



European Economic and Social Committee

TEN/655
Achieving low emission mobility targets

OPINION

European Economic and Social Committee

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – "Delivering on low-emission mobility. A European Union that protects the planet, empowers its consumers and defends its industry and workers"

[COM(2017) 675 final]

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Consultation	European Commission, 18/01/2018
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Section responsible	Transport, Energy, Infrastructure and the Information Society
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Outcome of vote (for/against/abstentions)	201/0/3

1. **Conclusions and recommendations**

- 1.1 The focus of this communication on road transport rests on an industry that is a **world leader** in manufacturing and service provision. This strong position must be maintained and used to accelerate, transform and consolidate the EU economy's clean energy transition, with the important goal of also achieving **leadership in new technologies** on the world market.
- 1.2 The EESC welcomes the general **technology-neutral** approach, open to new developments. The EESC would like to note, however, that the initiatives do not follow this approach fully. It is far from sure that our future mobility will be all-electric, and other propulsion technologies, such as hydrogen or completely fossil-free liquid fuels such as HVO100, also provide big potential for clean mobility. The EESC regrets that this is not well enough acknowledged.
- 1.3 The EESC welcomes the initiatives intended to restore **consumer confidence** in the automotive industry and the regulatory system by means of realistic emission standards and new test procedures. In this connection, it is essential that the industry itself take care and assume responsibility.
- 1.4 The EESC notes that at present about fourteen million new cars are launched every year, replacing only about 5% of the total fleet of 253 million cars in the EU. With this **rate of replacement** emissions will be reduced; however, this is not sufficient and the EESC would welcome any initiative that could accelerate the renewal rate of the existing car fleet in Europe, which would help to reduce emissions faster. However, the Commission's attention should be drawn to the need to counter the practice of removing vehicles from certain European markets only to see them sold on and used in other markets (see point 4.7).
- 1.5 We have to be aware that the build-up of a significant share of low-emission vehicles requires a **transition time**, the duration of which depends on the developments made by the automotive industry, how quickly customers accept the new technology, the costs involved, as well as other factors such as charging infrastructure. The EESC points out that the transition time does not provide a reason to allow diesel cars to surpass emission limits and that the question of possibilities for retrofitting diesel cars and the related responsibilities for covering the costs has to be solved quickly.
- 1.6 The EESC asks the European Commission to make a better and clear distinction between **climate protection** and improved **local air** quality. This is important to win people over for public and private investment. Certain types of fuels may help to improve the air quality in cities but are not beneficial for the climate – when the electricity or the hydrogen for EVs comes from coal power plants, for example. On the other hand, low emission vehicles using natural gas (this means predominantly methane from any kind of sources be it underground, organic materials or synthetic chemical processes or a blend of these) from bio-methane, while being climate friendly, may nevertheless contribute to local air pollution.
- 1.7 The EESC urges the Commission to be more rigorous in facilitating consumers' access to affordable new and cleaner forms of mobility and to make sure that the benefits of these new mobility services are available to all and are spread evenly throughout the Union. Some of the

proposed **funding instruments** may be helpful to tackle this problem, but the Committee does not believe them sufficient.

1.8 The EESC welcomes the important role the Commission plays in forming a pan-European alliance of industries with a view to establishing a complete value chain for the development and manufacturing of advanced **batteries** in the EU. A larger share of manufacturing along the value chain within the EU is vital for our jobs, and the guarantee that batteries manufactured are "clean" can best be achieved under EU environmental standards and rules, as for example in the circular economy approach.

2. **Introduction**

2.1 The EU is committed to a **decarbonised energy system** as described in the "**clean energy package**", which aims to accelerate, transform and consolidate the EU economy's clean energy transition in accordance with its COP21 commitments, while retaining the important goals of economic growth and job creation.

