

## COMMENTS ON THE EU STRATEGY FOR A SUSTAINABLE AND SMART MOBILITY ROADMAP

In response to the European Commission Communication on the EU Strategy for a Sustainable and Smart Mobility roadmap released for public consultation, the Association for Emissions Control by Catalyst aisbl ([AECC](#)) representing the companies of the European emissions control industry would like to comment.

**AECC fully supports the discussion and development of a European strategy for sustainable and smart mobility as announced in the Communication on the European Green Deal<sup>1</sup> and is ready to contribute with technical and scientific data from AECC testing programmes on light and heavy-duty vehicles. These AECC projects demonstrate the technical feasibility for reducing pollutant emissions using advanced emission control systems. The Internal Combustion Engine (ICE) and hybrid powertrains also have low greenhouse gas emissions when powered with sustainable and renewable fuels, showing that they are and will be contributing to a clean road transport.**

### ➤ Sustainable transport for the future

AECC is of the opinion that the European Commission needs to implement a robust technology-neutral regulatory framework which considers all current and future technologies that will be able to contribute to deliver a 90% reduction in transport-related greenhouse gas (GHG) emissions by 2050. Furthermore, this reduction needs to be achieved in a clean, efficient, convenient and affordable manner<sup>2</sup>.

The use of more sustainable and renewable low-carbon fuels in ICEs reduces vehicles' GHG emissions while using current combustion technology and fuelling infrastructure. This single action will impact current existing fleet as well as new vehicles in the European market.

As noted in the EC roadmap, the revision of the Alternative Fuel Infrastructure Directive (AFID)<sup>3</sup> will be feeding into the strategy, and thus, should be a unique instrument to reduce GHG emissions of the entire European fleet through increased blending of renewable fuels in the existing fuelling infrastructure.

### ➤ Clean ICE has a role to play for the future

It is important to point out that modern light- and heavy-duty vehicles are now equipped with ICEs with integrated emission control technologies, allowing for emissions reduction of nitrogen oxides (NOx) and particles (PM & PN) among other harmful pollutants.

Modern vehicles type approved to Euro 6d-temp and 6d (including hybrid, petrol- and diesel fuelled vehicles) are already showing very low emissions<sup>4</sup>. It is also important to note that lowering these pollutant emissions is not increasing the CO<sub>2</sub> produced by these vehicles, on the contrary, modern ICEs are also very efficient and constantly reducing GHG emissions. These vehicles are decisively contributing to have cleaner cities in an affordable and accessible manner. These new ICEs should replace old models with support from fleet renewal incentive schemes.

Further improvements to lower pollutant emissions from road transport are required to comply with the ambitious 2050 goals provided by the European Green Deal. AECC demonstrates ultra-low emissions are technically feasible for light- and heavy-duty vehicles and shows ICEs with advanced emission control systems can achieve ultra-low emissions for NOx and particulates in real world driving<sup>5</sup>.

The Euro 7/VII regulation, which is being discussed by the Commission's services, is a unique opportunity to implement a regulatory framework that could consider following three overarching principles to improve European air quality and to ensure the health and well-being of everyone<sup>6</sup>: further focus on real-world emissions; be fuel- and technology-neutral and legislate according to a 'total system approach' using a 'whole vehicle' basis.

### ➤ Circular economy; reuse, repair and recycle

Finally, with the development of a circular economy for Europe, and as repair and recycling of vehicle components and materials continues to increase, the demand for mined precious metals used in catalysts will reduce, as such increasing the sustainability of these technologies.

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> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. The European Green Deal (COM(2019) 640 final)

[https://eur-lex.europa.eu/resource.html?uri=cellar:b828d165-1c22-11ea-8c1f-01aa75ed71a1.0002.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:b828d165-1c22-11ea-8c1f-01aa75ed71a1.0002.02/DOC_1&format=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>.

<sup>3</sup> AECC comments on the Alternative Fuel Infrastructure roadmap

<https://www.aecc.eu/wp-content/uploads/2020/05/200504-AECC-position-on-AFID-roadmap.pdf>

<sup>4</sup> Based on the database on Euro 6 vehicles (ACEA/JAMA)

<https://www.acea.be/publications/article/access-to-euro-6-rde-monitoring-data>

<http://www.jama-english.jp/europe/publications/rde.html>

<sup>5</sup> “Integrated Diesel System Achieving Ultra-Low Urban and Motorway NOx Emissions on the Road”, J. Demuynck, 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>6</sup> AECC Euro 7/VII Emission Standards Position Paper

<https://www.aecc.eu/wp-content/uploads/2020/07/200709-AECC-position-on-Euro-7.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) and [www.dieselinformation.aecc.eu](http://www.dieselinformation.aecc.eu).*

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