

POSITION PAPER

Euro 7

Timely rules for future air quality standards



Content



Background.....	2
Executive summary.....	2
Assessment and recommendations	
1. Limit values and structure.....	3
2. Test conditions.....	4
3. Implementation timeline.....	4
4. On-board monitoring system.....	5

Background

In this paper, CLEPA, the European association of automotive suppliers, evaluates the European Commission's proposal for the further development of type approval rules known as Euro 7.¹ Building on our previous position paper adopted in March 2020, we hereby set out our position in the context of ongoing discussions in the European Parliament and the Council. This updated position aims to provide a comprehensive assessment of the proposed regulation and offers recommendations to facilitate the advancement of sustainable mobility in Europe.

Executive summary

- ⚙️ **CLEPA supports the further development of the type approval rules** with the introduction of **Euro 7**, driven by a commitment to sustainable mobility, improved air quality and public health.
- ⚙️ Overall, the proposal makes a **significant step towards higher ambition**, offering potential for further **reduction in the environmental impact of new vehicles on air quality**.
- ⚙️ However, key considerations regarding timing and both **technical and economic feasibility** need to be addressed to ensure the effective implementation of the new rules.
- ⚙️ Key factors influencing the overall ambition of the new regulation are the **specific technical parameters for vehicle testing**, which need to ensure that testing is performed under realistic driving conditions and the exclusion of "biased driving".
- ⚙️ A **swift adoption of the new rules, including implementing and delegated acts, within the current legislative period** is critical to a successful implementation.
- ⚙️ CLEPA emphasises the importance of providing industry with **adequate lead time** to develop and validate the new Euro 7 technologies. Euro 7 requirements should apply to all newly registered vehicles with effect from:
 - **Light-duty:** 24 months from the date of adoption of the implementing legislation or 1 July 2026, whichever is later;
 - **Heavy-duty:** 30 months from the date of adoption of the implementing legislation or 1 July 2027, whichever is later.

¹—REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on type-approval of motor vehicles and engines and of systems, components and separate technical units intended for such vehicles, with respect to their emissions and battery durability (Euro 7) and repealing Regulations (EC) No 715/2007 and (EC) No 595/2009

Assessment and recommendations

1. Limit values and structure

- The limit values for **light-duty vehicles (LDVs)** are mostly derived from Euro 6 values for petrol vehicles, but the introduction of on-road emission testing for all pollutants, the elimination of measurement tolerances for on-road emission testing, wider test conditions, and longer durability requirements, collectively result in more stringent pollutant standards overall.
- Notably, stringency has increased especially for light commercial vehicles, despite the proposed higher limits for vehicles with a power to mass ratio of less than 35 kW/t.
- For **heavy-duty vehicles (HDVs)**, the limit values and test conditions have been significantly tightened compared to Euro VI, with particular emphasis on the challenging N₂O limit of 100 mg/kWh.
- The combination of moving average window percentile limits and an absolute budget introduces inconsistency within the heavy-duty standard.

Recommendations:

- ⚙ The limit values **proposed by the European Commission could be feasible only if viable and clearly defined test conditions are adopted** (see next section) along with changes to the limit structure for heavy-duty vehicles.
- ⚙ The percentile methodology for heavy-duty vehicles should be replaced by an emissions averaging approach to ensure consistency and correctly reflect their actual environmental impact.



2. Test conditions

- The legislative **draft does not yet provide conclusive definitions** for the **test conditions** of on-road tests.
- While **some parameters are included in the Euro 7 regulation**, many details will be specified in an **implementing regulation** yet to be drafted by the European Commission, in particular the criteria for “**extended driving**” and the exclusion of “**biased driving**”.

Recommendations:

- ⚙️ **Extended driving:** Explicit clarification is necessary regarding the criteria for extended driving. The text should clearly state that test data are excluded from the results when two “extended conditions” apply simultaneously.
- ⚙️ **Biased driving:** To provide legal certainty for manufacturers, the co-decision regulation and implementing rules should clearly define biased testing both at cold start and over the whole test, and exclude emissions data collected under those conditions.
- ⚙️ **Heavy-duty engines:** It should continue to be possible to type approve the heavy-duty engine family independent from the vehicle type(s) as currently permitted by Euro VI; this structure allows the engine manufacturer to demonstrate compliance of the product, both on the laboratory test and complementary RDE tests, where the latter should be limited to a representative selection of vehicle variants.

3. Implementation timeline

- The Commission proposes the **implementation of Euro 7 standards** across all new **passenger cars and light commercial vehicles** by **July 2025**, independently of the date of adoption of key rules and criteria in secondary legislation. We are of the opinion that **this would not be feasible for OEMs, suppliers, technical service companies** or homologation authorities, especially as critical technical specifications may not be definitively decided until the end of 2024.

Recommendations:

- ⚙️ The Euro 7 requirements should enter into force for all newly registered **passenger cars and light commercial vehicles** with effect from 24 months from the date of adoption of the implementing legislation or 1 July 2026, whichever is later.
- ⚙️ For all newly registered **HDVs** with effect from 30 months from the date of adoption of the implementing legislation or 1 July 2027, whichever is later.
- ⚙️ For those performance requirements to be established by the Commission via subsequent delegated acts (i.e. Article 15 par 2) different and appropriate application dates shall be defined.



4. On-board monitoring system

- The proposal requires both passenger cars and commercial vehicles to have an **On-board Monitoring (OBM)** system that can detect when abnormal emission behaviour occurs. In this case, the OBM system will alert the driver and transmit the data wirelessly for technical inspections.

Recommendations:

- ⚙️ **OBM should only be mandatory for the pollutants that can be reliably monitored with available automotive sensors.**
- ⚙️ Sensors exist that measure NO_x, NH₃ and (by indirect measurement) Diesel PM. Their functionality, performance capability and durability need to be assessed in the ongoing regulatory processes.



Would like to know more? You can contact:

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CLEPA, the European Association of Automotive Suppliers, represents over 3,000 companies supplying state-of-the-art components and innovative technologies for safe, smart, and sustainable mobility.

CLEPA brings together over 120 global suppliers of car parts, systems, and modules and more than 20 national trade associations and European sector associations. CLEPA is the voice of the EU automotive supplier industry linking the sector to policy makers.

- The automotive sector accounts for **30% of R&D** in the EU, making it the number one investor.
- European automotive suppliers invest over **30 billion euros** yearly in research and development.
- Automotive suppliers register over **39,000 patents** each year.
- Automotive suppliers in Europe generate **1.7 million** direct jobs.

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