2.2 The EU has already done a lot so far. Its **greenhouse gas emissions** were reduced by 23% between 1990 and 2016, while the economy grew by 53% over the same period. This success has been achieved in many sectors except in **transport** – a sector which contributes about 24% of Europe's greenhouse gas emissions (2015 figure) and which has even seen a growth in emissions as the economic recovery in Europe continues. The **European strategy for low-emission mobility**¹ will tackle this problem.

2.3 The EESC notes that the EU has already made significant improvements towards clean mobility: in 2009 the average values for **CO₂ emissions** for new cars and light commercial vehicles were set at 130 g CO₂/km for 2015 and 95 g CO₂/km for 2020, which is key for achieving the EU climate goals. Since the **Euro-norm** was introduced in 1992, lawmakers have lowered the passenger-car limits for nitrogen oxides from Euro 1 to Euro 6 by 97% and for particles by 98%, which represents a significant improvement for local air pollution in cities.

2.4 Nevertheless, these measures for road transport are not sufficient in terms of the COP21 commitments and the most urgent need for clean air in cities. While the average emissions per car and km are decreasing, the total emissions from road transport are not, since total traffic has increased and the speed of vehicle fleet replacement in the EU is limited.

2.5 The European Commission has therefore responded with the "**Europe on the Move**" initiative, which comprises a number of legal initiatives being delivered in three packages. The **first package**, presented in 2017, reflected Europe's ambition of making rapid progress towards putting in place a clean, competitive and connected mobility system by 2025 that would integrate all means of transport and span the entire Union. This has been welcomed by the

¹ [COM\(2016\) 501 final](#).

EESC^{2 3} as being key for a well-functioning **Single European Transport Area** with an appropriate regulatory framework.

2.6 The communication⁴ on the **second package** of the "Europe on the Move" strategy, dealt with in this opinion, focusses more on instruments to reduce emissions from road transport, such as the Clean Vehicles Directive⁵, new CO₂ standards for vehicles⁶, an action plan for the trans-European deployment of alternative fuels infrastructure⁷, the revision of the Combined Transport Directive⁸, the Regulation on Passenger Coach Services⁹ and a battery initiative. The specific proposals are covered in detail in separate Committee opinions. The **third package**, which will focus more on safety issues, will be delivered in the first half of 2018.

3. **Gist of the Communication**

3.1 The second package contains several legal initiatives to establish clear, realistic and enforceable rules to help secure a level playing field between industry players operating in Europe. Consumers will be encouraged to make the shift to clean vehicles and other clean mobility options by enhancing the infrastructure for alternative fuels and provision of interoperable services across borders.

3.2 A new **CO₂ Regulation** for passenger cars and light commercial vehicles is proposed for the time after 2020. Under this, passenger car and light commercial vehicle manufacturers are to reduce the CO₂ output of their new vehicle fleet in the EU by 15% by 2025 and by 30% by 2030. These relative reduction goals will be replaced by absolute CO₂ emission values as soon as data from the new Worldwide Harmonised Light Vehicles Test Procedure (WLTP) become available (not expected before 2020).

3.3 The introduction of the WLTP as a robust and more realistic **testing framework for type-approval** of cars will be key to overcoming the severe crisis in consumer confidence and to restoring trust. Real Driving Emission (RDE) tests will also be introduced, to be performed on the road rather than on a test bench.

3.4 An action plan is proposed to boost investment in **alternative fuel infrastructure** and develop a network of fast and interoperable recharging and fuelling stations across the Union. Several funding instruments are involved, such as the Clean Transport Facility, the Connecting Europe

2 [OJ C 246, 28.7.2017, p. 64.](#)

3 [OJ C 81, 2.3.2018, p. 195–200](#)

4 [COM\(2017\) 675 final](#)

5 TEN/652 Clean and energy efficient vehicles, rapp Samm (not yet published in the Official Journal).

6 INT/835 Revision of the Regulations on CO₂ emissions from passenger cars and light commercial vehicles, rapp. Bergrath (not yet published in the Official Journal).

