

The Consumer Voice in Europe

BEUC RESPONSE TO THE EUROPEAN COMMISSION REGARDING THE PUBLIC CONSULTATION ON THE RDE 3RD PACKAGE



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BEUC, The European Consumer Organisation, welcomes the Commission's proposal on the 3rd Real Driving Emissions (RDE) package as an important step to tackle air pollution and the specific problem of particle emissions. With regard to particle emissions specifically, research indicates that motorists are particularly vulnerable to these pollutants and that inhalation of these substances can lead to numerous serious health problems ([Karanasiou et al, 2014](#); [EEA, 2015](#)). Research also indicates that there are low cost solutions for limiting their release ([ICCT, 2015](#)). It is clear that **particle emissions pose a serious public and consumer health problem and demand strict emissions limits to be implemented urgently and in a fully transparent manner.**

BEUC has the following recommendations with regard the Commission's proposed regulation:

- **Conformity factor:** We call on the Commission and Member States not to weaken the proposed conformity factor (the margin that accounts for test uncertainties) for particulate number (PN) of 50%. This is clearly in line with available scientific research ([JRC, 2016](#)) and in fact other evidence indicates that such a conformity factor can be considered a conservative estimate ([AECC, 2016](#)). Furthermore, conformity factors should be reviewed on a regular basis (annually) in order to ensure that technological advances are accounted for.
- **Timeline:** The proposed timetable for using RDE to test PN - 2017 for new vehicle types and 2018 for all vehicles - must be kept. Delaying the implementation of this measure would have the effect of delaying the urgently needed uptake of the appropriate pollutant filters by car manufacturers. Such a delay would also clearly result in emissions falling slower than what could otherwise be expected.
- **Transparency:** It is essential that the results of RDE tests are made public and in turn allow for consumers to have access to such information. BEUC has previously stated ([BEUC/ANEC, 2016](#)) to the Commission that an assessment should be made with regard to including information about the air pollution performance of cars under the car labelling Directive. Such information might help better inform the consumer about the environmental credentials of the vehicles they are buying.
- **Further work:** The Commission must also further assess the approach to measuring ultrafine particles that are currently not adequately captured by measuring equipment.

The decision taken by the Commission and Member States in 2015 to weaken the conformity factor for NO_x emissions for diesel vehicles was extremely disappointing. It is essential now that the Commission and Member States act firmly in order to restore consumer trust in the automotive sector through the adoption of this 3rd RDE package and in line with the above recommendations.

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