

# “We won't get fooled again”

## A CONSUMER CHECKLIST ON AMBITIOUS AIR POLLUTANT EMISSIONS STANDARDS FOR CARS

Since the 2015 Dieselgate affair, consumer organisations from the BEUC network have made significant efforts to obtain redress for the millions of impacted consumers. They also played a key role in pursuing the enforcement of air quality standards in the EU and helping consumers choose the cleanest cars. Yet more needs to be done by lawmakers to reduce car emissions.

That is because air quality should be considered a fundamental right for consumers, as stated by the World Health Organization when presenting new evidence of the health impact of pollutants such as nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM). EU regulation must therefore tackle the very crux of the issue: bringing down all emissions from cars on the road, where people drive them.

This also means that when going to the dealership, consumers should be able to trust what lies behind the ‘Euro’ standard of each vehicle, which regulates the emissions of various pollutants. In this checklist, we set out principles for ambitious legislation on this new set of standards, known as ‘Euro 7’.

# 1

### THERE CAN BE NO TRADE-OFF BETWEEN ENVIRONMENTAL (CARBON EMISSIONS) AND EURO (AIR POLLUTANTS) LEGISLATION

Despite the rise in the sales of electric cars, millions of internal combustion cars will be sold to consumers by 2035 and remain on the road until at least 2050. In some countries cars are on average over 15 years old. Euro 7 will therefore target a great share of the EU fleet for more than two decades.

As many petrol and diesel cars shall circulate alongside electric vehicles, there can be no trade-off between CO<sub>2</sub> standards legislation (an environmental policy tackling greenhouse gases) and Euro 7 (a primarily health policy tackling pollutants). The International Council on Clean Transportation (ICCT) showed that ambitious Euro 7 standards could lead to a 26% decrease in cumulative NO<sub>x</sub> emissions over the 2027-2050 period compared to currently adopted policies (Euro 6d). This is on top of the foreseen electrification of the fleet.



# 2

### CARS MUST MEET EMISSION STANDARDS IN ALL DRIVING CONDITIONS

The new Euro 7 legislation should assure consumers that their vehicle will meet emission standards in daily use. Testing procedures must therefore get closer to the reality of consumers using their cars. Lowering emissions in real-life driving conditions is indeed crucial to effectively enforce air quality standards and inform consumers. This also means that the so-called ‘conformity factor’ – which allows car makers to emit more than the current Euro 6 standards stipulate – must end.

As an example of more realistic testing procedures, the Green NCAP consortium (which includes several BEUC members<sup>1</sup>) developed a testing method using enhanced boundary conditions during laboratory and real-world driving tests (higher/lower ambient temperatures, robustness checks of the emission control systems, realistic payload, strong accelerations).

Setting limits for ‘cold start’ emissions, which are the most important, should also be done in a representative manner of urban journeys in Europe. The Euro 7 proposal could indeed introduce an ‘emission budget’ determining an aggregated limit value for emissions during the first kilometres driven by a car. Overall, special attention should be paid to short journeys, for example by decoupling the limits for the first kilometres and for the rest of the journey.

<sup>1</sup>Test Achats/Test Aankoop (BE), Consumentenbond (NL), Stiftung Warentest (DE), UFC-Que Choisir (FR), Which? (UK), Altroconsumo (IT), dTest (CZ), Deco Proteste (PT), Fédération Romande des consommateurs (CH), Forbrugerrådet Tænk (DK), OCU (ES), Verein für Konsumenteninformation (AT)

# 3

## EU REGULATION MUST STRICTLY LIMIT ALL POLLUTANT EMISSIONS

All pollutants emitted by cars, including those currently unregulated (such as very small particles or brake emissions), must be kept below strict limits. For example, evidence shows that a limit of up to 10mg/km for NO<sub>x</sub> emissions when the engine is warm (compared to the current 80mg limit for diesel and 60mg for petrol) is technically possible.

Euro 7 must impose the use of the best emission-control technologies available for all cars and fuels. Current standards give different limits, regulate different pollutants for different fuels/engines, or group them in generic categories. New standards should clarify this in light of new data available.

# 5

## THE EU MUST LEGISLATE FOR EURO 7 STANDARDS NOW – AND ENFORCE THEM

Car makers are pushing back on the need for a Euro 7 proposal. They have a long history in trying to delay any emissions legislation<sup>2</sup>. Yet, there is no time to waste.

Air pollution is the source of numerous deaths and diseases, even at low level of exposure. Any new delay in the implementation of strict Euro 7 standards would be unacceptable. According to the Commission's preliminary assessment, compliance costs for Euro 7 would be limited (between 100 and 500€ per car) and would not mean the end of the combustion engine.

Moreover, to avoid future scandals, market surveillance tools (random testing, intelligence sharing between EU and national authorities, etc.) must be reinforced.

<sup>2</sup> In July 2020, car makers notably demanded a six-month postponement of the newest vehicle emissions legislation due to the COVID-19 pandemic.



## EURO 7 LEGISLATION MUST KEEP EMISSIONS UNDER CONTROL THROUGHOUT THE LIFE OF THE VEHICLE

# 4

Most consumers in Europe buy cars second- or third-hand. Euro 7 approved vehicles are therefore likely to have a life span of more than 15 years. Many vehicles bought new in wealthier countries can also end their life in less affluent ones.

Euro 7 must therefore assure consumers that their vehicle will meet emissions standards regardless of whether they are bought new or used, via dedicated testing throughout the vehicle's lifetime and real-time monitoring of the emissions control system. The legislation should ensure that the vehicle will meet the standards for 20 years (or 240,000km), with regular checks on the accuracy of the deterioration factor for certain emissions whose control technologies naturally degrade over time.

# 6

## THE EU MUST BETTER INFORM CONSUMERS ABOUT CAR EMISSIONS

Consumers need clear and transparent information on their car's emissions to be able to make their purchase choice based on sustainability criteria. Along with Euro 7, the European Commission should revise the Car Labelling Directive. The current Directive is outdated and inconsistently applied across Europe. Improved legislation should allow consumers to clearly see a display of the Euro standard of a new or used car and easily compare the emission levels of various models based on real-life data.

