

Dear Sir

European Commission Consultation on reducing emissions from heavy duty vehicles (Euro VI)

1. Please find the response to the above consultation from the UK Road Haulage Association Ltd
2. The Road Haulage Association (RHA) represents the spectrum of companies whose main business is operating commercial vehicles. Our 9,500 members run almost 100,000 lorries and range from owner-drivers to large fleets.
1. In considering the four scenarios for diesel engine emissions we have considered research undertaken by Mike Dunne (DfT) on UK air quality; his report showed that NO_x and PM from heavy-duty vehicles were not a major cause of poor air quality in the UK. We believe reducing NO_x and PM for a possible Euro VI would not bring any notable improvement in air quality.
2. We have considered the two technologies being used to meet the current emission levels (SCR & EGR). We understand that SCR can reduce engine out NO_x levels with about 85% efficiency, it can improve slightly on Euro V NO_x levels, possibly to 1g/kWh without reducing fuel economy. However if industry is required to deliver a tail pipe out NO_x of less than 1g/kWh it will need to reduce engine out NO_x in some way, this could be by adding EGR to SCR after treatment, which would cause a deterioration in fuel consumption. We would not want additional costs for no perceived benefit. The RHA believes that we need to retain a choice of technologies in SCR and EGR along with any future technology developed in this area, as this will aid competitiveness between manufacturers.
3. A balance must be struck between air quality, technical complexity and cost. UK research indicates that scenario C is the most appropriate, especially in view of the emphasis now placed on minimising CO₂ emissions
4. Scenario C achieves the min level of NO_x output of 1g/kWh with continued reductions in PM, whilst remaining neutral on CO₂ emissions.
5. The RHA believes that industry should move forward on Euro VI and not delay while considering Euro VII, as we have seen that running Euro IV and V in tandem has caused considerable industry confusion.