[redacted] IVA5

Von: [redacted] IVC4/IVA5
Gesendet: Montag, 11. Juni 2012 14:47
An: [redacted] IVA5; [redacted] IVA5
Betreff: AW: CO2-Grenzwerte für Pkw - Kosteneinsparungen für Verbraucher

Danke und bitte Termin vereinbaren.

[redacted]
IV C 4 - Umweltinnovationen, Elektromobilität -
Bundesministerium für Wirtschaft und Technologie
Scharnhorststraße 34-37
D-10115 Berlin
Telefon 030 2014[redacted]

-----Ursprüngliche Nachricht-----
Von: [redacted] IVA5
Gesendet: Freitag, 8. Juni 2012 11:23
An: [redacted] IVC4/IVA5; [redacted] IVA5
Betreff: WG: CO2-Grenzwerte für Pkw - Kosteneinsparungen für Verbraucher

Wie in der Ref.-Besprechung dargestellt, anbei Infos und die Bitte von Greenpeace um einen Termin. Wenn Sie einverstanden sind, kann [redacted] einen gemeinsamen Termin vereinbaren. [redacted]

-----Ursprüngliche Nachricht-----
Von: [redacted] [mailto:[redacted]@greenpeace.org]
Gesendet: Dienstag, 22. Mai 2012 15:47
An: [redacted] IVA5
Cc: [redacted]@greenpeace.de
Betreff: CO2-Grenzwerte für Pkw - Kosteneinsparungen für Verbraucher

Sehr geehrter [redacted]

Wir hatten uns im letzten Jahr getroffen um über die CO2-Grenzwerte für Pkw zu sprechen. Hier nun unser Beitrag zur Konsultation der EU-Kommission sowie eine neue Studie, die wir neulich herausgegeben haben.

Wir haben berechnen lassen, welche Kosten der Fahrer eines Durchschnitts-Pkw in Deutschland und in weiteren 14 EU-Ländern einsparen kann, wenn die CO2-Flottenziele der EU wie beschlossen umgesetzt oder weiter verschärft werden.

Unseren Berechnungen zufolge spart der Durchschnittsfahrer in Deutschland ca 430 EUR oder 20% im Jahr an Kraftstoffkosten, wenn das 2020-Ziel von 95 gCO2/km ohne Aufweichungen bestätigt wird. Wird ein weiteres Ziel von 60 gCO2/km bis 2025 festgelegt, verringern sich die Kosten um ca 1 200 EUR oder 60% bis 2030, fünf Jahre nachdem der Zielwert für die Neuwagenflotte in Kraft getreten ist.

Die Berechnungen hat Malcolm Ferguson für uns ausgeführt, ein ehemaliger Berater für die EU-Kommission und Direktor für Klimawandel bei der Umweltagentur für England und Wales. Sie beruhen auf der (konservativen) Annahme, dass die Kraftstoffpreise konstant bleiben und nicht weiter ansteigen. Hier ist unser Briefing for the EU-15. Ich kann Ihnen die Berechnungsmethode zukommen lassen falls erwünscht.

Aus unserer Sicht kann die EU und die europäische Automobilindustrie nur mit einem niedrigen Zielwert für 2025 bei den Fahrzeugtechnologien weiterhin in Führung bleiben. Sowohl die USA als auch China sind dabei, Flottenziele festzulegen, die eine stärkere Absenkung des Kraftstoffverbrauchs, und damit eine schnellere technologische Entwicklung, erforderlich machen.

Wir würden gern hierzu das Gespräch mit Ihnen wieder aufnehmen, vielleicht am besten nach der Veröffentlichung der Vorschläge Mitte Juli? Ich habe die Anfrage auch an [redacted] gerichtet.

Mit freundlichen Grüßen,

[redacted] und [redacted]

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GREENPEACE

8 December 2011

Consultation on reducing CO2 emissions from road vehicles
Greenpeace contribution

Background

The European Union (EU) has, rightly, positioned itself as a global leader in fighting catastrophic climate change. It has signed up to the objective of keeping global average temperature rise below 2 degrees Celsius and put measures in place to reduce its greenhouse gas (GHG) emissions. Whilst Europe's overall emissions decreased by 17.4% between 1990 and 2009, emissions from road transport increased by 18% over the same period, and so road transport's share in the overall emissions has risen steadily.[1]

One reason for this is that the road sector depends almost entirely on oil, a fossil energy source. While the oil consumption per kilometre driven has declined due to vehicle efficiency improvements, the overall amount remains high at about 180 million tonnes of oil a year burnt in cars and vans alone. This represents more than a third of overall EU oil consumption.[2] The consequences are not only excessive levels of GHG emissions but also an increasing dependency on oil imports, with the associated risks of supply shortages and price shocks.

Greenpeace has calculated that the implementation of stringent CO2 standards could reduce oil consumption of cars and vans by 42 million tonnes in 2020 and 58 million tonnes in 2030, compared to business as usual. This would amount to a GHG reduction of 134 MtCO2 compared to BAU in 2020 and 186 MtCO2 by 2030. An annual saving of around $16 billion ($2008) in 2020 and of $42 billion ($2008) by 2030 could be made.[3]

The EU has adopted CO2 emission standards for passenger cars and light commercial vehicles (vans). A review of both laws is scheduled "by 2013" to decide on the implementation details of the two 2020 targets, and confirm the level of the vans target.

Greenpeace contribution to the Commission consultation

This contribution to the consultation focusses on cars and vans. However, Greenpeace is also concerned that stringent CO2 standards for trucks should be set urgently to counter the continuous rise in oil consumption and GHG emissions from this sector.

As regards the EU's CO2 standards for cars and vans, Greenpeace is asking the European Commission to not only consider the 2020 timeframe but to set further targets for passenger cars of 60 gCO2/km, and 100 gCO2/km for vans, by 2025. The first part of this paper explains why these targets are necessary, feasible and beneficial to Europe's car industry. The second part sets out a number of elements to be considered to achieve these targets.

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[1] European Commission, Progress toward achieving the Kyoto objectives, October 2011, http://ec.europa.eu/clima/policies/g-gas/docs/com_2011_624_en.pdf

[2] Greenpeace, Steering clear of oil disasters, October 2010, http://www.greenpeace.org/eu-unit/en/Publications/2010/Steering-clear-of-oil-disaster/

[3] Greenpeace, Steering clear of oil disasters, October 2010

New targets for 2025

(1) Necessary to put the brake on climate change

The best scientific knowledge available today suggests that even a 90% reduction of global greenhouse gas emissions by 2050 will not be sufficient to stay below the 2 degree threshold.[4] In order to prevent dangerous climate change, more reductions will be needed.

For developed nations this means that they need to practically eliminate all GHG releases into the atmosphere by 2050. To obtain these reductions, all sectors have to strive for zero emissions. Cars and vans have the potential to reach that level, based on currently known measures and technologies, whereas this will be harder to achieve for other sectors, including shipping and agriculture.[5]

Today, car technologies exist that can eliminate GHG emissions entirely by using energy from renewable sources. To make sure that cars and vans no longer emit any greenhouse gases by 2050, new cars being brought to market in Europe must have zero tailpipe emissions sometime before 2040. In less than 30 years, a complete technological changeover must have happened in the sector, not only in Europe but in the whole of the industrialised world, if we are to have any chance of preventing the worst impacts of global climate change.

Such transformational change will not happen unless legal standards are put in place to drive the development and roll-out of new technologies. This requires early investments. Therefore, standards should provide ample lead time for industry to prepare their implementation.

(2) Feasible from a technical and economic perspective

Once the EU's first legally binding CO2 targets were set, car manufacturers have been advancing not only faster than before but even faster than required by the law. Whilst some companies are very close to delivering their 2015 targets already, others have independently set themselves targets to exceed their legal standards.[6] According to projections by the European Commission, the EU's 130 gCO2/km target is likely to be achieved earlier than set out in the law.[7] Clearly, even greater improvements are possible if also those companies that have chosen to advance more slowly are legally obliged to accelerate improvements.

The European GHG- TransPoRD project has found that it is technically and economically possible to reduce new car emissions to 70 to 90 gCO2/km by 2020 and 50 to 60 gCO2/km by 2030. These targets would be achieved by either implementing all available efficiency technologies for petrol and diesel cars, or by combining efficiency advances in conventional vehicles with the introduction of battery and fuel cell electric vehicles. The researchers recommend that CO2 emission targets for new cars should be set at these levels.[8]

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[4] Greenpeace Climate Vision, May 2009, http://www.greenpeace.org/international/en/publications/reports/greenpeace-climate-vision/

[5] Stockholm Environment Institute, Europe's Share of the Climate Challenge, November 2009, http://www.sei-international.org/news-and-media/1732

[6] Greenpeace, Claims vs reality – how the European car lobby proved itself wrong, December 2011, http://www.greenpeace.org/eu-unit/en/Publications/2011/car-truths/

[7] TNO et al., Support for the revision of Regulation (EC) No 443/2009 on CO2 emissions from cars, November 2011, http://ec.europa.eu/clima/policies/transport/vehicles/cars/docs/study_car_2011_en.pdf

[8] GHG-TransPoRD, Final Conference Summary Note, November 2011, http://www.ghg-transport.eu/ghg-transport/downloads/Final_Conference/GHG_TransPoRD_Summary_Final_Conference.pdf

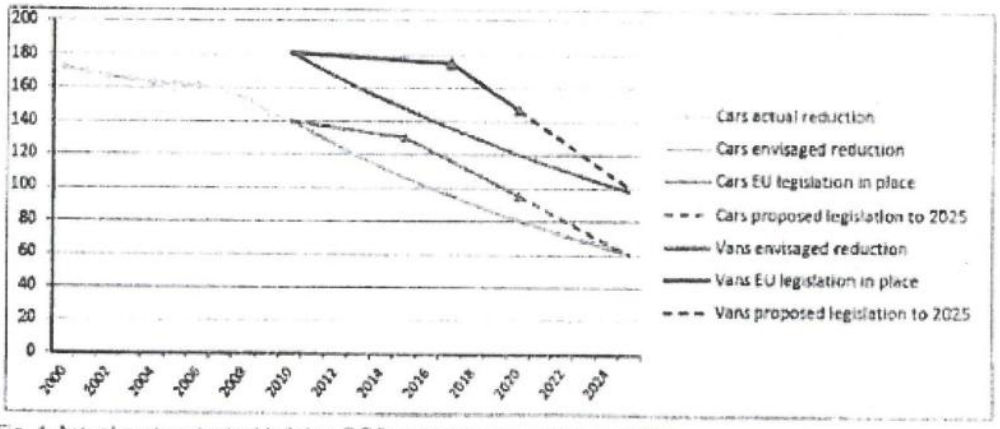

Fig. 1 Actual and projected tailpipe CO2 emission reductions to 2025

(3) Beneficial to the European industry

Today, Europe is a frontrunner in car efficiency worldwide. However, other markets have meanwhile developed standards that come close to the EU's benchmark target for 2020. The United States, for example, have proposed new standards until 2025 which would require a reduction in passenger car CO2 emissions by 5% per year between 2016 and 2025.[9] The graph below illustrates how this will bring the US market, which still has significantly higher levels than the EU, much closer to EU levels.

