

AVERE's Position Paper on the European Commission's proposal on emission performance standards for new passenger cars and light-duty commercial vehicles recast

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Introduction

The European Association for Electromobility (AVERE) was founded in 1978 and is a European network of members including EV users, NGOs, associations, interest groups, public institutions, research and development entities, and vehicle and equipment manufacturers.

AVERE welcomes the European Commission proposal to amend the Regulation on emission performance standards for new passenger cars and for new light commercial vehicles, and believes that this file will be of utmost importance to further accelerate the decarbonization of the transport sector. Likewise it will be key to speeding and scaling up the sales of zero emission vehicles in Europe.

In fact CO₂ emissions in the transport sector represent more than a fourth of the overall European CO₂ emissions. Equally concerning is the fact that emissions from the sector have grown in each of the last 3 years, influenced by the growth in passenger transport¹. At the same time, Europe risks being left behind competitively with both China² and the United States³, unless it ramps up support for the transition to electrification.

Furthermore, it has been found that **an increase in spending in the European automotive and infrastructure value chains, could prompt a net creation of 206,000 jobs⁴**. Additionally, **a mass market for zero emission cars will create substantial efficiencies and cost savings** which currently represents 17% of emissions from the wider light-duty fleet. It will also accelerate the development of a heavy duty vehicle ZEV / PHEV market for passenger and goods transportation, and will free up advanced biofuels for other transport sectors⁵.

In this context, AVERE urges both the European Parliament and Council to increase the overall ambition of the original Commission proposal and deliver strong and clear regulatory signals needed to bolster the European electromobility industry.

Strong Targets

AVERE believes that in order to increase Europe's competitiveness, to provide the right signals for both consumers and industry, and to accelerate the electrification of passenger and light duty vehicles, strong binding and intermediary CO₂ targets need to be set. Specifically, AVERE recommends a 2025 binding target of at least 25% reductions of CO₂ as well as a 40% emissions reduction target for 2030, that could be revisited within the early 2020s once the EV

¹<https://www.eea.europa.eu/data-and-maps/indicators/transport-emissions-of-greenhouse-gases/transport-emissions-of-greenhouse-gases-10>

² <https://euobserver.com/eu-china/139274>

³ <https://www.reuters.com/article/us-usa-trade-autos/trump-threatens-to-tax-european-auto-imports-idUSKCN1GFOQJ>

⁴ https://europeanclimate.org/wp-content/uploads/2018/02/FEF_transition.pdf

⁵ <http://www.eafo.eu/sites/default/files/The%20transition%20to%20a%20ZEV%20fleet%20for%20cars%20in%20the%20EU%20by%202050%20EAFO%20study%20November%202017.pdf>

market is more developed. We believe that this is fully in line with the ongoing developments, trends, as well as current and planned investments into the electrification of transport.

Zero Emission Vehicle (ZEV) Incentives

On top of specific targets, AVERE believes that providing concrete incentives and penalties will also help provide the right signals for industry to follow through on their EV investments. Additionally this will help ensure that Europe is able to compete on a level footing with the rest of the world, in particular China, the US, and Japan. The main mechanism in this regard is the establishment of a two way adjustment of the benchmark for zero and low emission vehicles (ZLEV Benchmark). AVERE considers that the real incentive for car manufacturers to meet specific targets will be this “malus” aspect which will ensure the increase in production of zero emission vehicles. Such a strong signal is needed to ensure the future development of the sector as well as to guarantee investment in other areas that will support the electromobility transition, such as infrastructure, supply chain, and interoperability.

A level playing field for fair competition

Zero tail-pipe emissions cannot be obtained by manipulating tests. Non-zero emitting cars need to have correct testing. Currently, the difference between type approved and real-world CO2 emissions and fuel efficiency is over 40%⁶ reinforcing the urgency for real-world testing of non-zero emitting cars. As such, it is necessary to ensure that the actual gap between reported CO2 emission values and actual emissions from vehicles does not persist. Additionally it is key so as to regain consumer trust in industry, to ensure no double testing or further manipulation of emission testing continues, in relation to both the NEDC and new WLTP tests.

A long-term life-cycle analysis for transparency

Lastly, in order to provide full transparency and clarity of the environmental, health, and climate impacts of vehicles in Europe, we recommend the Commission develop a life cycle analysis for vehicles with a long-term post-2030 perspective. The assessment shall not be used as part of the future CO2 calculations in the regulation and should be carried out and developed holistically and objectively.

Europe must take action now to support the transition to electrification

EV sales are on the rise, with latest forecasts showing sales surging to 30 million in 2030 globally⁷. If Europe is to remain competitive in this market, we must prioritise the electrification of transport. Developing an ambitious and forward-looking regulation on post-2020 car and van CO2 targets is essential in this regard. At the same time, the EU can set itself apart globally by prioritising and promoting the production of renewable powered electromobility over fossil fuel or coal powered EVs. In this vein, EVs have the ability to foster the uptake of renewables both through smart charging and vehicle-to-grid services. The development and transition towards green electrification therefore constitutes a key enabler in supporting Europe’s energy transition and fostering competitiveness within the continent.

⁶ <https://www.theicct.org/news/EU-real-world-vehicle-fuel-consumption-gap-all-time-high>

⁷ <https://about.bnef.com/electric-vehicle-outlook/#toc-download>