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Subject: ACEA position for CO2 monitoring system

Attachments: ACEA proposal for CO2 monitoring system.pdf

FYI

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ACEA proposal for CO2 monitoring system *Brussels, 24th January 2011*

Executive summary:

- Based on the current legislation in force, the industry recalls the responsibility for COM and Member States to ensure the monitoring compliance (with regard to Art. 8 of Regulation 443/2009). Car manufactures are taking responsibility to reduce CO2 emissions from passenger cars and are obliged to report to the Member States and to the Commission according to relevant provisions of the Regulation No 443/2009 each year.
- The manufacturers' compliance and possible Excess Emission Premiums are depending on an accurate monitoring system that avoids mistakes and must be also user-friendly for the manufacturers, European Commission and Member States administration. On the other hand, manufacturers do not control the registration process and have no opportunity to ensure registration of vehicles happened in the year of sales (A verification of EU data is not possible because data are only presented per Member States).
- Implementation of the new regulation faces new challenges concerning the real procedures for data monitoring and in practice illustrates existence of significant inconsistencies and mistakes in monitoring of CO2 emissions and other car parameters. Such existing inconsistencies need to be corrected as soon as possible in order to enable a robust and accurate monitoring of production and registrations.
- Having in mind current procedures and experience within the current system of monitoring and data collection, industry identifies several weaknesses of the system:
 - There exist different monitoring procedures in 27 Member States (also partially tackled by Okopol study launched by COM recently)
 - There exists also information gap limiting permanent tracking due to the fact that reporting to the COM from Member States executed only once a year with possible one year's time delay
 - Verification/detailed matching with manufacturers/real production is problematic due to lack of VIN data from the side of Member States

Therefore:

- Monitoring procedures should be implemented in real conditions
 - Data monitoring process should be streamlined to avoid double monitoring already required to be executed by industry for its own CO2 compliance efforts
 - Consistency and accuracy of data is not ensured due to different interpretation and registration processes
 - Real data verification process is not in place
 - Quality of data is not sufficiently robust for possible legal challenges
- From all above mentioned reasons, industry urges the COM to take rapid initiatives to propose a solution to ensure correct and in-time monitoring of CO2 from passenger cars, firstly trying to use current procedures and improve them to ensure high-quality monitoring. The system must ensure the possibility for the manufacturers to react and verify the quality data through the corresponding monitoring year (now following year as suggested by the Regulation).

ACEA proposal and recommendations for EU-wide CO2 monitoring system

Description:

Currently used database of the European Commission **shows different results** in comparison with private databases. There also exist gaps in the overall number of registrations (for example for EU25 gap in the registrations of 204 943 missing vehicles in EC database compared to AAA database). The EC database also shows higher number of missing figures for CO2 monitoring (rate of missing CO2 values are 3 times higher for EC compared to AAA).

On the contrary, private solutions (AAA for ex.) are mostly limited in scope and **do not cover of EU27** (based on contracts with some MS authorities).

It is also clear evidence that there is no standardized data collection and verification procedure on the Member State level and transfer of data on EU level for CO2 monitoring. On the contrary, there exist some systems through the EU institutions and Member States using vehicle data (VIN, registrations etc.) like EUCARIS or CoC joint database used by several Member States that can be used for the CO2 monitoring procedure. The new system should ensure that covers all **EU27 Member States and the streamline the procedures in national competences towards harmonized system of collection and verification of data.**

The current monitoring system is focusing on passenger cars. In line with the legislative requirements and proposal for setting up targets also for the light commercial vehicles (LCVs), the new system should avoid different monitoring procedures/data collection for PCs and LCVs. This can bring significant benefits for all stakeholders involved **(avoiding duplicate data monitoring on national and EU level).**

Quick implementation of a new system is needed to start monitoring in the phase-in phase as from 2011. As a simplest solution, ACEA recommends the improvement of existing system to force Member States to deliver registration data (including VIN) in more regular bases and explore more possible use of current systems already in place also for CO2 monitoring.

Having in mind that OEMs are already obliged to deliver CoC data to the registration process; the simplest solution is to use current tools and procedures in place. Member states are collecting the data from relevant registration offices in every case. The procedure must be modified to challenge the above mentioned bottlenecks of the current system.

The system must be able to deliver the information on vehicles registered (only reliable data is the VIN number) to the manufacturers to be able to react and deliver the purpose of the legislation – CO2 reduction.

Necessary initiatives to be taken:

- i) COM should change the template of the monitoring sheet and include specific column for VIN number.

Justification: VIN number is the only parameter that can identify each and every vehicle produced and registered (there can be differences relying only on TVV data). Registration is based on VIN number and proves a clear registration of a vehicle for the CO2 purposes as well.

- ii) COM should make obligatory that Member States deliver to the COM the data (including VIN) about registration on monthly bases.

Justification: recalling the wording of the Regulation on CO2, the Member States are obliged (recital 5 and Art 8) to report to the COM the data on CO2 of registered vehicles by end of February of the following year. That implies that there is no overview on CO2 level of vehicles registered throughout the corresponding year. That makes impossible for the COM to evaluate and monitor CO2 development in the current year. This fact also gives no possible quick reaction from the side of OEMs to adjust to the market development (there are differences in data timing for vehicle production, sale and registration, gray or parallel imports and exports). There is no clear system for the information for multi-stage vehicles, where OEMs and COM have no information on relevant CO2 level for the vehicles built by second-stage producers until registration (information on the whole completed vehicle).

More frequent reporting can solve substantially those problems.

- iii) COM should upgrade current/establish new database/platforms to collect the data from all 27 Member States (only requested data are VIN number, registration date and category) on a regular and more frequent basis.
- iv) COM should enable access to those data to the manufacturers (or send relevant data to relevant manufacturers) also on monthly bases. That enables more frequent check of data and planning certainty for manufacturers (including also multi-stage vehicles). At the very end gives the COM updated and regular overview of the CO2 development and data check from the side of manufacturers. That should also be seen as a measure to avoid possible legal disputes in the future.

Advantages of the solution:

- Using of simple/already existing tools from the side of the COM and Member States.
- Together with modified summary sheet for CO2 monitoring Member States and Commission have an instrument for double checking the registrations and CO2 values.
- COM has a regular and verified data from Member States enabling continuous monitoring of CO2 values.
- Avoiding disputes about CO2 values when the monitoring year is over (significant delay from production to registration and data collection for the CO2 monitoring purposes – maximum 1 and 1/2 year to verification process by OEMs).
- Timely communication of compliance situation.
- Planning certainty for OEMs.
- Room for improvement for electronic data transfer from Member States to the COM limiting the scope for mistakes.

ACEA also urges the COM to explore possibilities to use current, already used systems already in place within different COM services (for ex. EUCARIS or EU-wide CoC database) that can be used not only for CO2 monitoring, but are currently used for different purposes like avoiding double registration, registration of stolen cars etc.
