



THE NETWORK
OF MAJOR
EUROPEAN
CITIES

Brussels, 3 November 2014

TO:

Elżbieta Bieńkowska, Commissioner for Internal Market, Industry, Entrepreneurship and SMEs

Daniel Calleja Crespo, Director General, DG Enterprise and Industry

Dear Commissioner Bieńkowska, and Mr Calleja Crespo,

On behalf of Europe's largest cities, we are calling for a quick finalisation of the Real-world Driving Emissions (RDE) test procedure for the Euro 6 emission standard, currently being discussed by the Technical Committee on Motor Vehicles (TCMV). The new test protocol must be effective and should be fully operational by 2017 at the latest.

1. The new testing protocol must be applied as soon as possible

The Euro standards on vehicle emissions limits are first and foremost designed to improve urban air quality. This is a serious challenge for many cities across the EU. But real-world emissions from cars on the roads today are often much higher than those indicated by the official type-approval test results. Recent reports from the Dutch consultancy TNO¹ and the International Council on Clean Transportation² reveal that real-world emissions from new Euro 6 standard vehicles can be up to six or seven times higher than the official limit.

This is a serious failure of EU source policy. Given that cities rely heavily on these standards to deliver the air quality improvements required by EU legislation, notably the Ambient Air Quality Directive (2008/50/EC), this is unacceptable. Euro standards are used as a basis for establishing low emission zones (LEZs), which for many cities are an essential tool for curbing traffic pollution and meeting air quality obligations. We deplore that seven years after the adoption of Regulation 715/2007 establishing the Euro 6 standards, the RDE test procedure has still not been completed, despite new Euro 6 vehicles being sold and driven on European roads.

We believe it is time to curtail the current drawn-out debate on how best to represent extremes of altitude and ambient temperature in the RDE procedure. These conditions affect a very small proportion of EU territory, but the discussions risk delaying the introduction of the new test procedure even further. We strongly support the latest commitment to introduce RDE testing as of late 2014 for monitoring purposes, and at the absolute latest, from 2017 for full compliance with Euro 6.

¹ <http://bit.ly/1pgODyc>

² <http://bit.ly/ZGIRAK>



2. The new testing protocol must be effective

The new testing protocol must be representative of, and take into account, all the emissions produced under various urban driving conditions. For example, cold starts contribute significantly to pollutant emissions in urban areas, and must be accounted for properly. The Commission has indicated that it intends to set up a working group on this. It is important that its work is completed promptly, within the given timeframes.

Using a valid and reliable data evaluation method to ensure compliance with the required emissions limits is just as important. Two different tools have been introduced to date, EMROAD and CLEAR, but it should not be up to manufacturers to choose the method they want to use. They should either be required to comply with the limits on both tools or, if it is necessary to choose one, it should be the EMROAD tool developed by the Commission's Joint Research Centre (JRC).

The new RDE test procedure must, above all, be effective, representative, and ensure that Euro 6 vehicles deliver the required emissions reductions on the road. This would help make vast improvements to urban air quality.

Currently, more than half of EU member states are undergoing infringement procedures for not fulfilling the air quality limits set out in the EU Ambient Air Quality Directive. Effective Euro standards could make a big difference to the compliance issue. We call on you, as you consider the RDE over the coming weeks, to make a real contribution to improving Europe's air quality by making sure the new test procedure is effective and is in place as soon as possible.

Yours sincerely,

James McKay

Councillor, Birmingham City Council
Chair of the EUROCITIES Environment Forum

Anna Lisa Boni

EUROCITIES Secretary General

CC:

Karmenu Vella, Commissioner for Environment, Maritime Affairs and Fisheries

Karl Falkenberg, Director General, DG Environment

Philippe Jean, Head of Unit B4: Sustainable Mobility and Automotive Industry, DG Enterprise and Industry