



**Generalitat
de Catalunya**

GREATER LONDON AUTHORITY

18 January 2016

Dear MEP

On behalf of the above organisations, we are writing to call on you to follow the recommendation of the Environment Committee and **reject** the implementing measure on the **Real-world Driving Emissions (RDE)** test in plenary vote on 19 January. This measure will de facto increase the existing Euro 6 limits for diesel NOx and thus undermine future efforts to clean up Europe's air and improve public health. Air pollution is responsible for over 400,000 premature deaths in the European Union each year, causing health-related economic costs estimated between €330 and €940 billion annually¹.

In October 2015 the Technical Committee of Motor Vehicles (TCMV) voted to allow Euro 6 diesel cars to emit over double the Euro 6 limit from 2017 to 2020, and 50% more after 2020. This would result in new diesel cars emitting up to 120 mg/km of NOx instead of the 80mg limit agreed back in 2007. This will lead to much **slower improvements in air quality than required**, having serious repercussions for public health, our environment and economy.

The RDE proposal ignores the scientific advice of the Joint Research Centre of the maximum margin of error of $\leq 30\%$ ². It also ignores legislation agreed by MEPs in 2007 on Euro 6 NOx limits. The **RDE proposal is a political decision to increase the agreed limits for diesel NOx emissions by half and through an implementing act ignoring primary legislation.**

Should MEPs allow the measure to go through, the only other possibility on the table to strengthen RDE is through annual reviews to bring the long-term conformity factor down to 1. However, the

¹ European Commission Impact Assessment, Clean Air Package
http://ec.europa.eu/environment/air/clean_air_policy.htm

² https://circabc.europa.eu/d/a/workspace/SpacesStore/a4c8455f-de18-4f3a-9571-9410827c4f87/2015_10_01_Error_analysis_JRC.pdf

Commission has so far failed to provide any reliable commitment or outline plans to do so in the coming year.

Air pollution has been proven to cause many cardio-vascular and respiratory diseases such as asthma, allergies, COPD and damaging effects on prenatal and early childhood development.

Cities and regions rely heavily on Euro standards to reduce the shocking costs and health impacts of air pollution and to deliver improvements required by EU legislation, notably the Ambient Air Quality Directive (2008/50/EC). However, it is widely acknowledged that previous standards have failed to address NOx emissions in urban areas, which has prolonged NO2 exceedances in many cities across Europe.

RDE is an essential tool to address this problem and we know it works when it is implemented effectively. The introduction of RDE into the approval of new Euro VI heavy duty diesel engines has led to substantial improvements in NOx emissions in urban conditions³.

Unfortunately, the current agreement sets out to undermine this tool and subsequently delay and weaken Euro 6 limits for light-duty vehicles. This is unacceptable given that many cities and regions across the EU are in breach of air quality standards and facing infringement procedures.

We call on you to **support the Environment Committee and reject the RDE implementing measure in your vote on 19 January 2016**. This would send a clear message to the Commission and the Member States to come back with a better agreement by spring 2016 at the latest, so that diesel cars on EU roads can finally be as clean as intended in the Euro 6 legislation. Given that all the ground work for the new RDE test is already in place – on-road tests for monitoring purposes begin already this year – there is no reason why a more ambitious implementation of RDE cannot be agreed in a few months' time.

Yours Sincerely,

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Assumpta Farran i Poca, Director-General for Environmental Quality, Ministry for Territory and Sustainability, Catalunya

Prof. Bert Brunekreef, ERS Environment and Health Committee Chair

Génon K. Jensen, HEAL Executive Director

Jeremy Wates, EEB Secretary General

Jos Dings, Transport & Environment Executive Director

Karen Vancluysen, Polis Secretary General

Mariëtte Pennarts-Pouw, Executive of the province of Utrecht on behalf of the Randstad Region

Matthew Farrow, EIC Executive Director

Matthew Pencharz, Deputy Mayor for Environment & Energy, Greater London Authority

³ <https://www.london.gov.uk/sites/default/files/In-service%20emissions%20performance%20of%20Euro%20VI%20vehicles%20WEBSITE%20COPY.pdf>