

Response to documents EFV-04-11 and GRPE-58-02
(Environmentally Friendly Vehicles (EFV))

In order to meet the current challenges it is crucial to take measures for promoting and introducing environmentally friendly vehicles. The measures have to be based on a common understanding of environmentally friendly vehicles. This means that we jointly have to develop a globally harmonised method for evaluating the environmental friendliness of a vehicle.

Therefore, from the beginning OICA supported the feasibility study for a worldwide harmonised scheme for an Environmentally Friendly Vehicle (EFV) bearing in mind the Conclusion Paper of the 3rd EFV conference (Dresden, 2007) as expressed in GRPE-55-13.

OICA would like to thank Germany for their considerable work in running the EFV Informal Group of the GRPE and in compiling – as result of the effort – the “Background document regarding the Feasibility Statement for the development of a methodology to evaluate Environmentally Friendly Vehicles” (EFV-04-11) and the “Feasibility Statement for the development of a methodology to evaluate Environmentally Friendly Vehicles” (GPPE-58-02).

Concerning these two papers OICA has following remarks:

- In the Terms of Reference (EFV-01-03) it is mentioned that the EFV concept requires an involvement of the two environmental GR groups

of WP.29: GRPE (exhaust gas emissions, fuel consumption/CO2) and GRB (noise). For the time being the Informal Group considered exhaust gas and CO2 emissions only.

- The background document regarding the Feasibility Statement for the development of a methodology to evaluate Environmentally Friendly Vehicles (EFV-04-11) shows from a technical point of view, that none of the existing approaches and tools is currently able to overcome the weaknesses mentioned. OICA is of the opinion that a new approach must be found before a final feasibility statement can be made.
- Furthermore, OICA want to stress that besides the guidelines which are listed in chapter 6 of the Feasibility Statement (GRPE-58-02) a single score for defining EFVs is not at all recommended due to the fact that environmental indicators have to be interpreted based on the local or temporal situation and there is no scientific / technical justification for a set of weighting factors. Another disadvantage is that such a single score is calculated by mixing up different (environmental) values with incomparable units, applied for different cases (regions, environmental needs etc.). This might lead to the illusion that a “one size fits all” solution was created and must be avoided.

Under the assumption that it is not the aim of the EFV project under the framework of WP.29 to develop a new and additional legal binding regulation, OICA is prepared to continue with the ongoing constructive process which has to result in a clear statement on the feasibility of an EFV.

- - - - -