

To:

MEP Alexandr Vondra

Brussels, 23rd of June 2023

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MEP Bas Eickhout  
MEP Christel Schaldemose  
MEP Jens Gieseke  
MEP Nikolaj Villumsen  
MEP Susana Solís Pérez  
MEP Sylvia Limmer

### **Joint NGO letter for a robust Euro 7 emission standard**

Dear Mr Vondra,

Ahead of the upcoming debate within the Committee on the Environment, Public Health and Food Safety on the proposed Euro 7 pollutant emission standard for cars, vans, buses and trucks we the undersigned health, consumer and environmental organisations would like to raise our concerns on the weakening of key provisions of the Euro 7 proposal within the draft committee report.

The proposed revision of the Ambient Air Quality Directive (AAQD) reduces air pollution limits to more closely align with the World Health Organisation's guidelines. This is a challenge for public authorities, as there are still many areas where air pollution levels fail to comply with the current AAQD legislation. As such, it is fundamental to provide cities and regions with the necessary framework conditions and tools to successfully safeguard the health of EU citizens. Air pollution from road transport prematurely kills 70,000 people in Europe every year and causes a multitude of serious diseases including cardiovascular diseases, stroke, chronic obstructive pulmonary disease, lower respiratory infections, cancer, diabetes and asthma in children resulting in billions in societal and healthcare costs. Air pollution has the largest impact on the poorest in society widening inequalities in Europe. Despite the shift away from internal combustion engines to electromobility, another 100 million internal combustion engine cars and 3.1 million trucks are expected to be sold in Europe, these vehicles will stay on the road, polluting European towns and cities, for decades to come. We should therefore avoid this erroneous dichotomy between electromobility and Euro 7, as these will complement each other in the short and medium term.

But there is a solution to reduce pollution from these ICE vehicles; a robust Euro 7 pollutant emission standards. Euro 7 which is, at the minimum, aligned with the findings of the Euro 7 Impact Assessment can cut pollution from road transport in cities by around 50% already in 2035 resulting in up to 24% lower concentrations of toxic NO<sub>2</sub>, a contributor to childhood asthma, diabetes and chronic lung disease. The technology to do so is available and affordable and is already being implemented in other key automotive

markets such as the U.S. and China. Europe should not be allowed to fall behind. This is especially true for all EU citizens living in Member States whose car market largely relies on second- or third-hand vehicle imports. Depriving them of having access to less polluting used cars in the future would widen the gap between Western and Eastern Europe. A robust Euro 7 must therefore come with a longer compliance period.

Yet the committee's draft report weakens crucial Euro 7 provisions of the Commission's proposal such as pollution limits and on-road testing provisions for trucks reverting largely to outdated Euro 6 testing which is insufficient to ensure compliance with emission limits on the road, especially in cities. Strong separate emission limits for when the engine is first started (cold limit) and for all other driving (hot) is crucial for ensuring that emissions are properly controlled wherever the truck is driving in the city. Tyres and brakes constitute a growing share of particle pollution and tyres emit 400,000 tonnes of microplastic pollution every year equivalent to 23 billion plastic bottles. Europe needs to take action to reduce pollution from this source as soon as possible and should not have its hand tied by a UN process when it comes to implementation timeline or ambition of limits.

The signatories would also like to underline that e-fuels have no place in the future of road transport. Allowing their use in cars and trucks via the Euro 7 standards would undermine actions to reduce air pollution since the use of e-fuels does not significantly reduce pollution compared to fossil fuels. Allowing their use via the creation of another unnecessary Euro 7 subcategory, a carbon correction factor or any other mechanism which circumvents the EU car CO<sub>2</sub> standards would also risk the EU's electromobility leadership and result in unnecessary costs for consumers. Research shows that an e-fuel car will cost drivers €10,000 more over just five years than an equivalent battery electric car. This threatens the EU's sustainable transport industry leadership being taken over by the US and China.

We remain at your disposal for further exchange,

Yours Sincerely,