



European
Automobile
Manufacturers
Association

ACEA Position Paper Monitoring and reporting CO₂ emissions and fuel consumption of new heavy-duty vehicles



November 2017

INTRODUCTION

The European Automobile Manufacturers' Association (ACEA) welcomes the European Commission's proposal for a regulation on the monitoring and reporting of CO₂ emissions and fuel consumption of new heavy-duty vehicles.

Industry supports the Commission's objective to increase transparency in the market regarding CO₂ emissions from heavy-duty vehicles, thereby also contributing to the further decarbonisation of road transport in Europe.

Following the introduction of the certification regulation for the calculation of CO₂ emissions using the VECTO tool, the proposed monitoring and reporting scheme is an additional, logical step to close the knowledge gap about CO₂ emissions from trucks in Europe. Closing this gap is a prerequisite for the proper implementation of CO₂ reduction strategies. Moreover, it will also provide our customers with certified fuel consumption values for their heavy-duty vehicles.

Truck manufacturers are, however, concerned by the suggestion to aggregate and disclose certain confidential and technically-sensitive data through a database accessible to the general public. This would undermine the competitiveness of the European truck industry, without any decarbonisation benefits or increasing transparency on the market. European truck manufacturers make significant investments in designing their vehicles; that is why competitive data, such as aerodynamic factors, must be kept confidential in order to safeguard Europe's industrial know-how.

In addition, further clarification is needed regarding the scope of the proposal (ie which vehicle types it covers) and the definition of the production date of a vehicle, and to ensure that the disclosure of the average fuel consumption per manufacturer is done in a comparable way.

DATA TO BE MONITORED AND REPORTED BY MANUFACTURERS (ANNEX I, PART B)

ACEA fully supports that information on the fuel consumption and CO₂ emissions of complete vehicles, as calculated by the VECTO tool¹, should be made publicly available. Fuel consumption information is key to enabling vehicle operators to make well-informed purchasing decisions, as they can easily identify which vehicle performs best in terms of fuel consumption.

To that end, the VECTO tool will provide customers with values indicating the CO₂ emissions and fuel consumption of a new truck. That comes on top of the fact that all truck manufacturers already

¹ CO₂ values calculated by VECTO will be mandatory as of 2019 for most of new trucks produced.

share technical, confidential data about individual vehicles with their customers on a bilateral basis.

However, ACEA is concerned by the proposal to disclose confidential and technically-sensitive data through a database accessible to the general public – especially when it comes to data on the aerodynamic performance of a truck, the so-called 'CdxA value', as well as axle and transmission certification numbers (items 4, 5 and 23 of Annex I Part B).

In order to address this problem, ACEA proposes adding items 4, 5 and 23 to the list of data not to be made public, as specified in Article 6 of the Commission's proposal. Though ACEA does support making these data available to competent EU authorities and member states to promote transparency.

Confidential and technically-sensitive data – item 23

Tested and certified input data covering engines, air-drag, transmissions and axles are used by VECTO to calculate the overall CO₂ performance of a vehicle. To ensure reliability, these data are verified in accordance with EU type-approval procedures, overseen by type-approval authorities. The Commission proposal now suggests to make the air-drag data publicly available.

In fact, these data are confidential and technically-sensitive as they reflect the technical know-how of Europe's truck manufacturers, acquired through significant investments in R&D². Aggregating such data for all individual vehicles on the market, and subsequently disclosing the data to any interested party (including competitors) would severely hurt our competitiveness. It would save competitors, in Europe and abroad, the R&D investments required for designing competitive products.

In addition, air-drag values are determined under standardised conditions, assuming generic bodywork and operating conditions. Unless the corresponding data for specific bodies or trailers are available, air-drag values do not provide any relevant information about the actual vehicle. Finally, no other regulatory system in the world requires the publication of a truck's exact CdxA value.

Competitive data – items 4 and 5

Commercially-sensitive information should not be disclosed. Aggregated information on which suppliers are used for different components provides strategic insight into market shares, leading to distortion of competition. The European Commission's proposal recognises this, suggesting not to make the name of a supplier public. However, certification numbers provide the same information and should therefore not be disclosed to the public either.

² The automotive industry is the largest private investor in R&D in Europe, spending €50.1 billion in 2016 alone.

Data for inspections and tests, including third-party testing

Data required for testing and inspecting heavy-duty vehicles should be made accessible to parties with regulatory obligations in order to allow for independent verification. These data should, for instance, be available to the technical services assigned to perform the necessary inspections and tests, as well as to the type-approval authorities granting the approval of a vehicle and providing the type-approval certificate.

However, making such certified data publicly available is not necessary to allow for independent testing by a third party. Any type-approval authority or other authorised authority of a member state in the European Union, as well as the European Commission, can indeed access the data of a specific vehicle and provide these to a qualified third-party testing organisation for legitimate verification purposes. The qualification of the laboratory performing the test could be verified through a proper accreditation process (ie ISO 1702x), conforming that the laboratory has the right technical expertise to perform the test but also follows administrative and ethical procedures.