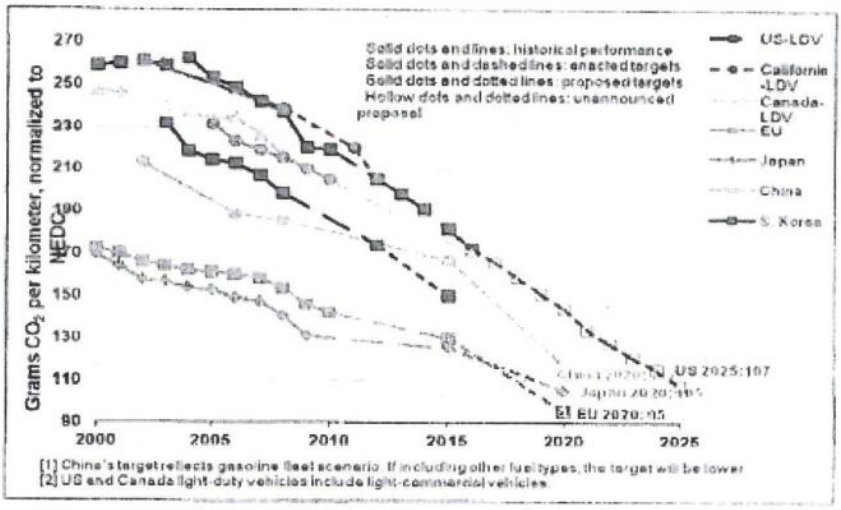

Fig. 2 Historical fleet CO_2 emissions performance and current or proposed standards[10]

[9] US EPA, Fact Sheet "EPA and NHTSA Propose to Extend the National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks", November 2011, http://www.epa.gov/otaq/climate/documents/420f11038.pdf

[10] ICCT, Global Comparison of Light-Duty Vehicle Fuel Economy/GHG Emissions Standards, August 2011 http://www.theicct.org/passenger-vehicles/global-py-standards-update/

While it is too early to judge how the European industry has fared on the EU's CO2 standards there is some evidence that the US carmakers have suffered from the absence of tighter rules. Former Vice-Chairman of General Motors, Bob Lutz, has argued that part of the reason why GM failed in the US was because of poor US fuel economy standards.[11] This may well be the reason why the proposed US rules to 2025 have the support of 13 global manufacturers.[12]

A new EU target of 60 gCO2/km for passenger cars, and 100 gCO2/km for vans, will allow Europe, still the world's largest car market, to retain its position at the forefront of the global race toward cleaner cars, and foster the European industry's strong position in the global marketplace.

Standards and flanking measures to achieve these targets

The following elements should be part of the new proposals.

(1) New targets for 2025

The current EU standards set targets to 2020. It is crucial that the EU sets out further demands on the car industry early on to ensure they are reflected in companies' plans. These targets should be in line with the requirements of the global climate crisis and Europe's pole position in developing and producing technologically advanced vehicles that reduce oil consumption and CO2 emissions, and lower our dependency on oil imports. Greenpeace advocates targets of 60 gCO2/km for cars, and 100 gCO2/km for vans, by 2025.

It is these CO2 targets, not the inclusion of "multipliers" for ultra-low emission vehicles, that will be the key driver for the market introduction of new technologies. The existing "multipliers" or "super-credits" should not be continued as this would only lead to higher CO2 emissions overall.[13]

(2) Re-assessment of 2020 targets

We are also asking the European Commission to reconsider the 2020 targets set in the existing legislation, in particular for vans.

Latest data show that the EU's van standard would achieve less than a 20% reduction in CO2 emissions from new vans between 2010 and 2020, from 181 to 147 gCO2/km. With such a standard, the EU would do too little to drive technology improvements in the sector, and miss an important opportunity to reduce its oil consumption and CO2 emissions. In our view, an average of 120 gCO2/km for vans can and should be achieved by 2020.

The car standard would achieve more than a 30% reduction between 2010 and 2020, from 140 to 95 gCO2/km. However, recent developments indicate that faster reductions are possible, and EU research recommends a target in the range of 70 to 90 gCO2/km.[14] Greenpeace believes that average CO2 emissions should be reduced to no more than 80 gCO2/km by 2020.

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[11] Automotive News, How GM cars got better, May 2011, http://www.autonews.com/apps/pbcs.dll/article?AID=/20110523/OEM02/305239951/1432#ixzz1NBxqyHJV

[12] Stakeholder Commitment Letters, July 2011. http://www.epa.gov/otaq/climate/letters.htm#2011a

[13] TNO et al., Support for the revision of Regulation (EC) No 443/2009 on CO2 emissions from cars. November 2011, http://ec.europa.eu/clima/policies/transport/vehicles/cars/docs/study_car_2011_en.pdf

[14] GHG-TransPoRD, Final Conference Summary Note, November 2011

(3) Footprint not weight as the basis for differentiation

The current law sets different targets for different vehicles on the basis of weight - heavier cars get a more lenient CO2 limit than lighter cars. To make sure that all avenues of CO2 reduction are fully exploited, including the reduction of vehicle weight, the EU should move toward a size-based approach as customary in the US.[15]

(4) Regulating the real climate impact of cars

To provide for a maximum impact in the real world, and public acceptance of the measures, the EU should make sure it regulates the real climate impact of cars.

a. An accurate measurement of tailpipe emissions

Today, tailpipe CO2 measurements return results that are far from reality. New procedures should be put in place to ensure that official CO2 levels provide a more accurate reflection of the reality. This new official EU test procedure should be the sole means to measure CO2 reductions in new cars and vans. No CO2 credits should be given for so-called "off-cycle" or "eco-innovation" technologies whose impact cannot be measured under this procedure.

b. Capturing the full climate impact of cars

With new technologies such as hybrid and battery electric cars, some of the savings in tailpipe emissions will be wiped out by increases in GHG emissions linked to the production of the vehicles[16,17,18] and energy supply for the operation of the vehicles[19].

As these new technologies gain ground, driven by the EU's CO2 standards, it will be necessary to move beyond tailpipe CO2 standards in order to capture a wider range of climate impacts, and to differentiate between different vehicles with zero tailpipe emissions. These changes should be made in a way that promotes both the reduction of energy consumption and the use of renewable energy.

(5) Bringing the message to consumers

The EU should also look to ensure that consumers are well-informed about the climate impact of the vehicle they choose to buy or rent. A clear and honest labelling scheme will help to increase the market demand for the vehicles produced to meet the EU's CO2 standards.

For further information, please contact Franziska Achterberg, Greenpeace European Unit, at franziska.achterberg@greenpeace.org or +32 2274 1918.

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[15] ICCT, Evaluation of parameter-based vehicle emissions targets in the EU, July 2011, http://www.theicct.org/pubs/ICCT_EUtypicalstargets_jun2011.pdf

[16] Ricardo, Preparing for a Life Cycle CO2 Measure, May 2011, http://www.lowcvp.org.uk/assets/reports/RD11_124801_4%20-%20LowCVP%20-%20Life%20Cycle%20CO2%20Measure%20-%20Final%20Report.pdf;

[17] AEA et al, The role of GHG emissions from infrastructure construction, vehicle manufacturing, and ELVs in overall transport emissions, April 2011, http://www.eutransportghg2050.eu/cms/assets/Uploads/Meeting-Documents/EU-Transport-GHG-2050-II-Task-2-Report-21April-2011_DBAET.pdf

[18] CE Delft, April 2011, Assessment of electric vehicle and battery technology, http://ec.europa.eu/clima/studies/transport/vehicles/docs/ct2_en.pdf

[19] AEA et al, Exploration of the likely knock-on consequences of relevant potential policies, June 2011, http://www.eutransportghg2050.eu/cms/assets/Uploads/Meeting-Documents/EU-Transport-GHG-2050-II-Task-3-Preliminary-Report27042011.pdf

Cost of driving briefing note

May 2012

Greenpeace commissioned an independent expert to calculate the cost savings that drivers in 15 European states can expect if EU fuel efficiency legislation is implemented as-is, and if it is improved. This briefing accompanies the research to highlight the main findings and put them in the context of today's record high fuel prices and this summer's expected lobby battle as EU legislation is revised.

Record fuel prices

Fuel prices are at record levels in Germany, France, the UK, Greece, Italy and Spain, according to European Commission data. In April, the average European driver was paying €1.69 per litre of petrol and €1.84 in Italy and Greece [1, 2]. Several governments are discussing measures to shield drivers from further price hikes.

Efficiency saves money

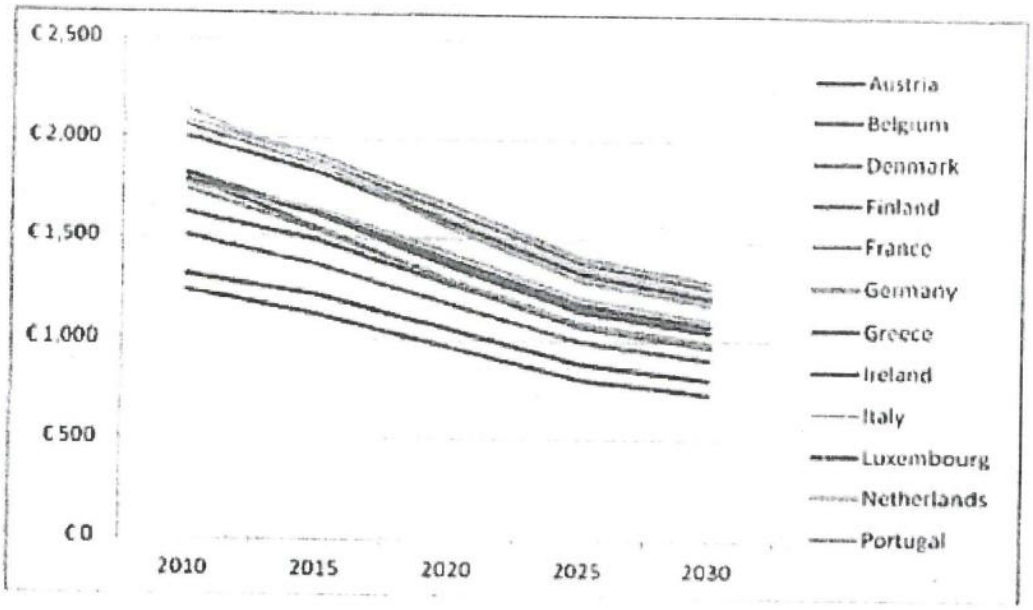
Besides driving less, the best way to shield drivers from rising pump prices is to improve the efficiency of new cars. EU fuel efficiency legislation has been in place since 2009 and is subject to review starting this summer.

