

Brussels, 10 November 2022

Subject: POLIS and Eurocities' concerns regarding the draft Euro 7/VII emission standard for cars, vans, buses and trucks

We are writing to you on behalf of POLIS and Eurocities members, comprising over three hundred European local and regional authorities who represent millions of European citizens living in urban areas, to express our serious concerns about the draft Euro 7/VII pollutant emission standards for cars, vans, buses, and trucks adopted today by the European Commission, and its interplay with the revision of the Ambient Air Quality Directive.

We duly note that the proposal includes some positive steps such as, notably targeting non-exhaust emissions, as well as including increased real driving emission requirements. Unfortunately, it seems to confirm our previous concerns¹ – **the proposed provisions are not ambitious enough, and not a clear improvement over Euro 6 for tailpipe emissions from cars, especially petrol ones.** While we understand that the current geopolitical and economic circumstances have resulted in challenges to the European industry, including the automotive sector, **the EU must put in place a legislative and regulatory framework that meets the needs of our cities and the rights of our citizens to breath cleaner air.** We remind you that air pollution in European cities also brings a severe economic challenge for all citizens.

EU legislative support is needed to tackle a major source of urban air pollution – gasoline and diesel vehicles. An ambitious Euro 7 regulation for cars, vans, buses and trucks is essential, as any shortcomings **will result in a negative impact on local air quality.**

We are afraid that the lack of ambition of the Euro 7 regulation will result in **serious struggles for cities and regions to as they will have to comply with the new air quality standards of the revised Ambient Air Quality Directive** issued on 26 October. This because the overall fleet emission performance will not improve fast enough to fulfill the requirements of this proposal. The requirements proposed today are likely to lead to a mismatch between these two legislations whose alignment was a key milestones of the Zero Pollution Action Plan."

With the proposed Euro 7 standards, cities and regions will have no other option than to implement even more ambitious Urban Vehicle Access Regulations (UVARs), such as brand-new congestion-charging schemes and Zero-Emission zones (ZEZ). These measures are politically costly for local authorities despite their necessity and may **result in an additional public backlash.**

¹ See for instance the joint letter Eurocities – Polis sent in May 2022, available at :
<https://eurocities.eu/latest/local-networks-to-eu-make-euro-7-more-ambitious/>

Therefore, we ask you to ensure that the final Euro 7 regulation is ambitious enough to support cities and regions' commitment to improving our urban air quality, including:

- **A meaningful Euro 7 emission standard** that fully delivers significant reductions in ICE vehicles' exhaust and non-exhaust emissions. If the final text lacks ambition, local authorities will have no other option than to act downstream and shoulder the burden of implementing even more stringent measures like congestion charging, ZEZ or simply banning the circulation of ICE vehicles in their territory;
- **A swift adoption of the regulation** to help public authorities with the new air pollutants limits set in the revised Ambient Air Quality proposal. The latter sets emissions limits to be achieved by 2030 and even before. Without a strong reduction of air pollution from traffic, the EU will fail to deliver on the objective to halve the number of premature deaths by 2030 linked to air pollution, as out in the Zero Pollution Action Plan;
- **A fit-for city regulation:** despite several calls from stakeholders to simplify Euro 7 regulation, the proposed text introduces more complexity, namely with the introduction of different categories. It is likely to create confusion for local governments at the time of setting up low emission zones based on the Euro standards. More clarifications are needed to better understand the new proposed categories and their impacts on local air quality. However, we would like to warn against any temptation of greenwashing on emissions standards and of bypassing local regulations as the new vehicles categories based on geo-fencing and adaptive emission could provide a way to transfer emissions of air pollutants from LEZ and ZEZ to their adjacent areas.

Eurocities, Polis and their members stand ready to collaborate with EU policymakers during the negotiations to improve the text and to better take into account the above-mentioned considerations.

Respectfully yours,



Karen Vancluysen
POLIS Secretary General



André Sobczak
Eurocities Secretary General