



“Fitfor55” - Proposta di nuova regolamentazione CO₂ per autovetture e veicoli commerciali leggeri

Proposta di regolamento del Parlamento europeo e del Consiglio che modifica il regolamento (UE) 2019/631 per quanto riguarda il rafforzamento dei livelli di prestazione in materia di emissioni di CO₂ delle autovetture nuove e dei veicoli commerciali leggeri nuovi, in linea con la maggiore ambizione dell'Unione in materia di clima COM(2021) 556

Position paper

ANFIA, in rappresentanza della filiera industriale italiana automotive, intende esprimere pieno supporto ed impegno della filiera per il raggiungimento degli obiettivi di decarbonizzazione perseguiti dal pacchetto di proposte “Fit for 55”.

Al settore trasporti è richiesto un impegno molto sfidante in tempi molto ristretti, che impatta su imprese non sempre “grandi”, lavoratori e cittadini, che nel nuovo paradigma di mobilità dovranno cambiare completamente produzione e fruizione dei mezzi di trasporto. Principalmente per tali motivi si ritiene fondamentale che nella definizione delle strategie a medio e lungo termine per il raggiungimento dei condivisi obiettivi di decarbonizzazione e salvaguardia ambientale, non si debbano trascurare l'importanza di mantenere un tessuto industriale europeo competitivo a livello globale e la salvaguardia dei consumatori, che ad oggi sono nella più totale confusione sulle scelte da fare anche a causa di una spinta di mercato che non vede di pari passo lo sviluppo infrastrutturale.

In ottica costruttiva e di collaborazione, tenuto conto della forte accelerazione alla transizione produttiva del settore automotive impressa in particolar modo dalla proposta di revisione dei target CO₂ per autovetture e veicoli commerciali leggeri, riteniamo opportuno porre all'attenzione dei legislatori europei e italiani alcune **osservazioni e proposte emendative su tale revisione di regolamentazione, riservandoci di fornire ulteriori elementi di sostegno sul Pacchetto complessivo.**

Le osservazioni e proposte che seguono, in linea con gli obiettivi complessivi di decarbonizzazione, sono improntate ad assicurare un percorso realisticamente realizzabile e una fondamentale attenuazione degli impatti sociali ed occupazionali.

→ La stima d'impatto sugli effetti derivanti dalla totale e immediata elettrificazione della produzione dei veicoli leggeri sulla filiera automotive italiana, evidenzia che sono a rischio il **30% delle imprese della componentistica e circa 70.000 addetti diretti.**

Sarà pertanto fondamentale intervenire per rendere la regolamentazione europea sostenibile anche dal punto di vista industriale e sociale, e al contempo sul piano nazionale mettere in campo uno specifico **“pacchetto automotive” che comprenda misure e strumenti di politica industriale** in grado di accompagnare la filiera verso la transizione produttiva e sostenere le diverse esigenze e specificità delle aziende del settore.

Proposte e osservazioni

- **Ripristino del principio europeo di neutralità tecnologica**, che negli anni ha sempre contraddistinto le politiche continentali e che viene completamente meno con i nuovi target proposti dalla Commissione. **L'identificazione esclusiva della tecnologia elettrica per il possibile raggiungimento degli obiettivi si traduce in un ingiustificato phase-out di specifiche tecnologie che con l'ausilio e la valorizzazione dei carburanti rinnovabili e sostenibili possono dare contributo fondamentale per la decarbonizzazione;**



- **In linea con quanto attualmente contenuto nella proposta, continuare a mantenere invariati gli attuali obiettivi** di riduzione delle emissioni di CO₂ per auto e veicoli commerciali leggeri **previsti al 2025**, considerati i tempi ristretti per l'attuazione, al fine di garantire affidabilità e solidità al quadro regolatorio;
- **In linea con quanto presente nella attuale proposta, continuare a mantenere la differenziazione dei target per le autovetture e i veicoli commerciali**, in considerazione delle specificità tecniche e delle differenti missioni dei veicoli commerciali leggeri e dei fruitori di tali veicoli, rispetto alle autovetture;
- **Vincolare i futuri target di riduzione delle emissioni di CO₂ per autovetture e veicoli commerciali leggeri al raggiungimento dei target in capo agli Stati Membri per lo sviluppo di una infrastruttura di ricarica diffusa e adeguata** in relazione al numero di veicoli circolanti a basse emissioni. Tali target per gli stati membri **devono essere resi vincolanti e obbligatori**, tanto quanto lo sono i target di emissioni in capo ai costruttori.
- **Mantenimento anche oltre il 31 dicembre 2029 delle deroghe per i costruttori di un numero di autovetture o di veicoli commerciali leggeri immatricolati nell'Unione, inferiore, rispettivamente, a 10 000 e a 22 000 unità per anno** e mantenimento delle esenzioni previste per i costruttori responsabili di meno di 1 000 immatricolazioni all'anno, tenendo conto delle loro peculiarità, così come già fatto dal legislatore europeo non più tardi del 2019.
- Inserimento di un **meccanismo di "crediting system" o di "carbon correction factor" per la valorizzazione del contributo dei carburanti rinnovabili a zero e basse emissioni** nel raggiungimento dei target di decarbonizzazione.
- Prevedere la possibilità di **"pooling" anche tra costruttori di auto e veicoli commerciali**. Ad oggi la normativa consente di fare accordi solo tra costruttori di stessa categoria (auto con auto e commerciali con commerciali)
- **Assicurarsi che la proposta per una nuova normativa Euro 7/VII sia coerente con gli obiettivi definiti con la regolamentazione CO₂ e non maggiormente stringente in tempi più ristretti.**