Today, drivers in Europe pay between €1,235 (Luxembourgish average – European low) and €2,143 (Swedish average – European high) in annual fuel costs. EU law requires carmakers to reduce average CO2 emissions from 140 grammes CO2 per kilometre to 95g CO2/km by 2020. If this figure remains after this summer's legislative revision, costs will go down to between €962 (Luxembourgish average – European low) and €1,665 (Italian average – European high) by 2020.

	2010	2015	2020	2025	2030
Austria	€ 1,314	€ 1,213	€ 1,051	€ 886	€ 807
Belgium	€ 1,788	€ 1,616	€ 1,391	€ 1,174	€ 1,072
Denmark	€ 1,792	€ 1,547	€ 1,290	€ 1,083	€ 989
Finland	€ 2,062	€ 1,864	€ 1,587	€ 1,332	€ 1,212
France	€ 1,503	€ 1,360	€ 1,176	€ 997	€ 911
Germany	€ 2,003	€ 1,828	€ 1,576	€ 1,327	€ 1,208
Greece	€ 1,620	€ 1,484	€ 1,273	€ 1,069	€ 974
Ireland	€ 1,820	€ 1,619	€ 1,365	€ 1,145	€ 1,045
Italy	€ 2,088	€ 1,913	€ 1,665	€ 1,412	€ 1,288
Luxembourg	€ 1,235	€ 1,119	€ 962	€ 810	€ 738
Netherlands	€ 1,737	€ 1,533	€ 1,291	€ 1,083	€ 988
Portugal	€ 2,075	€ 1,882	€ 1,631	€ 1,384	€ 1,264
Spain	€ 1,765	€ 1,638	€ 1,427	€ 1,208	€ 1,101
Sweden	€ 2,143	€ 1,862	€ 1,551	€ 1,295	€ 1,178
UK	€ 2,076	€ 1,868	€ 1,601	€ 1,349	€ 1,228

Annual fuel costs for the driver of an average car in case existing EU fuel efficiency legislation is confirmed (95 gCO2/km)

european unit

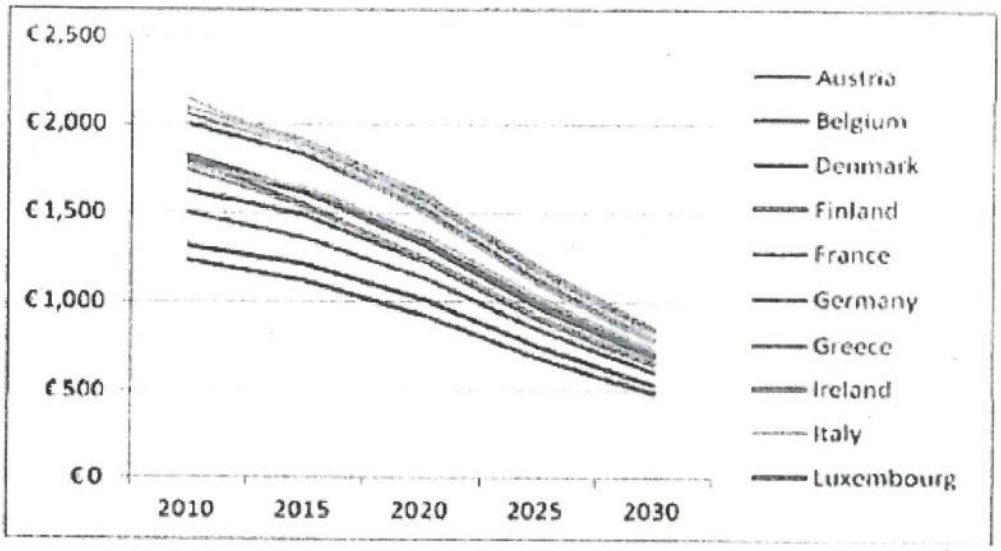


Annual fuel costs for the driver of an average car in case existing EU fuel efficiency legislation is confirmed (95g CO2/km by 2020)

If EU governments decide to tighten the target to no more than 60g CO2/km by 2025, fuel costs will drop to between €494 (Luxembourgish average – European low) and €863 (Italian average – European high) by 2030, five years after the target is met and fuel saving improvements have become more common. With fuel prices set to rise further, as predicted by the International Energy Agency [3], motorists are in line for higher annual fuel bills. But they will save substantially more money as a result of the improvements in fuel economy than if these were not in place.

	2010	2015	2020	2025	2030
Austria	€ 1,314	€ 1,213	€ 1,020	€ 757	€ 540
Belgium	€ 1,788	€ 1,616	€ 1,349	€ 1,003	€ 718
Denmark	€ 1,792	€ 1,547	€ 1,251	€ 925	€ 663
Finland	€ 2,062	€ 1,864	€ 1,540	€ 1,138	€ 811
France	€ 1,503	€ 1,360	€ 1,141	€ 852	€ 610
Germany	€ 2,003	€ 1,828	€ 1,529	€ 1,134	€ 807
Greece	€ 1,620	€ 1,484	€ 1,235	€ 913	€ 651
Ireland	€ 1,820	€ 1,619	€ 1,324	€ 978	€ 700
Italy	€ 2,088	€ 1,913	€ 1,614	€ 1,206	€ 863
Luxembourg	€ 1,235	€ 1,119	€ 934	€ 692	€ 494
Netherlands	€ 1,737	€ 1,533	€ 1,252	€ 925	€ 662
Portugal	€ 2,075	€ 1,882	€ 1,582	€ 1,182	€ 847
Spain	€ 1,765	€ 1,638	€ 1,384	€ 1,032	€ 737
Sweden	€ 2,143	€ 1,862	€ 1,505	€ 1,106	€ 788
UK	€ 2,076	€ 1,868	€ 1,553	€ 1,152	€ 822

Annual fuel costs for the driver of an average car where EU fuel efficiency legislation is extended (60g CO2/km by 2025)



Annual fuel costs for the driver of an average car where EU fuel efficiency legislation is extended (60g CO2/km by 2025)

Efficiency is achievable

The US government requires carmakers to reduce the fuel consumption in new cars and light trucks by 50 percent between 2011 and 2025. The decision was backed by 13 global carmakers, including Toyota, Ford and BMW but not VW [4].

The European Commission has said it would consider a similar move this year to halve CO2 emissions, and hence fuel consumption, by 2025 [5]. Recent research shows most of this can be achieved with conventional car technology, while further advances in plug-in hybrid and electric car technology will be needed to reach further reductions beyond these levels [6].

Obstruction from the car industry

European suppliers of automotive parts [7], as well as Sweden's Volvo Car Corporation [8], have spoken in favour of the 95g EU target and said the EU should set a non-binding target for 2025 to provide the car industry with investment security.

But Europe's biggest carmaker, the Volkswagen Group, is opposed to the EU law. VW has described the 2020 target as *"not based on sound impact assessment nor on a realistic appreciation of the costs and technical progress necessary to meet the goal within the timescale"* [9]. VW and the other German car companies also vehemently oppose a further target for 2025. They claim this would mean *"making the second before the first step"* and *"acting high-handedly, and playing with the competitiveness of the European car industry"* [10]. Greenpeace is campaigning to stop VW lobbying against fuel efficiency targets. So far, more than 500,000 people worldwide have pledged their support. Greenpeace is calling on the EU to set an ambitious long term CO2 saving target for cars of 60 gCO2/km by 2025.

The research and its author

Greenpeace commissioned independent consultant Malcolm Fergusson to conduct the study highlighted here. Mr Fergusson is a specialist in climate change, energy and transport at national and European levels. He has been a Senior Fellow at the Institute for European Environmental Policy and subsequently Head of Climate Change at the Environment Agency for England and Wales. He is currently working as an independent consultant. Full data and an explanation of the methodology used to reach it is available for each of the 15 European countries studied.

Contacts

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Greenpeace media officer Jack Hunter: +32 (0)476 988 584 Jack.Hunter@Greenpeace.org

Notes

[1] http://www.bloomberg.com/news/2012-04-29/record-high-gasoline-further-burdens-consumers-in-europe.html
[2] http://ec.europa.eu/energy/observatory/oil/doc/prices/mau/2012_04_23_oil_prices_es95.pdf
[3] This assumes that the oil price increases to $115 (USD 2008) per barrel in 2030, in line with World Energy Outlook 2009.
[4] http://www.businessweek.com/news/2011-07-29/automakers-agree-to-54-5-mpg-fuel-economy-rule-obama-says.html
[5] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52010DC0656:EN:NOT
[6] http://www.theicct.org/ghg-reduction-potential-and-costs-ldv-technologies-2
[7] http://www.euractiv.com/climate-environment/tajani-backs-away-2025-fuel-efficiency-fight-news-511735
[8] http://www.reuters.com/article/2012/03/23/uk-eu-car-emissions-idUSLNE82M02420120323
[9] Letter to Greenpeace, June 2010
[10] http://www.welt.de/print/die_welt/wirtschaft/article13920923/Europas-Parlamentarier-wollen-das-Drei-Liter-Auto.html

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CLAIMS VERSUS REALITY: How the European car lobby proved itself wrong

INTRODUCTION

When policy makers discussed the EU's first ever mandatory CO_2 emission standard for cars in 2006–2008, individual car companies and their lobby group, ACEA (the European Automobile Manufacturers' Association), lobbied hard to stop the recommended standards becoming law.

The car industry claimed that targets to reduce carbon dioxide emissions from cars to no more than 120 grammes of carbon dioxide per kilometre (g CO_2/km) would be technologically impossible to meet by 2012. It also argued that the necessary changes would be too expensive and that there would be no consumer demand for efficient vehicles. It even went so far as to say that introducing such standards would lead to the collapse of the entire industry. All the while, European car companies and their lobby group, ACEA, claimed to be concerned about the environment.

As a direct result of the car industry's lobbying, European policy makers not only weakened its proposed target to 130g CO_2/km but also delayed it by three years from 2012 to 2015.

This document looks at the claims the industry made when the standards were first put in place and compares them with the reality of developments since then. It is clear that many of the industry's statements were hugely exaggerated and have already been proved wrong.

In 2012 and for the next two years, EU policy makers will be deciding how to achieve a longer term target of 95g CO_2/km by 2020 and setting a new target for 2025. In the run up to this adoption of new standards, it is crucial that lessons are learned and that unsubstantiated and false claims from the car industry are not allowed to once again water down the emission targets needed to tackle climate change.

GREENPEACE
December 2011
www.greenpeace.org

CAR INDUSTRY CLAIMS

CLAIM 1:

'WE CAN'T DO IT'

'A VEHICLE-RELATED TARGET OF 130 GRAMMES CO_2 PER KILOMETRE BY 2012, AS PROPOSED BY THE COMMISSION, IS NOT FEASIBLE.' ACEA, 2007 [1]

In early 2007, Volkswagen, together with other German car companies, sent a letter to European Commissioners asking them to reconsider proposals for a mandatory target of no more than 120g CO_2/km for new cars sold in Europe by 2012. The companies claimed that this target was *'technically not accomplishable'*.[2] Meanwhile the European car industry lobby group, ACEA, attacked the proposals calling the target *'arbitrary and too severe'*.[3]

Their arguments persuaded the Commission to water down the proposed target from a maximum of 120g to a more lenient target of 130g CO_2/km for EU average fleet emissions by 2012. But even this weakened target was too much for ACEA who then argued that 130g CO_2/km by 2012 was *'not feasible'*. Following subsequent negotiations with the EU governments and the European Parliament and further lobbying by the car industry, the standard was eventually delayed by three years, until 2015.

