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**From:** [pg@acea.be](mailto:pg@acea.be) [<mailto:pg@acea.be>]

**Sent:** Monday, September 17, 2012 3:54 PM

**To:** JEAN Philippe (ENTR)

**Cc:** UNTERSTALLER Andreas (ENTR); BONVISSUTO Barbara (ENTR); MARTINEZ Bernardo (ENTR); DE POORTER Christina (ENTR); SZYMANSKI Maciej (ENTR); STEININGER Nikolaus (ENTR); [pd@acea.be](mailto:pd@acea.be); OWEN Philip (CLIMA); LINDVALL Susanna (CLIMA); SUPERTI Valentina (CAB-TAJANI)

**Subject:** Fw: ACEA position on the COM amendment of Regulation 715/2007 - CO2 equivalent values

**Importance:** High

Dear Mr Jean,

I refer to my email below of 6 August and earlier of 9 July.

The document I sent to you on 9 July notes ACEA's objection to the idea to include CO2eq values in the so-called "pot-pouri" co-decision proposal that DG ENTR is still preparing. So far we have seen no proposal and no impact assessment.

As you know, ACEA strongly objects to the inclusion of CO2eq values based on the justification that such a measure will help CNG vehicles.

May we assume that DG ENTR has now dropped the proposal to include CO2eq values since it is a measure that is not justified and stakeholders have not been consulted at all. The attached ACEA note outlines our strong objections.

best regards,

**Dr Paul Greening**

Director Emissions & Fuels



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## **ACEA position on the amendment of Regulation (EC) No 715/2007 (CO<sub>2</sub>eq)**

*Brussels, 6<sup>th</sup> 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 CO<sub>2</sub> 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 CO<sub>2</sub> equivalent is not compatible with current system of CO<sub>2</sub> measurement, targets set and CO<sub>2</sub> monitoring (through Regulations 443/2009 and 510/2011).
  - Within above mentioned Regulations, CH<sub>4</sub> or other GHGs should not be counted in CO<sub>2</sub> targets. Any change would require new impact assessment (refer to CO<sub>2</sub> only, not CO<sub>2</sub> equivalent) and re-opening of a whole process of CO<sub>2</sub> target setting for light duty vehicles.
  - Proposed change would confuse customers, which focus on CO<sub>2</sub> values. The whole CO<sub>2</sub> labelling issue would need to be revisited.
  - Such a change would also lead to tax increases for EU citizens in all countries with a CO<sub>2</sub> 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

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