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Subject : Proposal for a Regulation of the European Parliament and of the Council setting emission performance standards for new light commercial vehicles as part of the Community's integrated approach to reduce CO<sub>2</sub> emissions from light-duty vehicles

- Policy debate

= Compilation of Member States' contributions

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Delegations will find in Annex a compilation of contributions by HU/LV/NL/SI/SE to the Presidency questions as set out in 6938/10.

HUNGARY

- a) *Do you agree with the proposed long -term target of 135 g CO<sub>2</sub>/km to be met in 2020 and subject to a review that will confirm its viability?*

Hungary agrees with the proposed long -term “2020” target of 135 g CO<sub>2</sub>/ km. It is important to harmonize the principles of existing LDV and the (planned) LCV regulations. In order to ensure consistency between the LCV and LDV regulations, care must be taken to ensure that the requirements and limits during the transition period do not impose more stringent conditions in the planned new (LCV) regulation than in the existing (LDV) regulation.

- b) *Do you consider that the flexibility mechanisms included in this proposal are appropriate to ensure the balance between the need to reduce CO<sub>2</sub> emissions and the feasibility of the objectives of this legislation? Is the level of penalties of this proposal adequate to ensure the dissuasive objective of this regulation, maintaining the necessary level of ambition?*

The flexibility mechanisms included in this proposal – regarding the currently predictable technical development – are appropriate for balancing the need to reduce CO<sub>2</sub> emissions and the feasibility of the objectives of this regulation. However, the results and conclusions of the planned revision of the LDV regulation in 2014 could influence views on the feasibility of the LCV regulation. If necessary, a reconsideration of the values for the transition period could be proposed. In our view, the level of penalties contained in the proposal are appropriate for achieving the aim of the regulation and meeting the desired target.

## LATVIA

- a) *Do you agree with the proposed long term target of 135 g CO<sub>2</sub>/km to be met in 2020 and subject to a review that will confirm its viability?*

Latvia supports the proposed long- term target of 135g CO<sub>2</sub>/km to be met in 2020, because in general it also helps to achieve the EU overall objectives concerning the reduction of climate change and air pollution.

- b) *Do you consider that the flexibility mechanisms included in this proposal are appropriate to ensure the balance between the need to reduce CO<sub>2</sub> emissions and the feasibility of the objectives of this legislation? Is the level of penalties of this proposal adequate to ensure the dissuasive objective of this regulation, maintaining the necessary level of ambition?*

Taking into account the fact that Latvia does not produce automobiles, we can't offer an opinion concerning the possible results of a phase-in approach to the reduction of CO<sub>2</sub> emissions or an opinion on possible result of imposing an excess emissions premium if the average specific emissions exceed its specific emissions target. Taking that into account Latvia could show flexibility in this matter and endorse the position of the majority of other Member States.

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## NETHERLANDS

- a) *Do you agree with the proposed long term target of 135 g CO<sub>2</sub>/km to be met in 2020 and subject to a review that will confirm its viability?*

The Netherlands agrees fully with the proposed long-term target of 135 g CO<sub>2</sub>/km since an ambitious target is necessary to achieve our climate goals and to keep the increase in global temperature below 2 °C. The proposed target is stringent but feasible, and is essential for reaching the reduction target set by the Effort Sharing Decision (406/2009/EC). Since CO<sub>2</sub>-reduction measures in the transport sector are more cost effective than in other sectors, we need to lead by example and set an ambitious target. An ambitious target also supports European efforts to promote development of electric, hybrid and hydrogen cars, and can help the European automotive sector in becoming more innovative and competitive.

Should the scope of the regulation be limited to N1-vehicles only, the Netherlands actually favours a slightly more stringent target. If the Council decides after the regulation's review in 2013 that N2 and M2 vehicles should remain excluded from its scope, the Netherlands would like to make the reservation that a downwards adjustment might be needed. This does not mean that later inclusion of the N2 and M2 vehicles should automatically entail a higher target than 135 g/km. After all, the proposed targets are based on inclusion of those N2 and M2 vehicles which are derived from N1 vehicles, as specified in the impact assessment.