AND THE REALITY

'THE INDUSTRY AS A WHOLE REDUCED AVERAGE CO_2 EMISSIONS BY 3.7% LAST YEAR [2010] CONTINUING THE TREND OF MUCH FASTER REDUCTIONS SINCE ADOPTION OF THE EU'S MANDATORY CO_2 TARGETS FOR CARS.' TRANSPORT & ENVIRONMENT, 2011 [4]

Even since the targets were cemented into law, improvements have been made very quickly, despite carmakers' claims.

The efficiency of the overall European car fleet improved by 5.1% in 2009 and 3.7% in 2010. This meant that last year the industry as a whole reached an average CO_2 emission level of 140g CO_2/km.

European carmakers now need to lower their average fleet emissions by a mere 7% to hit 130g CO_2/km (which is their 2015 target) and 14% to hit 120g CO_2/km.[5]

Several carmakers are now clearly on track to meet their 2015 targets in 2012, the year that ACEA claimed was *'not feasible'*. Toyota, for one, was virtually there already in 2010, five years ahead of time. PSA and Fiat are very close too, with just 3% and 5% reductions left to make respectively.[6] Last year, in response to figures showing that carmakers were making rapid improvements to their fleets, The Society of Motor Manufacturers and Traders – the UK industry lobby group – admitted that its members had overestimated the difficulty of cutting emissions. It said they had not anticipated how quickly the whole industry would respond to the move from voluntary to compulsory targets. A spokesman said: *'Having those limits imposed focused attention and encouraged everyone to do whatever they could to accelerate development'*.[7]

A number of carmakers have recently gone even further and independently set themselves targets to exceed their legal standards. Renault has announced it wants to reach a fleet wide average emissions level of below 100g CO_2/km by 2016 for their European car fleet, far more ambitious than their official 2015 target of 127g CO_2/km.[8]

Daimler, one of the German luxury carmakers, has a legal target of 138g by 2015, but recently committed itself to reduce the emissions of its car fleet to less than 140g CO_2/km by 2012 and to 125g CO_2/km by 2016.[9] Yet cables leaked by wikileaks now show that in 2008 when the legislation was being set, Daimler was lobbying hard to water down the proposals, despite the fact that even then, they expected their fleet to be at an average CO_2 emission level of 136g CO_2/km by 2012.[10]

We will never know what would have happened had the EU preserved its ambition of achieving an average of 120g CO_2/km for new cars by 2012. What is clear however, is that the legal standards for 2015 are too easy for many carmakers across the different segments of the market – despite their insistence that more ambitious targets could not be reached.

'THE INDUSTRY WILL COLLAPSE'

'THE EU RULES WOULD EFFECTIVELY "'KILL" THE EUROPEAN AUTO INDUSTRY WHILE ACHIEVING LITTLE BENEFIT TO THE ENVIRONMENT'. AUDI (WIKILEAKS), 2008 [11]

Leaked cables show that in 2008 Audi officials were arguing that the EU legislation would destroy the European car industry and fail to contribute to addressing climate change. The US official who reported the comments back to Washington stated that this was a *'questionable argument'*, but nonetheless it is clear that Audi was using this kind of language to frighten European policy makers into weakening the legislation.

In early 2007, then ACEA President, Sergio Marchionne sent a letter to Commission President Barroso, which said, *'I cannot stress sufficiently how serious the implications of such a policy [120g CO_2/km by 2012] would be for competitiveness of the European car industry and employment.'* [12] Days later, Volkswagen and other German carmakers (BMW, Ford-Germany, Opel, and DaimlerChysler) sent a separate letter to Barroso warning that the legislation would lead to massive industrial destabilisation. They argued that it would constitute *'a massive industrial political intervention at the expense of the entire European, and especially the German, automobile industry'* and *'the direct consequence would be the migration of a large number of jobs from European production plants of automobile manufacturers and the supplier industry'.* [13]

Later that year, once the Commission had weakened the CO_2 reduction target to 130g CO_2/km, ACEA then stated that even this target *'if implemented, would effectively reduce the competitive strength of the European automobile sector and put car manufacturing in the European Union at risk.'* [14]

AND THE REALITY

'THE REGULATION HAS TRIGGERED THE LARGEST INNOVATION PUSH [INNOVATIONSWELLE] IN THE EUROPEAN CAR INDUSTRY SINCE THE SECOND WORLD WAR.' PROFESSOR DUDENHÖFFER, GERMAN CAR INDUSTRY EXPERT, 2011 [15]

The car industry has clearly not collapsed. Whilst the economic recession of 2008–2009 did reduce demand for new cars (along with other factors such as changes in population demographics)[16], EU CO_2 rules have in fact spurred innovation and increased competitiveness of the EU car industry.

German car industry expert Professor Dudenhöffer, states that, *'the experience with the regulation of CO_2 emissions from cars shows that fuel consumption standards can improve the innovativeness of the sector significantly.'* [17]

The European Commission, in a 2010 paper on European manufacturing, reported that if the car industry fails to embrace the shift towards more fuel efficient vehicles, it will continue to be structurally unprepared for the future. The report went on to state that, *'demand is increasingly shifting towards more fuel efficient vehicles and vehicles with alternative power trains [...] The issue of further restructuring in favour of more fuel efficient vehicles and vehicles with alternative power trains still needs to be faced.'* [18]

Part of the industry, including in the US, recognises that the shift to tighter fuel economy standards actually presents a huge opportunity to create jobs, drive innovation and foster high-tech industries supplying additional manufactured components. As chairman and CEO of Cummins, the US diesel engine manufacturer explains, *'tighter regulations are a fact of life. Back in the '90s we saw this as burdensome, but we now see this as an advantage. If we have the advantage, either in fuel economy or emissions or both, we're going to gain market share, we're going to be able to enter new markets. As a result, we secure employment and grow the business'* [19]. Former Vice-Chairman of General Motors, Bob Lutz, argues that part of the reason why GM failed in the US was because of poor US fuel economy standards. [20]

The fact is that CO_2 standards have not led to the collapse of the industry, and what is clear is that the continual improvement of vehicle efficiency heading towards a low carbon future, is critical to both the continuation of the car market, and to protecting the climate.

CLAIM 3:

'WE NEED MORE TIME'

'ENGINE ADJUSTMENTS ARE HUGELY COMPLICATED AND EXPENSIVE OPERATIONS. DEVELOPING ENGINES AND VEHICLES NEEDS AMPLE PREPARATION, UP TO FIVE YEARS AT MINIMUM. NEW TECHNOLOGIES OFTEN NEED EVEN LONGER TO ENFOLD [SIC] THEIR FULL MARKET POTENTIAL.'
ACEA, 2007 [21]

The car industry first successfully pressured the European Commission into watering down its proposed emission reduction target of an industry average of 130g CO_2/km instead of 120g CO_2/km for new cars sold in Europe. It then lobbied the EU to postpone even the new, weaker target from 2012 to 2015.

To support the case for a delay of the standard, carmakers said industry needed longer lead-in time to develop and produce new models. They argued that most of the cars that would be on sale in 2012 had already been designed and put into the production pipeline, and so costs and production cycles would make it impossible to make the required changes to the models to meet the requirements of the legislation in time.

AND THE REALITY

'ALL AVAILABLE EVIDENCE POINTS TOWARDS CARMAKERS IN EUROPE HEADING FOR VERY SIGNIFICANT 'OVER-COMPLIANCE' WITH THE CO_2 REGULATION AND ARE HENCE LIKELY TO HIT THE 130G CO_2/KM TARGET FOR 2015 SEVERAL YEARS IN ADVANCE.'
TRANSPORT & ENVIRONMENT, 2011 [22]

In reality, carmakers did not need as much time as they claimed in order to improve their average fleet emissions.

Their argument regarding production timelines might have made more sense if the EU's CO_2 standards applied to each vehicle sold. But this is not the case – carmakers' fleets and not individual vehicles have to remain below an average CO_2 level set in the legislation. So carmakers have been able to continue selling many different models, but have been able to adjust the sales of each to reduce the overall average of the whole fleet.

As we have outlined above, since the introduction of the legislation, carmakers have made very rapid progress in reducing the CO_2 emissions from their fleets. They have done this through a mixture of both improved technology and by increasing sales of smaller less polluting cars. Some carmakers, such as Toyota, have discontinued sales of high CO_2 models which has helped them meet their targets, whilst others have boosted sales of their low CO_2 vehicles.

In addition, carmakers have used regular mid-model *'facelifts'* to insert fuel saving technologies – they did not have to wait until the end of a production cycle to improve the efficiency of their car models. Volkswagen introduced the fuel saving versions of their Golf, Polo and Passat models during *'facelifts'*, not waiting until complete model changes. For example, this year Volkswagen introduced a *'facelifted'* Passat which has significantly improved efficiency.[23]

CLAIM 4:

'IT WILL COST TOO MUCH'

'IT IS BEYOND DOUBT THAT THE COSTS OF REACHING 120G/KM VIA VEHICLE TECHNOLOGY ONLY ARE PROHIBITIVE AND NOT AT ALL COST-EFFECTIVE'
ACEA, 2007 [24]

Carmakers claimed that introducing CO_2 standards to comply with legislation would be prohibitively expensive. They also argued that expensive improvements would force carmakers to increase prices, thereby preventing less affluent people from buying cars. In December 2007, ACEA argued that, *'a strategy that focuses excessively on vehicle technology, with a target of 130 grammes CO_2/km by 2012 as the Commission proposes, will lead to a price increase per car of up to €3000 on average. (...) For many consumers, cars could become unaffordable.'*[25]

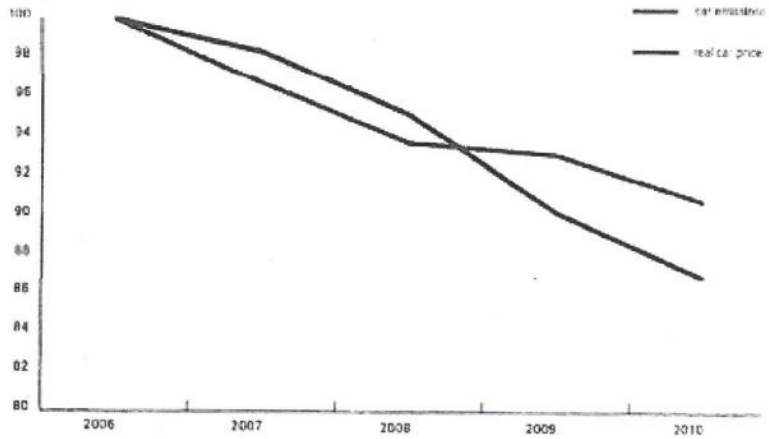
AND THE REALITY

'OVER THE PAST DECADE LEGISLATIVE REQUIREMENTS, OF WHICH CO_2 REDUCTIONS IS ONE EXAMPLE, HAVE NOT STOPPED THE TREND OF CARS BECOMING EVER MORE AFFORDABLE – LOWER CO_2 (AND OTHER) EMISSIONS AND LOWER PRICES HAVE GONE HAND IN HAND'. TRANSPORT AND ENVIRONMENT, 2011 [27]

