

COMMENTS ON AMENDMENT OF THE REGULATION SETTING CO₂ EMISSION STANDARDS FOR CARS AND VANS INCEPTION IMPACT ASSESSMENT

The European Commission released on 29 October 2020 the inception impact assessment on the revision of performance standards for CO₂ emissions of cars and vans. The emissions control industry that AECC represents, welcomes the opportunity to comment on the proposed inception impact assessment.

More sustainable and renewable fuels should be used in cars with internal combustion engines. A mechanism to consider the contribution of these fuels towards CO₂ reduction will incentivise the car manufacturers to encourage their use; the fuel industry to increase their production at competitive cost and for customers to use them widely. This will help lowering greenhouse gas emissions from road transport, coming from new vehicles as well as from the existing vehicle fleet.

AECC's vision¹ for clean, efficient, convenient and affordable mobility and commitment to the European Green Deal are fully aligned with the European Commission's objective towards climate neutral and zero-emission mobility in 2050. Climate change is a reality. Greenhouse gases (GHGs) are contributing to the warming of our planet and road transport is a contributor to this. It is understood that the CO₂ performance standards for cars and vans is a key piece of legislation to lower the GHG contribution of the road transport sector to the ambitious goals set by the European Green Deal.

AECC member companies develop, manufacture and supply emission control technologies to the automotive industry as part of the vehicle manufacturers' powertrain design. These emission control catalysts, adsorbers and filters are integrated with the engine system design, hybrid systems and operating strategies into advanced emission control systems by the vehicle manufacturers.

AECC regularly demonstrates the emissions reductions that are technically feasible with state-of-the-art emission controls and recently showed that advanced emission control systems can achieve ultra-low emissions for oxides of nitrogen (NO_x) and particulates in real world driving² on a medium-sized diesel car. Notwithstanding the fact that emission control technologies reduce pollutant emissions, AECC has also demonstrated low CO₂ lifecycle emissions through testing vehicles with more sustainable fuels, showing that technologies that lower pollutant emissions are compatible with fuels to lower CO₂ emissions³. These technologies are available already today 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.

AECC believes the issues described in this inception impact assessment about the need for a higher uptake of zero-emission vehicles for achieving the European Green Deal objectives, which higher market uptake could be key to make zero emission mobility more affordable are relevant. However, forecasts show that the internal combustion engine (ICE) will continue to be included in the majority of light vehicles in the medium term, as hybrid or plug-in hybrid powertrain, reaffirming the need for lower pollutant and CO₂ emissions from these vehicles..

Furthermore, one of the policy options the EC refers to in the inception impact assessment, is the appropriateness of a new mechanism to take into account the potential contribution of renewable and low-carbon fuel when determining manufacturers compliance with their targets, including the option of voluntary crediting mechanism and in view of other EU policies and measures to decarbonise fuels.

On this basis, we would like to propose considering the following in this EU Commission inception impact assessment:

- ➊ Modern light duty vehicles are now equipped with internal combustion engines with integrated emission control technologies, allowing for simultaneous and combined emissions reduction of nitrogen oxides (NO_x), particles (PM & PN) and carbon dioxide (CO₂). Further technology innovation is expected on these vehicles⁴ to comply

with the new emissions standards for cars, vans, lorries and buses, for which, the European Commission is preparing a proposal for.

- An effective way of moving the road transport emissions towards zero in the short term is to encourage faster fleet renewal. This promotes the market uptake of cleaner cars and vans, including hybrids and clean internal combustion engine vehicles. To ensure a just transition, the fleet renewal will support current industrial developments, jobs and it would guarantee removing older, more polluting vehicles from the European roads, replacing them with cleaner vehicles in a sensible socio-economic way.
- More sustainable and renewable fuels are to be used in cars with internal combustion engines to reduce greenhouse gas emissions from new vehicles as well as from the existing vehicle fleet. AECC shows that using renewable fuels in passenger cars will not hinder the reduction of pollutant emissions, both pollutant and CO₂ reductions can be achieved. On this point, the policy option mentioned in your inception impact assessment about finding a new mechanism to take into account the potential contribution of renewable and low-carbon fuel when determining manufacturers compliance with their targets is fundamental not only to incentivise the car manufacturers, but also to incentivise the production of these fuels at a competitive cost and for customers to use them widely.
- Renewable liquid fuels, like e-fuels or carbon-neutral fuels, are fit for purpose. This is because they can use the same fuelling infrastructure already in place allowing a swift implementation in the market.

AECC would like to confirm its commitment to work with the EU Commission services on the revision of the CO₂ performance standards for cars and vans.

AECC will continue to provide robust scientific data and facilitate informed discussions on how to improve the local and global air quality whilst maintaining the 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.

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References:

- ¹ 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>.
- ² “Integrated Diesel System Achieving Ultra-Low Urban and Motorway NOx Emissions on the Road”, J. Demuynck, et al.; 40th 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>.
- ³ “Improving Air Quality and Climate Through Modern Diesel Vehicles”, J. Demuynck, et al.; MTZ worldwide, Issue 9/2020
<https://www.aecc.eu/wp-content/uploads/2020/09/200901-modern-diesel-MTZ.pdf>
- ⁴ AECC position on Euro 7 emissions standards
<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 and www.dieselinformation.aecc.eu.

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

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