

European  
Automobile  
Manufacturers  
Association

Brussels, 18 March 2015

Commissioner Elzbieta Bienkowska  
Internal Market, Industry, Entrepreneurship  
and SMEs  
European Commission  
BE – 1049 Brussels

**Subject: Latest Commission proposal on Real Driving Emissions / RDE (March 2015) – unacceptable for the automobile industry**

Dear Commissioner,

Following the meeting we had with you and ACEA [REDACTED] in February, we want to reiterate the concerns the European Automobile industry has with the way DG Growth is preparing proposals to change how to measure real driving emissions for diesel vehicles.

The process followed is contrary to all principles of good regulation as promoted before through CARS 2020.

While our industry welcomes the initiative of the Commission to strengthen and update how to measure Real Driving Emissions, we cannot accept the piecemeal approach followed by your services in preparing proposals which will trigger major changes both in how manufacturers will have to design new diesel vehicles as well as how they will have to measure emissions in the future.

Your services plan to present parts of proposals in meetings to be set up through the Technical Committee for Motor Vehicles or TCMV during March, September December and during 2016, while industry needs to have clarity in advance on what to expect so that they can plan the development and design of their vehicles in line with the new requirements; we need a complete package and not parts of it for planning purposes.

The subject of Real Driving Emission (RDE) is hugely important to the European auto-industry. The RDE legislation is needed for several reasons, for example:

- It will help us to improve the performance of diesel passenger cars in respect of their emissions of oxides of nitrogen (NOx) that have an impact on ambient concentrations of nitrogen dioxide (NO2), which remains under focus in many member states and cities.
- It is a necessary but complex tool that will give confidence to EU policy makers that new Euro 6 diesel passenger cars will have emissions of NOx at the expected level under conditions of normal driving, compared to the Euro 6 NOx type-approval emission limit agreed by the co-legislators in 2007.

We are aware that next week on 24 March in the regulatory committee (TCMV) of DG GROW there will be a proposal to decide on only a first RDE package: we are very concerned that this package will not be enough for industry to start work on RDE in order to be compliant by September 2017.

Sufficient lead-time to implement any piece of legislation is one of the cornerstones of the principles of better regulation and the conclusions of CARS21 and CARS2020 initiatives. DG Growth was, and still is, a leading Commission service to ensure implementation of the agreed principles with the automotive industry. We strongly request that those agreed principles are implemented in all decisions by policy-makers, especially this proposal on RDE.

Industry has participated with your services in the RDE development process in the most constructive way but we now have the impression that our key needs are ignored.

**Industry would like to see that this first package being proposed would be more comprehensive and would include the following elements:**

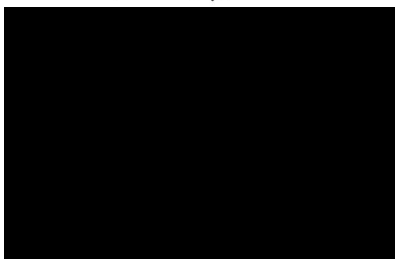
- All boundary (test) conditions including the dynamic boundary conditions that an expert group has agreed to include – all the boundary conditions are needed to start the work to develop RDE compliance and to decide in a next step the diesel NOx limits for an RDE test.
- Clear dates when RDE will apply and in 2-steps (2017/19) with a second step 5 years after the publication of the complete RDE Regulation in the Official Journal.
- A clear and unambiguous timetable for the additional elements of RDE that your services must deliver in 2015.

Industry needs these elements to be included in any decision that the TCMV might reach in its next meeting on 24 March. **If not, industry strongly recommends that a vote should not be taken in March but rather in May when all these elements can be introduced into a RDE proposal by your services.**

Industry respectfully requests that all of the principles of better regulation agreed within the CARS2020 initiative must be respected, especially by the member states and the Commission who all recently agreed those principles.

I am ready to answer any questions you may have but I would also suggest we arrange a meeting to discuss how to move forward on RDE at your earliest convenience.

Yours sincerely,



Copy: Mr Daniel Calleja, Director General DG Growth