Obiettivi di riduzione delle emissioni di CO₂ delle Autovetture:

- Per garantire uno scenario di decarbonizzazione realistico e che tenga conto degli impatti devastanti che si prospetta in uno dei settori più importanti a livello europeo e nazionale ed in considerazione della non trascurabile specificità dei diversi Stati membri, si propone **un target al 2030 del -45% e la definizione dei target al 2035 ed al 2040 in occasione della revisione del 2028**, così da poterne valutare la fattibilità in base allo stato di avanzamento della rete infrastrutturale e della risposta del mercato e del livello di penetrazione della quota rinnovabile nel mix energetico europeo.

Obiettivi di riduzione delle emissioni di CO₂ dei veicoli commerciali leggeri:

- I veicoli commerciali leggeri svolgono un ruolo chiave nella catena logistica e sono un bene strumentale essenziale nel lavoro delle PMI. Importanti fattori come la capacità di carico e l'efficienza del trasporto concorrono alla definizione del costo totale di esercizio che risulta determinante per il consumatore al momento dell'acquisto. La particolare composizione tecnologica dei veicoli commerciali leggeri, i ridotti margini di elettrificazione, nonché i tempi di sviluppo e i cicli di produzione tipicamente più lunghi, rendono necessario prevedere un percorso di decarbonizzazione specifico e differenziato da quello delle autovetture. Per tale motivo, in linea



con lo “scenario medio di ambizione, TL_Med¹” già analizzato dalla Commissione, gli obiettivi per gli anni 2030, 2035 e 2040 (rispetto al valore di riferimento del 2021) dovrebbero essere formulati come segue:

- per il 2030, **riduzione delle emissioni di CO2 del 40%**;
 - per il 2035, **riduzione delle emissioni di CO2 del 70%**;
 - per il 2040, **riduzione delle emissioni di CO2 del 100%**.
- Al fine di non compromettere l'integrità del regolamento e di garantire la prevedibilità e la programmazione degli sforzi di riduzione, è **necessario confermare**, come da normativa vigente, **il meccanismo della “curva limite” e la relativa pendenza per i veicoli commerciali leggeri**. Tale meccanismo assicura un'equa distribuzione degli sforzi tra i costruttori di veicoli commerciali leggeri e in particolare riflette adeguatamente le specificità dei furgoni più pesanti e i loro diversi usi e missioni. Le disposizioni di modifica della pendenza della curva limite, previste nella proposta di revisione, provocherebbero un ulteriore inasprimento del nuovo target proposto per il 2030 con un impatto sproporzionato per alcuni produttori.

¹ IMPACT ASSESSMENT - Part 1 (p. 26) - Accompanying the document Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) 2019/631 as regards strengthening the CO2 emission performance standards for new passenger cars and new light commercial vehicles in line with the Union's increased climate ambition.

PROPOSTE DI EMENDAMENTO

Obiettivi di riduzione di CO₂ di autovetture e veicoli commerciali leggeri

Article 1

Regulation (EU) 2019/631 is amended as follows:

(1) Article 1 is amended as follows:

(a) paragraph 5 is amended as follows:

(i) in point (a), the figure “37,5 %” is replaced by ‘55—~~45~~’,

(ii) in point (b), the figure “31 %” is replaced by ‘50 40’, (b) the following paragraphs 5a and 5b are inserted:

‘5a. From 1 January 2035, the following EU fleet-wide targets shall apply:

~~for the average emissions of the new passenger car fleet, an EU fleet-wide target equal to a 100% reduction of the target in 2021 determined in accordance with Part A, point 6.1.2, of Annex I;~~

(a) for the average emissions of the new light commercial vehicles fleet, an EU fleet-wide target equal to a ~~400%~~ 70% reduction of the target in 2021 determined in accordance with Part B, point 6.1.2, of Annex I.

5b. From 1 January 2040, the following EU fleet-targets shall apply:

(a) **for the average emissions of the new light commercial vehicles fleet, an EU fleet-wide target equal to a 100% reduction of the target in 2021 determined in accordance with Part B, point 6.1.2, of Annex I.’**

(b) in paragraph 6, the words “From 1 January 2025,” are replaced by ‘From 1 January 2025 to 31 December 2029,’,

(c) paragraph 7 is deleted;

Article 15

Regulation (EU) 2019/631 is amended as follows:

(10) Article 15 is amended as follows:

(a) paragraph 1 is replaced by the following:

‘1. The Commission shall, in 2028, review the effectiveness and impact of this Regulation, building on the two yearly reporting, and submit a report to the European Parliament and to the Council with the result of the review.

