

POLICY POSITION ON EURO 7



The FIA European Bureau supports the European Union in its endeavours to achieve **climate neutrality** and improve **air quality**, and the revision of the stepwise regulation on pollutant emissions from road vehicles (Euro 7).

Among others, FIA and Mobility Clubs contribute to these goals by sponsoring and actively participating in the Green NCAP program. This independent consumer program tests the environmental performance of new vehicles against performance criteria that are more ambitious than those laid down in Euro 6 legislation. Lifecycle Assessment is one of the ways in which Green NCAP informs citizens, industrial stakeholders, and governments, of the actual cradle-to-grave environmental impacts of various powertrains. It is a powerful tool to tackle the environmental performance concerns at the source.

We believe that improving test requirements and effectively enforcing them are equally important: in fact, the best possible set of legal requirements is as good as the efficiency and effectiveness of its



enforcement. Market surveillance and audits of a vehicle's environmental performance by independent third parties must be better accommodated.

Lifetime compliance with strict but fair Euro 7 type-approval requirements is of paramount importance to make the fleet on European streets cleaner in the decades to come; these requirements must be **technology-neutral** and tested against cost-efficient performance criteria. No propulsion technology should be excluded from the scope of testing or be pushed to the side-lines in the market.

Modern vehicle connectivity opens the door for On-Board Fuel Consumption Monitoring (OBFCM), On-Board Monitoring (OBM) of pollutant emissions, remote In-Service Conformity testing (eISC), Remote Diagnostic Support (RDS), electronic Periodical Technical Inspection (ePTI), prognostics, and emission-relevant, over-the-air software updates. All these legal use cases require direct access to in-vehicle data and functions at a state-of-the-art level of security. In our view, its implementation requires a fully-fledged **Secure On-Board Telematics Platform (S-OTP)**, allowing authorised parties to get remote access to the environmental performance control systems, and help consumers keep their cars on the road, avoiding breakdowns at the source.

Background

The Euro step legislation traditionally targets reduction of pollutant emissions of the individual vehicle, resulting in pollutant emissions reduction of the entire fleet with a certain time-delay linked to fleet renewal. In various impact assessments, fast reduction in moderate steps showed to be more effective and efficient to clean the fleet compared to applying very low, ambitious limits at a longer time horizon. In other words, the short application time is the critical factor, not necessarily the reduction step size.

Existing vehicle pollutant emission standards are regulated in type approval Euro 6/VI Regulation¹ and UN Regulations on the WLTP² and Real-world Driving Emissions (RDE). The introduction of RDE in Euro 6 Regulation, especially, led to an enormous leap forward in effectively lowering pollutant emissions.

Recommendations

Technology neutral approach

FIA advocates a technology-neutral approach whenever possible. Certain propulsion technologies will require dedicated tests and performance criteria (e.g., the electrical driving range for electrified

¹ Regulation (EU) 2017/1151 of 1 June 2017 on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information

² UN Regulations: R83; R101; R154



vehicles, or evaporative testing for petrol vehicles); however, the overall scope of tests and performance criteria should push all propulsion technologies to become as clean and energy efficient as possible.

Enhancing test procedures and revising performance criteria

The FIA supports a critical review of the current Euro 6/VI environmental performance testing procedures, as well as an adjustment of the performance criteria and limits in the upcoming Euro 7 legislation. The FIA EB supports the introduction of limits for the emissions of e.g., methane (CH₄), ammonia (NH₃), nitrous oxide (N₂O), and soot (namely PN₁₀) in the new regulation.

Identical limits for both petrol and diesel across technologies should be established, and we specifically recommend that the applicability of the particulate matter (PM) and particle number (PN) limits be extended to indirect injection petrol engines.

Vehicles should continue to be tested both in the laboratory - to achieve best possible repeatability - and on the street - to ensure that real-world emissions truly are low when they are new and remain low over the vehicle's lifetime.

Inclusion of effective vehicle security and data access requirements

Mitigating measures, which prove to be less effective tackling local security risks and threats such as odometer manipulation or tampering of emission control systems, are today laid down in the Euro 6/VI approval legislation. Also, the basic, direct access to in-vehicle data and functions through On-board Diagnostics (OBD) for independent service providers, are set out in the Euro 6/VI approval package currently in force.

The future Euro 7 legislation must consider connected vehicles, equipped with new technologies based on IT- and communication-systems. In-vehicle data and functions, as well as integrated on-board diagnostics of environmental performance and safety functionalities, must also be in the focus of Euro 7 approval requirements. The relevant diagnostic data and functions must be made conveniently accessible, free of charge, for authorised parties and competent, independent, and authorised auditors.

We recommend the Commission to implement such a harmonised security scheme across the EU and making it consistent across all regulatory use cases, as well as for the purposes of independent vehicle environmental performance testing by Green NCAP.

Of course, it is very important that the consumer always remains in control of the dataflows to and from the vehicle; to this purpose, the consumer needs a **Secure On-board Telematics Platform (S-OTP)**.



FEDERATION INTERNATIONALE DE L'AUTOMOBILE
EUROPEAN BUREAU



Fédération Internationale de l'Automobile (FIA) European Bureau

The FIA European Bureau, based in Brussels, is a consumer body comprising 101 Mobility Clubs that represent over 36 million members from across Europe, the Middle East and Africa. The FIA represents the interests of our members as motorists, riders, pedestrians, and passengers. We work to ensure safe, affordable, clean, and efficient mobility for all. Learn more at www.fiaregion1.com.

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