

Ensure continued and intensified development of greener, leaner cars

Dear Sir, dear Madam,

Your vote will decide the future of the automobile – with a brave vote the new EU-legislation will make the European market the place where tomorrow's leaner and greener car is first seen and reaches the highest market share, with a sharply reduced climate impact as a result.

A strategy for the future must include a rapid and radical improvement of new car's energy consumption and efficiency, a quick and decisive shift from yesterday's fossil fuels to tomorrow's renewables and a reduced dependency on car use. Our main proposals for the upcoming directive on CO₂-emissions from new cars are:

- 100 % compliance by 2012. Any delay means increased environmental impact, and the industry has known what is coming for long enough to adapt.
- Average 120 g CO₂-limit. A higher permitted average would be counterproductive in reaching the EU targets on reduced climate change.
- Size or use, not weight. Basing the permitted emissions on a vehicle's weight would discourage the industry from making cars lighter, contrary to the needed development. Basing emissions on size/footprint is better, but still allows for wastefully big cars to emit more than compact, space-efficient cars.
- No exemption for small manufacturers. Such an exemption would open up for larger producers of similar cars to demand the same treatment.
- A clear bonus for using renewable, climate friendly biofuels, based on the actual use of these fuels and their actual, well-to-wheel CO₂-performance

We note with grave concern that the EU-directive may not be in line with these proposals. The Swedish Association of Green Motorists also want to ensure that incentives for car-makers to supply Multifuel-cars is rewarded, since this is where the Swedish experience is unique and relevant for European legislators.

In Sweden, biofuel cars, able to run on biofuels like ethanol or biogas account for more than 20 per cent of new car sales, According to the Swedish Environmental Protection Agency, a car running on ethanol E85, has a 60 per cent lower climate impact than the equivalent car running on petrol (or about 50 per cent lower than a diesel), while biogas reduces the climate impact with up to 85 per cent (Life cycle values). These figures are very much in line with the European Commission's figure for the proposed biofuels directive. Since August 2008, all E85 (ethanol) fuel on the market is independently verified from social- and environmental criteria.

A "bonus" for carmakers that supply biofuel cars would be a strong incentive for a continued technological development. It would help make sure that customers all over Europe can choose not only cars with a lowered consumption, but also cars that can run on renewable rather than fossil fuels. Carmakers, however, should not be given this bonus without ensuring

that their cars actually run on the intended biofuel, and that this biofuel complies with the standards as described in the up-coming EU-directive on biofuels. Carmakers can easily retrieve this information as part of servicing the car, or by other means they can present. It is up to them, if they cannot prove that the car runs on the appropriate fuel, no bonus.

We strongly oppose all real loopholes, such as exemptions for heavy cars/trucks, low volume-manufacturers etc, and urge you to base the emission levels on size/footprint rather than weight, to keep the 120 g CO₂/km average, to stick to the year 2012 and to add a 90 g CO₂/km target for the year 2020, ideally with a clear differentiation of fossil and renewable CO₂.

We suggest the following wording

(fc) 'eco-innovation' means any technological measures or innovations proven to deliver a quantifiable contribution to reducing CO₂ emissions that is neither included or insufficiently considered in the CO₂ test procedure under Regulation 715/2007/EC nor legally required by the additional measures mentioned in Article 1. A single limited, but revisable, list of measures shall be established.

A passenger car adapted for multi fuel use, where one fuel is a renewable fuel meeting standards on social- and ecological impact as defined by the European Union, can be afforded a further 10% reduction in reported CO₂ emissions if, and only if, it can be certified that the car runs on the renewable fuel for at least 70% of its energy use.

This addition, with a wording as or similar to what is suggested above, will *not* be a loophole for the car industry, but will ensure that they in addition to delivering more frugal cars also speed-up the change to renewable fuels, and that the car industry will have an interest in making sure that these biofuels are sustainable on a well-to-wheel-basis. The on-board diagnostics of modern cars can verify what fuel is used, or even what mix of fuel that is used.

Knowing that the time remaining to your final vote on this very important topic is limited, we are ready to on a very short notice furnish you any further information that you might need in order to vote for a rapid improvement of the auto industry's environmental performance.

With warm regards,



Jakob Lagercrantz

President

The Swedish Association of Green Motorists

The Swedish Association of Green Motorists is an independent NGO with no links to petrol companies, carmakers or other sectors of the industry. Our aim is to rapidly make the car sector greener, in Sweden and in the world.