

## COMMENTS ON EURO 7 ROADMAP

The European Commission released on 27 March 2020 a combined evaluation roadmap for the development of post-Euro 6/VI emission standards for cars, vans, lorries and buses. The emissions control industry that AECC represents, welcomes the opportunity to comment on the roadmap.

**AECC welcomes the initiative to prepare the next step in the emission standards for cars, vans, lorries and buses. A new era for vehicle emissions control started with the introduction of RDE and PEMS testing within Euro 6/VI legislation, but there remain areas where improved emission standards are required.**

EU air quality has generally improved as a result of increased application of vehicle emission control systems and other powertrain measures. AECC member companies will continue to supply these emission control technologies to the automotive industry as part of the vehicle manufacturers' powertrain design. These emission control catalysts and filters are integrated with engine design, hybrid systems and operating strategies into advanced emission control systems by the vehicle manufacturers.

AECC regularly demonstrates the emissions reductions that are feasible and recently showed that advanced emission control systems can achieve near-zero emissions for NO<sub>x</sub> and particulates in real world driving<sup>1</sup>. These technologies are available already and are therefore an important option among the solutions that you will require to successfully ensure a solid pathway towards zero emission mobility in 2050. Furthermore, with the development of a circular economy, and as recycling of vehicle components continues to increase, the demand for mined precious metals used in catalysts will reduce, increasing the sustainability of these technologies.

We would like to stress that AECC's vision<sup>2</sup> is fully aligned to the European Commission's objective in the post-Euro 6/VI roadmap: more action is required to "clean" the combustion engine and ensure protection of human health in urban areas. It is also important to prevent the internal market from fragmenting due to individual national, regional or local initiatives. AECC would like to confirm its strong commitment to work with your services on the new Euro 7 emissions legislation.

We would like to put forward the following points for your roadmap consideration:

- We believe limiting the evaluation baseline proposed in the roadmap to 2019 will not consider important regulatory elements contained in Euro 6d (for passenger cars and light commercial vehicles) and Euro VI-E (for heavy-duty vehicles). This omission will prevent a full factual view on further pollutant emissions reductions expected from these steps.
- We agree and support the three preliminary issues identified by your services that need to be tackled by Euro 7: simplification; evaluation if the current emissions limits represent the state-of-the-art emissions reduction technology; and further focusing on actual real-world emissions.
- We consider that focusing more on a top-level system approach will help to address all these issues. This means the regulation should focus on the emissions compliance of the vehicle as a whole and not on the operation of individual components within the system.
- Without underlying scientific evidence on the three policy options described in the document, it is difficult to comment on the individual options. We would like to indicate that these options could also be introduced as different phases within a clearly defined Euro 7 regulatory framework. The framework should address individual exposure to pollutant emissions and ensure the health and well-being of everyone. It should guarantee an economically and socially acceptable manner for European citizens to have mobility options which are accessible and affordable, leaving no-one behind and ensuring a just transition for the European industry and consumers.

AECC will continue to provide robust scientific data and to facilitate informed discussions on how to improve the local air quality whilst maintaining the global competitiveness of the European automotive industry through the integration of modern emission control technologies within the vehicle powertrain system.

Should you need more information, you can contact AECC at [info@aecc.eu](mailto:info@aecc.eu).

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References:

<sup>1</sup> “Integrated Diesel System Achieving Ultra-Low Urban and Motorway NOx Emissions on the Road”, J. Demuyck, et al.; 40<sup>th</sup> International Vienna Motor Symposium, 15-17 May 2019, <http://www.aecc.eu/wp-content/uploads/2019/04/190516-AECC-IAV-IPA-Integrated-Diesel-System-achieving-Ultra-Low-NOx-on-the-road-Vienna-Symposium.pdf>.

<sup>2</sup> AECC 2025 Vision for clean, efficient, convenient and affordable mobility <http://www.aecc.eu/wp-content/uploads/2020/02/200203-AECC-Vision-Document-Web.pdf>.

*AECC is an international non-profit scientific association of European companies operating worldwide in the research, development, testing and manufacture of key technologies for emissions control. Their products are the ceramic substrates for catalysts and filters; catalysts (substrates with catalytic materials incorporated or coated); adsorbers; filter-based technologies to control engine particulate emissions; and speciality materials incorporated into the catalyst or filter. Members' technology is integrated in the exhaust emissions control systems of cars, commercial vehicles, buses, non-road mobile machinery and motorcycles in Europe. More information on AECC can be found at [www.aecc.eu](http://www.aecc.eu).*

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

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