The graph below, based on official EU data, makes it clear that cars have not become more expensive due to the CO_2 standards. In fact, as CO_2 emissions have come down, so have prices. Transport & Environment figures demonstrate that car prices fell even more once the CO_2 regulation started having an impact. Decreases in average car prices were 2.5% in the 2007–2010 period, compared to 0.6% in 2002–2006.[26]

Professor Dudenhöffer notes in relation to the car CO_2 standard that *'the adaptation and use of new technology went much faster and was less costly than many expected.'*[29] He highlights the example of stop-start technology, which shuts off the engine when the car is at stand-still, saving 5–13% of CO_2. The price mark-up for the system is between €250 and €300. The price will decrease further in the coming years due to the high demand, to little more than €100 in 2015, according to Professor Dudenhöffer. The system will likely be offered as a standard in all models of the compact and larger segments from 2012.[30]

FIGURE 1: TREND IN NEW CAR CO_2 EMISSIONS AND REAL CAR PRICES IN EUROPE FROM 2006 TO 2010



THE YEAR 2006 EQUALS 100% ON THE HORIZONTAL AXIS.[28]
*Prices adjusted for inflation

CLAIM 5:

'OUR CUSTOMERS SIMPLY DON'T WANT LOW EMISSION CARS'

'THE CAR INDUSTRY RECOGNISES THE DECREASE IN CO_2 EMISSIONS HAS RECENTLY SLOWED. THIS IS DUE TO STRONG CUSTOMER DEMAND FOR LARGER AND SAFER VEHICLES AND DISAPPOINTING CONSUMER ACCEPTANCE OF EXTREMELY FUEL-EFFICIENT CARS, WHICH HAVE BEEN BROUGHT INTO THE MARKET IN LINE WITH THE CO_2 COMMITMENT'.
ACEA, 2006 [31]

Carmakers argued that there was no market for low CO_2 cars So, they said, how could they be asked to produce what no one will buy?

But carmakers shape demand through their marketing strategies and by controlling prices. While many companies do now advertise their low emission models, the bulk of their marketing spending is still on big and high-emitting cars, creating and driving demand for powerful polluting vehicles.

Where carmakers do advertise greener cars, what is often not clear is that consumers are expected to pay a premium for fuel-saving technologies which mean that many consumers then opt for a more polluting model. Adding a premium of €1,000 to €1,500 for 'green' models, as Volkswagen does, clearly puts off many potential customers.

AND THE REALITY

'THE DEMAND FOR VEHICLES EMITTING LESS THAN 120G CO_2/KM ROSE BY 20%*, UP TO A TOTAL OF 3.9 MILLION CARS. THIS IS 29% OF THE TOTAL DEMAND FOR NEW CARS.'
ACEA, 2010 [32]

As ACEA itself admitted in its 2010 economic report, it has become clear over time that customers do want low-emission vehicles, especially at a time when fuel prices have risen significantly.

Fuel consumption is becoming an increasingly important factor for fleet operators which represent around half of the whole EU market, and more than 60% of the market for medium, upper medium and large cars.[33] The fleet market is placing greater emphasis on the total cost of ownership rather than on purchase price, making lifetime fuel consumption a key factor, although company car taxation in many countries still works in favour of high-emitting vehicles.

Governments too have had an influence both on private and fleet buyer demand by setting tax levels and rules for consumer labelling. Over the last couple of years, three examples have been important. Britain's company car tax system has had a major impact on CO_2 reduction of the overall car market.[34] France's *'bonus-malus'* system (a fee on inefficient technology and a rebate on efficient vehicles) meant that CO_2 emissions from new cars declined by 12% over two years, from 149g CO_2/km in 2007 to 131g CO_2/km in 2010.[35] But Germany's new CO_2 label, in force since 1 December 2011, is likely to contribute little if anything to CO_2 reduction.[36]

As mentioned earlier, the European Commission and many parts of the industry recognise that there is a shift towards fuel efficiency. This trend is expected to persist, especially given that oil prices are expected to remain high.

CLAIM 6:

'BUT WE REALLY DO CARE ABOUT THE ENVIRONMENT'

'THE EUROPEAN AUTOMOBILE SECTOR, ONE OF THE MOST INNOVATIVE AND VALUABLE INDUSTRIES IN THE EU, IS FULLY COMMITTED TO REDUCING CO_2 EMISSIONS FROM CARS AND SUPPORTS THE EU OBJECTIVE OF REACHING A LEVEL OF 120 GRAMMES CO_2 PER KILOMETRE.'
ACEA, 2007 [37]

Both individual companies and industry lobby groups regularly release public statements claiming that environmental issues are important to them.

BUT THE REALITY...

Carmakers are very good at announcing their green credentials but continue to drag their feet instead of genuinely ensuring best environmental practice. Despite carmakers' claims to be fully committed to reducing CO_2 emissions, European – and particularly German – carmakers still make the largest profits on powerful high-end cars that emit – even after improvements – more CO_2 than smaller cars. Their business model is still geared toward performance, particularly engine power, rather than fuel savings or alternative fuels. For example, Volkswagen's first hybrid car, the Toureg SUV, still emits 193g CO_2/km despite the company stating in its sustainability report that it aims *'to be the most eco-friendly automaker in the world!'*.[38]

Carmakers are still bringing to market new models and variants with high CO_2 emissions including 4x4s. They anticipate – and create – demand for these vehicles. Unsurprisingly, market shares of 4x4s have increased continuously. Since 2000, this segment increased by 15% per year in Germany where it accounts for more than 10% of the new car market.[39]

Consequently, carmakers have been trying to pressure non-EU markets to preserve unlimited access for this type of vehicle and have been using their lobbying power to influence regulations in other countries. When the EU-Korea Free Trade Agreement was negotiated, carmakers successfully pressured the EU to demand changes to Korea's draft CO_2 standard for cars so it would be more lenient for heavy cars even though the proposed rules were already more lenient than the EU's own standard.[40]

With standards in place however, the situation is beginning to change. BMW has begun to adapt its brand to suit the 'responsible' well-off driver, and to attract fleet customers looking for both performance and low running costs. Other luxury brands have taken up the challenge and entered into a competition for the lowest consumption in their models.[41]

However, much more must be done to bring about the CO_2 reductions that are so urgently needed in the transport sector. It is not until carmakers have stopped trying to weaken and delay legislation that the industry will be able to credibly claim it is 'committed' to doing its part to protect the climate.

CONCLUSION

European carmakers have continuously displayed a reluctance to make concrete commitments to reducing CO_2 emissions from their vehicles. The industry resisted the introduction of mandatory standards for years, successfully lobbying EU policy makers to stop voluntary standards becoming law. Then, once the introduction of these standards finally became inevitable, the industry turned its attention to weakening and then delaying them significantly.

Despite the car industry's resistance, it is clear that mandatory standards have successfully improved the efficiency of the European car fleet. It is also evident that carmakers are capable of rapid progress and innovation in making their cars more efficient, which is helping to both reduce emissions and maintain their competitiveness.

With new emissions targets for 2020 and 2025 up for discussion in the next two years, it is crucial that the car industry is not permitted to repeat history and block or weaken the new standards. To date, the industry has issued too many lies and exaggerated claims to be trusted.

European carmakers and their lobby group, ACEA, now have an opportunity to live up to their environmental claims, stop opposing the laws we need to tackle climate change and get on with playing their role in reducing emissions and oil consumption.

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12.11.12

ORIGINAL

Berlin, 08. November 2012

Gesprächsvorbereitung

St He
a.d.D

StHk
T. wurde von AL IV übernommen (danke!)
IV, IVA5 z.K.

Betr.:
Gespräch mit DUH-Bundesgeschäftsführer Jürgen Resch

Ort:
in Ihrem Dienstzimmer im BMWi

Für den Termin am: 14.11.2012, 17:00 Uhr

Vom Leitungsbereich auszufüllen	
TGB-Nr	10075
Eingang Leitung	09 11 2012
V-/U-Nr	5459

Abzeichnungsleiste	
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AL	[redacted] IV 09 11 12
UAL	i V [redacted] IVA1 09 11 12

Referatsinformationen	
Referats-leiter	i V [redacted] gez [redacted] IVA5 08 11 12
Bearbei-ter	[redacted]
Mit-zeichnung	
Referat und AZ	IV A 5 – 44 04 78/19

Die Staatssekretärin und die Staatssekretare haben Abdruck erhalten

Teilnehmer: Deutsche Umwelthilfe e.V. (DUH)
Bundesgeschäftsführer Jürgen Resch
BMWi
[redacted] IV A 5

I. Gesprächsziel und Interessenlage

Das Gespräch kommt auf Initiative von Herrn Resch zustande, der das folgende Thema benannt hat:

- **CO_2-Regulierung von Pkw (KOM-Vorschlag).**

Aufgrund aktueller Ereignisse dürfte Herr Resch auch das folgende Thema ansprechen:

- **Einsatz des Kältemittels HFO-1234yf in Pkw-Klimaanlagen.**

II. Gesprächselemente

Begrüßung / Einführung

- Ich darf Sie herzlich begrüßen. Das BMWi ist stets auch an den Positionen von Umweltverbanden interessiert und berücksichtigt diese bei der Festlegung des eigenen Standpunktes.

...

- Die Themen, die wir heute ansprechen werden, betreffen die Automobilindustrie. Die **Lage der europäischen Automobilindustrie besorgt uns sehr**. Die aktuelle Wirtschaftskrise in etlichen Euro-Ländern wird den Automobilmarkt voraussichtlich noch länger belasten.
- Vor diesem Hintergrund legen wir großes Augenmerk darauf, dass neue Regulierungsvorhaben zur Stärkung der Wettbewerbsfähigkeit der Automobilindustrie beitragen, diesem Ziel jedenfalls nicht zuwiderlaufen.

