

Mr Antonio Tajani
Vice-President of the European
Commission
European Commission

B – 1049 Brussels

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Brussels, 13 December 2012

Subject: Consumers support early introduction of World Light Duty test procedure

Dear Vice-President,

We write on behalf of ANEC, BEUC and FIA Region I to express our concern that the current type approvals procedure using the **New European Driving Cycle (NEDC) does not represent realistic driving conditions**. Hence we urge to restrict the possibility to exploit flexibilities and tolerances in the current test procedure and the adaptation of the World Light Duty test procedure (WLTP) to be completed as swiftly as possible.

Our organisations support the long-term need to curb CO₂ emissions from transport. One strategy to achieve this goal is via the implementation of **stricter CO₂ emissions targets** for passenger vehicles. This step is needed to reduce the dependence on foreign oil imports, to protect consumers from steady increases in fuel prices and to prevent further air pollution. As consumers' representatives, ANEC, BEUC and FIA Region I are concerned about the **growing gap** between the measurement of emissions **during type approval** and the **level of real world emissions**.

The International Council on Clean Transportation (ICCT) compared the CO₂ emissions measured by the New European Driving Cycle (NEDC) at type approval with real world values. Based upon analyses of more than 28,000 user entries of the German fuel consumption database spritmonitor.de, the ICCT found that the gap between type-approval and "real-world" CO₂ values **increased from about 8% in 2001 to 21% today**, with a particularly strong increase since 2007. According to the analysis, this trend can be attributed to an **increased use of flexibilities** and worryingly coincides with the introduction of mandatory CO₂ reduction targets at European level.

We are therefore concerned that exploiting flexibilities and tolerances in the current test procedure may lead to a significantly lower decarbonisation and emissions reduction than originally planned by policy-makers. In addition, the full benefits of higher emission standards are not fully grasped by consumers, i.e. the fuel consumption reductions achieved in laboratory conditions **are not translated into monetary benefits for consumers**.

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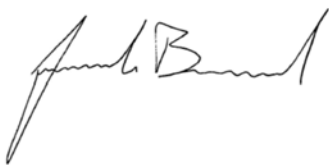
In addition, in order to be effective, any policy to cut emissions from transport must provide consumers with accurate and reliable information on fuel consumption and CO₂ emissions of cars, necessary to help them make the right choices and progress towards reaching ambitious CO₂ reduction targets. Estimation of running costs is a key criterion for consumers buying a car today and is likely to increase even more in the future, in light of soaring fuel prices.

Therefore, the New European Driving Cycle (NEDC) is **not adequate to measure the real life emissions level** and fuel consumption of a vehicle. As a consequence, consumers are misled on the benefits they can expect when buying an efficient vehicle today. The lack of predictability of expected real savings is likely to **generate mistrust**, which will negatively impact on the goal's achievement. More should be done to safeguard consumers' willingness to invest in energy efficient technologies by giving them reliable information on vehicles' actual performance.

The **test cycle** and **test procedure** therefore **need a thorough overhaul**. As an immediate action, we urge you to ensure the **limitation of the possibility of exploiting flexibilities and tolerances in the current test procedure** as a matter of urgency. In addition, we support the development of a better, harmonised testing standard. This is the objective of a World Light Duty test procedure in the framework of the United Nations Economic Commission for Europe (UNECE), which aims at enabling consumers to get a more realistic picture on vehicles' actual fuel consumption. As consumer organisations, we look forward to endorsing the **introduction of the new test procedure by 2016 at the latest, provided that it genuinely reflects real world conditions** and does not allow loopholes. In addition, we feel there is a need to significantly strengthen both **compliance testing and sanctions** by the authorities in case of non-compliance.

We urge you to ensure that the process of developing a better, harmonised testing standard is completed and implemented as swiftly as possible and that the new WLTP truly reflects real-world CO₂ emissions and fuel consumption for the entire range of different powertrains (including hybrid and electric vehicles). If this process is delayed or if the new type approvals procedure would still not represent realistic driving conditions, we trust that the European Commission will **take its own additional actions** to assure the provision of accurate and reliable information on fuel consumption and CO₂ emissions of cars.

Yours sincerely,



Jacob Bangsgaard
FIA Region I Director General



Monique Goyens
BEUC Director General



Stephen Russell
ANEC Secretary General

CC: Commissioner Connie Hedegaard, European Commissioner for Climate Action,
Commissioner Tonio Borg, European Commissioner for Health and Consumer Policy.