



**CLEPA Position on the revision of Regulation EC No 443/2009 setting emissions performance standards for new passenger cars and Regulation EC No 510/2011 setting emissions performance standards for new light commercial vehicles**

**A) Fundamental principles**

- CLEPA strongly believes in technology-neutrality as a general principle of CO2 regulation in the road transport sector.

**B) Target**

- The 95g/km target (passenger cars) **can be reached** with available technologies by 2020.
- The 147g/km target (LCV) **is quite feasible** with available technologies by 2020. These targets should be based on today's test cycle (NEDC) so as not to undermine planning in the automotive industry.

**C) Measures to reach 2020 targets**

- An average fleet approach and a slope that differentiates targets based on a parameter should be kept as part of the cars regulations so as to maintain the diversity of the European car industry and provide flexibility in implementation.
- Even if an "ideal parameter" does not exist, CLEPA has no objections to the continued use of the parameter mass.
- Eco-innovations should continue to be rewarded in 2020 and beyond so as to set incentives for the market introduction of innovative technologies. Simplified rules need to be put in place in regarding eligibility criteria and administrative procedures.
- Super-credits that support the market introduction of innovative low-emission vehicles without putting into question the environmental integrity of the CO2 legislation are welcome. Cars with CO2 emissions that are at least 50% lower than their weight-based target should be eligible.  
Should the EC envisage fostering the development of new CO2 reducing technologies, the introduction of a higher multiplier in the period 2016-2024 for a significant percentage of new registrations per manufacturers, will be supported by CLEPA.

**D) Market penetration green powertrains in 2020**

- |                                |          |
|--------------------------------|----------|
| • Stop and Start               | 85%      |
| • Full Hybrid + Plug-in Hybrid | 5% - 15% |
| • Electric vehicles            | 2% - 5%  |

**E) Beyond 2020**

- Given uncertainties about costs and market penetration of alternative powertrains, some work is needed to suggest an indicative target for 2025 and the measures to achieve it. Consultations among CLEPA members are open to define an indicative limit in order to contribute to the EC communication expected by the end of 2012.

#### **F) Related policy measures**

- As far as taxation is concerned, CLEPA believes that the proposed revision of EU energy taxation is counterproductive and would lead to higher emissions and lower competitiveness.
- As far as labelling is concerned, CLEPA supports a labelling system that rewards efficiency improvements across all vehicle segments, small and large.
- Intelligent Transport Systems can further increase the potential for CO2 reductions while at the same time improving the efficiency of the EU transport system.