CO_2-Regulierung von Pkw

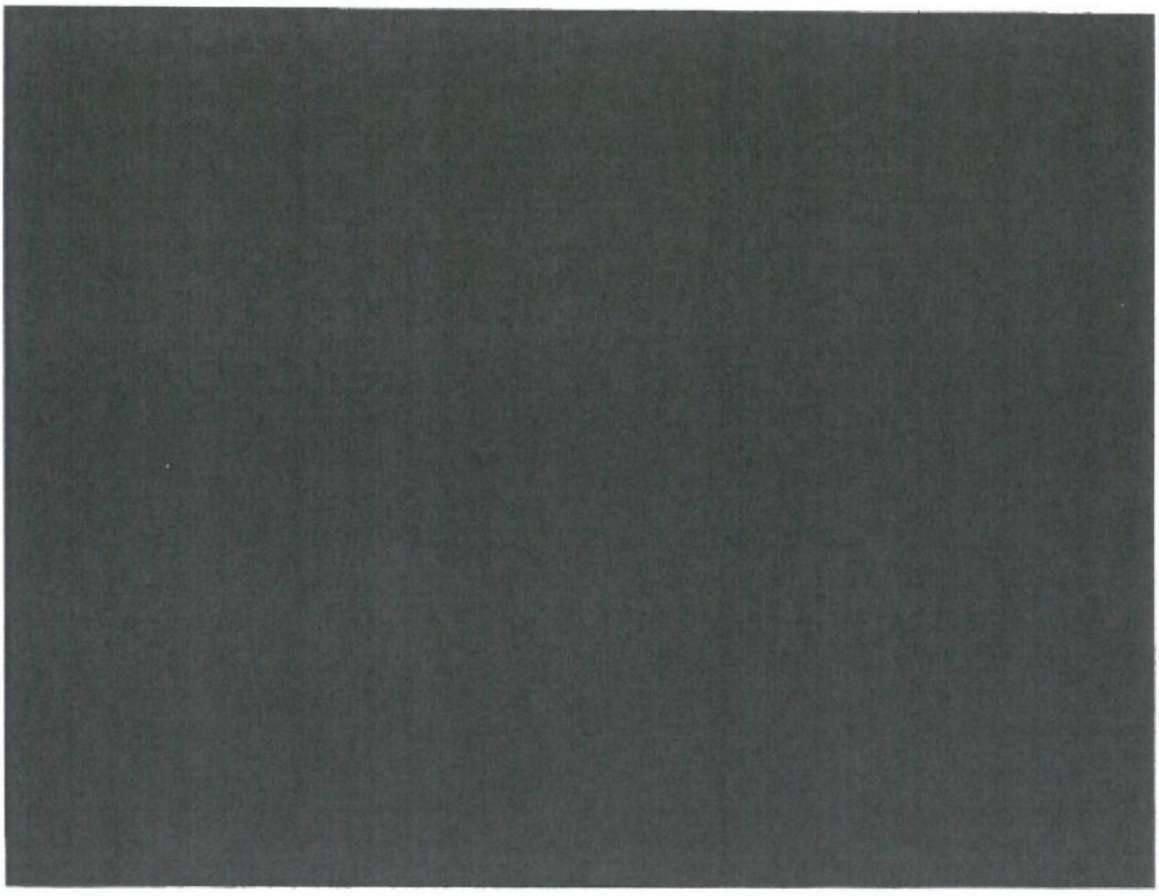
[Interessenlage: DUH tritt für weitere drastische Einsparungen beim Spritverbrauch und CO_2-Ausstoß von PKW und Nutzfahrzeugen ein. Herr Resch dürfte daher die Themen „Zielwert für 2020" (DUH fordert weitere Absenkung auf 80 gCO_2/km bis 2020), „Supercredits" (DUH gegen „Verwässerung" des Zielwerts) und „Langfristziel für 2025" (DUH fordert Zielverschärfung auf 60 gCO_2/km ab 2025) ansprechen. Diese Forderungen sind unrealistisch und werden von uns abgelehnt. Zielführender wäre daher eine Fokussierung auf Fragen der instrumentellen Ausgestaltung einer künftigen Supercredits-Regelung. Insgesamt sollte BMWi – wg. der gerade laufenden Ressortabstimmung – zurückhaltend argumentieren und die DUH-Forderungen möglichst passiv kommentieren.]

- Die EU-Kommission hat im Sommer Vorschläge zur CO_2-Regulierung von Pkw und leichten Nutzfahrzeugen ab 2020 vorlegt. Die KOM-Vorschläge sind ggü. früheren Entwürfen verbessert, aber **noch nicht akzeptabel**.
- Wir haben alle ein Interesse daran, dass im Verkehrsbereich der CO_2-Ausstoß deutlich zurückgeht. Aber es darf nicht zu Wettbewerbsverzerrungen kommen. Problematisch ist, dass größere Fahrzeuge nochmals stärker belastet werden sollen als kleinere Fahrzeuge. Für eine erneute Umverteilung der Minderungslasten gibt es u. E. **keine überzeugende Begründung**. Die Hersteller brauchen langfristige Planungssicherheit.
- Die BReg ist sehr an einem **schnellen Markthochlauf von Fahrzeugen mit innovativen, besonders emissionsarmen Antriebstechnologien** einschließlich Elektrofahrzeugen interessiert. Die vorgesehene **Förderung von emissionsarmen Fahrzeugen halten wir für nicht ausreichend**, um innovative Antriebstechnologien (Elektrofahrzeuge) schneller auf den Markt zu bringen. Wir brauchen eine **wirksamere Supercredits-Regelung** bis 2020 und darüber hinaus.

...

- Schließlich sollte die **Anrechnung von Öko-Innovationen** umfassender und verlässlicher geregelt werden. Das derzeitige Verfahren ist zu bürokratisch.
- *Mögliche Frage:* Wie bewerten Sie den Vorschlag der EU-Kommission? Sehen Sie Nachbesserungsbedarf bei der Förderung von hocheffizienten Fahrzeugen?
- *Mögliche Frage:* Es wird vorgeschlagen, dass sich Hersteller die frühzeitige Markteinführung von besonders emissionsarmen Fahrzeugen in späteren Jahren anrechnen lassen dürfen (Banking). Wie stehen Sie zu solchen Vorschlägen?
- *Mögliche Frage:* Es wird die Einführung einer neuen Supercredits-Regelung vorgeschlagen, die die Markteinführung von Fahrzeugen begünstigt, die doppelt so effizient sind, wie sie sein müssten. Wie bewerten Sie diesen Vorschlag?

Einsatz des Kältemittels HFO-1234yf in Pkw-Klimaanlagen (nur reaktiv)



...

[redacted]

III Sachverhalt

CO_2-Regulierung von Pkw

In den **VO (EG) Nr. 443/2009** (Pkw) und **VO 510/2011** (leichte Nutzfahrzeuge – LNF) wurden CO_2-Emissionszielwerte für die gesamte EU-Neuwagenflotte festgelegt:

a) Für Pkw: 130 gCO_2/km ab 2015 (phase-in ab 2012) und 95 gCO_2/km ab 2020.

b) Für LNF: 175 gCO_2/km ab 2017 und (vorbehaltlich einer Prüfung) 147 gCO_2/km ab 2020.

Die einzelnen Hersteller müssen einen spezifischen Emissionszielwert einhalten, der vom durchschnittlichen Gewicht ihrer gesamten Neuwagenflotte (im Basisjahr 2006) abhängt, sonst drohen Strafzahlungen. Dabei wurde Ende 2008 (dt.-frz.-Kompromiss zw. BK'in Merkel und Präs. Sarkozy) vereinbart, dass schwere Fahrzeuge mehr CO_2/km emittieren dürfen als leichte Fahrzeuge.

Mit den am 11.07.12 vorgelegten **Änderungsvorschlägen** will die KOM die bereits in den geltenden Rechtsakten genannten **Emissionszielwerte ab 2020** und die **Modalitäten für deren Erreichung** endgültig festschreiben:

- Festlegung des CO_2-Flottenziels für Pkw auf 95 g/km und für LNF auf 147 g/km ab 2020.
- Die Pkw-Grenzwertkurve wird weiter abgeflacht (Steigungswinkel sinkt von 0,0457 auf 0,0333); dadurch werden schwerere Fahrzeuge nochmals stärker belastet.
- Ultra-emissionsarme Fahrzeuge (unter 35 g CO_2/km) können in geringem Umfang (20 000 Fahrzeuge je Hersteller) im Zeitraum 2020-2023 mit dem Faktor 1,3 angerechnet werden. Die Begünstigung von emissionsarmen Fahrzeugen (unter 50 g CO_2/km) endet 2015.
- Emissionsminderungen durch Maßnahmen außerhalb des Textzyklus (Öko-Innovationen) werden weiter angerechnet. Die Umsetzung wird durch KOM-Verordnung geregelt.
- KOM soll spätestens Ende 2014 Vorschläge für eine weitere Zielverschärfung nach 2020 vorlegen.

BMWi begrüßt, dass die **Langfristziele** von 95 bzw. 147 g CO_2/km bestätigt werden, darauf haben sich die Hersteller eingestellt. Problematisch aber, dass die Lastenteilung zw. den Herstellern verändert werden soll. So will die KOM den **Steigungswinkel der Pkw-Grenzwertkurve** von aktuell 0,0457 (gemäß VO 443/2009) auf 0,0333 abflachen, wodurch schwerere Fahrzeuge eine **noch größere Reduktionsleistung** erbringen müssten. Das ist nicht im Interesse der deutschen Hersteller größerer Fahrzeuge, die derzeit noch eine Stütze des europäischen Automobilmarktes sind. Hier **sehen wir noch Prüf- und Begründungsbedarf**.

Europäische Fahrzeughersteller brauchen **mehr Flexibilität**, um die deutlich verschärften Flottenziele kosteneffizient und wettbewerbsneutral erreichen zu können. Auch die geplante **Mehrfachanrechnung („super credits") von besonders emissionsarmen Fahrzeugen** (v.a. Elektroautos) im Zeitraum 2020-2023 ist unzureichend. Hier brauchen wir stärkere Anreize

...

(keine Deckelung der Anzahl der Fahrzeuge und eine Brückenregelung für emissionsarme Fahrzeuge (Begünstigung auch im Zeitraum 2016 bis 2019) damit Hersteller Elektrofahrzeuge in ihre Modellflotte aufnehmen. Die **Anrechnung von Öko-Innovationen** sollte praktikabler und verlässlicher geregelt werden.

Position der Industrie

Nach Auffassung des VDA ist der Pkw-Flottenzielwert sehr ambitioniert (weltweit am schärfsten). Notwendig seien weniger bürokratische und stärker die Innovationen anreizende Rahmenbedingungen. Zentrale Punkte sind

- Der VDA äußert „schwerwiegende Bedenken" gegen die Abflachung der Grenzwertkurve und fordert die „kritische" Überprüfung des vorgeschlagenen Steigungswinkels von 0,0333.
- Zur wirksameren Förderung hocheffizienter Fahrzeuge fordert der VDA einen generellen Multiplikator von 2,5, die vollständige Streichung der herstellerbezogenen Obergrenze, die Anknüpfung an die relative Effizienz der Fahrzeuge statt an das Erreichen absoluter CO_2-Grenzwerte, die unterbrechungslose Fortführung der Förderung zwischen 2015 und 2020 sowie die Möglichkeit einer zeitlichen Verrechnung der Supercredits in diesem Zeitraum und darüber hinaus (Banking).
- Der VDA fordert, die Anerkennung von Öko-Innovationen zu erleichtern und zu entbürokratisieren, indem die Marktdurchdringungsklausel (max. 3% Verbreitung einer Innovation) gestrichen wird, die Mindestreduktionsvorgabe von 1 gCO_2/km abgesenkt wird, vom Fahrer beeinflussbare Minderungstechnologien zugelassen werden und eine Positivliste pauschaliert anerkannter Technologien (wie in USA) definiert wird.
- Der VDA fordert die Zielerreichung in 2020 anhand des heute geltenden Testzyklus (NEFZ) festzustellen und Zielvorgaben für die Zeit nach 2020 nicht vor 2017 festzulegen.

