



## **Commission consultation on the future “EU 2020” strategy**

### **ACEA comments**

#### **I. Need for an EU strategy continues**

- ACEA welcomes the initiative to define a new strategy on growth and jobs that takes into account the additional challenges posed by the economic crisis and longer term environmental, economic and social objectives.
- Europe needs a true industrial policy to compete globally in the future. This means a clear vision of its future industrial base, and integrated policies to realise it.
- The CARS 21 initiative can and should make a major contribution to EU industrial policy on the key automotive sector.

#### **II. Environmental, economic and social goals**

- Balancing these objectives should be the guiding principle of the new strategy.
- It should be kept in mind that competitive, thriving industries are the basis of improvement and innovation in all three areas.

#### **III. Better regulation**

- Better regulation is one of the core contributions that EU policy makers can make to ensure the right framework conditions for more growth, and, subsequently, more jobs and resources to improve environmental protection.
- The automotive industry is a world leader in producing fuel-efficient and environment friendly vehicles, and committed to retain this position. Policy makers need to provide the right framework for this through
  - using integrated approaches to policy making, so that the desired results are achieved at the lowest possible cost to society;
  - adopting technology neutral regulation;
  - reducing unnecessary administrative and other regulatory burdens on industry to free resources for investment in innovation;
  - increasing EU support for R&D to further develop break-through technologies for the longer term and improve existing technologies for the short and mid term;
  - fostering global harmonization of regulation
  - speeding up approval procedures under the Framework Programmes for Research;
  - ensuring affordability of new technologies

The CARS 21 recommendations and Mid-Term Review should guide the application of better regulation to automotive regulation.

#### **IV. Integrated policies**

- ACEA welcomes the Commission’s intention to increase integration of policies between different policy areas, between the EU institutions and between Member States.



- In order to meet its own ambitions and the challenges ahead, the EU needs to develop an industrial policy that is more efficient in yielding results by looking at competitiveness, climate and environmental protection and energy together.
- In particular, the industry underlines the need for an integrated approach to automotive environment and safety regulation. As recommended under CARS 21, all relevant stakeholders need to be involved and their contributions joined to achieve the most cost-effective solutions.

#### **V. Better infrastructure for sustainable mobility and transport**

- ACEA welcomes that the Commission recognizes the need for upgrading infrastructure, as better traffic flows are vital for reducing CO2 emissions.
- However, investments in improving infrastructure should be made where they contribute most to transport efficiency, in particular to CO2 reductions, and not based on the choice of transport mode.
- Contrary to wide spread belief, modal shift from road to other modes, while suitable from an environmental point of view in some very specific cases, is neither possible nor suitable for the majority of transport assignments.
- It is not acceptable that the European transport policies are based on the assumption that some modes of transport would be, by definition, more environmentally friendly than others and should therefore be given preeminence over the others.
- An inconsiderate move away from road transport to other modes - without thoroughly assessing their efficiency - risks entailing high costs for the economy while providing no benefit or even being detrimental for the environment.
- In freight transport for instance, to a great extent the environmental performance of a transport mode depends on the utilization of its maximum capacity. Capacity utilization, in turn, depends on the volume and the weight of the transported goods, the need for loading and unloading, the density of the network (rail/road/waterway), the energy source used, the energy need for a loaded compared with an unloaded vehicle and specific needs with respect to the commodity transported.
- Aside from road infrastructure, energy infrastructure will need upgrading as well to enable the use of alternative fuels, including electricity and hydrogen.

#### **VI. Trade policy**

- Globalisation and increasing production capacity in emerging markets will increase trade flows from emerging markets to Europe.
- Automobile manufacturers are ready to rise to this challenge and continue to support the principle of free trade and open markets.
- It is essential that the EU takes a strong stance against protectionism and ensures that future bilateral or multilateral trade agreements be balanced and based on the principle of mutual benefit, as agreed under CARS 21.

\*\*\*\*\*