

COMMENTS ON NEW EU URBAN MOBILITY FRAMEWORK ROADMAP

The European Commission released on 27 April 2021 the roadmap on a new EU Urban Mobility Framework. The emissions control industry that AECC represents, welcomes the opportunity to comment on the proposed roadmap.

AECC welcomes the new EU Urban Mobility Framework roadmap. AECC strongly recommend using ultra-low emissions road transport in addition to zero emission vehicles to take advantage of this unique opportunity to tackle one of the biggest challenges European cities are currently facing: excess concentrations of NO₂ and PM₁₀. Using modern internal combustion engine vehicles with advanced emission control systems and renewable fuels will lead to cleaner cities in a fair, inclusive and accessible manner.

AECC's vision¹ is fully aligned to the European Commission's EU Urban Mobility Framework roadmap. It aims to contribute to EU emissions reduction commitments in the transport sector, as well as to decrease the dependency on fossil fuels. We believe that Euro 7 Regulation and sustainable, renewable fuels are needed to deliver on the EU's Green Deal goals. It is the use of fossil fuels that should be reduced, rather than the use of the internal combustion engines. This was clearly stated in a recent open letter² AECC sent to EU Commissioners.

Through the years, European vehicle emissions regulations have encouraged technological development to help reduce air pollution and protect the environment, with a specific focus recently on urban emissions. AECC member companies have been at the forefront of innovations in the required emission control technologies. AECC regularly demonstrates the emissions reductions that are technically feasible and recently showed that advanced emission control systems can achieve near-zero emissions for NO_x and particulates in real world driving on light-³ and heavy-duty⁴ vehicles. AECC has also demonstrated low CO₂ lifecycle emissions through testing vehicles with renewable fuels, showing that lowering pollutant emissions is compatible with lowering CO₂ emissions⁵. These technologies are available today.

A robust policy framework is therefore required, based on solid scientific foundation. On this basis, we would like to propose considering the following items on this EU Commission roadmap:

- As technology continues to improve, the future of personal transport in cities will comprise a range of technologies from 'conventional' petrol and diesel to electrified engines - mild, full or plug-in hybrid – as well as cars with zero tailpipe emissions. These will all be needed to replace older, more polluting vehicles on European roads. Euro 6d vehicles are already delivering very low emissions⁵ and policies should incentivise fleet renewal to replace older vehicles. To ensure continued improvement in air quality, the new Euro 7⁶ emissions standards should further focus on real world vehicle emissions. These standards need to be fuel and technology neutral, ensuring a free choice for consumers without market distortion. The new emissions standard should also aim for application-neutral stringency, despite differences in vehicle design and function, as the impact on local air quality is independent of the type of vehicle. The Euro 7 regulation should legislate according to a 'total system approach' using a 'whole vehicle basis'.
- Regarding greenhouse gas emissions, more sustainable and renewable fuels should be used in cars with internal combustion engines. This will guarantee lower greenhouse gas emissions from the existing vehicle fleet as well as from new vehicles. Renewable liquid fuels, like e-fuels or carbon-neutral fuels, are particularly fit for purpose; this is because they can use the same fuelling infrastructure already in place allowing a swift implementation in the market.

Finally, AECC would like to confirm its strong commitment to support the work of the EU Commission services by providing robust scientific data and facilitate informed discussions on how to improve 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.

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 AECC open letter “Euro 7 Regulation and sustainable, renewable fuels are needed to deliver on the EU’s Green Deal goals”
<https://www.aecc.eu/wp-content/uploads/2021/03/210324-AECC-open-letter-on-Euro-7-and-renewable-fuels.pdf>
- ³ “Integrated Diesel System Achieving Ultra-Low Urban and Motorway NOx Emissions on the Road”, J. Demuyneck, 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>
- ⁴ “Demonstration of Extremely Low NOx Emissions with Partly Close-Coupled Emission Control on a Heavy-duty Truck Application”, P. Mendoza Villafuerte, et al.; 42th International Vienna Motor Symposium, 29-30 April 2021,
https://www.aecc.eu/wp-content/uploads/2021/05/210219_Vienna_HD-diesel-AECC-FEV-paper-final_v2.pdf
- ⁵ “Improving Air Quality and Climate Through Modern Diesel Vehicles”, J. Demuyneck, et al.; MTZ worldwide, Issue 9/2020
<https://www.aecc.eu/wp-content/uploads/2020/09/200901-modern-diesel-MTZ.pdf>
- ⁶ AECC position on Euro 7/VII 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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