Brussels, 30 September 2019

WORKING PAPER

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MEETING DOCUMENT

From: Danish Delegation
To: Working Party on Technical Harmonisation (Motor vehicles)
Subject: DK comments regarding "Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 715/2007 on type approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information"
Danish position regarding proposal to amend the light vehicle emission type approval regulation (715/2007)

Denmark supports a swift adoption of the proposal in order to have a sufficient type approval scheme ensuring emissions from light duty vehicles reflect normal condition of use.

Denmark still has three points to raise with regards to the latest compromise text of 13th of September.

1. Conformity factors
Denmark urges the Commission to finalize the analysis of the conformity factor to bring this proposal up to date by lowering the factor.

Vehicles sold today will be our legacy fleet for the next 15-20 years. They will contribute to air pollution in our cities and it is therefore crucial to strengthen the regulation and regularly and swiftly bring it up to date.

2. Temporary conformity factor
Denmark supports deletion of the temporary conformity factors, the second row in Table 2a CF pollutant-temp. Both with regards to passenger cars and vans.

The conformity factor shall only reflect the uncertainty of using PEMS equipment. The temporary conformity of 2,1 didn’t correspond only to the uncertainty of the PEMS (Portable Emission Monitoring System) equipment. Denmark supports the position of NL in this regard (WK 9246/2019)

3. The delegation of powers – follow up on discussions on WP 19th September
Denmark supports the empowerment to the Commission to adopt delegated acts to regularly revise and amend the conformity factor to reflect only the uncertainty of the PEMS equipment. The delegation of power shall be explicitly circumscribed to revising downwards the conformity factors (art. 14 (2) and (3)). Denmark therefore supports following the recommendations of the Legal Service (12340/19).