In the end, type-approval authorities will still be responsible for ensuring that the technical data are accurate. Publication of all data for reliability checks is therefore not a proportionate measure, considering that there are already systems in place for exactly that purpose.

In a nutshell:

- ACEA supports the monitoring and reporting of all data to the European Commission and member states, as specified in the Commission's proposal.
- ACEA is in favour of publishing all data in a central register with exception of data items 4, 5 and 23. Data covered by these items are confidential, technically-sensitive and competitive. This comes in addition to the data items already identified by the Commission, ie numbers 1, 24, 25, 32, 33, 39 and 40, as specified in Part B of Annex I. Other confidential, technically-sensitive and competitive data should not be included in the central register either.
- Testing by third-parties should be restricted to independent bodies with a legitimate interest for verification purposes (and a proper accreditation), in accordance with today's rules for compliance testing.

SCOPE (ARTICLE 5)

At this stage, the VECTO calculation tool does not cover all types of heavy-duty vehicles. Hence, it should also be clarified in the proposed monitoring and reporting legislation that data collection by manufacturers is limited to those vehicles subject to the mandatory CO₂ declaration (using VECTO).

DEFINITION OF THE 'DATE OF PRODUCTION' FOR APPROVAL OF INDIVIDUAL VEHICLES (ARTICLE 5)

Heavy-duty vehicles are often built in steps, whereby an incomplete vehicle is finalised by a second- or third-stage manufacturer or bodybuilder. Individual vehicle approval is done by distributors/dealers after the vehicle has been completed by the final-stage manufacturer; usually at the vehicle's time of registration. The signature date of the individual approval is not known to the initial manufacturer of the incomplete vehicle, and therefore does not constitute an appropriate definition of the 'date of production'. In multi-stage manufacturing, the incomplete vehicle manufacturer can only assume responsibility for the vehicle at the stage of completion achieved under its control. Generally speaking, that is when the incomplete vehicle leaves the production line of the first manufacturer.

ACEA recommends that truck manufacturers' responsibility is limited to collecting and reporting the data available to them as long as the vehicle is still under their control.

An appropriate definition of the 'date of production' would be the date on which the customer's CO₂ file is generated by means of the VECTO tool, ie when CO₂ values are calculated according to the certification regulation.

REPORT (ARTICLE 8)

When performing and publishing analyses of the data provided by member states and manufacturers, the Commission should consider the diversity of driving cycles (long-haul, regional, construction, municipal/utility, EMS, etc) in ACEA's view. This would avoid unjustified disadvantages for certain manufacturers when analysing the average fuel consumption per manufacturer. In this regard, key factors include among others: percentage of vehicles adapted for EMS applications (capacity of more than 40 tonnes), percentage of refuse and construction trucks in a vehicle group primarily defined for long-haul and regional transport, etc.

PROVISIONAL REPORTING AND NOTIFICATION (NEW)

Each year, manufacturers will be requested to report a data set to the European Environment Agency. By combining these data sets with the figures provided by the member states, the European Commission will create a central register.

ACEA recommends including the possibility for member states and manufacturers to cross-check

the (provisional) consolidated data, allowing them to notify the Commission in case of any error before the register is made public.

This would provide an efficient mechanism for guaranteeing the correct consolidation of the data provided by member states and manufacturers, in line with the scheme for CO₂ emissions from light-duty vehicles (according to Regulation 443/2009 for passenger cars and 510/2011 for vans).

DELEGATION OF POWERS (ARTICLE 10)

The current proposal suggests that the European Commission, through delegated acts, will be able to amend the annexes. ACEA agrees that the annexes likely will be subject to revisions in the future to adapt the system to new technologies and other developments. However, this cannot happen without a robust assessment process. Hence, the use of implementing acts seems to be more appropriate for this purpose.



European
Automobile
Manufacturers
Association

ABOUT ACEA

- ACEA represents the 14 Europe-based car, van, truck and bus manufacturers: BMW Group, DAF Trucks, Daimler, Fiat Chrysler Automobiles, Ford of Europe, Hyundai Motor Europe, Iveco, Jaguar Land Rover, PSA Group, Renault Group, Toyota Motor Europe, Volkswagen Group, Volvo Cars, and Volvo Group.
- More information can be found on www.acea.be or [@ACEA_eu](https://twitter.com/ACEA_eu).

ABOUT THE EU AUTOMOBILE INDUSTRY

- 12.6 million people – or 5.7% of the EU employed population – work in the sector.
- The 3.3 million jobs in automotive manufacturing represent almost 11% of EU manufacturing employment.
- Motor vehicles account for almost €396 billion in tax contributions in the EU15.
- The sector is also a key driver of knowledge and innovation, representing Europe's largest private contributor to R&D, with more than €50 billion invested annually.
- The automobile industry generates a trade surplus of about €90 billion for the EU.