7 TEN/654 Action plan for alternative fuels infrastructure (Communication), rapp. Boland (not yet published in the Official Journal).

8 TEN/651 Combined transport of goods, rapp. Back (not yet published in the Official Journal).

9 TEN/650 Access to the international market for coach and bus services, rapp. Hencks (not yet published in the Official Journal).

Facility, the European Fund for Strategic Investment Financing and the European Regional Development Fund.

- 3.5 The **Combined Transport Directive** is revised to promote the combined use of different modes for freight transport (e.g. lorries and trains).
- 3.6 The **Directive on Passenger Coach Services** shall stimulate the development of national bus connections and bus connections over long distances across Europe, provide a bigger choice for transport for all citizens, and offer alternative options to the use of private cars.
- 3.7 The **Clean Vehicles Directive** shall promote clean mobility methods in public procurement tenders as a demand stimulus for the automotive industry.
- 3.8 A **battery initiative** helps an alliance of European industries to become more independent and to increase the share along the electric vehicle production value chain. The European Commission will also allocate EUR 200 million directly to battery research and innovation under Horizon 2020 (Work Programme 2018-2020), on top of the EUR 150 million already allocated.

4. **General comments**

- 4.1 The focus of this communication on road transport rests on an industry that is a **world leader** in manufacturing and service provision. The production part of this sector employs 11% of all workers in manufacturing across the EU and generates 7% of EU GDP. This strong position must be maintained and used to accelerate, transform and consolidate the EU economy's clean energy transition, with the important goal of also achieving **leadership in new technologies** on the world market.
- 4.2 The EESC welcomes the general **technology-neutral** approach, open to new developments, which we can expect in view of the ongoing strong R&D efforts which are supported by the EU. The EESC would like to note, however, that the initiatives do not follow this approach fully. Depending on the technological progress, it is far from sure that our future mobility will be all-electric. Other propulsion technologies also provide big potential for clean mobility. In view of the fast developments in modern transport technology for the years to come the EESC therefore recommends a **more flexible approach** rather than, for example, fixed emission thresholds or procurement targets. A mid-term review of emission thresholds and minimum targets for example seems to be the least to be done to allow for adaptation at a later stage.
- 4.3 The EESC welcomes the initiatives intended to restore **consumer confidence** in the automotive industry and the regulatory system. Rebuilding trust by means of realistic emission standards and new test procedures is vital. The EESC notes that more realistic emission values will depend not only on the car's technology but to a large extent on driver behaviour and on weather and road conditions. Consumers will consequently be faced with a rather large variation of data even for a single type of car.

- 4.4 Every year about fourteen million new cars are launched, replacing only about 5% of the total fleet of 253 million cars in the EU. Even with this **rate of replacement** alone – and based on existing emission standards –, CO₂ emissions will be reduced by more than 30% by 2030 compared with 2005 (VDA report). The EESC would welcome any initiative which could accelerate the renewal rate and thus also reduce emissions further. In particular for countries with a less developed automotive industry tradition the need for new production solutions delivers opportunities for innovativeness and a potential for an upsurge of competitiveness in the development of low-emission mobility.
- 4.5 The EESC would like to point out that the Commission should also consider, in addition to its focus on new technologies such as electric cars, the large potential for improvements in the **existing fleet**. For example, a reduction of CO₂ emissions by 1g delivered through the addition of fossil-free fuels for the whole fleet is just as effective as a 20g improvement in the new vehicle fleet (VDA report).
- 4.6 We have to be aware that the build-up of a significant share of low-emission vehicles requires a **transition time**, the duration of which is unpredictable. It depends on the developments made by the automotive industry, how quickly customers accept the new technology and the costs involved, as well as other factors such as charging infrastructure, fuel prices or public-sector procurement.

