

# Position of Spain concerning the Commission proposal of amending Regulation (EC) No 692/2008 as regards emissions from light passenger and commercial vehicles (Euro 6)

(TCMV 28.10.15)

## A. General Statement

Spain welcomes the proposal from the European Commission concerning the second package of the real driving emissions (RDE) test procedures. We are in favour of a quick introduction of the first phase of requirements in order to improve the air quality in our cities. In that sense, we think that the date of September 2017 is acceptable. In that context, Spain can accept the text proposed by the Commission in TCMV, on 6.10.2015, with the following modifications:

### 1. Recitals:

- 10) In order to allow manufacturers to gradually adapt to the RDE rules, the final quantitative RDE requirements should be introduced in two subsequent steps. In the first step, which should apply from 3 years after the mandatory Euro 6 dates, a Conformity Factor of **2.3** should apply. The second step should follow **3** years after and should require full compliance with the emission limit value for NO<sub>x</sub> of 80 mg/km set out in Regulation (EC) No 715/2007 plus a margin taking into account the additional measurement uncertainties of the PEMS test procedure **with a Conformity Factor of 1.6**. For extended conditions as defined in point 5.2 of Annex IIIA to Regulation (EC) 692/2008, NTE emission limits should be increased by 60 % as compared to moderate conditions.

### 2. Article 1:

#### *Article 1*

Regulation (EC) No 692/2008 is amended as follows:

Annex I is amended as follows:

In Appendix 6, table 1 is amended as follows:

- (i) Rows ZD, ZE, ZF shall be replaced by the following:

"

ZD	Euro 6c-TEMP	Euro 6-2	M, N1 class I	PI, CI	1.9.2017	<b>1.9.2019</b>	<b>31.8.2022</b>
<b>ZE</b>	<b>Euro 6c-TEMP</b>	<b>Euro 6-2</b>	<b>N1-class II</b>	<b>PI, CI</b>	<b>1.9.2018</b>	<b>1.9.2019</b>	<b>31.8.2020</b>

ZF	Euro 6c-TEMP	Euro 6-2	N1 class III, N2	PI, CI	1.9.2018	1.9.2019	31.8.2020
----	--------------	----------	------------------	--------	----------	----------	-----------

"

(ii) The following rows are inserted after row ZF:

"

ZG	Euro 6c	Euro 6-2	M, N1 class I	PI, CI	1.9.2020	1.9.2022	
ZH	Euro 6c	Euro 6-2	N1 class II	PI, CI	1.9.2021	1.9.2023	
ZI	Euro 6c	Euro 6-2	N1 class III, N2	PI, CI	1.9.2021	1.9.2023	

"

### 2.1.1 Final Conformity Factors

The conformity factor  $CF_{pollutant}$  for the respective pollutant is specified as follows:

Pollutant	Mass of oxides of nitrogen (NO <sub>x</sub> )	Number of particles (PN)	Mass of carbon monoxide (CO) <sup>(1)</sup>	Mass of total hydrocarbons (THC)	Combined mass of total hydrocarbons and oxides of nitrogen (THC + NO <sub>x</sub> )
$CF_{pollutant}$	1,6	tbd	-	-	-

~~Margin is parameter taking into account the additional measurement uncertainties introduced by the PEMS equipment and is set to 0,2. This value shall be regularly revised according to the improved quality of the PEMS procedure due to technical progress.~~

### 2.1.2 Temporary Conformity Factors

By way of exception to the provisions of point 2.1.1, until **6** years after the dates given in Article 10 (4) and (5) of Regulation (EC) 715/2007 and upon request of the manufacturer, the following temporary conformity factors may apply:

Pollutant	Mass of oxides of nitrogen (NO <sub>x</sub> )	Number of particles (PN)	Mass of carbon monoxide (CO) <sup>(1)</sup>	Mass of total hydrocarbons (THC)	Combined mass of total hydrocarbons and oxides of nitrogen (THC + NO <sub>x</sub> )
-----------	---	--------------------------	---	----------------------------------	---

					NO <sub>x</sub> )
$CF_{pollutant}$	2,3	tbd	-	-	-

The application of temporary conformity factors shall be recorded in the certificate of conformity of the vehicle.

5.4.1 The overall excess or insufficiency of driving dynamics during the trip shall be checked using the methods described in Appendix 7a of this Annex.

**In this regards, average v.apos should be limited to less than or equal to 12 in the case of moderate conditions and should be limited to less than or equal to 17 in case the of extended conditions.**

5.4.2

(g) In point 6.11, the following sentence is added:

“In addition, the proportional cumulative positive altitude gain shall be **less than 650 m/100 km for moderate conditions, and less than 1100 m/100 km in the case of extended conditions**, and be determined according to Appendix 7b.”

## **B. Justification**

Spain is the European leader in production of diesel vehicles which represents 54.2% of our total national production motor vehicles, that represents 1.4 million of diesel passenger cars per year. In fact, 31 over 43 models manufactured in Spain are provided with a diesel engine.

Regarding diesel engines, the total yearly production reaches the amount of 1.1 million. In terms of work force, the data shown before represents an amount of 2.500 qualified employees.

In total, net value of diesel vehicles and engines production in Spain reaches the amount of 25.000 mill. € per year.

The introduction of severe new requirements in terms of timing and conformity factor would have the following consequences:

- Negative influence in the Spanish economy.
- Difficulties in meeting CO<sub>2</sub> targets.
- Weakness in European competitiveness related to diesel technology.
- Would introduce the risk of destroying highly qualified jobs.
- Would reduce the investment in R+D+i.

- Would facilitate the introduction of non European technologies.
- Would have implications across the entire value chain: suppliers, OEMs and dealers.

Regarding vehicles of category N1 class II and III, it should be considered that the European market of LCVs in category N1 classes II & III, N2 and M2 is relatively small: around 9% of the total passenger car and LCV market. Moreover, some of these vehicles are outside the scope of the RDE requirements since they are approved according to the heavy-duty emissions legislation. It is, then, appropriate to delay the application of the new requirement for some years.