



Mr. Daniel Calleja
Director-General
DG Enterprise
European Commission
B – 1049 Brussels

Brussels, 8th October 2014

Dear Mr Calleja Crespo,
Dear Daniel,

I am reaching out to you to seek your urgent intervention in order to make corrections in how the Commission is currently managing the process to finalise a proposal on Real Driving Emissions (RDE); at the same time, I would like the Commission to revisit what they plan to propose at the regulatory committee that will take place on 15 October.

Our industry is supporting the Commission's efforts to come up with an improved test reflecting real driving emissions, even if this means that our member companies will need to make major additional investments to ensure compliance with the new RDE test.

However, given the major cost and technology implications of a new RDE proposal, we want to make sure that efforts underway on RDE are:

- based on robust scientific data,
- will help achieve cost-effective improvements in air quality in the areas where member states have problems, and
- will result in one complete and coherent new RDE package for approval by the member states.

ACEA is of the opinion that a proposal on RDE should address the issue at hand - not a proposal that simply adds complexity and stringency when there are other valid approaches for RDE that will achieve the same end result.

We value the on-going dialogue with your services on RDE but we are concerned that at this time, proposals are being submitted which are overly stringent while only addressing part of the solution that member states need.

That is why ACEA member companies have worked diligently, under enormous time pressure, to prepare a complete RDE regulatory package that is not only stringent but is also ensuring that industry can deliver in the short term, i.e. from 2017. We strongly

believe that our approach is fully in line with the legal basis of existing Regulations and will fully address the environmental problem that RDE is being designed for. The ACEA proposal would also allow for a solution that member states can start implementing sooner.

ACEA would like the Commission to consider the industry's proposal and its content as a valid alternative to the more complex proposal the Commission has been working on.

That is also why we feel that the process followed to submit at this stage a very incomplete Commission proposal to the regulatory committee on October 15, is not acceptable.

Normal protocol for the regulatory committee requires the agenda & documents to be available 14 days in advance. ACEA is concerned about the intention to present now only part of the RDE package to the regulatory committee (still 80 pages or so), without giving all member states the time to properly prepare for the discussion, which is highly complex.

In conclusion, ACEA is supportive to a new RDE proposal which is coherent and complete and which can be implemented easily by Member States: ACEA is now finalising such a coherent and complete industry proposal for RDE which should meet all policy objectives; we want to work together with your services to get a full package completed in the shortest time so that this can be presented to the member states for agreement in the coming months.

Looking forward to progress this effort jointly.

Sincerely Yours,



Copy: [redacted] DG ENTR
[redacted] ACEA