

From: JEAN Philippe (ENTR)
Sent: mardi 10 juillet 2012 8:17
To: DE POORTER Christina (ENTR)
Subject: FW: ACEA position on the amendment of Regulation 715/2007 - CO2 equivalent

Attachments: ACEA on CO2 equivalent.pdf
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From: pd@acea.be [mailto:pd@acea.be]
Sent: Monday, July 09, 2012 11:52 AM
To: OWEN Philip (CLIMA); JEAN Philippe (ENTR)
Cc: pg@acea.be; amp@acea.be
Subject: ACEA position on the amendment of Regulation 715/2007 - CO2 equivalent

Dear Mr. Jean, dear Mr. Owen,

please find attached ACEA position on a proposal to amend Regulation EC NO 715/2007 (CO2 equivalent).

With kindest regards
Petr Dolejsi

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ACEA position on the amendment of Regulation (EC) No 715/2007 (CO₂eq)

Brussels, 6th July 2011

- ACEA welcomes the opportunity to give input to the discussion on review of the Regulation 715/2007.
- From the first assessment, **ACEA is strongly against introducing CO₂ equivalent principle** in any piece of legislation, including foreseen review of 715/2007.
- Strong opposition to this idea is based namely on a number of negative impacts that this proposal might have:
 - Principle of CO₂ equivalent is not compatible with current system of CO₂ measurement, targets set and CO₂ monitoring (through Regulations 443/2009 and 510/2011).
 - Within above mentioned Regulations, CH₄ or other GHGs should not be counted in CO₂ targets. Any change would require new impact assessment (refer to CO₂ only, not CO₂ equivalent) and re-opening of a whole process of CO₂ target setting for light duty vehicles.
 - Proposed change would confuse customers, which focus on CO₂ values. The whole CO₂ labelling issue would need to be revisited.
 - Such a change would also lead to tax increases for EU citizens in all countries with a CO₂ based tax system. Having in mind current economic difficult time, this measure would have additional negative impacts on vehicle registrations in the EU
 - The proposal does not respect principles of smart regulation. The intention is only mentioned without through impact assessment presented. Also details of the calculations would come only via delegated acts, which is not acceptable.
- From the perspective of the industry, the proposal breaks basic principles of smart regulation, goes against CARS21 conclusions and threatens future competitiveness of the industry and will have negative impacts on consumers demand for new vehicles (limited fleet renewal with negative environmental impacts).
- From all above mentioned, ACEA urges the COM to withdraw this proposal and continue with the rest of the package
