



European
Automobile
Manufacturers
Association

Brussels, 30 September 2015

Dear Member of the Competitiveness Council, Dear Minister,

Following the recent developments regarding emission testing by one car manufacturer, I want to reconfirm that our industry takes the issue very seriously.

We take this seriously because the current debate related to the use of “defeat devices” is being confused with the important discussion on how to better measure real emission values. The outcome of this discussion may affect a vast number of the diesel-powered vehicles (passenger cars and light commercial vehicles) that are produced in Europe. To achieve the very ambitious vehicle CO₂ targets set in Europe, all manufacturers have heavily invested in innovation, developing advanced diesel technology which consumes less fuel, thus reducing CO₂ emissions by some 15 % compared to an equivalent petrol powered vehicle.

The European manufacturers have taken globally a leadership role in this technology, which has created jobs across the entire supply chain in Europe.

While our industry recognizes several of the issues, which are the focus of the current discussions, especially on how to better test pollutant emissions from diesel engines, we should avoid measures which could undermine the competitiveness of our sector which accounts for 12.1 million jobs in Europe.

Our industry recognizes the need for the urgent adoption of a complete & updated proposal on Real Driving Emissions (RDE) to ensure the industry can prepare itself to start implementing the new regulation addressing diesel NO_x emissions under diverse driving conditions from 1 September 2017.

Note that ACEA has been calling on the Commission to bring forward the complete RDE regulation for several months now.

ACEA rejects all allegations that its members have embarked on full scale cheating to misrepresent the emission values for diesel vehicles. The methods used for gaining type-approvals were fully in line with the emissions legislation applicable at the time of type-approval. We have stated consistently that these test methods are outdated and explain why there are discrepancies between what was measured in the laboratory and on the road.



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Emission values resulting from testing done today have always been in line with existing regulatory requirements and have been verified and certified by the national vehicle type approval authorities in all member states in order to ensure that vehicles homologated in one country can move freely to other countries within the European Union.

Shorter-term improvements to the performance of already available NOx control systems can be achieved in a first step by September 2017 for new types but not before September 2019 for all new registrations.

More rigorous testing methods foreseen by RDE will require significant hardware changes to be implemented by manufacturers including re-engineering of engines and changing platforms and assembly lines: this is the only reason why industry is seeking appropriate lead-time to prepare for the significantly more complex implementation of this second step foreseen after 2020.

As it stands, in May 2015 the member states agreed a first package of RDE that covers only an incomplete set of boundary conditions (BCs) and procedures for analysing and assessing the data collected during an RDE drive. The member states also agreed that RDE should be in two steps. However, the first RDE package is still very much incomplete and contains many errors and inconsistencies and, rather importantly, the dates of the two RDE steps and the RDE conformity factors (CFs) for the two steps are still all missing.

To achieve the above timelines, we are calling upon the support of the Competitiveness Council to request a finalised proposal on Real Driving Emissions to be ideally submitted by the European Commission to the meeting of the Technical Committee on Motor Vehicles (TCMV) on 6 October; these proposals should remain technically sound and technically feasible with appropriate lead-times and should not jeopardize the competitiveness of the European industry.

Industry will not be able to start implementing stricter emission standards without having clarity on timings and all testing conditions: new requirements will affect production and people involved in the production process which is why industry needs clarity soon.

We remain committed to make serious progress on emissions but without giving up one of the technologies where Europe has been leading on and which will remain essential to deliver on the ambitious CO2 emissions targets set for 2021.

I am sure that we share a common interest to retain in Europe a strong and competitive Automotive Industry. Our industry is ready to engage to make real progress on this important dossier.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Carlos Ghosn', with a horizontal line underneath.

Carlos Ghosn,
ACEA President