european aluminium association

Position paper

EAA position on the revision of the regulations on CO2 from cars (EC No 443/2009) and vans (EC No 510/2011)

Brussels, January 2013

The European Aluminium Association (EAA) fully supports the objectives of reducing the GHG emissions from the transport sector but is concerned by EU regulations penalizing solutions that are directly contributing to achieve this objective. EAA is calling policy makers to fully take into consideration the contribution of all sustainable technologies such as lightweighting in the revision of the Regulations 443/2009 and 510/2011 to ensure technology neutrality.

The current calculation method based on mass is not rewarding all CO2 emission reduction technologies the same way. A manufacturer choosing lightweighting to reduce its CO2 emissions is today penalized with a tougher target, whereas heavier cars are allowed to emit more. By instead basing the CO2 target on the car's footprint (size), manufacturers would get the full CO2 credit for any efficiency improvement, including making vehicles lighter. EAA acknowledges the fact that differentiating the CO2 target with a utility parameter is a good way to ensure diversity of the European car fleet. However, the mass of a vehicle is not a good measure of its utility (usefulness).

- **Reducing vehicle weight** is one of the most straight forward ways to reduce the energy consumption and hence also the CO2 emissions of a car. A weight reduction of 100 kg results in 8 g/km lower CO2 emissions.
- Using mass as the utility parameter clearly **reduces the incentives** for manufacturers to invest in lightweight technologies since a lighter car is penalized with a tougher CO2 target.
- Mass is **not a technology neutral** parameter. Different CO2 reduction technologies are not treated in the same way. CO2 reduction technologies not changing the weight (like engine efficiency improvements) receive full credit while lightweighting is penalized with a tougher target.
- The **mass of the car is not a good indicator of its utility (usefulness)** and should therefore not be used to define the specific emission targets.

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- On the contrary, footprint (track width x wheelbase) is a **better utility parameter**: it is more neutral, stable and better reflects the usefulness of a car. Car buyers might chose a car based on its size, but not on its weight.
- A footprint based regulation would give the manufacturers the full credit for their effort to lightweight their cars and would lead to an **overall lower cost for manufacturers for meeting the 2020 targets.**
- A recent study by the International Council for Clean Transportation (ICCT) shows that a footprint based regulation can reduce the average compliance cost for manufacturers by up to 30%. The impact assessment from the European Commission also shows that the average cost for manufacturers would be lower with a footprint based regulation.

Finally, a footprint based regulation would also be better for overall vehicle safety since **size is a better determinant for vehicle safety than mass.** A lighter car is also more "friendly" for other vehicles in the event of a crash since less crash energy needs to be absorbed

About the European Aluminium Association:
The European Aluminium Association, founded in 1981, represents the European aluminium industry from alumina and primary production to semi-finished and end-use products, through to recycling. The European aluminium industry directly employs about 255,000 people. *For information, please visit www.alueurope.eu*

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