

CLEPA Statement

European Commission proposal for a regulation amending Euro 5/6 and VI COM(2014) 28 final

General approach

The European Commission has presented a proposal for amending the defined Euro-standards 5/6 (light-duty) and VI (heavy-duty) in various respects. For the amendments planned, delegated acts constitute a swift and purposeful approach. However, CLEPA calls on the Commission to ensure a maximum of transparency throughout the process, as a minimum of three years of planning certainty is key for the automotive supplier industry.

A) Methane emissions (Euro 5/6)

CLEPA supports regulating methane as CO₂ equivalent instead of as pollutant emission. There are climate concerns linked to methane, but there is no evidence for air quality problems. Furthermore, increasing or abolishing the THC limit value will facilitate the market entry of natural gas vehicles. For being consistent, NMHC limit values should be introduced for CI vehicles and be identical with the already existing ones for PI vehicles. CLEPA suggests following the same approach for heavy-duty vehicles.

B) Nitrogen dioxide limit value (Euro 5/6)

For CLEPA, there is no need to define an additional NO₂ limit value. With Euro 6, the NO_x limit value is reduced to 80 mg/km compared to 180 mg/km under Euro 5. The Real Driving Emissions (RDE) test scheduled to take effect from September 2017 will ensure that reductions are credible under real-world conditions. NO₂, which constitutes a fraction of NO_x, will also be reduced. Addressing total NO_x is also appropriate given the especially relevant formation of NO₂ in ambient air through NO_x and O₂.

C) Limit values for low temperatures (Euro 5/6)

CLEPA supports updating the emission limits for low temperatures following technical feasibility but considering also their relevance for ambient air quality improvements.

D) Repair and maintenance information (Euro 5/6)

CLEPA stands for competition in the automotive aftermarket. Therefore, Commission efforts to study the functioning of the Euro 5/6 regulation in the market and seek improvements regarding access to repair and maintenance information are highly appreciated.

It is important for independent operators (parts suppliers, data publishers, wholesalers,...) that RMI is provided as a database which can be individually processed and not in a database as foreseen by the current regulation.

In order to close the gap to upcoming state of the art technology a direct, standardized and independent wireless access to in-vehicle information for remote diagnostics, repair and maintenance information is crucial. CLEPA advocates for ensuring access to in-vehicle information and RMI by a mandatory interoperable, secure, standardized and open in-vehicle telematics platform (OTP). Furthermore, an OTP will provide information for consumer-friendly services with innovative and attractive benefits for safer, smarter, sustainable and environmental-friendly mobility (e.g. predictive maintenance, remote diagnosis, traffic assistance, cooperative safety systems etc.).

E) Ammonia limit value (Euro VI)

As vehicles with PI engines might also be equipped with after-treatment systems (especially lean NOx trap) where an ammonia slip might occur, CLEPA suggests keeping the limit values for CI and PI.

F) Weight limits for type approval (Euro 5/6 and VI)

CLEPA supports reducing administrative procedures by allowing identical platforms below/above the light-/heavy-duty threshold to obtain emission type-approval following light-duty requirements only.

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CLEPA is the European Association of Automotive Suppliers.

109 of the world's most prominent suppliers for car parts, systems and modules and 23 National trade associations and European sector associations are members of CLEPA, representing more than 3 thousand companies, employing more than 5 million people and covering all products and services within the automotive supply chain. Based in Brussels, Belgium, CLEPA is recognized as the natural discussion partner by the European Institutions, United Nations and fellow associations (ACEA, JAMA, MEMA, etc).

Facts about the European automotive industry

- Some **12 million** people are employed in the European automotive industry
- European automotive suppliers directly employ **5 million** people
- European automotive suppliers invest **€18bn** in RDI per year. They are the biggest private investor into research and innovation



- Per year, **18 million** vehicles are manufactured in Europe, contributing to the stability and growth of the European economy