

Brussels, 23 January 2007



Friends of the Earth Europe



**GREENPEACE**



European Federation for TRANSPORT and ENVIRONMENT



To:  
European Commission  
President José Manuel Barroso  
Vice President Jacques Barrot  
Vice President Günter Verheugen  
Stavros Dimas, Commissioner for Environment  
Andris Piebalgs, Commissioner for Energy

## Re: Reducing CO<sub>2</sub> emissions from light duty vehicles

Dear Mr President, dear Vice Presidents, dear Commissioners,

With this letter the Green10 environmental NGOs want to express grave concern over recent disagreements within the Commission on the forthcoming Communication on the reduction of CO<sub>2</sub> emissions from light duty vehicles.

We urge you to:

- announce binding legislation to achieve the long-standing 120 g/km average CO<sub>2</sub> target for new passenger cars by 2012, and to continue improvement through 2020;
- ensure that the target is met through improved energy efficiency of new cars – the inclusion of cars or road transport in the EU Emissions Trading Scheme or the introduction of more biofuels are NOT adequate solutions.

We have the following reasons for this:

### The voluntary agreement is failing

The Commission's own assessment, based on 2004 data, was that 'the situation is not satisfactory'. Data for 2005 showed that progress was just a 1 per cent reduction compared with 2004. Fleet average CO<sub>2</sub> emissions of cars sold in 2005 stood at 162 g/km. In other words, the manufacturers are not sufficiently committed to voluntarily achieving their 140 g/km target.

The Commission has always made it clear that such a failure was likely to lead to binding legislation for carmakers. Failing to announce legislation ensuring that the 120 g/km target is met would seriously undermine the credibility of the Commission. It would also mean that the Commission fails to deliver on its first real-world policy following the announcement on January 10<sup>th</sup> of a greenhouse gas reduction target of at least 20% by 2020.

### Existing target should be met through improvements in car fuel efficiency

The long-standing 120 g/km CO<sub>2</sub> figure has always been an energy efficiency objective for new cars, namely 4.5 (diesel car) to 5 (petrol car) litres per 100 km. The deadline for meeting it has already been postponed from 2005 via 2010 to 2012. The target has always been just one element of a set of policies to reduce CO<sub>2</sub> emissions from road transport.

Hence, making alternative policies 'count' towards the 120 g/km target effectively weakens it. Given the fact that in 1996, when this target was set, oil dependence and climate change issues were less urgent than today, any additional weakening of an 11 year old target would clearly be unacceptable.

### **Emissions trading and biofuels no substitute for fuel efficient cars**

Including road transport in the emissions trading system or biofuels are NOT alternatives for making cars more fuel-efficient. Such an integration would come down to a modest rise – a few cents- in the price of petrol and diesel. It would hence not provide meaningful new incentives to car makers to improve the energy efficiency of their products. Biofuels are also a scarce resource and are not a substitute for energy efficiency.

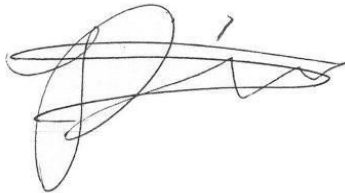
### **'120' target is feasible**

The 120 g/km target is feasible. It is a fleet-average target that can be met through instruments that require neither individual car makers nor individual cars to meet it. It is not just about deploying complicated and advanced new technologies, it is just as much about using existing technologies and stopping or reversing the trend towards ever-more powerful and faster cars (for example fitting cars with smaller engines is a very effective and cost effective measure).

### **Longer term targets needed**

Finally, both climate policy and the car industry need clear and ambitious long-term goals. The year 2012 is only five years away. Strong targets for 2016 and 2020, and beyond, are needed. Doubling fuel efficiency over the next decade is a feasible target and would fit with the strategy to protect the climate by reducing the EU's emissions by 30% by 2020.

The Commission has a unique opportunity to accelerate technological advances in this key industry – advances that are necessary not just for the survival of the industry, but for the planet as a whole. We urge you to show much-needed leadership on this critical issue.



Jos Dings  
Director  
European Federation for Transport and Environment (T&E)  
rue de Pépinière 1, 1000 Brussels

Also on behalf of:

Christian Baumgartner, Secretary General, International Friends of Nature  
Matthias Duwe, Director, Climate Action Network Europe  
Fouad Hamdan, Director, Friends of the Earth Europe  
John Hontelez, Secretary General, European Environmental Bureau  
Genon Jensen, Director, European Public Health Alliance – Environment Network  
Tony Long, Director, WWF European Policy Office  
Clairie Papazoglou, Head of EU Policy, BirdLife International  
Jorgo Riss, Director, Greenpeace European Unit  
Magda Stoczkiwicz, Policy Coordinator, CEE Bankwatch Network