



Brussels, 11 October 2004

Re: Input to Environment Council debate on Sustainable Road Transport

Dear Minister

On 14 October you will discuss a range of, generally technological, options to improve the environmental performance of road transport.

T&E, the European Federation for Transport and Environment, and EEB, the European Environmental Bureau, call upon you to:

1. Urge the Commission to come forward with a 'Euro 5' proposal for cars and vans for 2008 and a 'Euro 5/6' proposal for lorry engines for 2008/2010, with values corresponding with the 2003 proposal from the German Umweltbundesamt;
2. Ask the Commission to start preparations for a *legally binding follow-up* of the car industry's voluntary CO₂ commitment, to achieve the agreed 120 g CO₂/km target by 2010 at the latest;
3. Demand that noise standards for all types of vehicles – road, rail and air - are dealt with in the Environment Council, just like the emissions standards. In the meantime, tighten the noise standards for car tyres by 4 dB(A) as of 2007, and increase pressure on the speed and quality of the UN-ECE work on noise test cycles.

The reasons for these demands are outlined on the following pages. We hope you can take the considerations in both letters on board during the Council meeting.

Yours sincerely,

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Input to Environment Council debate on Sustainable Road Transport

Background: there is a problem, and technology is important in solving it

"The present system of mobility is not sustainable, nor is it likely to become so if present trends continue." This is a recent statement from, amongst others, Volkswagen, GM, DaimlerChrysler, Ford, Honda, Nissan and Toyota, working together in the World Business Council for Sustainable Development ("Mobility 2030" report). The statement is a powerful summary of what is going on. Estimations of premature deaths in Europe due to air pollution lie in the range of 100,000. The number of ozone alarm days has not decreased over the last decade. CO₂ emissions from transport rise by 2 per cent per year on average, negating improvements in other sectors.

History also shows that the process of setting environmental standards at EU level can be a very effective and broadly supported way to tackle the problems mentioned. In terms of economics, costs have shown to decrease drastically after mass-implementation of technologies. Although sustainable mobility requires a broad range of policies and measures to be implemented, technological standards are one of the most powerful instruments the European Union in general, and the Environment Council in particular, has.

Demand 1 Air quality: early introduction of standards proposed by UBA

The UBA study of 2003 shows that the technological means exist to reduce the particle emissions of diesel cars, vans and lorries by 90% and NO_x emissions by 70% compared with their respective 'Euro 4' levels. Such standards would save tens of thousands of lives all over Europe every year. Costs should in principle not play a role in decisions like this. Still, history shows that costs come down rapidly after mass-introduction. Three way catalysts were estimated to cost EUR 1,000 before introduction, they appeared to cost one tenth of that. Besides, ambitious standards boost innovation and long-run competitiveness of the European car and catalyst industry.

As the technology is available today, T&E and EEB feel that the standards as proposed by Umweltbundesamt are feasible, and that it is feasible to introduce the 'Euro 5' standards for cars and vans as early as in 2008. Furthermore, T&E and EEB endorse

Demand 2 Voluntary CO₂ commitment unlikely to deliver, binding follow-up needed

Officially, the voluntary commitment to achieve 140 g CO₂ per km by 2008 is on track: the industry met the interim target. T&E and EEB however have serious doubts whether the industry will live up to the commitment in the coming years. First, annual progress over the last years was only 1 per cent, where 3 per cent per year is needed to achieve the 140 g/km target. Second, an important part of the past reduction was achieved by the 'dieselisation' of the car fleet, an almost finished process that shifted the environmental burden from climate change to air pollution.

Council and Parliament previously agreed on a target of 120 g/km to be achieved by 2010 at the latest. This target will not be met without extra measures.

With fuel prices expected to stay high, climate change becoming more and more pressing, and the Kyoto Protocol almost entering into force, Europe needs to look for innovative ways to cope.

It is urgently needed to prepare a legally binding and environmentally effective follow-up to the voluntary commitment that leads to achieving 120 g/km by 2010 at the latest. Vans and air conditioners should certainly be included in such a follow-up. The responsibility of the car industry should stay very clearly and separately defined, and should not be watered down with an 'integrated approach' as favoured by the vehicle industry.

Demand 3 Noise: increase political control, speed up process

The present EU noise standards for cars, vans, tyres, motorcycles and actually also for lorries do by far not reflect the present level of technology. The work in Geneva (UN-ECE) and in several DG TREN Noise Working Groups takes place outside of the political domain and without any political pressure, contrary to the work on emission standards for example. As a consequence, the process has been extremely slow, and has led to very weak noise emission standards for cars, motorcycles and tyres and inadequate test procedures for the noise emission of cars.

All over Europe costly and often ugly noise barriers appear. Improving the noise at source could save billions of investment in such barriers and keep landscapes open. This is not just valid for road transport, but also for rail and air transport. And again, advanced standards could give European tyre manufacturers a competitive edge.

It is in the short term necessary to tighten the noise standard for tyres. Analysis shows that over half of the tyre types sold in 2002/3 are 4 dB(A) quieter than the limit specified in 2001/43 and some were even 8 dB(A) quieter. A tightening of 4 dB(A) as of 2007 should therefore be relatively easily achievable for all car tyre types. It is furthermore important to give a strong signal to the UN-ECE to speed up and to develop a set of test cycles that represent vehicle use in practice. And finally, it is crucial that the Environment Council gains the political power to decide about this issue that seriously affects the health and quality of life of EU citizens.

Brussels, October 2004

For further information:

www.t-e.nu
www.eeb.org
www.umweltbundesamt.de