

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 is 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

(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)

UETR European Road Haulers Association
info@uetr.eu
Rue Joseph II 36-38 Brussels

A.2 I am replying as I 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 I professional association
- trade union
- law firm I public affairs consultancy
- non-governmental organisation I association of NGOs
- think-tank I 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
- World wide
- 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 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)

(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 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)
(at most 1 answer)

Yes

No

No opinion

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)
(at most 1 answer)

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
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-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) (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)

Euro norms have reduced most of the harmful emissions from HGV. Engine technology improvement, if technically feasible and at a reasonable cost, is the only effective way to reduce CO₂ emissions.

Tyre manufacturers should be called upon in order to further reduce rolling resistance and hence fuel consumption.

For HGVs a revision of directive 96/53 should be taken into account in order to evaluate the feasibility of measures for longer vehicles whose fuel consumption can be reduced by specific tools in order to reduce the CX value of these vehicles. UETR stresses the importance of further research on aerodynamics of vehicles and, in case, of provisions on the shape of new commercial vehicles.

Moreover, on a limited basis and ensuring road safety and modal split, member states should be allowed to implement long and heavy vehicles of up to 25,25 metres, even for intra EU cross border transportation if agreed by neighboring countries.

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 (CO₂)? (optional) (at most 1 answer)

- 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) (at most 1 answer)

- Yes
- No
- No opinion

E.7 Please specify why not (optional)
(maximum 1000 characters)

The targets set for 2020 are, in our opinion, adequate and sufficiently satisfactory. To impose mandatory targets beyond that date could be useless, or even harmful. As a matter of fact, experience demonstrates that long-term predictions, sometimes, turn out to be incorrect or inaccurate. Consequently, the commitments related to these provisions could be inefficient or unattainable.

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

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 (CLIMA-C02-VEHICLES@ec.europa.eu). (optional)
(maximum 5000 characters)

Reduction of oil-dependency (which makes the sector vulnerable to fluctuations of oil price increases in the future less competitive) is of paramount importance for UETR. A deeply investigated cost-benefit analysis is necessary in order to prevent any future EU-legislation from having more costs than overall benefits. Such analysis must absolutely include the overall influence on transportation costs on both the micro scale (road transport entrepreneurs, SMEs in particular) and macro-economic consequences.

No economically viable alternative on a EU-wide scale to the HGV diesel engine has been found yet, hence the diesel engine is bound to be predominant for the next 10 to 15 years with regards to this segment. Reduction of CO2 will hence have to be realistically sought for within these limits. LNG can be a feasible solution in the future, provided the necessary energy infrastructure (e.g. refueling stations).

Should the legislator intervene in a financial or fiscal way and thus make diesel powered vehicles more expensive to run, then the consequence would be a mere cost increase with no real improvement of CO2 emissions. Therefore more is to be expected from measures that enhance technical innovation and measures that work on reductions of CO2 emissions by changing other legislation (e. g. directive 96/53). Road haulage sector is characterized by a large number of micro and small enterprises. Very often the only affordable investment regards the acquisition of vehicles. The introduction of new standards at the same time all over the EU for new vehicles is the best way to achieve the desired results. Furthermore haulage companies should be supported in order to be able to make the investments in these new vehicles. Various member states have supported their companies with subsidies for the greenest vehicles in the past: it is the best way towards a quick implementation of vehicles that will meet higher CO2 emissions standards.

Despite fleet renewal in the past, economic crisis of 2008/2010 severely hit our sector, with much harder access to credit for entrepreneurs, and even by end 2011 a pressure for many just to stay on the market. Investments are being postponed because there is no alternative. Aiming at the already weakened sector by harsh fiscal measures regarding the existing fleet will worsen the situation at least for half a decade from now, both in terms of the survival chances of these companies and as to the desire decrease in CO2 emissions.