



The Honourable
Executive Vice-President of the European Commission
Mr. Frans Timmermans

The Honourable
European Commissioner for the Environment, Oceans and Fisheries
Mr. Virginijus Sinkevičius

The Honourable
European Commissioner for Transport
Ms. Adina Vălean

The Honourable
European Commissioner for Health and Food Safety
Ms. Stella Kyriakides

Brussels, 26th of April 2022

Subject: European citizens expect an ambitious EURO 7, VII

We are writing to you on behalf of POLIS and EURO CITIES members, comprising over three hundred European local and regional authorities who represent millions of European citizens living in urban areas, to express our concerns about the upcoming EURO 7, VII Vehicle Emission Standards and its interplay with the revision of the Ambient Quality Directive.

Vehicle emissions from motorized traffic (e.g., NO_x) are a major **threat to public health**, and also a **major source of inequality and injustice**, as they affect, disproportionately, populations that have lower income and use cars much less.

We have followed the discussions over EURO 7, VII through the *Advisory Group on Vehicle Emission Standards (AGVES)* meetings. Within these, some industrial partners were reluctant to develop a more stringent EURO standard. Therefore, **we are particularly concerned over the potential lack of ambition in some requirements (e.g., cold-start emissions and non-exhaust emissions), over the constant postponement of the proposed regulations, and, furthermore, over its potential weakening in the coming months, pushed by the opposition of the automotive industry.**

When regulating to protect air quality we must consider the impact that air pollution from motorized vehicles has in the environment and on the health of European citizens. And when assessing the economic implications of this regulation, we must consider, first of all, the enormous costs already incurred by the public health systems. According to the latest estimates from the CE Delft to EPHA, vehicles emissions translate in a total cost to the European public health system of more than 1.200 € per year per inhabitant¹.

It is essential that the European Commission puts forward an ambitious, clear, resolute, and effective Euro 7 proposal. We are committed to supporting the Commission's efforts, to the benefit of the millions of Europeans for whose urban habitats our member regions and cities are responsible.

We also expect those efforts to help public authorities comply with **air quality standards recommended by the scientific community and people's right to breathe a cleaner air.** Several public authorities already took the World Health Organization air quality standard as the reference within their environmental and transport policies. Aligning the European air quality standards more closely with the 2021 WHO recommendations is a commitment of the Green Deal that we welcome and expect to see very soon as part of the revised Ambient Air Quality Directive. This will allow European public bodies to take, in the short term, coordinated and efficient action to protect the health of their citizens.

¹ CE Delft, *Health impacts and costs of diesel emissions in the EU* – Delft, November 2018

To live up to the goal of the Green Deal and the Zero Pollution Action Plan, we call on your team and the directorates general you supervise to contribute actively to the ongoing work of DG GROW. Such collaboration is needed, more than ever, to ensure that the new EURO 7, VII Vehicle Emissions Standards will be ambitious enough to contribute to achieving the tightened air quality limit values recommended by the WHO Air Quality guidelines.

We know that a more stringent EURO 7, VII is technically and economically attainable with the current level of technologies, as recommended by the CLOVE consortium during the AGVES meetings. It is necessary to reinforce the role of on-road emissions testing considering normal driving conditions in urban areas, since within the current framework, most of the conditions that lead to higher vehicle emissions in cities are not yet properly considered in the current type-approval and conformity testing procedures.

Therefore, we ask you to ensure that specific aspects of the EURO 7, VII legislation are set to meet the WHO air quality standards, including:

- Cold start needs to be part of any future vehicle emissions legislation and testing to generate substantial air quality improvement in urban areas;
- Vehicle durability needs to expand to the full vehicle lifecycle, with the necessary emissions control systems being in place to monitor emission performance – in the road under real driving conditions and with a unique standard whatever the motorization;
- New emerging pollutants should now be taken into account in the exhaust emission standards like ultrafine particles and ammonia, harmful to health and also methane, a powerful greenhouse gas;

- Focus should be not only on establishing more stringent limits to the exhaust level, but also on incorporating other requirements, such as non-exhaust emissions originated by abrasion of brakes and tires, which are a major source of particulate matter emissions from road transport, and, in this case, not only for internal combustion vehicles (ICE). Monitoring vehicle energy consumption and CO2 emissions can provide key information not only in relation to GHGs but also on non-exhaust emissions.

We are committed to supporting the Commission's efforts, to the benefit of the millions of Europeans for whose health and environment we are responsible for.

We also expect those efforts to **meet the needs of our cities, the rights of our citizens, and the international goals accepted as scientifically valid international standards.**

Respectfully yours,



Karen Vancluysen
Secretary General, POLIS



Dorthe Nielsen
Acting Secretary General, EURO CITIES

For further reference:

- "A New Approach for Post-Euro 6 Standards" (POLIS Position Paper, October 2020): <https://www.polisnetwork.eu/wp-content/uploads/2020/10/POLIS-POST-EURO-6-POSITION.pdf>
- Future Euro 7 proposal, joint letter from EURO CITIES and POLIS to Ms Joanna Szychowska Head of Unit I.2 Mobility, DG GROW, 17 March 2021