



AECC POSITION ON EUROPEAN COMMISSION'S PROPOSAL COM (2014) 28 FINAL

AECC*, the Association for Emissions Control by Catalyst, generally supports the European Commission proposal to introduce a number of amendments to the light-duty Euro 5&6 Regulation (EC) No 715/2007 and Heavy-duty Euro VI Regulation (EC) No 595/2009.

Nevertheless, AECC would like to comment on a number of specific points:

Article 1

Regulation (EC) No 715/2007 is amended as follows:

...

(5) Article 14 is amended as follows:

(a) paragraphs 1, 2 and 3 are replaced by the following:

"1. Without lowering the level of environmental protection within the Union, the Commission shall be empowered to adopt delegated acts in accordance with Article 14a concerning:

(a) the replacement of the information on the mass of CO₂ emissions in the certificate of conformity referred to in Article 18 of Directive 2007/46/EC with the information on total mass of CO₂ emissions equivalents, which shall be the sum of the mass of CO₂ emissions and methane emissions, expressed as equivalent mass of CO₂ emissions with regard to their greenhouse gas effects;

(b) the increase or removal of the limit value of total hydrocarbons (THC) emissions for positive ignition vehicles.

➤ The removal of methane from total hydrocarbon emissions in the Euro 5&6 Regulation (EC) 715/2007 can only be done once CO₂ emissions in the vehicle's certificate of conformity include methane emissions expressed in CO₂-equivalent. A CH₄ GWP (Global Warming Potential) factor of 25 times the GWP of CO₂ should be taken into account. Otherwise, European source emissions legislation would be seriously weakened.

2. After the completion of the UN/ECE Particulate Measurement Programme, conducted under the auspices of the World Forum for Harmonisation of Vehicle Regulations, and at the latest upon entry into force of Euro 6, the Commission shall be empowered to adopt delegated acts in accordance with Article 14a in order to adopt the following measures, without lowering the level of environmental protection within the Union:

(a) amendment of this Regulation for the purposes of recalibrating the particulate mass based limit values set out in Annex I, and introducing particle number based limit values in that Annex so that they correlate broadly with the petrol and diesel mass limit values;

(b) adoption of a revised measurement procedure for particulates and a particle number limit value.

➤ Any change to the PMP measurement procedure for PM and or PN should avoid weakening the Euro 5&6 legislation which has been a success in terms of controlling ultrafine particles emissions from cars and vans by the effective use of Particle Filters. On 1 September 2015, Euro 6 will have entered force for all M1 vehicles though.

3. The Commission shall keep under review the procedures, tests and requirements referred to in Article 5(3) as well as the test cycles used to measure emissions. If the review finds that those procedures, tests, requirements and test cycles are no longer adequate or no longer reflect real world emissions, the Commission shall act in



accordance with Article 5(3) in order to adapt them so as to adequately reflect the emissions generated by real driving on the road."

- The European Commission shall introduce the Real-Driving Emissions requirements in the Euro 5&6 legislation as soon as possible. Conformity factors (i.e. deviation to Euro 6 limits allowed in real-world) should be defined such that they deliver the air quality benefits needed in the European Member States.

(b) in paragraph 4, the following subparagraph is added:

"The Commission shall be empowered to adopt delegated acts in accordance with Article 14a to set out, in addition to the existing limit value for emissions of total NOx, a limit value for emissions of NO₂ for vehicles approved as complying with the Euro 6 emission limits set out in table 2 of Annex I. The limit for emissions of NO₂ shall be set on the basis of an impact assessment, shall take into consideration the technical feasibility and shall reflect the air quality objectives set out in Directive (EC) No 2008/50 of the European Parliament and of the Council.

- Overall NOx reduction will reduce the absolute NO₂ emissions levels in the exhaust. If established, any NO₂ limit shall be defined in absolute terms (i.e. in mg/km) and not as a percentage of NOx.

(c) paragraph 5 is replaced by the following:

"5. The Commission shall be empowered to adopt delegated acts in accordance with Article 14a to amend and supplement table 4 of Annex I in order to set out limits for tailpipe emissions at cold temperatures for vehicles approved as complying with the Euro 6 emission limits set out in table 2 of Annex I. The limits for emissions of NOx and NO₂ shall be set on the basis of an impact assessment shall take into consideration the technical feasibility and shall reflect the air quality objectives set out in Directive (EC) No 2008/50 of the European Parliament and of the Council."

- Again, any new limit for emissions at cold temperatures, be it NOx or NO₂, should be defined in absolute terms (i.e. in mg/km).

Article 2

Regulation (EC) No 595/2009 is amended as follows:

...

(2) In Annex I, in the table "Euro VI Emission Limits", the row corresponding to the entry "WHTC (PI)" is replaced by the following:

"WHTC (PI)	4 000		160	500	460	-	10	(3)".
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- The removal of an ammonia (NH₃) emissions limit for Positive Ignition heavy-duty engines is sensible as it was introduced to ensure proper control of urea injection in Selective Catalytic Reduction (SCR) systems fitted to Diesel engines to control their NOx emissions. Generally, NH₃ limits be better defined in absolute terms (mg/km) rather than in average concentration such as the existing Euro VI heavy-duty engines limit of 10 ppm.

- In addition, the introduction of an NH₃ limit in the light-duty Euro 5&6 Regulation (EC) No 715/2007 for vehicles using compression-ignition (CI) engines should be considered by the European Commission as Euro 6 Diesel cars and vans also rely more and more often on urea-based SCR technology to control their NOx emissions.

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** AECC is an international non-profit scientific association of European companies engaged in the development, production and testing of catalyst and filter based technologies for vehicle and engine emissions control. This includes the research, development, testing and manufacture of autocatalysts, substrates and speciality materials incorporated into the catalytic converter and filter and catalyst-based technologies to control engine emissions. Members' technology is incorporated in the exhaust emission control systems on new cars, commercial vehicles, buses, non-road mobile machinery and motorcycles in Europe. More information on AECC can be found at www.aecc.eu. Information on emissions control retrofit for existing heavy-duty vehicles and non-road machinery can also be found at www.dieselretrofit.eu.*

AECC's members are: BASF Catalysts Germany GmbH, Germany; Ividen Europe B.V. Stuttgart Branch, Germany; Johnson Matthey PLC, United Kingdom; NGK Europe GmbH, Germany; Solvay, France; and Umicore AG & Co. KG, Germany.

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