Einsatz des Kältemittels HFO1234yf in Pkw-Klimaanlagen

[redacted]

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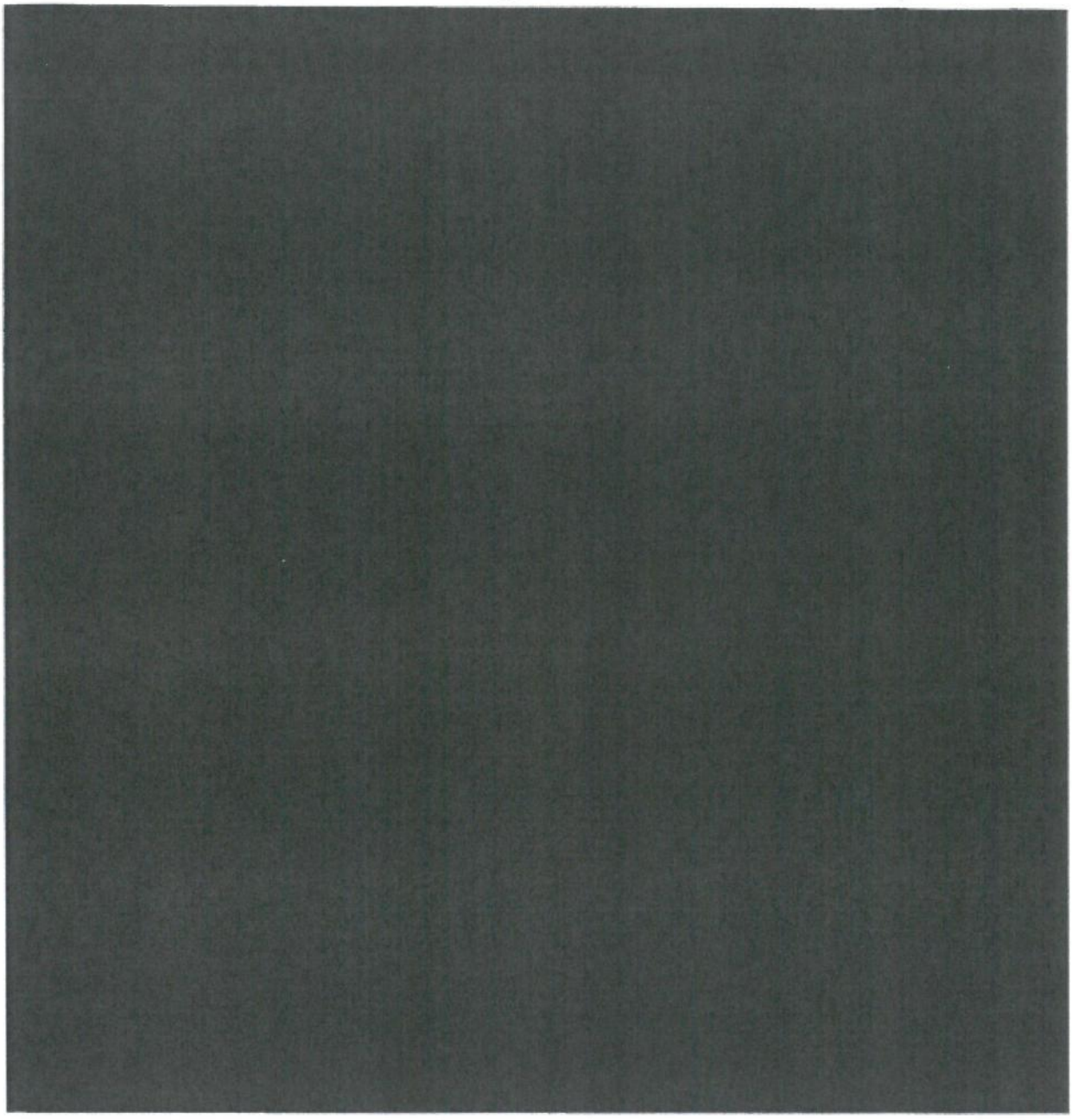

ORIGINAL

Berlin, 30. Oktober 2012

Entscheidungsvorlage

St He
a.d.D. 1/ 31/10

Betr.:
Gesprächsanfrage von DUH-Bundesgeschäftsführer Jürgen Resch

StHe
1. T findet statt am 14.11., 17h.
2. IV, IVA5 mdB um Gesprächsvorbereitung bis 9. Nov., 16h sowie FB.
1/ 31/10

Die Staatssekretärin und die Staatssekretäre haben Abdruck erhalten.

Vom Leitungsbereich auszufüllen	
TGB-Nr.	10047
Eingang Leitung	31 10 2012
V-/U-Nr.	5232

Abzeichnungsleiste	
St	StS Heitzer
AL	[redacted] IV 30.10.12
UAL	[redacted] IVA 30.10.12 MDG Dr [redacted]

Referatsinformationen	
Referatsleiter	MR [redacted] gez. [redacted] IVA5, 30.10.12
Bearbeiter	[redacted] gez. [redacted] IVA5 30.10.12
Mitzeichnung	
Referat und AZ	IV A 5 - 44 04 78/19

I. Votum

Das angefragte Gespräch wird befürwortet.

Termin
bis spätestens [illegible]
- Eingang im Büro der Leitung -

II. Sachverhalt und Stellungnahme

Der langjährige Bundesgeschäftsführer der Deutschen Umwelthilfe (DUH), Jurgen Resch, hat um ein Gespräch zum Thema CO_2-Regulierung von Pkw gebeten. Anlass ist der im Juli 2012 vorgelegte VO-Vorschlag der EU-Kommission, der derzeit verhandelt wird (noch Ebene Ratsarbeitsgruppe). Der Vorschlag wird von uns unter verschiedenen Aspekten kritisch eingeschätzt (zusätzliche überproportionale Minderungsanforderungen für schwere Pkw, unzureichende Anreize für innovative Antriebstechnologien und Elektrofahrzeuge). Die DUH setzt sich für weitere drastische Einsparungen beim Spritverbrauch und CO_2-Ausstoß von PKWs und Nutzfahrzeugen ein.
Mit Vertretern der Automobilindustrie, Greenpeace, VCD und dem europäischen Umweltverband T&E wurden zu diesem Thema bereits mehrere Gespräche geführt (unterhalb StS-Ebene (BSch 30/10)). Eine abgestimmte Position der BReg liegt noch nicht vor.
ERGÄNZUNG (ARo, 30/10): Herr Resch ist Hardliner in Sachen CO_2.

[redacted]

[redacted], ST-He

Von: [redacted]@duh de]
Gesendet: Montag, 29. Oktober 2012 15:16
An: Buero-ST-He (Heitzer)
Betreff: Terminanfrage Jürgen Resch DUH

Sehr geehrter Herr Dr. Heitzer,

wie telefonisch mit Ihrem Sekretariat vereinbart möchte ich für Herrn Resch um einen Gesprächstermin mit Ihnen zum Thema CO2 Grenzwerte bei Pkw anfragen. Möglich wären Termine beispielsweise am 6.11 ab 11:30h oder am 14.11 ab 17:00h.
Über eine positive Rückmeldung würde ich mich sehr freuen.

Mit freundlichen Grüßen

[redacted]
Stellvertretende Leiterin Verkehrsbereich
Persönliche Referentin des Bundesgeschäftsführers

Deutsche Umwelthilfe e.V.
Bundesgeschäftsstelle Berlin

Hackescher Markt 4
10178 Berlin
Telefon: +49 30 2400867 [redacted]
Telefax: +49 30 2400867
E-Mail: [redacted]@duh de
www.duh de

DUH e.V.
BGF: J. Resch, M. Spielmann
Vorstand: Prof. Dr. H. Kächele,
B. Jakel, C.-W. Bodenstein-Dresler
Frankfurt/M Nr. 6771
Konto: VoBa Konstanz-Radolfzell
Kto. 210677216 BLZ 69291000
IBAN: DE89692910000210677216
BIC: GENODE61RAD

StHe

IV, IVC5 mdB um kurzfristiges Votum.

HS 30/10

14.11. - 17 Uhr

100 47

sofort

[redacted] IVA5 IV b 5 - 440478/16

Von: [redacted] IVA5
Gesendet: Mittwoch, 19. Juni 2013 08:47
An: [redacted] IVA5
Betreff: WG: TB#04247 - Offener Brief zue CO^2-Grenzwertverordnung für neue Pkw
Anlagen: TB#04247 - Offener Brief zue CO^2-Grenzwertverordnung für neue Pkw.pdf

[redacted]

b. zdA (Antwort nicht verfügt)

Grüße
[redacted]

-----Ursprüngliche Nachricht-----
Von: [redacted] IVA5
Gesendet: Montag, 3. Juni 2013 13:21
An: [redacted] IVA5
Cc: [redacted] IVA5
Betreff: WG: TB#04247 - Offener Brief zue CO^2-Grenzwertverordnung für neue Pkw

-----Ursprüngliche Nachricht-----
Von: [redacted] IVA
Gesendet: Montag, 3. Juni 2013 11:36
An: 1_Eingang (IVA5)
Betreff: TB#04247 - Offener Brief zue CO^2-Grenzwertverordnung für neue Pkw

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Elektronischer Dienstweg Vorgang

*** TB#04247 - Offener Brief zue CO^2-Grenzwertverordnung für neue Pkw ***

.ORGANG AN: IVA5
VON: IVA

[redacted]
Unterabteilungsleiter IV A
- Industrie -
Bundesministerium für Wirtschaft und Technologie Scharnhorststraße 34 - 37, 10115 Berlin
Telefon: (030) 18615-[redacted]
Fax: (030) 18615-[redacted]
E-Mail: [redacted]@bmwi.bund.de
Internet: http://www.bmwi.de

-----Ursprüngliche Nachricht-----
Von: [redacted] IV

Gesendet: Montag, 3. Juni 2013 11:27
An: 1_Eingang (IVA); 1_Eingang (IVA5)
Betreff: TB#04247 - Offener Brief zue CO²-Grenzwertverordnung für neue Pkw

*** TB#04247 - Offener Brief zue CO²-Grenzwertverordnung für neue Pkw ***

VORGANG AN: IVA, IVA5
VON: IV

-----Ursprüngliche Nachricht-----
Von: BUERO-M-BL
Gesendet: Montag, 3. Juni 2013 10:57
An: 1_Eingang (IV)
Betreff: TB#04247 - Offener Brief zue CO²-Grenzwertverordnung für neue Pkw

TAGEBUCH-NR.:	04247
SCHREIBEN VOM:	27.05.2013
BETREFF:	Offener Brief zue CO²-Grenzwertverordnung für neue Pkw
ABSENDER:	Leif Miller
FIRMA/BEHÖRDE:	NABU - Naturschutzbund Deutschland e.V.
STRAßE:	Charitéstraße 3
PLZ/ORT:	10117 Berlin
ANGEFORDERT VON:	M
ORGE:	IV

Bindend sind darüber hinaus die auf den elektronischen Dokumenten angebrachten Fristen, Verfügungen und Vermerke, die sich ggf. im Anhang dieser E-Mail befinden.

