



AECC STATEMENT ON TECHNOLOGICAL NEUTRALITY

The CARS 21 Interim report says that “Financial incentives should be technologically neutral and avoid singling out one technology or creating counter-productive environmental effects, instead setting the criteria based on an objective environmental performance criterion” and the consensus paper on an ‘Integrated Approach to LDV CO₂ Emissions’ identifies the importance of accurate information to consumers. The AECC contribution to the CARS 21 process, submitted in June 2011, emphasised that one of the keys issues is seen as technological neutrality in defining and supporting clean vehicles for the future and fully supports the CARS 21 statement.

Currently the information supplied to consumers identifies the CO₂ emissions of light-duty vehicles as only the CO₂ emissions from the tailpipe measured over the regulatory test cycle, so plug in electric vehicles are considered as having zero tailpipe CO₂ emissions. This is misleading for consumers as the CO₂ emissions from the generation of the electricity to charge the battery is not counted, whereas that from the fuel used on board a convention IC engined vehicle is.

The Commission recognises in the interim report that ‘well-to-wheel’ life cycle assessment is the correct thing to do but is not a convenient measure of a vehicle’s CO₂ efficiency as it is much too complex. However, existing regulations (UN Regulation N° 101, called up in Regulation (EC) 715/2007 as amended) provide for the measurement of both fuel consumption and electrical energy consumption. Together with existing data submitted to UNFCCC on the CO₂ produced by electricity generation in the EU, this permits data to be provided on the real CO₂ levels resulting from vehicle usage for conventional, hybrid and pure electric vehicles.

The use of conventional vehicles will be necessary for a certain time into the future and consumers will need to decide on IC engine or electric vehicles at the point of sale. To meet the Commission’s objective of technological neutrality, the information on vehicle CO₂ provided to consumers and for incentives should properly take account of the real CO₂ release resulting from use of that vehicle, both for conventional vehicles and for those using electricity from the grid either wholly or as a supplementary power source. We repeat that EU-wide and national data is already available to allow such simple calculations and also note that the Commission’s work to provide a more realistic drive cycle will also help inform this consumer choice.

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