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**ENV 103  
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**ADDENDUM TO NOTE**

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from : General Secretariat  
to : Delegations

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Subject : Communication from the Commission to the Council and the European  
Parliament on the results of the review of the Community Strategy to reduce CO2  
emissions from passenger cars and light-commercial vehicles  
– Policy debate at Council (Environment) on 20 February 2007  
= Written contributions

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In reply to questions from the Presidency (6189/07), delegations will find annexed written contributions from BE/RO.

Belgium**1. Do Ministers believe that the existing self-regulation by industry to reduce CO<sub>2</sub> car emissions should be replaced by legislation binding on carmakers?**

In Belgium's view, the solution to the problem requires an integrated cost-efficient approach involving both the supply side (vehicles, infrastructure etc.) and the demand side (demand for travel, choice of means of transport etc.). The importance of emissions from vehicles themselves in this context should not be underestimated. As it is very uncertain whether the car industry will deliver on the voluntary agreements setting emissions of 140 g/km by 2008-2009, a harmonised Community initiative is required and consideration should be given to imposing binding rules. From that point of view, then, the answer to the first question is in the affirmative. Coming on top of existing measures, such a step will also help reduce air pollution and improve air quality.

The impact of binding rules will depend very heavily on the form they eventually take. Will there be one rule for each vehicle manufacturer? Will car manufacturers be able to spread the burden among themselves? Will allowance be made for the number of vehicles sold? Will rules be imposed for each Member State? What penalties will be faced and by whom?

Care should be taken to ensure that the difficult balance to be struck actually results in an appreciable reduction in CO<sub>2</sub> emissions from road transport.

As there is still a long way to go and in view of the importance of further elaboration of the details, Belgium would ask the Commission to put forward a specific proposal as soon as possible, rather than waiting until the end of the year, accompanied by the necessary extensive, high-quality impact assessment.

**2. Do you agree with the target of 120 g CO<sub>2</sub>/km by 2012, knowing that improvements in motor technology would have to reduce emissions to 130 g CO<sub>2</sub>/km while complementary measures would contribute a further emissions cut of up to 10 g CO<sub>2</sub>/km?**

Belgium certainly agrees with the retention of the 120 g/km target set back in 1995.

The impact assessment in preparation for the legislative initiative should shed light on the feasibility of that target, on the allocation mechanism and on coordination of the various tracks (engine technology and other measures) within the promised integrated approach.

Pending that information, we are therefore unwilling as yet to abandon in advance the existing target of 120 g/km by 2012 via engine technology. Given the imponderables, given the uncertainty regarding coordination of the various tracks and as CO<sub>2</sub> emissions from road transport have been increasing since 1995, when the CO<sub>2</sub> strategy was approved, we wonder how to ensure that the 10 g/km gap can actually be bridged. In doing so, care must be taken to avoid any double counting with the impact of biofuels under the review of the Directive on fuel quality.

I should also just like to touch briefly on the demand-oriented measures in the Commission communication. By this, the Commission means influencing demand for clean vehicles. It is crucially important that (existing) climate-friendly cars find sufficient market outlets. This means that, besides further technological innovation, urgent attention must also be paid to greening the procurement policy of individual consumers, authorities and businesses alike. Clean cars are available, but we need to have them better "sold".

We agree with the Commission that vehicle taxation provides an important lever with which to incite consumers to buy cleaner vehicles. However, there has been no further progress on the relevant proposal submitted by the Commission. We should like to repeat the proposal for enhanced cooperation on environmental taxation, which found considerable resonance at the informal Council meeting in Finland. The Commission could begin a kind of benchmarking of Member States so as, via an open coordination method, firstly to work towards harmonisation and secondly to provide Member States with a picture of the effectiveness of the various existing and future systems.

The Commission should also carefully consider whether, besides the financial and fiscal instrument, it cannot also take any other, additional harmonising measures to influence consumer behaviour and promote sales of clean cars.

I should lastly like to thank the Commission for its proposal and wish it every success in further work on it.

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## Romania

### **1. Do Ministers believe that the existing self-regulation by industry to reduce CO<sub>2</sub> cars emissions should be replaced by binding legislation on carmakers?**

The replacement of industry self-regulation by binding EU legislation may be an option.

This option should be pursued only if substantial and independent evaluations show that self-regulation does not really work, both from a European and a global perspective.

Romania also considers that an impact assessment study is necessary before it is possible to decide how to further pursue the matter. The impact study should cover the environmental, economic, financial and social impacts and all other relevant aspects.

### **2. Do you agree with the target of 120g CO<sub>2</sub>/km by 2012, knowing that improvements in motor technology would have to reduce emissions to 130g CO<sub>2</sub>/km while complementary measures would contribute further emissions cut of up to 10g CO<sub>2</sub>/km?**

The target of 120g CO<sub>2</sub>/km by 2012 is a very ambitious one. Romania is not opposed, in principle, to its adoption at EU level. Nevertheless, European automotive competitiveness needs to be considered.

Romania does not support a differentiated approach on types of vehicles, taking into account that this would lead to high costs for vehicles with small cylinder capacity. Such a measure would have a significant impact on the national car fleet.

Consumers with small incomes, the main buyers for this type of car, will bear the financial burden of this measure.

Regarding 10 g CO<sub>2</sub>/km, we must make sure that biofuels which will be available on the market – at a competitive price – will make it possible to reach this target.

In this respect, all possibilities should be explored in order to identify and to promote the most advanced technological solutions, including, if appropriate, synthetic fuels.

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