







# Next round of Real-world Emissions tests: time for Governments to put public health above penny-saving carmakers

On 20 December the European Commission will meet with EU Member States in the Technical Committee on Motor Vehicles (TCMV) to agree the next milestone of the EU vehicle testing reform. The so-called **RDE 3rd package** extending the new on-road tests to particulate emissions from gasoline direct injection cars and is designed to tackle the problem of large numbers of ultrafine and highly damaging particles emitted from the new generation of gasoline engines. These particles penetrate deeply into human lungs and blood and contribute to the 467,000 deaths from air pollution annually according to the latest [EEA](#) figures.

Extension of the Real-world Driving Emissions (RDE) test to include particulate emissions is urgently needed to ensure Gasoline Direct Injection (GDI) engine exhausts are fitted with a particle filter like diesel engines. These GDI engines emit 10 times more particles than their predecessors when on the road despite the fact that an easy and cheap solution to the problem already exists; a Gasoline Particulate Filter (GPF) that costs around EUR 25 per car and captures the majority of dangerous pollution. Without robust tests the industry will not deploy this solution on an adequate scale and time frame.

The European Commission consulted on its proposal in November. T&E supported the proposals along with many stakeholders such as cities and regions, consumer organisations, some suppliers, health groups and NGOs from Austria, Belgium, France, Germany, Hungary, Italy, Poland, Portugal, Spain, Sweden and the Netherlands, as well as their EU umbrella organisations. All these organisations stress the need to apply the new tests to particulate emissions as soon as

## Carmakers' responses to RDE 3 public consultation

		Implementation dates	Conformity factor (PN)	Market fuel
	ACEA	Delay to September 2019 for all vehicles	Higher than 0.5	Limit fuels used in tests
	Ford	Delay	Higher than 0.5	Limit fuels used in tests
	Hyundai	Delay	Higher than 0.5	Limit fuels used in tests
	JAGUAR LAND-ROVER	Delay	Higher than 0.5	Limit fuels used in tests
	Opel	Delay to September 2019 for all vehicles	Not disclosed	Not disclosed
	Toyota	Delay to September 2019 for all vehicles	Not disclosed	Not disclosed

possible to prevent the potential damage and, in the aftermath of the emissions cheating scandal, all call for greater transparency and access to test results in the future.

Car manufacturers have also responded to the public consultation, both through their industry associations and as individual manufacturers. Some car makers have already announced plans to fit particle filters to their petrol vehicles from next year. These include the VW Group, Daimler (Mercedes-Benz) and the PSA Group. These companies did not respond to the consultation as their forward-looking technology choices mean they will not have difficulty complying with the new rules. The replies of the manufacturers that did respond are detailed below. These call for a delay and weakening of the Commission proposal. Specifically:










- To delay the introduction of the regulation;
- To effectively raise the limits through the use of a higher conformity factor;
- To hide the test results and not allow these to be published.

The most misleading industry claim is that manufacturers only have a few months lead-time to adjust their vehicles to the new RDE requirements. This ignores the fact that the decision to apply real-world tests to the particles limits was taken back in 2007 when the Euro 5/6 legislation was agreed; it was later confirmed in 2011. The car industry had at least 5 years to prepare the roll-out of GPFs across their fleets, which they always knew would be the technology required to meet the new test requirements.

The industry also want to increase the 50% margin by which they are allowed to overshoot the Euro 6 limits (a conformity factor). Refusal to make public emissions tests is particularly deplorable as this information is of great importance for local authorities (e.g. in design of their low emission zones), consumer groups and third-party testing organisations who have been calling for this for a long time. Several national governments are supporting the positions of their national carmakers despite the dozens of infringements over EU air quality limits and sombre death statistics. Based on Transport & Environment's intelligence so far, there are many governments who are backing the carmakers' position and would like to delay and weaken the law next week. These include **Italy**, the Czech Republic, Slovakia, Romania and most likely Poland and **Spain**. The Netherlands, Denmark, France and Germany are expected to largely back the Commission proposal. The positions of others, including **the UK**, are not yet known and the relevant decision-makers are refusing to disclose these. The table below summarises the intelligence so far.

The key countries that will sway the vote next week are Italy and Spain, yet the relevant ministries claim that they are still un-decided. Ford and Opel have an important factory in Spain and have been lobbying the Government to support their position. Similarly, Italy will be under pressure from Fiat. The UK position is also still being decided.

# Member States' positions on RDE 3<sup>1</sup>

		Implemen- tation dates	Conformity factor (PN)	Data trans- parency
	Germany	✓	✓	-
	France	✓	✓	-
	Italy	✗	-	✗
	Spain	✗	-	✗
	Sweden	✗	✓	-
	Netherlands	✓	✓	✓
	Denmark	✓	✓	✓
	Czech Republic	✗	✗	✗
	Slovakia	✗	✗	✗
	Poland	✗	✗	✗
	Romania	✗	✗	✗
	United Kingdom	-	-	-

<sup>1</sup> ✓ Support Commission proposal

✗ Support industry position

The agreement the Member States will reach next week will have a pivotal importance for the air that Europeans will breathe in cities and the technology investments that the industry will make in the coming years. In the last few days before the vote the ministers should make public their positions on RDE 3 as the public health is in their hands. If the industry position prevails and the decision is delayed and weakened, the European Parliament is likely to try and veto it early next year.

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