

(ENV)

From: (GROW) **On Behalf Of** (GROW)

Sent: Wednesday, March 16, 2011 4:01 PM

To: (ENV); (CLIMA)

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(CLIMA); (CLIMA); (GROW);

(GROW); (ENER); (GROW)

Subject: CARS21 sherpa meeting: Draft paper on the revision of the test cycle

Importance: High

Dear colleagues,

Please find attached a revised paper which takes on board some of your comments. Concerning your other comments, please find below the reasons why we are not able to take them on board:

International harmonisation

In last year's Communication on Clean and Energy Efficient Vehicles, it is clearly stated that the new test cycle should be developed through UNECE. We do not see why we should depart from this decision. While we are all aware that, if the process at UNECE does not progress properly, we should take measures at EC level, we do not believe it is helpful to highlight this option in the CARS 21 paper.

Real driving emission issues

Your comments suggest that the WLTC should also "solve" the real driving emission issues. We believe (and Member States and industry agree) that this is not possible "by design" since a predefined test cycle will always allow for cycle beating, i.e. calibration of the emission control in such a way that it works on the test cycle but not properly under "normal use" of the vehicle. Such largely undetectable defeat strategy is incentivised by the fact that regulated pollutant emission control (in particular for NOx) competes with other elements like fuel consumption, use of reagent or vehicle performance. Consequently there is a commercial incentive for the manufacturer to reduce regulated pollutant emission control at "normal use" (about which the average customer does not care, at least not for his own vehicle...) for improving other parameters.

Regulated pollutant emissions under real driving conditions can only be controlled by specific test procedures, which are currently being developed by the JRC and a specific stakeholders' working group. This is a parallel process which takes place at EU level and will eventually result in changes under Euro 5/6 Regulations to introduce such "RDE" procedures via Comitology. We can already anticipate there will be a big political fight in this respect and we should already prepare the political ground for this step. The CARS 21 discussions on the driving cycle would offer a good opportunity for this.

Our recommended position is to keep the focus of the WLTC on CO2 emissions and complement the WLTC by specific RDE procedures developed at EU level to keep the real driving emission at bay. Stating that the WLTC should address CO2 and regulated pollutant emissions alike not only would prove to be a technically impossible objective but would undermine the political momentum for RDE specific procedures.

I hope the above clarification is acceptable to you. In case you still would like to make further comments on the attached paper, we should call for a meeting as soon as possible, even tomorrow.

Best regards,