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CLEPA Statement

Real Driving Emissions - conformity factors and measurement uncertainty

CLEPA strongly supports the development of the Real-Driving Emissions (RDE) test.

Credible emission reductions under real-world conditions are of utmost importance for air quality improvements particularly in inner cities as well as for the reliability of the entire automotive industry. Technological solutions for diesel and gasoline vehicles are available on the market today. CLEPA strongly believes in technology-neutrality and smart regulation that enhance the leadership of the European Automotive industry.

CLEPA therefore welcomes the adoption of the first RDE package presented in May 2015.

An agreement on the second package including conformity factors and boundary conditions until the end of 2015 is strongly recommended for ensuring a binding and ambitious RDE implementation starting in September 2017.

As regards as the European Commission proposal on “**NTE emissions limits and application dates for RDE Legislation**” presented at the TCMV meeting on 6th October 2015, CLEPA would like to express the following views:

1. The timing of RDE First Step for all new vehicles and the level of conformity factors require careful consideration.

This is particularly true given the proposed all new vehicles date of September 2018 in combination with a conformity factor of 1,6. Such levels of real-world emissions can be reached with best performing NO_x aftertreatment systems. However, given the significant share of NO_x storage catalysts in the current diesel market, CLEPA expects that a substantial share of current vehicle models will not be able to reach this conformity factor by September 2018 – even if these vehicles can make progress.

An approach that significantly disrupts the market, and CLEPA sees this risk in the current Commission proposal, cannot have the support of CLEPA.

European automotive suppliers, therefore, recommend to define a very ambitious conformity factor of 2,5 for the first step in order to give the European automotive industry a realistic chance to develop vehicles being able to fulfill the future RDE regulation.

Concerning the timing, CLEPA proposes the following:

- **For RDE step 1, from September 2017 (new types) and September 2019 (all types) for M and N1 class I. One year later for N1 classes II and III and N2.**

2. For RDE Step 2, Clepa is in favour of a more stringent approach with a conformity factor in the range of 1,5-1,8.

The conformity factors proposed by the Commission for RDE Second Step take into account PEMS measurement uncertainties. CLEPA believes that the uncertainties have to be studied carefully in order to come to a realistic assessment. European automotive suppliers are skeptical towards a measurement risk division between regulator and manufacturer. Clepa does not believe that the Commission proposal has included a realistic margin level for the measurement the uncertainty.

Concerning the timing for RDE step 2 Clepa proposes the following:

- **From September 2020 (new types) and September 2021 (all types) for M and N1 class I. One year later for N1 classes II and III and N2.**

All the above elements should not be considered in isolation, but have to be seen in the context of market impacts and the achievability of the CO₂ targets for 2020/21.

CLEPA is the European Association of Automotive Suppliers.

116 of the world's most prominent suppliers for car parts, systems and modules and 24 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