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Sent: 25 May 2012 11:26
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Cc: [REDACTED] (ENTR); [REDACTED] (ENTR)
Subject: Real driving emission of light duty vehicles (RDE-LDV): audio/web conference of Member States

Dear colleagues,

Yesterday we had a quite hot (in any sense) RDE-LVD meeting, for which an executive summary of the conclusions will be distributed shortly.

It became quite obvious that vehicle manufacturers strongly resist the introduction of PEMS at any stage of type approval (initially and at in-service conformity), while we are convinced that PEMS is definitely necessary at some stage for NOx emission measurements under real driving conditions. Actually this ACEA attitude contradicts previous talks I had with individual manufacturers that were ready to accept PEMS at least at in-service conformity. While we may speculate now whether these reservations are motivated by real concerns about practicalities (that would have to be addressed) or the desire to have the random cycle as an "easier procedure" for emission compliance leaving the door open for some cycle beating (which has to be avoided) I think we should discuss a third option that may bring things forward:

1. PEMS procedure is developed as gold standard for NOx RDE assessment.
2. Random test cycle is developed in parallel as "equivalent" procedure (regarding coverage of driving conditions, of course the issue of intentional cycle beating would remain)
3. Manufacturers may use either PEMS or the random test cycle at type approval and in-service conformity
4. Member States (i.e. not only the approving type approval authority!) may assess the in-service emission performance of vehicle families according to the well-defined PEMS procedure. NB: this would be real "market surveillance" applied in many other product areas, which is not quite common yet in the automotive area. Given the massive NO2 air quality problems of Member States it appears to be justified.
5. If non-compliance is identified, the case has to be reported to the approving authority and there is a further investigation (using PEMS and better statistics) for compliance. If final non-compliance is established there are well defined consequences for the manufacturer, i.e. at least withdrawal of the type approval but also recall or financial penalties in more severe cases.

I would like to have your views on this option. It is obvious that it would only work if Member States are really willing to check emission performance of vehicles using PEMS with "sufficient" frequency.

Regards,

[REDACTED]