



EUROPEAN COMMISSION

*Brussels, 30.11.2018
C(2018) 8071 final*

*Mr Ondřej BENEŠÍK
Chair of the Committee for
European Affairs of the
Poslanecká sněmovna
Sněmovní 4
CZ – 118 26 PRAGUE 1*

*cc. Mr Radek VONDRÁČEK
President of the
Poslanecká sněmovna
Sněmovní 4
CZ – 118 26 PRAGUE 1*

Dear Chair,

The Commission would like to thank the Poslanecká sněmovna for its Opinion on the third “Mobility Package”¹.

In his State of the Union address of September 2017, President Juncker set out a goal for the European Union and its industries to become a world leader in innovation, digitisation and decarbonisation. Building on the previous ‘Europe on the Move’ Mobility Packages of May and November 2017, the European Commission adopted in May 2018 a third and final set of measures to make this a reality in the mobility sector. The objective is to allow all Europeans to benefit from safer traffic, less polluting vehicles and more advanced technological solutions, while supporting the competitiveness of the European industry. To this end, the initiatives under the third

¹ Proposals for a Regulation of the European Parliament and of the Council setting CO₂ emission performance standards for new heavy-duty vehicles {COM (2018) 284 final}, for a Regulation of the European Parliament and of the Council on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/... and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009. {COM (2018) 286 final}, and of a Directive of the European Parliament and of the Council amending Directive 2008/96/EC on road infrastructure safety management {COM (2018) 274 final}, Communication — Towards automated mobility: EU strategy for the mobility of the future {COM (2018) 283 final}, and Communication — Europe on the Move — Sustainable mobility for Europe: safe, connected and clean {COM (2018) 293 final}

mobility package include an integrated policy for the future of road safety with measures for vehicles and infrastructure safety; the first ever CO₂ standards for heavy-duty vehicles; a strategic Action Plan for the development and manufacturing of batteries in Europe and a forward-looking strategy on connected and automated mobility. With this third 'Europe on the Move' package, the Commission is completing its ambitious agenda for the modernisation of mobility.

The Commission takes note of the doubts expressed by the Poslanecká sněmovna on the estimated safety impacts of some of the proposed vehicle general safety requirements, such as tyre pressure monitoring systems, intelligent speed assistance function, vehicle manufacturers' guidelines to facilitate eventual alcohol interlock device installation (i.e. not the mandatory installation of such devices), and driver distraction monitoring systems and of its concern about the cost-benefit impacts of new mandatory safety features in cars on car manufacturers and consumers. In all cases, however, the impact assessment has introduced a new and specific calculation methodology, eliminating double-counting and over-estimation, that has been expressively endorsed by the relevant vehicle industries of the European Union. Furthermore, the calculation model's input variables consisting of the various technologies' detailed costs and their effectiveness in the real world, have been carefully assessed and reviewed by the large stakeholder base that included a significant representation of the vehicle and automotive supplier industry members. Hence, both industries have essentially validated the approach and have also confirmed the conservative nature of both the estimated real world safety impact as well as the cost/benefit analysis that underpins the Commission's Impact Assessment.

The Commission also takes note that the Poslanecká sněmovna considers that the objectives of safe, connected and clean mobility could in fact hinder the development of a competitive automotive industry in Europe, and that, as regards CO₂ emission performance standards for heavy-duty vehicles, the level of ambition proposed for emissions reductions in 2025 and in 2030 is not sufficiently realistic.

On this, the Commission would like to point out that the targets have been set on the basis of an in-depth quantitative and qualitative analysis, the results of which are summarised in the Impact Assessment accompanying the proposal. These targets strike the right balance and are both ambitious and realistic.

The proposed 15% target in 2025 compared to 2019 is based on the deployment of readily available cost-effective technologies. The upfront additional technology costs will be by far outweighed by the large fuel savings, to the benefit of transport operators which are mainly small and medium enterprises. Flexibilities, such as banking and borrowing, have also been introduced so that manufacturers can cost-effectively meet the target.

With reference to 2030, the proposed emission reduction target of at least 30% compared to 2019 is aspirational. The Commission has proposed to determine the 2030 CO₂ emission target as part of the 2022 review, once sufficient CO₂ emission data and more information will be available on the costs and savings of the prospective technologies.

The Poslanecká sněmovna considers that the penalties applicable for exceeding emissions limits, as well as the deadlines for the introduction of mandatory technologies, should be set at a more realistic level. The Commission would like to clarify that the proposed level of the excess emission premium is of a comparable stringency as for cars and vans CO₂ emission standards. Furthermore, the proposal is based on a technology-neutral approach and does not include obligations for introducing specific technologies.

The Poslanecká sněmovna also concludes that the design of the emission performance standards should take into account the full life-cycle of the fuels (well-to-wheel). The Commission would like to highlight the need of clear responsibilities for clear actors, while avoiding double regulation. The proposed CO₂ emission performance standards apply directly to heavy-duty vehicle manufacturers, who cannot be held responsible for the type of fuel or fuels used in each vehicle. The Commission is already taking action to decarbonise emissions from well-to-tank: the Emission Trading System reform will ensure decarbonisation of electricity production and the revised Renewable Energy Directive will ensure that more low-carbon fuels will enter the market.

As regards measures to streamline the implementation of the main trans-European transport network, the Commission takes note of the view expressed by the Poslanecká sněmovna that the approach proposed fails to take on board the need to conduct environmental impact assessments to promote low-emission mobility, and its recommendation that rules regarding land purchases should be simplified.

Finally, the Commission takes note that the Poslanecká sněmovna considers that a European strategy on connected and automated mobility should be broader in its scope and extend to all modes of transport (e.g. drones) and not be limited to road transport. While the three mobility packages adopted respectively in May and November of 2017 and in May 2018 focus in particular on road transport, where safety, digitisation and decarbonisation are key challenges, the Commission has taken a holistic approach to its mobility policies by putting forward proposals that cover all transport modes. In this context, the Commission would like to draw the attention of the Poslanecká sněmovna to the Aviation Strategy it adopted in December 2015 {COM (2015) 598} and to Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency. The Aviation Strategy emphasised the need to develop safety rules to allow a new market for drones to thrive in Europe, which represent a tremendous opportunity for the aeronautical manufacturing industry, especially for small and medium sized enterprises, and for the many aviation and non-aviation businesses that will be able to integrate drones into their activities, and increase their efficiency and competitiveness.

The points made above are based on the initial proposal presented by the Commission, which is currently in the legislative process involving both the European Parliament and the Council.

The Commission hopes that the clarifications provided in this reply address the issues raised by the Poslanecká sněmovna and looks forward to continuing the political dialogue in the future.

Yours faithfully,

*Frans Timmermans
First Vice-President*

*Violeta Bulc
Member of the Commission*