

Brussels, November 18th 2016

Object: Transport & Environment's answer to the European Commission regarding the RDE 3rd package public consultation

Transport & Environment (T&E) welcomes the Commission's proposal on the 3rd RDE package – as well as this public consultation – as a timely step in the right direction to tackle particulate emissions from Gasoline Direct Injection cars and strengthen the RDE test procedure. However, we are particularly concerned by two issues:

- Firstly, the extension of RDE to measure PN emissions must be **implemented without delay under the proposed timetable**, i.e. 2017 for new types and 2018 for all new vehicles. Any slippage of either of these dates is unacceptable and would lead to delaying urgent investment needed to ensure the growing fleet of direct gasoline injection petrol cars meets the Euro 6 limit on the road.
- Secondly, both the actual RDE test results and the maximum declared values for manufacturers must be made available in the public database in line with the Commission proposal. Any weakening of these important **access to data provisions** will seriously undermine RDE 3 and public information. There are orders of magnitude difference in emissions for vehicles fitted with gasoline particle filters and not, and drivers should be provided with this information.

T&E considers the current draft text of the proposed 3rd RDE package to be the minimum acceptable to be effective. If there is any further weakening of the text during discussions in TCMV on the 20th December, T&E and many other stakeholders, including possibly the European Parliament; will have legitimate concerns as to the suitability of the new regulation and whether we should seek to have it rejected. There are several areas of potential improvements that should be made to the text, ideally now, or certainly before the 2nd step of RDE is introduced in 2020. These are:

- Addressing **ultra-fine particles** (sub-23-nm) something the Commission recognises in recital 14. Further work is needed to extend measurement to these most dangerous to health emissions in order to include them by 2020 at the latest.
- The approach used to account for higher **cold-start emissions** (point 27 in annex 2) should be replaced with a more accurate weighting process of their fair share in an average urban trip. Furthermore the possibility to use an up to 30s idling period between the engine start and the first movement of the vehicle (point 25 in annex 2) is a loophole to severely underestimate cold-start emissions of gasoline engines, and should be closed.
- As regards **regeneration events**, T&E asks the TCMV to remove the possibility to use Engine Control Unit (ECU) data for detection of such events to ensure RDE results cannot be manipulated by carmakers (point 19 of annex 2). The exhaust temperature should be used instead. We welcome recital 17 that allows updates of Ki factors to be closer to real-world situations, but the Commission should establish a public database with more realistic values from independent tests.
- The **conformity factors** should be reviewed annually.

T&E believes that the above changes will ensure that the on-road emissions tests are robust and accurately represent vehicles' performance on the road.