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A little knowledge is a dangerous thing: why T&E are wrong on Euro 7 proposals

For better air quality in cities – the priority for cars is that Euro 7 is affordable to support faster fleet turnover

Euro 7 is all about new cars, and many think that this regulation holds the key to reducing transport's impact on air quality. However, air quality in cities is about the whole fleet of cars, trucks, buses, building heating systems, industrial background, and transboundary air pollution. To get the best results we need to work out how Euro 7 can contribute and can make the best improvements *within this context*.

To improve the air in Europe's cities – it is obvious that **adding** one EV or new Euro 7 ICE car will not do this. To improve things, we have to **take away** one older Euro 2/3/4/5 or early Euro 6 vehicle. These older vehicles can have emission levels between 10 and 1000x those of today's Euro 6d cars.

T&E's proposal ([T&E, September 2021](#)) seem to be to set a near impossible and probably very expensive Euro 7 standard, that would certainly raise the price of new cars, and also discourage carmakers to even make and sell them. It is logical to expect that this will have an undesired effect of slowing down the fleet turnover and lengthening the life of some of the older vehicles – the exact vehicles we should aim to remove and replace by effective and affordable cars. T&E's proposal and their input to the AGVES group might be simply a strategy to achieve an earlier ICE ban, by making the lower cost Euro 7 hybrid vehicles out of reach for citizens. Such an objective would be disingenuous and could slow air quality progress.

A fit-for-purpose Euro 7 proposal of the Commission would in our view, if implemented, maintain affordable (ICE – hybrid) vehicles, which in turn would maintain today's level of fleet turnover to new cars at the latest emissions standard. This is the most sensible strategy for a faster progress in air quality.

In 2018, Concawe together with Ricardo conducted a study to determine the actual and expected Real Driving Emissions (RDE) for vehicles (Euro 6b, Euro 6c, Euro 6dtemp, and Euro 6d vehicles). These were used as input in a study Concawe conducted with Aeris to model how fleet turnover to either Euro 6d cars or EVs affected the air quality throughout EU27+UK with a particular focus in 10 European cities.

The conclusion was that “by 2030 Euro 6d vehicles are as effective as EV vehicles in helping cities improving compliance with AQLVs (Air Quality Limit Values)”.

So the strategy should as a priority be about how fast we get to that state, and only once this is achieved, about to how to “optimise” each single new vehicle. The scientific report (Concawe Report 8/18) is available [here](#) and the supporting RDE study by Ricardo [here](#), both from Concawe's website.

To accelerate progress, there is also a need for measures to support the removal of those older vehicles:

- Scrappage of the oldest Euro-level and support owners to buy affordable newer Euro 6d level vehicles or EVs
- Identification and removal of those vehicles that have been (illegally or even legally) tampered with or badly maintained, resulting in drastic increases in emissions

We recommend that policymakers at EU and Member State level consider implementation of measures to achieve this. To us it is simply odd that NGOs are largely silent on these issues, and not contributing to effective policy development here.

As we focus on the objective of improving air quality in our cities, we take the view that T&E should publicly distance themselves from The Guardian's headline "Almost 100 million highly polluting cars could appear" [[The Guardian 21/10/2022](#)] to result from the Euro 7 leaked proposals, as there is no basis for this claim. T&E should also retract their current proposal for Euro 7 and instead consider measures that can assist in the removal of older genuinely, demonstrably higher polluting vehicles in a socially responsible and economically efficient way.

We call on the European Commission to propose an affordable Euro 7 standard in the interests of citizens being able to afford new efficient ICE-based vehicles, such that a faster rate of improvement in air quality in our cities can be achieved.

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Director General