



To Ministers in Charge for Environment,
To Members of the Committee of Permanent Representatives,
To Members of the European Parliament

Friday, 13th June 2013

Subject: European Consumer Organisations support early introduction of a new test, the WLTP, to measure fuel consumption by 2017 at the latest

Dear Sir or Madam,

We are writing to you on behalf of Test-Achats/Test-Ankoop (Belgium), Consumentenbond (the Netherlands), Altroconsumo (Italy), UFC-Que Choisir (France), Deco-Protteste (Portugal) and OCU (Spain) in order to express our support for an early introduction of a new test to measure the fuel consumption of new cars, the Worldwide Harmonized Light Vehicles Test Procedure (WLTP), as early as possible and no later than 2017.

As leading consumer organisations in Europe, we continuously carry out a rigorous program testing on average 150 cars a year, with the main goal to provide consumers with comprehensive information on the environmental performance of certain car models. The test is commissioned by the ICRT consortium (International Consumer Research and Testing) and conducted by the ADAC laboratory (Allgemeiner Deutscher Automobil-Club), making use of the ADAC EcoTest¹.

One of our latest tests which will appear in the July edition of the Test-Achats/Test Ankoop magazine has measured realistic fuel consumption values of cars of up to 27% higher than the figures claimed by manufacturers.

Our results are in line with a recent large study published by the International Council on Clean Transportation (ICCT). The ICCT study combines numerous large data sets of on-road driving data from several countries throughout Europe. The analysis of the on-road driving data revealed that the average gap between official and “real-world” fuel consumption figures rose from less than 10 % in 2011 to up to 25 % in 2011.² The authors also show that the increase in the difference between those two figures was particularly noticeable after 2007/2008, a period when several Member States introduced a CO₂-based vehicle taxation system and an EU regulation on CO₂ emission reduction targets was introduced at EU level. According to the ICCT study, the average driver has to spend an extra €300 for fuel per year, comparing to a situation in where official fuel consumption figures would match real world figures.

¹ ADAC has the facilities to perform vehicle tests similar to the ones that manufacturers carry out for the certification of a new vehicle. Our test relies on the ADAC Eco-test, a test of cars that goes beyond applicable legal requirements and simulates real-life conditions. We made use of the ADAC EcoTest that was adapted in March 2012 to include the new Worldwide harmonized Light vehicles Test Procedure (WLTP).

² See <http://www.theicct.org/laboratory-road>

Reasons for this growing gap are numerous, including the growing application of technologies that reveal a greater impact on fuel efficiency in type-approval tests than under real-world driving conditions (e.g. start-stop technology). However, studies have also shown that one explanatory factor is the increased use of flexibilities in the type-approval procedure. Such loopholes include the fitting of special tyres with a lower rolling resistance, the overinflating of tyres, or the use of taping over indentations to reduce aerodynamic drag, just to name a few. By contrast, our own tests are conducted in such a way where such “creative interpretation of the test procedures” is not applied and therefore does not dilute the results.

This manipulation of fuel efficiency values has a major detrimental impact on consumer confidence and on the effectiveness of policy targeted at real emissions reductions. Consumers are frustrated by unrealistic fuel consumption figures, and this frustration inhibits their willingness to invest in new fuel-efficient vehicles. In addition, in countries where CO₂-based vehicle taxes are in place, the effect of unrealistically low type-approval CO₂ emissions values on tax revenues can be significant. Finally, regulators must also be concerned that such an exploitation of flexibilities of the system may lead to a significantly lower decarbonisation and emissions reduction than originally planned by policy-makers.

It is no secret that the current test applied for type approval of cars, the New European Driving Cycle (NEDC) is not adequate to measure the real life fuel consumption values of a vehicle. At the moment, a better, harmonised testing standard – the WLTP, is currently under development at UNECE level and is close to completion. It is anticipated that the WLTP will solve many of the problems of the NEDC and will provide more realistic fuel consumption estimates.

Within the revision of Regulation 443/2009, the European Parliament has recently proposed to introduce the WLTP from 2017 onwards. **Some Member States, however, are apparently opposing the introduction of the new test and propose a post 2020 date for the introduction of the WLTP.** Delay after 2020 will lead to the current inadequate test being used for nearly another decade. As leading national consumer organisations in Europe, **we urge you as policy makers to support the replacement of the current applied test for type approval, the NEDC, by the WLTP as early as possible and no later than for 2017.**

In addition, the introduction of the new test will be accompanied by a correlation exercise to make sure that the ambition of the current target of 95 g CO₂/km will not be altered for the car manufacturers. As the European Commission has already initiated this process, **we support that the conversion of the new target should be conducted through a purely technical exercise and not through a political co-decision** in order not to reopen the debate on the 95 g CO₂/km target.

We also fully support the European Parliament to call on the European Commission to consider supplementing the WLTP by incorporating additional provisions when integrating it into EU law, if needed. Finally, **we also fully support the introduction of checks on production vehicles** (conformity of production) to ensure that CO₂ emissions of production vehicles conform to the values of the approved type.

Finally, we also are fully supportive of including an indicative long-term target for 2025 in the revision of Regulation 443/2009. **We support a target of 70 g CO₂/km for 2025**, but see the vote in the Environment Committee of the European Parliament to set a 68-78 g CO₂/km range as welcome as it sends an important signal.

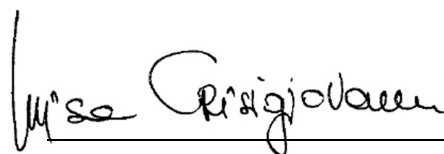
BEUC – The European Consumer Organisation, who acts as the umbrella group for national consumer organisations in Brussels representing all six signatories of this letter at EU level, has also repeatedly highlighted the urgent need for setting a long-term target for 2025 and for a thorough overhaul of the test cycle and test procedure in order to safeguard consumers' willingness to invest in fuel efficient technologies.

We urge you to take the consumer relevant issues into account when deciding on this important legislative package.

Yours sincerely,



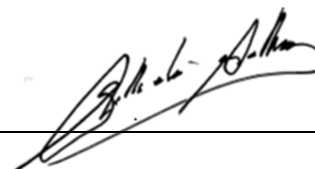
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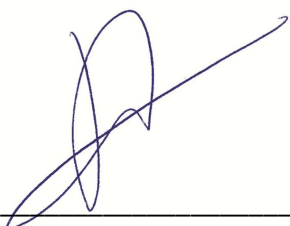
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Annexe : Article to be published in Test-Achats magazines in July.

C.C. Monique Goyens, Director General of BEUC.

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