



To; Mr Thierry Breton

Commissioner for the Internal Market, Industry, Entrepreneurship and SMEs

European Commission

Brussels, 14 July 2020

Joint civil society reaction to ACEA's demand to delay the introduction of emissions legislation

Dear Commissioner Breton,

It is with great concern that we have seen a [letter](#) sent to you by the European Automobile Manufacturers Association (ACEA) to ask for a 6-month postponement of the EU vehicle emissions legislation, including Euro 6d TEMP for heavy vans and ambulances, Euro 6d ISC-FCM for passenger cars and light vans and Euro VI Step E for trucks.

Yet again weakening the enforcement of air pollution laws is not the appropriate answer to the current health and economic crisis and would stand in stark contradiction to the letter and spirit of the European Green Deal and its zero pollution ambition, which require swift and decisive action. Postponing the application of emissions legislation would set a dangerous precedent.

According to the 2019 report by the European Environment Agency (EEA), ca. 400,000 premature deaths per year are [attributable](#) to air pollution in the European Union which is largely produced by internal combustion engines in road transport. This is especially worrying in the context of the current public health emergency, as health experts [warn](#) that air pollution probably makes humans more vulnerable to Covid-19. A recent pan-European [survey](#) has shown that 2 in 3 city dwellers do not want to go back to pre-pandemic pollution levels and demand effective protection from air pollution.

The pandemic therefore cannot be used as a pretext to delay the enforcement of Euro 6/VI emissions standards that were set more than 10 years ago and the introduction of which has been spread over seven years. The industry has been given more than enough time to put compliant vehicles on the market and the needed technology to curb emissions has long been available, as [shown](#) inter alia by the Association for Emissions Control by Catalyst.

Worryingly, ACEA's assumption that 'the proposed postponement will have no impact on the emission level of the vehicles concerned or on air quality' is not correct. As data from Emissions Analytics [Air Index](#) shows, light commercial vehicles which are pre-Euro 6d temp (pre-RDE approved) can emit in excess of the RDE emission limits on the road, meaning that any delay to the implementation of standards will have a negative impact on the emissions performance of vehicles sold in the EU and therefore air quality. Euro 6d temp standards were agreed in the aftermath of

the Dieselgate scandal as a temporary flexibility to allow carmakers time to upgrade their aftertreatment systems and reduce NO_x emissions and were never designed as a long-term solution. It is therefore imperative that Europe moves to the final Euro 6d standard that will significantly tighten the exceedances allowed (from 110% to 43%).

Furthermore, data available from the [ACEA](#) and [JAMA](#) RDE databases shows that there is generally a reduction in on-road emissions of NO_x emissions between passenger cars certified under the EURO 6d-temp standard and Euro 6d, so continuing to sell Euro 6d-temp vehicles instead of Euro 6d will have a negative impact on air quality. What is more, the introduction of in-service conformity testing requirements as soon as possible is critical for ensuring lifetime compliance with emission limits in the real world and avoiding another emissions scandal. Delaying the application of these provisions could have negative impacts on air quality in the longer term.

As regards heavy duty vehicles, any delay to the introduction of EURO VI Step E will also have a negative effect on emissions and air quality as EURO 6 Step E introduces the measurement of cold-start emissions (which have a large contribution to total NO_x emissions, especially in urban areas) during the on-road PEMS testing procedure as well as an on-road limit for particulate number (PN) emissions which heavy-duty trucks certified under previous EURO VI standards would not have had to meet.

At the time where many governments and the EU are putting in place very significant public stimulus programmes to relaunch the economy and continue green investments, not setting the policy line straight would send a very worrying signal. With Euro 6d-ISC-FCM not coming into force until January 2021, coupled with vehicle sales increasing again and additional boosts to sales expected due to generous tax payer funded scrappage schemes, there should be enough time for car manufacturers to sell legacy stock without a delay to the implementation dates necessary. Carmakers can also benefit from the EU end of series provisions that would allow them to sell off stocks even once the stricter standards come into force.

Instead of weakening emission rules, there are good alternatives to support the economy and consumers while cleaning up the air Europeans breathe. The European Commission should incentivise the healthiest, the least polluting and most efficient transport options. Civil society organisations have put forward a series of proposals for [stimulus programmes](#) and policies to give [more consumers](#) access to sustainable modes of transport.

In the interest of public health, consumer rights, environmental protection and fair competition, we ask you to maintain the current timeline for emissions legislation. This kind of discussion requires full involvement of civil society and should not boil down to a bilateral talk between the Commission and the industry. We therefore remain at your disposal for a direct exchange on this topic.

Sincerely yours,

Monique Goyens

Director General, The European Consumer Organisation (BEUC)



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