- b) *Do you consider that the flexibility mechanisms included in this proposal are appropriate to ensure the balance between the need to reduce CO<sub>2</sub> emissions and the feasibility of the objectives of this legislation? Is the level of penalties of this proposal adequate to ensure the dissuasive objective of this regulation, maintaining the necessary level of ambition?*

The flexibility mechanisms included in the proposal are (more than) appropriate to ensure a balance between the need to reduce CO<sub>2</sub> emissions and the feasibility of the objectives of this legislation. Further extension of the flexibility mechanisms could seriously jeopardize the objectives of this regulation: reduction of CO<sub>2</sub> emissions from light-commercial vehicles.

The proposed excess emissions premium strikes an appropriate balance between a deterrent effect against non-compliance and competitiveness, based on the marginal CO<sub>2</sub> abatement costs through vehicle technology for light-commercial vehicles.

## SLOVENIA

- a) *Do you agree with the proposed long term target of 135 g CO<sub>2</sub>/km to be met in 2020 and subject to a review that will confirm its viability?*

We support the Commission's proposal for a regulation determining CO<sub>2</sub> standards for light commercial vehicles. This proposal allows a reduction of CO<sub>2</sub> emissions from traffic and thus a reduction of the impact on climate change, while at the same time it could provide a competitive advantage for the European car industry because of improved technology.

Slovenia has a lot of difficulties in the area of emissions in the non-ETS sector. Emissions from traffic, which amount to 30% of all CO<sub>2</sub> emissions in our country, are particularly problematic and so we must reduce emissions from all sources. This is why we want to pursue ambitious objectives that will allow a reduction in emissions, and we therefore support the long-term objective proposed by the Commission, i.e., reducing the CO<sub>2</sub> emissions to 135 g/km by 2020.

- b) *Do you consider that the flexibility mechanisms included in this proposal are appropriate to ensure the balance between the need to reduce CO<sub>2</sub> emissions and the feasibility of the objectives of this legislation? Is the level of penalties of this proposal adequate to ensure the dissuasive objective of this regulation, maintaining the necessary level of ambition?*

We believe that flexible mechanisms contained in the Commission's proposal are appropriate, because the capability of the car industry to adjust to the set objectives of reduced emissions must also be taken into consideration. The penalties must be effective, dissuasive and proportionate. They must be determined in such manner that they will encourage the implementation of legislation, which means that the costs of failure to meet the objectives must be higher than the costs of introducing the required changes. For the purpose of the proportionality of these penalties with the penalties determined for passenger cars in the legislation, we can also support a "3-gram" corridor with the proposed penalty amount.

## SWEDEN

- a) *Do you agree with the proposed long term target of 135 g CO<sub>2</sub>/km to be met in 2020 and subject to a review that will confirm its viability?*

Sweden believes that the Regulation should set a long-term target to reduce the CO<sub>2</sub> emissions from light-duty vehicles. We support the proposed target of 135 CO<sub>2</sub>/km by 2020. This long-term target should be reviewed no later than 2013. The same review should also include consideration of the utility parameter and the possibility to extend the scope to include vehicles of category N<sub>2</sub> and M<sub>2</sub> as well.

- b) *Do you consider that the flexibility mechanisms included in this proposal are appropriate to ensure the balance between the need to reduce CO<sub>2</sub> emissions and the feasibility of the objectives of this legislation? Is the level of penalties of this proposal adequate to ensure the dissuasive objective of this regulation, maintaining the necessary level of ambition?*

Sweden does not consider that the proposed flexibility mechanisms provide a suitable balance between the environmental objectives and the economic feasibility of the proposal.

Our opinion is that the proposed emission target of 175 g CO<sub>2</sub>/km should apply from 2014 without a phase-in period. Reducing CO<sub>2</sub> emissions from light-duty vehicles is a measure that is profitable for both the users of these vehicles and society at large. Moreover, it also reduces the burden on other non-ETS sectors.

To ensure the fulfilment of this target the level of the penalties needs to be €120 from 2014, in accordance with the Commission's impact assessment.

Sweden also finds the proposed derogations for certain manufacturers too generous. The number of qualified vehicles sold by the manufacturer needs to be reduced.

However we are in favour of the possibility for the manufacturers to form a pool to meet their targets. Pooling could be a flexible way to reduce the emissions more cost-effectively.

In order to encourage innovation of environmental and clean technologies we also support the proposals on credits for eco-innovations and super-credits for low-emitting, light-duty vehicles.

Additionally, Sweden believes that vehicles that are designed to run on biofuels have a role to play making road traffic sustainable and that the legislation should therefore give incentives for the vehicle industry to develop these vehicles also.

