



Mr Dan Jørgensen
Member of the European Parliament
Vice-Chair of the EP ENVI Committee

Brussels, 22 November 2010

Subject: CLEPA position on CO2 reduction from Light Commercial Vehicles (LCVs)

Dear Mr Jørgensen, Honourable Member,

In 2009 the European Commission issued a proposal on CO2 reduction from Light Commercial Vehicles (2009/173 (COD)). Technologies being developed by European Automotive Suppliers will be key enablers in the fight against emissions. Likewise the Environment Committee of the European Parliament is playing a key role in determining the ultimate shape of the regulatory framework in which this innovation will take place. In order to support your legislative work with industry data the CLEPA-European Automotive Suppliers Association would like to bring to your attention its view on the targets proposed by the Commission.

The proposal aims at achieving a single target for CO2 emissions of 175 g/km for light commercial vehicles between 2014 and 2016. In addition, the proposal defines a long term target of 135 g/km for 2020 subject to a confirmation of the feasibility by a new impact assessment. CLEPA can accept the intention with the proposal considering its political context. Nevertheless, CLEPA considers that the targets need to be revised in order to ensure feasibility and avoid unwanted negative consequences such as encouraging SMEs to postpone the purchase of the new more fuel efficient vehicles due to prohibitively high prices. After all, SME's, tend to own, not lease, the transporters and are therefore more sensitive about the purchase price increase than large companies.

The best available technologies will allow reaching **an average target of 175g CO2/km in a transition phase from 2015-2017.**

The long-term target of 135g CO2/km by 2020 is on the other hand overly ambitious. It does not take properly into account the longer development lead times, stage-wise production methods nor the higher design constraints of the LCVs. It seems also to ignore that LCVs are already more fuel efficient compared to passenger cars due to the fact that fuel efficiency is a more important competitive element in this vehicle class.



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Therefore CLEPA promotes a target of 150 g CO₂/km by 2020 as an ambitious target but one that would bring significant emission cuts while allowing the industry to innovate without putting competitiveness at major risk. Even with this target, the prices of the new vehicle would rise over 2000 € according to recent studies.

This brings us to eco-innovations whose inclusion in LCVs CLEPA supports. Such CO₂ credits can help innovation technologies enter the market and provide flexible in implementation. For this to happen, it is crucial that a well-functioning application procedure

is agreed for eco-innovations. Suppliers must be able to put forward application for eco-innovations as foreseen by the proposal.

As concerns enforcement, CLEPA considers that penalties for exceeding the target are not required to bring fuel efficiency technologies into the vehicles. At €120/g they are high exceeding even the €95/g agreed for passenger vehicles.

Should you need more information about CLEPA policies on this issue, please do not hesitate to contact me.

Yours sincerely,

Lars Holmqvist

CLEPA is the European Association of Automotive Suppliers. 80 of the world's most prominent suppliers for car parts, systems and modules and 29 National trade associations and European sector associations are members of CLEPA, representing more than 3,000 companies, employing more than three million people and covering all products and services within the automotive supply chain. www.clepa.eu