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27 September 2018

Subject: BEUC's recommendations on CO2 performance standards for cars and vans in the post-2020 period.

Dear Deputy Ambassador,

I am contacting you on behalf of BEUC, the European Consumer Organisation, ahead of the Environment Council of October 9th. On the agenda will be the Council's general approach regarding the European Commission proposal for a regulation that sets CO₂ performance standards for cars and vans in 2025 and 2030.

EU CO₂ emissions standards are crucial to enable consumers to have access to clean, low carbon and fuel-efficient cars. This will allow people to save money on fuel as well as better protect the environment and their health. Last November's proposal by the Commission lacks the necessary ambition and would fall short of delivering the expected benefits for consumers.

Below we list the key areas where the Council must adopt a strong position that will significantly contribute to decarbonising the European transport sector, for the direct benefit of consumers.

We first need to **increase the level of ambition of CO2 emission reductions targets, from 15 to 25% in 2025 and from 30 to 45% at least in 2030.** These targets will allow people buying a petrol/diesel car in 2025 to save between €4,400 and €9,400 in fuel over a car's lifetime when compared to 2015. Such reductions will also help materialise the forecasted drop in price of zero-emission cars such as electric vehicles – making them match the running cost of a petrol car by the middle of the 2020s. The more stringent the targets, the more zero-emission cars manufacturers will have to put on the market to reduce their average emissions.

To ensure that fuel consumption and emissions reductions are delivered in the real world, and not only on paper, we need to **extend the Real Driving Emissions test to CO2 emissions.** Today most cars achieve CO₂ targets – and thus, fuel consumption figures – only in the laboratory. This laboratory/real-world [discrepancy](#) translate to additional fuel costs per year versus what a consumer would expect on basis of the information when buying the car. For instance, the Austrian consumer group AK Wien found that for the top 30 selling cars in the country, owners were paying almost € 300 more per year due this gap. An official RDE test ought to close this difference.

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Finally, BEUC supports the **introduction of a real penalty scheme for low and zero-emission cars**. Currently, consumers [lack choice](#) in switching to these cars. Sales practices, among other things, undermine their real-world availability. In addition to rewarding car makers that place enough of these cars on the market, there should also be penalties for those that do not (in the form of stronger overall CO2 reduction targets).

We trust you will take these recommendations into account in your deliberations and stand at your disposal should you have any question.

Yours sincerely,

Monique Goyens
Director General