However, this transition time must not be seen as giving free rein to continue exceeding the limits for diesel cars and to avoid retrofitting them with an SCR system to comply with the Euro 6 standard. The Commission should ensure that Member States' national legislatures take up Euro 6 retrofitting as quickly as possible, and that responsibility and liability for costs are clarified.

- 4.7 The EESC calls on the automotive industry to use the transition time in such a way that the **cohesion** in the EU is improved by making the right choices about the location of industrial sites and that the opportunities for clean vehicles are the same in all Member States. It would be unacceptable if, for example, older diesel cars would be banned in some Member States and then be sold to Member States with a weaker economy. Moreover, developments outside the EU play a significant role, since the European automotive industry works to a large extent for the **world market**. It is of the utmost importance that EU policy support the international agreements which are fair for the European automotive industry compared with its competitors in the USA or Asia.
- 4.8 Whether we have a technological breakthrough in future, in battery performance for example, depends on **research and development**. Such a breakthrough could happen not only in battery electric vehicles, but also in the area of fuels to be used in internal combustion engines or fuel cells. While climate-friendly, completely fossil-free fuels such as HVO100 are already widely used in some countries (such as Sweden), **new types of fuel** could also become available, such as syn-fuel or hydrogen, which might be produced at acceptable costs with the excess electricity available in increasing amounts due to the ongoing expansion of fluctuating renewable energy sources.

- 4.9 The EESC asks the European Commission to make a better and clear distinction between the different objectives pursued in introducing clean vehicles. There are two aims: climate protection and improved local air quality. It is important to note that certain types of fuels may help to improve the air quality in cities but are not beneficial for the climate – when the electricity or the hydrogen for EVs comes from coal power plants, for example. On the other hand, low emission vehicles using natural gas from bio-methane, while being climate friendly, may nevertheless contribute to local air pollution. The reduction of local air pollution in cities is a matter of great urgency and requires action at regional and local levels, while climate protection is a global issue and changes can only be achieved (and observed) over decades. It is important to make a clear distinction between these aims in order to win people over for public and private investment.
- 4.10 The EESC urges the Commission to be more rigorous in facilitating consumers' access to affordable new and cleaner forms of mobility and to make sure that the benefits of these new mobility services are available to all and are spread evenly throughout the Union. Possible problems, in particular additional **costs for consumers**, are a matter of concern. Some of the proposed funding instruments may be helpful to tackle this problem, but the Committee does not believe them sufficient. In this connection, the EESC welcomes the Commission's initiative to improve consumers' ability to make more refined choices when purchasing or using a vehicle by providing more transparency and offering a methodology for comparing costs.
- 4.11 The EESC welcomes the important role the Commission plays in forming a pan-European alliance of industries with a view to establishing a complete value-chain for the development and manufacturing of advanced **batteries** in the EU. There are several reasons for this objective: more independence from battery manufacturers from outside the EU is of strategic importance; a larger share of manufacturing along the value chain within the EU is vital for our jobs, and the guarantee that batteries manufactured are "clean" can best be achieved under EU environmental standards and rules, as for example in the circular economy approach. Large-scale investment for this goal from industry is essential, while the Commission's role is to lay down proper boundary conditions, such as technical standards.
- 4.12 The EESC endorses the tail-pipe emission approach for defining "clean vehicles" because it is simple. It would, however, also like to emphasise that this approach does not reflect the **carbon footprint** of a vehicle over its whole lifetime. In order to avoid any unjustified treatment of certain types of vehicles, more efforts are needed on the legislation front in order to go beyond the tail-pipe approach and also take into account manufacturing issues or the provision of clean energy.

4.13 The EESC concludes that the main obstacle to the modernisation of **public transport** is the lack of financial support and urges the Commission to reconsider the revision of the directive on public procurement with a focus on financing. The EESC notes that, besides the need to have more clean vehicles in public transport, it is essential to convince more citizens to use this transport by making it much more attractive (connections, comfort), rather than focusing on low ticket prices.

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