

## PORSTI-RONNBERG Satu (ENTR)

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**Sent:** 25 February 2011 15:49  
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**Cc:** LINDVALL Susanna (CLIMA); DANIEL Ewelina (ENTR); MATTINO' Giacomo (ENTR); MARTINEZ Bernardo (ENTR)  
**Subject:** ACEA comments on eco-innovatios  
**Attachments:** ACEA comments on EI\_final.doc

Dear colleagues,

please find attached ACEA comments on the draft Regulation and Guidelines on eco-innovations.

Kindest regards

Petr

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## **ACEA comments on the draft Regulation and Guidelines for Eco-innovations**

25<sup>th</sup> February 2011

## General remarks:

ACEA welcomes the progress made by the Commission and JRC concerning the preparation and presentation of draft Regulation and guidelines for eco-innovations, as implementing measure for the Regulation 443/2009.

On the other hand ACEA stresses the need to conclude as soon as possible with the procedure in order to start the implementation. It is necessary to stress that the phase-in period starts in 2012, so the process of verification of eco-innovations should start **immediately**.

**ACEA urges all stakeholders to conclude the negotiations on the whole process of application, verification and approval before summer 2011.**

ACEA also stresses the need to ensure **long-term viability of this instrument** (support of eco-innovations) in the future, even when changing conditions, type-approval procedures or setting long-term CO2 objectives.

## Key general points relevant to the proposal:

- ACEA urges the need to have **consistency between the Regulation and Guidelines**, using the same wordings and citing explicit provisions from the Guidelines to the Regulation and vice-versa.
- The Guidelines should be clearly stated as a **minimum set of requirements** that would be generic for all OEM and that could be complemented by further revision, specifically given the unclear regulatory proposal and possible involvement of new bodies.
- Agreement on Regulation and Guidelines should be followed by **immediate change in the type-approval mechanisms**.
- As specifically mentioned in Art. 2.2. eco-innovations should not be limited only to safety and efficient run of the vehicle, but in line with integrated approach as and integral part of the European strategy for lowering emissions from passenger cars, **technical measures with a sustained effect on drivers behaviour** should not be excluded from the scope of Regulation.

*Note: as typical examples for such advanced technical measures could be considered eco-mode, eco-scoring/ coaching, eco-challenge or eco-navigation.*

## Key specific points of the proposal for Regulation:

*Note: the list covers the proposal Article by Article*

### Art. 2.2.: Penetration

- ACEA strongly opposes setting up the **threshold of 3% penetration** as key eligible criterion that can limit certain eco-innovations. ACEA suggests there should be no threshold linked to the penetration, namely for two reasons:
  - The figure for level of penetration is extremely difficult to provide. The producers cannot prove those data that are not publicly available.

- All eco-innovations are based on being off-cycle so there should be no further limitations to the possible list of eco-innovations. That goes against the principles of the eco-innovations.
- The text should be in line with the wording in Guidelines, speaking about “of all *newly* registered cars in 2009”
- The definition of eco-innovations as “*intrinsic* to the safe and efficient operation of the vehicle” is questionable. Explanation of this qualification criterion can lead to legal challenges. ACEA suggests deleting above mentioned part of the sentence and replace it by wording “..., and relate to items improving the energy use of a vehicle and not only increasing comfort of the driver and passengers”.

*Note: As an example of a measure that should be considered as an eco-innovation in that area is more efficient cabin heating that reduces the energy consumption at the same level of comfort for the driver.*

#### **Art. 3 b): Definitions**

- The “eco-innovation” should be defined in line with the Guidelines and explicitly mention also “**technology package**” in the Regulations (in line with point 2.4.3. of the Guidelines)

#### **Art. 4: 2f) - i) – Evidence demonstrating**

- The emissions reduction achieved should cover also “**technology package**”

#### **Art. 8.1.: Eligible criteria**

- **ACEA strongly opposes to set the minimum total savings at level of 1g CO<sub>2</sub>/km** and considers that too high. According to ACEA, a measure or technology proven to deliver a quantifiable contribution to reducing vehicle CO<sub>2</sub>-emissions benefit **at least 0.5 gram /km** per application.

**Justification:** Threshold of 1g eliminates a huge number of eco-innovations that are mostly:

- partially covered by test-cycle
- close to limit 1g, because of the calculation presented there is a need to “cover” the deviations as well, so the real value is approximately 1,1-1,2 g
- having in mind the verifiability variants (see bellow), CO<sub>2</sub> reduction from technology packages should be significantly higher than 1 g

According to the guidelines the calculation methodology/simulation referred to indicates a result even for level 0,1g that could be reached. That should be questioned also as a valid threshold.

- On the **verifiability of a minimum threshold** – the variants of calculations seem to be quite complicated, namely in case no 1 the total output in case of technology packages will result into very high level of total threshold. Therefore **ACEA suggests taking Variant 2** as the valid one (but also keeping in mind negative impacts on the 1g eligible criteria – see above)

## **Key specific points of the proposal for Guidelines:**

### **Chapter 2.3.2. – Criteria for necessity (non-comfort)**

**ACEA comments:** In line with the argumentation for change in definition (Art. 2.2.) of the proposal for Regulation, from examples **should be excluded seat and cabin heating systems** (measures keeping the same level of comfort with reduction of energy consumption).

### **Chapter 3.4.1. - Description for energy storing systems**

**ACEA comments:** Second sentence should be adjusted as follows: “**Heat, kinetic and electric storage by measures...**”

### **Chapter 4.4. – Deterioration**

**ACEA comment:** Inclusion of this principle is disproportionate and should be deleted.

**Justification:** Using the same durability tests as for exhaust emission pollutants implies a real aging during 160 000 km (or 1 year testing) This is relevant for exhaust emissions systems (catalyst, turbo, etc) but is not appropriate for other equipments like LED's, alternator for 3 reasons :

- During the exhaust emission aging procedures some of the EI will not be activated
- Those elements can be changed when you go to the garage
- There is no need to age a complete vehicle to assess this point.

## **Chapter 5: Data sets for simplified approaches**

### **ACEA comments:**

- ACEA supports more simplified approach for the assessment of Eco-Innovations.
- To simplify the document, ACEA suggests only making reference to relevant legislation, where respective figures are set.
- ACEA also requests that the source of data/calculations should be accompanied to the document.

### **On 5.1.1. – efficiency of engine figures**

**ACEA comment:** following figures should be used only in case that the manufacturer is not providing its own data for the engine efficiency of the vehicle.

**On 5.1.2. – efficiency of alternator,** there is no ISO standard to qualify the efficiency of the alternator. If there is a need to certify an Eco-Innovation related to the Alternator efficiency (QO4) we need to asses either:

- ➔ a standard methodology
- ➔ or a baseline alternator reflecting the market that we can test as a baseline

**On 5.3.1. – fuel densities** – presented figures are not consistent with reference fuels as specified in 692/2008.

On 5.3.2. – **conversion fuel consumption to CO2 emission** – the figures should be inline with the carbon balance formulas (regulatory).

On 5.4.2. – **shading of solar panels** – the figure of usage factor UF should be **0,25 instead of 0,15**

On 5.5.2. and 5.5.3. – ACEA suggests those calculations (**Xenon gas discharge and LEDs**) to be excluded from the list of data – do not refer to general, neutral physical data but to concrete technologies.

On 5.7. – **solar irradiation** – the value should be **120 instead of 90**

On 5.8. – **parking time distribution** – and 5.9. – **trip length distribution** – ACEA suggests for the trip length distribution that the distribution should be categorized into more slots above 5km.

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