

COMMON POSITION ON SETTING CO₂ EMISSIONS PERFORMANCE STANDARDS FOR NEW PASSENGER CARS

Friends of the Earth Europe (FOEE) believes that making cars more energy-efficient would make a major contribution to cutting carbon dioxide emissions from transport. However technology alone will not deliver the scale of cuts needed to make sure that the transport sector plays its full and fair part in reducing carbon dioxide emissions. Changes to travel behaviour will also be needed, but these should not reduce the cuts needed from technology. Making cars more energy-efficient will also reduce Europe's dependency on imported oil, much of which comes from unstable regions of the world.

FOEE calls for:

A 2012 target of 120g/km CO₂ to be met by vehicle technology measures alone

The target of 120g/km was first set in the mid 1990s and has already been delayed twice. The original target date of 2005 has been put back, first to 2010 and then to 2012. Further weakening by relaxing the target to be met by vehicle technology from 120g/km to 130g/km would be unacceptable. Additional measures which are not captured under the driving test-cycle (NEDC), such as better tyres and improved driving, could contribute to cutting carbon dioxide emissions but their contribution must be seen as additional to, not as part of, meeting the 120g/km CO₂ target. Measuring the contribution of these measures, particularly improved driving, will be extremely difficult, so there can be no guarantee that they will deliver the claimed savings. Moreover, no party can be held accountable for meeting the targets related to these additional measures.

FOEE believes that agrofuels are a false solution to climate change and that improving car fuel efficiency is a much better way to cut carbon dioxide emissions and address energy security issues.

Penalties set at a level to ensure compliance from the outset

The compliance regime is very important for achieving the environmental objectives of the regulation. The objective of the penalties is not to raise revenues from the industry but to ensure compliance, so they should be set at a level high enough to ensure full compliance. We believe that the penalties should be set at €150 per gram of CO₂ exceeded per car. The full level of the penalties should apply as of 2012. Delaying or phasing-in the penalty regime is effectively postponing the policy.

Footprint rather than weight if a utility parameter is to be used

Europe should have a fleet average standard for all cars sold in a given year without distinction between classes of car.

If, however, a parameter-based system is introduced, the parameter used should be footprint. We strongly disagree with the European Commission's proposal to base the CO₂ standards on car weight. A weight-based system would be counterproductive in environmental and safety terms as it removes much of the incentive to make cars lighter. It would effectively penalise those car makers that manage to produce lighter cars with a tougher CO₂ standard.

A footprint-based system would give much better incentives to achieve the environmental objectives in a cost-effective way as it fully rewards all possible compliance options, including weight reduction. FOE believes that under a parameter-based system, top-end and premium cars should make the biggest effort to increase energy efficiency, as their price-elasticity is higher, which will allow for new energy efficient technologies to be introduced quickly to the market and trickle down to the lower end of the market.

Long-term targets of 80g/km by 2020 and 65g/km by 2025

Long-term targets of 80g/km by 2020 and 65g/km by 2025 should be set now. Long-term targets are needed to provide both clarity for climate change policy and certainty for the industry. Setting long-term targets now would allow the industry time to plan, in line with their R&D and production schedules. This should also remove the possibility of a repeat of the current situation where the industry claims that the 2012 target date is too soon.