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Real Driving Emissions: Time for Reality

Credible emission reductions under real-world conditions are of utmost importance for air quality improvements, particularly in city centres.

Therefore, CLEPA strongly supports the development of the Real-Driving Emissions (RDE) test and recommends an agreement by the end of 2015 on the second RDE package including conformity factors, boundary conditions and implementation starting in September 2017.

However, the EC proposal "**NTE emissions limits and application dates for RDE Legislation**" presented at the TCMV meeting of 6 October and to be discussed on 28 October, requires careful consideration, especially as regards the timing of RDE first step for all new vehicles and the level of conformity factors. This is particularly true given the proposed date of September 2018 in combination with a conformity factor of 1,6 for all new vehicles.

Such levels of real-world emissions can be reached with best performing NOx after treatment systems. Yet, given the significant share of NOx 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.

"The two step approach is the right strategy. Unfortunately, we are very concerned about the unrealistic conformity factors proposed by the European Commission for the first step. If adopted, they will disrupt the European automotive markets and affect automotive suppliers which are key enablers for emission reducing technologies", said Mr Paul Schockmel, CLEPA CEO.

European automotive suppliers, therefore, recommend to define a very ambitious conformity factor of 2,5 for the first step - 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.

This will give the European automotive industry a realistic chance to develop vehicles being able to fulfill the future RDE regulation.

For RDE second step, CLEPA favours a more stringent approach with a conformity factor in the range of 1,5-1,8 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.

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 regulators and manufacturers. CLEPA does not believe that the Commission proposal has included a realistic margin for measuring the uncertainty.

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

“European automotive suppliers are committed to keep pushing the technical boundaries in order to combine customer benefits of diesel in terms of fuel economy and low CO₂ with continuously reduced emissions. CLEPA members are firmly committed to stay in the lead by further investing in safety, environmental protection and societal responsibility”, concluded Mr Paul Schockmel, CLEPA CEO.

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