

NGVA Europe's Position on the Proposal for setting emission performance standards for new passenger cars and light-duty commercial vehicles

The Natural Gas Vehicle Association (NGVA Europe) is a European association that promotes the use of natural and renewable gas as transport fuel. Founded in 2008, its 135 members from 31 countries include companies and national associations from across the entire gas and vehicle manufacturing chain.

NGVA Europe welcomes the publication of the EU Commission's Proposal for setting emission performance standards for new passenger cars and light-duty commercial vehicles. Furthermore, NGVA Europe would like to highlight the importance of introducing a **more comprehensive approach** for assessing the environmental benefits from the mobility solutions, **especially considering the role that renewable energy can play in decarbonising transport emissions.**

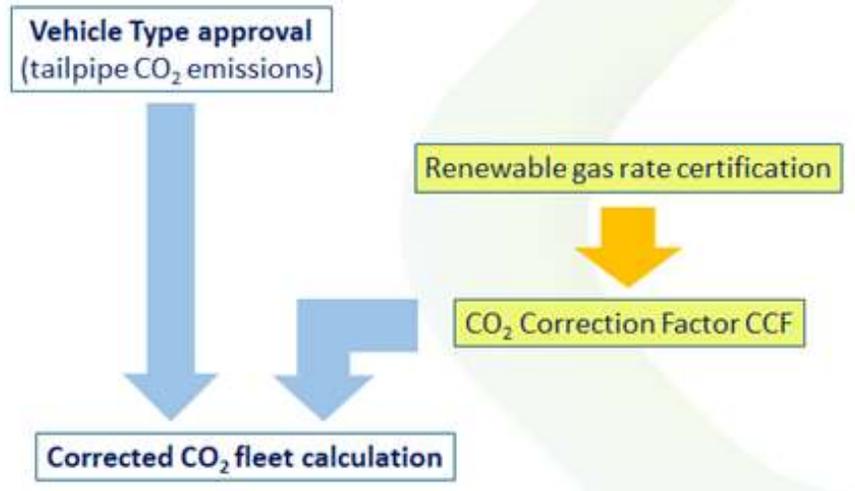
Under a **medium-long-term** perspective, the **Well-to-Wheel** approach can guarantee a fair and complete evaluation of the decarbonisation effect among different solutions, translating the need to maintain **technology neutrality.**

Technology neutrality is mandatory in the next decades in order to provide to the transport sector as much as possible solutions to achieve the decarbonization target and to tackle air quality issues. While electrification will progressively penetrate the market, **other solutions, already available today, have to contribute to that accelerating the reverse of trend of the CO₂ emissions from this sector.**

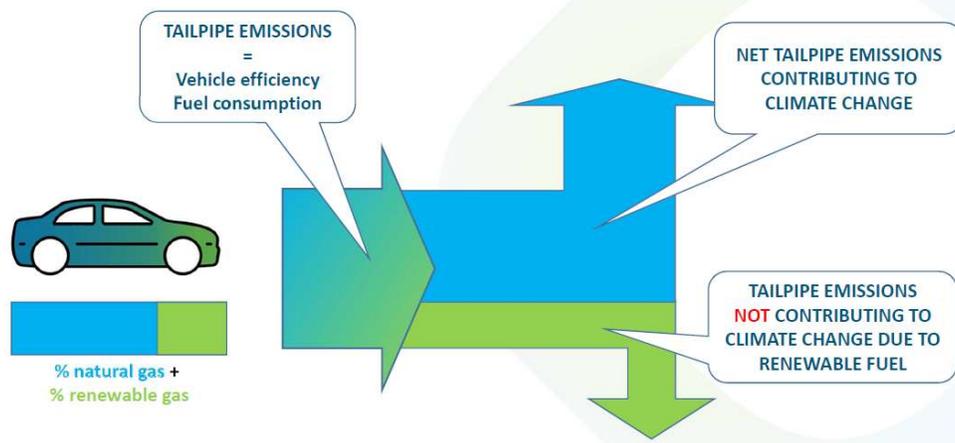
For this benefit to be achieved in the **short-term**, NGVA Europe advocates for the following approach to be undertaken in the current proposal:

- Current tailpipe approach for **type-approval homologation remains unchanged** to provide the information about fuel consumption/vehicle efficiency.
- In order to take into account the benefit of renewable gas and to also connect this Proposal with the Renewable Energy Directive, a **CO₂ Correction Factor (CCF)** should be introduced at the **monitoring and reporting phase of the regulation**
 - The CCF is counted based on the renewable gas used in each Member State and is subtracted from the homologation number of the vehicle
 - E.g. a vehicle running on natural gas homologated at type-approval as 100gCO₂/km in a country with 20% renewable gas in the grid (biomethane or synthetic gas) should be reported as 80gCO₂/km (CCF=20%)
 - **As such the method for calculating CCF is the following: CO₂ (natural gas vehicle fleet) = Type-approval*(1-CCF)**

The scheme is shown in the following figure:



The proposal translates the fact that tailpipe emissions are not in measure to distinguish the part of net CO₂ emissions really impacting on climate change from the one reabsorbed from the renewable fuel carbon cycle, as represented in the following figure:



This measure will create a **real market demand** from renewable gas (but the same scheme could also apply to other advanced sustainable biofuels), with the consequence to **spread the CO₂ reduction effect** not only on the **new registered vehicles** but also leveraging on the **existing fleet** that, anyway, will be on the road in the next years and will be responsible of most of the CO₂ emissions from the sector.