



## AECC INPUT TO THE CARS21 MID-TERM REVIEW

AECC, the Association for Emissions Control by Catalyst ([www.aecc.eu](http://www.aecc.eu)), is pleased to provide input to the mid-term review of CARS21. AECC Member companies are the European developers and manufacturers of automotive emissions control catalysts, traps and particulate filters. AECC supports the European regulatory development process for the control of engine and vehicle emissions through the timely provision of appropriate scientific data from test and demonstration programmes conducted in independent laboratories. AECC's Member companies invest in the development of the cost-effective emissions control technologies available to the automotive industry to meet both current and future regulations.

AECC supports the CARS21 vision of better regulation for the automotive industry and remains ready to provide data and information in support of legislative developments.

With regard to the CARS21 mid-term review, we would comment that:

- The CARS21 report rightly set forward key-principles for future regulation, including stakeholder consultation, performance-oriented legislation and the definition of long-term plans and policy objectives, including indication of a 'N+2' stage. The development of Euro 5 and Euro 6 light-duty emissions standards has followed this principle and the Commission Communication 2008/C182/08 on its future development provides a model that could usefully be applied to other areas. Nevertheless the development of Euro 5 and 6 highlighted the need to ensure that critical technical issues are addressed in sufficient time to avoid over-complication of the timescale for introduction of regulatory requirements.
- Simplifying European Community Regulations by referencing UN-ECE Regulations and global technical regulations provides a valuable step in harmonisation, potentially enabling the motor manufacturers to develop systems that could have wider application than the EU alone. This may be particularly valuable for relatively small volume applications. There is, however, a disadvantage in that any users of the legislation now need to blend numerous documents together to determine the precise requirements and procedures. Provision of useable consolidated documents by the Commission would provide a valuable service.
- Internationally harmonised procedures can help minimise the motor industry's costs, but harmonisation should not inhibit the timely setting of requirements to meet specific European needs. Indeed, the Commission has previously noted that science-driven European legislation can provide a strong lead to other countries and at the same time give a competitive advantage to European companies both in their home market and overseas.
- AECC feels that 2 specific emissions-related areas have not been fully addressed yet by recent legislative developments. Firstly, requirements for replacement emissions control devices for future vehicles to ensure their effectiveness and their durability have to be defined. Secondly, the rules on the fitment and effectiveness of 'retrofit' pollution control devices are handled at a local level, leading to the potential for substantial differences between regions. Whilst recognising that decisions on the need for fitment of such devices and on the incentives associated with this need to be taken at a national, regional or local level, there is potential for a Community-wide framework to provide a 'level playing field'. In this context, AECC has recently launched an informative web site on retrofit technologies and projects for heavy-duty vehicles in Europe ([www.dieselretrofit.eu](http://www.dieselretrofit.eu)).

In conclusion, the principle of providing a long-term view for the auto industry is correct and needed. European emissions legislation is capable of providing a competitive advantage for European manufacturers. There are still opportunities to assist Administrations and industries in the implementation of complex legislation and in efforts to improve European air quality.

05.09.2008