NABU Bundesgeschäftsstelle Charitéstraße 3 10117 Berlin

Bundesminister für Wirtschaft und
Technologie
Herrn Dr. Philipp Rösler
11019 Berlin

Bundesgeschäftsstelle

Leif Miller
Bundesgeschäftsführer

Tel. +49 (0)30.28 49 84-[redacted]
Fax +49 (0)30.28 49 84-[redacted]
[redacted]@NABU.de

Berlin, 27. Mai 2013

Offener Brief zur CO_2-Grenzwertverordnung für neue Pkw

Sehr geehrter Herr Bundesminister,

anbei erhalten Sie einen offenen Brief der Umweltverbände an Bundeskanzlerin Angela Merkel zum Thema CO2-Grenzwerte bei Neuwagen zu Ihrer Kenntnis.

Mit freundlichen Grüßen

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BIC BFSWDE33XXX

Spendenkonto
Bank für Sozialwirtschaft
BLZ 370 205 00
Konto 100 100
IBAN DE65 3702 0500 0008 0518 05
BIC BFSWDE33XXX

Der NABU ist ein staatlich anerkannter Naturschutzverband (nach § 63 BNatSchG) und Partner von Birdlife International. Spenden und Beiträge sind steuerlich absetzbar. Erbschaften und Vermächtnisse an den NABU sind steuerbefreit.

NABU BUND VCD Verkehrsclub Deutschland 50 JAHRE WWF

Deutsche Umwelthilfe GREENPEACE

Frau Bundeskanzlerin
Dr. Angela Merkel
Bundeskanzleramt
11012 Berlin

Offener Brief zur CO_2-Grenzwertverordnung für neue Pkw

Berlin, 27.05.2013

Sehr geehrte Frau Bundeskanzlerin,

zurzeit sind auf EU-Ebene die konkreten Instrumente zur Ausgestaltung der anstehenden Neuregelung der CO_2-Grenzwerte für Pkw in der Diskussion. In diesem Zusammenhang wurde in der vergangenen Woche ein an Sie adressiertes Schreiben des VDA-Präsidenten Matthias Wissmann bekannt. Erlauben Sie uns, bezugnehmend auf die Hauptargumente Herrn Wissmanns unsere Sichtweise zu erläutern. Wir können nicht erkennen, dass die Argumentationslinie von Herrn Wissmann die Suche nach einer „ökologischen und ökonomischen Balance" beschreibt. Vielmehr reflektiert der Verfasser sehr einseitig die Interessen ausgewählter Autohersteller. Umwelt- und Klimaschutz sowie Belange des Verbraucherschutzes werden in den Ausführungen von Herrn Wissmann nicht berücksichtigt.

Die unterzeichnenden Umwelt- und Verbraucherschutzverbände halten im Gegensatz zu dem VDA-Präsidenten ambitionierte CO_2-Grenzwerte für Fahrzeuge für eine der effektivsten Maßnahmen, um den CO_2-Ausstoß im Verkehr zu verringern, innovative Fahrzeugtechnik anzureizen und die Treibstoffkosten für Verbraucher zu senken. Der Erfolg der heute gültigen Regelung ist ein eindrücklicher Beleg. Im Folgenden möchten wir die drei vom VDA-Präsidenten angesprochenen Hauptaspekte aufgreifen: Die Festlegung eines Langfristziels für 2025, „Supercredits" (d.h. die Mehrfachanrechnung von Fahrzeugen mit niedrigen Emissionen) sowie ein adäquates Messverfahren zur Ermittlung der tatsächlichen Klimagas-Emissionen.

1. Zukunftsweisend: Einen Zielwert für 2025 bereits jetzt festlegen

Derzeit ist allein der Verkehrssektor für rund ein Viertel der CO_2-Emissionen in Europa verantwortlich. Eine ambitionierte Ausgestaltung der Grenzwert-Regelung muss einen wichtigen Beitrag zur Erreichung der Ziele von EU und Bundesregierung zur Reduzierung des CO_2-Ausstoßes leisten. Nach heutigem Stand der Technik wäre eine Minderung auf 60 g/km CO_2 in 2025 möglich und auf dem Pfad zu einer vollständigen Dekarbonisierung bis zum Jahr 2050 auch dringend geboten. Der vom Umweltausschuss des EU-Parlaments vorgeschlagene Zielkorridor von 68-78 g/km CO_2 nutzt

dieses Potenzial leider nicht in vollem Umfang aus. Dennoch gewährleistet die frühzeitige Festschreibung eines Langfristziels sowohl weitere Effizienzsteigerungen als auch die geforderte Planungssicherheit bei der Produktentwicklung. Das CO_2-Ziel für 2020 wurde 2008 mit 12 Jahren Vorlauf beschlossen – dieses Erfolgsmodell einer frühzeitigen Zielsetzung sollte nun auch für 2025 umgesetzt werden. Der CO_2-Grenzwert für 2015, dessen Festlegung von der Autoindustrie mit denselben Argumenten wie heute vehement bekämpft und erfolgreich verschoben wurde, wird von den meisten Herstellern nunmehr deutlich vor dem Zieljahr erreicht.

Gerade durch die Festlegung eines Langfristzieles ergibt sich der erwünschte Anreiz für die Weiterentwicklung alternativer Antriebskonzepte, wie etwa batterieelektrische Autos oder Plug-In-Hybride. Denn nur mit ihrer Hilfe lassen sich bei größeren Fahrzeugen auch in Zukunft noch die vorgeschriebenen Grenzwerte einhalten. Daher sind verbindliche Langfristziele ein zielführendes Instrument, um kunftige Erfordernisse an kommende Neuwagengenerationen zu definieren. Um die tatsächliche Marktsituation entsprechend zu berücksichtigen, sieht der Vorschlag zudem eine Revisionsklausel vor, um gegebenenfalls auf unerwunschte Entwicklungen reagieren zu konnen.

2. Keine Rechentricks! Supercredits rechnen Verbräuche schön, statt Kraftstoff einzusparen

Die Mehrfachanrechnung besonders sparsamer Fahrzeuge bei der Berechnung des Flottenemissionsdurchschnitts ist aus Klimaschutzgrunden nicht hinnehmbar. Diese sogenannten Supercredits erzeugen lediglich auf dem Papier eine saubercre Flotte, real wird der CO_2-Ausstoß jedoch nicht reduziert. Durch das von Herrn Wissmann geforderte „Banking", das eine spatere Anrechnung angesparter Supercredits ermöglicht, potenziert sich die schädliche Wirkung der Supercredits nochmals, da dieser Mechanismus die tatsächliche Erreichung des Grenzwertes von 95 g CO_2/km um vier Jahre nach hinten verschieben würde. Das wären vier verlorene Jahre für den Klimaschutz und die technische Innovation.

Nur derjenige Hersteller, der langfristig die sparsamsten Fahrzeuge liefert, wird seine Stellung als Marktführer einer innovativen Zukunftsindustrie behaupten und darüber dauerhaft eine entsprechende Nachfrage mit entsprechenden Arbeitsplatzeffekten generieren können. Eine Studie von Cambridge Econometrics/Ricardo-AEA hat errechnet, dass allein die Implementierung des CO_2-Grenzwerts von 95 g/km bei Pkws, respektive 147 g/km bei leichten Nutzfahrzeugen, mit geringer zeitlicher Verzögerung rund 360.000 neue Arbeitsplätze entstehen lassen konnte.

Die Erreichung des Grenzwertes von 95 g/km ist moglich. Schon heute lässt sich mit sparsamen Fahrzeugen über alle Fahrzeugsegmente hinweg – bezogen auf deren Zulassungsanteil in Deutschland – eine Flotte zusammenstellen, die bereits jetzt den entsprechenden Grenzwert für 2020 erfüllt – ohne reine Elektroautos und Plug-In-Hybride. Auch das Bekenntnis von Europas größtem Automobilbauer Volkswagen zu einem 95-Gramm-Ziel ohne weitere Aufweichungen verdeutlicht, dass dieser Wert ohne Supercredits und Banking erreicht werden kann.

3. Einfach, aber wahr: Prüfzyklen sollen realistisch abbilden, was ein Auto auf der Straße verbraucht

Die im derzeit gültigen Testzyklus gemessenen Verbrauchswerte sowie die damit verbundenen CO_2-Emissionswerte weichen um bis zu 40 Prozent von den realen Verbräuchen auf der Straße ab. Damit sind die auf dem Prüfstand aufwändig ermittelten Verbrauchsangaben nur wenig mehr als ein grob geschätzter Verbrauchskorridor. Die Rechnung zahlen die Verbraucherinnen und Verbraucher mit jeder Tankfüllung. Mehrere Milliarden Euro wandern so in die erdölfordernden Länder ab, statt in europäische Spitzentechnologie investiert zu werden. Wir setzen uns für die rasche Einführung eines neuen Testverfahrens ein, das bestehende Schlupflöcher schließt und die realen Verbrauchswerte so präzise wie möglich abbildet.

Sehr geehrte Frau Bundeskanzlerin, wir möchten Sie bitten, dafür Sorge zu tragen, dass sich die Bundesregierung in den laufenden Verhandlungen auf EU-Ebene für ambitionierte CO_2-Grenzwerte auch über 2020 hinaus einsetzt, Supercredits und Banking-Mechanismen ablehnt sowie die rasche Umsetzung eines neuen Testzyklus' sicherstellt. Das Wohlergehen dieser und künftiger Generationen hängt auch entscheidend von der Frage ab, wie viele Treibhausgasemissionen wir Umwelt und Klima noch zumuten. Die Antwort muss lauten: So wenig wie möglich! Und technisch möglich ist schon jetzt mehr, als Herr Wissmann und andere Vertreter der Automobilbranche glauben machen wollen.

Mit freundlichen Grüßen

Prof. Dr. Hubert Weiger
Vorsitzender des BUND e.V.

Jürgen Resch
Bundesgeschäftsführer Deutsche Umwelthilfe e.V.

Brigitte Behrens
Geschäftsführerin Greenpeace Deutschland

Leif Miller
NABU Bundesgeschäftsführer

Michael Ziesak
Bundesvorsitzender VCD e.V.

Eberhard Brandes
Vorstand WWF Deutschland

Da Herr Wissmann seinen Brief an Sie zur Kenntnis an Umweltminister Peter Altmaier, an Wirtschaftsminister Dr. Philipp Rösler sowie Verkehrsminister Dr. Peter Ramsauer geschickt hat, erlauben wir uns, den Ministern auch von unserem Brief eine Kopie zukommen zu lassen.