

Consultation on reducing CO2 emissions from road vehicles

Meta Informations

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Overview – EU policy on road-vehicle greenhouse emissions

Setting greenhouse emission standards for road

Entirely agree

vehicles is an important aspect of EU action to reduce such emissions.	
These standards should be in line with the greenhouse targets in the EU's roadmap to a low carbon economy and Transport White Paper.	Entirely agree
Road vehicle greenhouse gas emissions standards should be set based on the average greenhouse gas emissions of new vehicles entering the vehicle fleet.	Entirely agree
Standards for road vehicles should apply equally to different technologies used for powering road vehicles.	No opinion
EU regulation of road-vehicle emissions stimulates innovation in the automotive sector and helps keep Europe's automotive industry competitive.	Entirely agree

Light-duty vehicles (cars and vans)

Do you think the current legislation is working and delivering tangible benefits?	Yes
If the Commission's analysis demonstrates that the 2020 target of 147 gCO ₂ /km for light-commercial vehicles is technically achievable, at reasonable cost, should the target be confirmed?	Yes

Heavy-duty vehicles

The EU should have a strategy for reducing HDV greenhouse gas emissions.	Entirely agree
Additional regulation (as opposed to non-regulatory measures) is needed for this purpose.	Entirely agree
If the Commission proposes a HDV greenhouse gas strategy, which types of HDVs should it cover (as far as is feasible)?	All HDVs
And what sort of measures should be considered for inclusion? (max 3 choices)	Measures affecting HDV design Measures affecting HDV usage Measures influencing HDV purchase decisions

Future developments – beyond 2020

Road-vehicle emissions may be reduced by changes in other policies, such as taxation. Should targets for road vehicles continue to be set, regardless?	Entirely agree
In your opinion, which are the policies in which changes might affect the setting of greenhouse gas targets for road vehicles?	
Should the approach to regulating road-vehicle	No opinion

emissions consider emissions from the whole energy lifecycle?	
Should other road-vehicle greenhouse emissions also be measured, alongside carbon dioxide (CO2)?	No opinion
Should longer-term indicative targets (for after 2020) be set?	Yes
Please specify for what time period (following adoption of the related legislation)?	5 years
The current legislation contains vehicle-based targets until 2020. For post-2020, should we consider alternatives to vehicle-based greenhouse gas regulation?	No

Additional comments

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).

There are three questions where we have answered "no opinion". This is because the debates surrounding these questions are actually quite complicated, which is difficult to adequately represent by selecting a single tick-box. For instance, measuring black carbon might be a good thing, but if it is a first step towards weakening CO2 limits, then it would be nonsensical. Cars are responsible for 14% of the EU's total CO2 emissions, and they are the single largest source of transport emissions, representing around half of the total. CO2 emissions from the transport sector have increased by 29% since 1990, whereas those of other sectors have decreased by 22%. The contribution of the transport sector to the EU's CO2 emissions now stands at 30%, up from 20.5% in 1990. The real picture is actually worse, because transport greenhouse gas emissions statistics do not include lifecycle emissions, only 'tailpipe' emissions. In the case of oil, this leads to an underestimation of 20%. Transport is also critical in the debate on Europe's energy dependence. Transport is responsible for about two-thirds of oil use. Cars are the single biggest consumer of oil in the EU, responsible for using around half of transport sector demand, and hence a third of all oil. At current oil prices, Europe imports approximately €250 billion worth of oil every year, or €700m every day. For comparison - this is roughly the same amount as the Greek, Irish and Portuguese bailouts combined - every year. This is incredibly expensive and wasteful, only serving to further sap the EU economy, exacerbate inequalities, poverty and insecurity, and make more difficult our very real sustainability challenges. The age of cheap oil is over. Reducing fuel consumption of cars is one of the most effective strategies to help achieve the EU's aspirational energy savings target of 20% by 2020. Efficiency savings is demonstrably the fastest, cheapest, most effective, flexible and safest way of getting our greenhouse gas emissions down. But it is not going to happen naturally. Instead, it requires real policy and legislative focus. We are also increasingly forced to consider the risks involved in securing traditional energy sources; inter-state wars have been fought over energy resources such as oil. Efforts to adjust energy provision in ways which maximise the potential for peace and development will fail if we refuse to become more discerning in terms of the sources and methods of energy provision which most of us take for granted. Furthermore, a wide range of studies has concluded that 'ex ante' (pre-regulation) cost estimates of environmental policy tend to systematically overestimate. For example, studies conducted ten and five years ago predicted that reducing CO2 emissions from new cars to an average level of 140g CO2/km would make cars more expensive. Meanwhile new cars have become 13% cheaper on average in real terms over the past eight years. We are aware of the complex set of factors that make up a car's retail price, and that regulatory compliance costs is just one of these factors. Nevertheless the analysis shows that fears that reduction of CO2 emissions would make cars unaffordable have been unfounded. The absence of any relationship between reduction of CO2 and higher retail prices has important implications in future emissions compliance negotiations with carmakers in the implementation periods after 2015. According to objective analysis, carmakers in Europe are heading for very significant 'over-compliance' with the CO2 regulation and are hence likely to hit the 130 g/km CO2 target for 2015 several years in advance. The industry as a whole reduced average CO2 emissions by 3.7% in 2010, continuing the trend of much faster reductions since adoption of the EU's mandatory CO2 targets for cars. As of 2011, the carmaking industry stands at an average CO2 emission of 140 g/km. We support Transport and Environment's recommendation that 'weight' is a bad parameter

to base CO2 standards on, proposing to base CO2 standards on the surface area between the car's four wheels. This is how the USA regulates CO2 emissions from different vehicles. Research commissioned by Transport and Environment found that basing CO2 standards on the car's 'footprint' is likely to allow cheaper and deeper CO2 reductions, and likely to lead to safer vehicles than weight-based standards. We also believe the Commission should publish a proposal that would account for the full climate impact of biofuels on transport emissions, including the emissions resulting from indirect land use change. The policy should be fixed by introducing feedstock-specific 'ILUC factors' that reflect emissions from indirect land use change for different types of biofuel crops. The Commission should review these factors periodically, revising them as necessary in order to reflect the best available scientific evidence. Some text copyright, European Federation for Transport and Environment