checkbox"/> Belgium | <input type="checkbox"/> Hungary | <input type="checkbox"/> Romania |
| <input type="checkbox"/> Bulgaria | <input type="checkbox"/> Ireland | <input type="checkbox"/> Slovakia |

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| <input type="checkbox"/> Cyprus | <input type="checkbox"/> Italy | <input type="checkbox"/> Slovenia |
| <input type="checkbox"/> Czech Republic | <input type="checkbox"/> Latvia | <input type="checkbox"/> Spain |
| <input type="checkbox"/> Denmark | <input type="checkbox"/> Lithuania | <input type="checkbox"/> Sweden |
| <input type="checkbox"/> Estonia | <input type="checkbox"/> Luxembourg | <input type="checkbox"/> United Kingdom |
| <input type="checkbox"/> Finland | <input type="checkbox"/> Malta | <input checked="" type="checkbox"/> EU wide |
| <input type="checkbox"/> France | <input type="checkbox"/> Netherlands | <input type="checkbox"/> World wide |
| <input type="checkbox"/> Germany | <input type="checkbox"/> Poland | <input type="checkbox"/> 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)

- 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 CO2 emission requirements for new cars (to 2015)
- [Regulation \(EC\) No 510/2011](#) – mandatory CO2 emission requirements for new vans (to 2017)

Both also set CO2 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's [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 (CO₂) – though others include methane (CH₄), nitrous oxide (N₂O), 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)

- 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)

- 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)

- 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)

- 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)

- 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 CO2 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)

- Yes
- No
- No opinion

C.2 Please specify why not

The current legislation has created additional burdens for the customer and the road haulage company, who are the ones who have to pay the additional costs for the Light-Duty Vehicle to be conformed to rules CO2 emissions. Moreover, the regulation contributes to put a larger amount of smaller vehicles into use instead of curbing CO2 emissions.

C.3 If the Commission's analysis demonstrates that the 2020 target of 147 gCO2/km for light-commercial vehicles is technically achievable, at reasonable cost, should the target be confirmed? (optional)

- Yes
- No
- No opinion

D. Heavy-duty vehicles

The Commission is currently working on a CO2 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 CO2 emissions and this share is likely to increase. The main HDV sectors and their share of emissions are shown in the table below:

HDV sector	Share of HDV greenhouse gas emissions
Long haul lorries	37.1%

Regional delivery lorries	13.9%
Services and local delivery	12.8%
Construction	12.5%
Buses	8.7%
Coaches	6.3%
Utility vehicles	5.2%
Urban delivery	3.7%

As HDVs are used almost entirely for commercial activities, there is strong pressure on purchasers to buy fuel-efficient, low-CO₂ vehicles. However, it can be argued that additional action on CO₂ 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 CO₂ 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)

- 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)

- 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)

- 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)

- 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)

- 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)**

Taxation, road charging systems based on the internalisation of external costs in road transport for all types of road vehicles, and EU policy related to masses and dimensions for road freight transport (for load optimisation), are some examples of policies that should affect the setting of greenhouse gas targets for road vehicles. In particular, CLECAT members want to avoid the situation where the Commission fails to consider existing fiscal burdens on transport users by not taking into account those CO₂ costs that are already (fully or partly) internalised through existing excise, taxes or charges.

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

- 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 (CO₂)? (optional)

- Yes
- Yes, especially methane (CH₄)
- Yes, especially nitrogen oxides (NO_x)
- Yes, especially black carbon
- No

No opinion

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

Yes

No

No opinion

E.7 Please specify why not (optional)

CLECAT believes that long term unrealistic targets would bring not benefits and just create more confusion for the industry.

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)

Yes

Not now, but this should be reconsidered in future

No

No opinion

F. Additional comments

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 (CLIMA-CO2-VEHICLES@ec.europa.eu). (optional) (maximum 5000 characters)