



C L E P A
*European Association of
Automotive Suppliers*

POSITION PAPER

**CLEPA Position Paper on
CO₂ reduction from Light Commercial Vehicles (LCVs)**

Background:

1. Commission proposal

In 2009, the European Commission issued a proposal on CO₂ reduction from Light-Commercial Vehicles (2009/0173 (COD)). The proposal notably foresees:

- an average CO₂ target of 175g/km to be phased-in between 2014 and 2016 can be reached in the period and with available technology;
- a long-term target of 135g/km for 2020;
- the possibility to obtain CO₂-credits via eco-innovations;
- “super-credits” for vehicles with emissions below 50g/km;
- Penalties of up to €120/g for exceeding the target value.

2. General remarks

CLEPA accepts the setting of CO₂ targets for LCVs so as not to upset the political agreement that was made under the CO₂ legislation for cars. Specific measures, including CO₂ legislation for LCVs, were agreed in exchange for increasing the car target from 120g/km to 130g/km. CLEPA believes that an early decision and a clear indication of the long-term target would give necessary planning certainty to the industry. The longer life cycles of LCV (compared to PC) require an adapted phase-in and this would in turn reduce implementation costs.

CLEPA asks the European Institutions to adopt a balanced legislation that considers the environmental objectives, the available emissions reduction potential of technologies as well as the needs of the industry in terms of lead-times and costs. Moreover, the legislation should not discriminate against certain LCV segments, technologies or manufacturers. In addition, the legislation should consider the specificities of this vehicle class. It should be noted that LCVs compared to cars are already more fuel efficient today, due to the fact that the fuel efficiency is more of a competitive element in vehicles that are used for commercial purposes.



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Position:

1. Support for 175g/km target

The target of 175g/km can be reached with available technologies.

2. Long-term targets very ambitious

The proposed long-term target of 135g/km, whilst technically feasible, seems to be too ambitious. Calculations show that the last 10g/km are expected to significantly increase compliance costs. Moreover, the remaining 10g/km could force technologies into the LCV market that, for some applications, are not deemed cost-effective. Therefore, CLEPA supports an increase of the long-term target that would permit the industry to stay competitive by significantly improving the cost-effectiveness of the legislation whilst meeting requirements for substantial reductions of CO₂ emissions.

3. Support for eco-innovations

CLEPA supports the inclusion of eco-innovations for LCVs, believing that such CO₂-credits can help innovative technologies enter the market and provide flexibility in implementation. For this to be the case, it is crucial that a workable procedure is agreed for the applications for eco-innovations. CLEPA insists that suppliers must be able to put forward applications for eco-innovations, as foreseen by the legislative proposal.

4. Support for super-credits

CLEPA supports “super-credits” for very low emission vehicles as a temporary measure to stimulate the market uptake of such vehicles.

5. High penalties

CLEPA notes that the Commission proposes high penalties for not meeting the CO₂ targets. At €120/g, these even exceed the €95/g that were agreed under the cars legislation. CLEPA believes that such high penalties are not required to bring efficiency technologies into the vehicles.