The report shall, ~~where appropriate,~~ be accompanied by a proposal for amending this Regulation **by introducing EU fleet-wide targets for passenger cars from 1 January 2035 and from 1 January 2040 as appropriate.’**

(b) paragraph 2 is amended as follows:

‘2. In the report referred to in paragraph 1, the Commission shall consider, inter alia, the real-world representativeness of the CO₂ emission and fuel or energy consumption values determined pursuant to Regulation (EC) No 715/2007; the deployment on the Union market of zero- and low-emission vehicles, in particular with respect to light commercial vehicles; the roll-out of recharging and refuelling infrastructure reported under ~~Directive 2014/94/EU~~ **Regulation (xxx) of the European Parliament and of the Council on the deployment of alternative fuels infrastructure, including their financing; the implementation of Directive 2010/31/EU on the Energy Performance of buildings and its foreseen review;** the potential contribution of the use of synthetic and advanced alternative fuels produced with renewable energy to emissions reductions; the CO₂ emissions reduction actually observed at the existing fleet level; the functioning of the incentive mechanism for zero- and low-emission vehicles; the potential effects of the transitional measure set out in point 6.3 of Part A of Annex I; the impact of this Regulation on consumers, particularly on those on low and medium incomes; as well as aspects to further facilitate an economically viable and socially fair transition towards clean, competitive and affordable mobility in the Union.

(bc) paragraphs 3 to 5 are deleted,

(ed) the following paragraph 9 is added:

‘9. The Commission is empowered to adopt delegated acts in accordance with Article 17 in order to amend the formulae set out in Part B of Annex I, where such amendments are necessary in order to take into account the procedure for multi-stage N1 vehicles set out in Part A of Annex III.’;

ANNEX I Part A (Passenger Cars)

(a) in point 6.1, the heading is replaced by the following:

‘EU fleet-wide targets for 2025 onwards’,

(b) in point 6.1.2, the heading is replaced by the following:

‘EU fleet-wide target for 2030 to 2034’

(c) the following point 6.1.3 is added:

‘6.1.3 EU fleet-wide target for 2035 onwards

EU fleet-wide target₂₀₃₅ = EU fleet-wide target₂₀₂₁ · (1 - reduction factor₂₀₃₅)

where:

EU fleet-wide target₂₀₂₁ is as defined in point 6.0;

Reduction factor₂₀₃₅ is as defined in Article 1(5a), point (a).’

(a) (d) in point 6.2 the heading is replaced by the following:

‘Specific emissions reference targets’

(b) (e) point 6.2.2 is deleted.

(c) (f) point 6.3 is replaced by the following:

‘6.3 Specific emissions targets for 2025 onwards

6.3.1 Specific emissions targets for 2025 to 2029:

Specific emissions target = specific emissions reference target · ZLEV factor

where:

specific emissions reference target is the specific emissions reference target of CO₂ determined in accordance with point 6.2.1;

ZLEV factor is (1 + y - x), unless this sum is larger than 1,05 or lower than 1,0 in which case the ZLEV factor shall be set to 1,05 or 1,0, as the case may be;

where:

y is the share of zero- and low-emission vehicles in the manufacturer's fleet of new passenger cars calculated as the total number of new zero- and low-emission vehicles, where each of them is counted as ZLEVspecific in accordance with the following formula, divided by the total number of new passenger cars registered in the relevant calendar year:

ZLEVspecific = 1 - (specific emissions of CO₂ · 0,750)

For new passenger cars registered in Member States with a share of zero- and low-emission vehicles in their fleet below 60% of the Union average in the year 2017 and with less than 1 000 new zero- and low-emission vehicles registered in the year 2017*, ZLEVspecific shall, until and including 2029, be calculated in accordance with the following formula:

ZLEVspecific = (1 - (specific emissions of CO₂ · 0,750)) · 1,85



Where the share of zero- and low-emission vehicles in a Member State's fleet of new passenger cars registered in a year between 2025 and 2028 exceeds 5 %, that Member State shall not be eligible for the application of the multiplier of 1,85 in the subsequent years;

x is 15 % in the years 2025 to 2029.

6.3.2 Specific emissions targets for 2030 ~~to 2034~~ onwards

Specific emissions target = EU fleet-wide target₂₀₃₀ + a₂₀₃₀ · (TM-TM₀)

Where,

EU fleet-wide target₂₀₃₀ is as determined in accordance with point 6.1.2;

a₂₀₃₀ is a₂₀₂₁ · EU fleet-wide target₂₀₃₀ average emissions₂₀₂₁

where,

a₂₀₂₁ is as defined in point 6.2.1

average emissions₂₀₂₁ is as defined in point 6.2.1

TM is as defined in point 6.2.1

TM₀ is as defined in point 6.2.1

6.3.3 Specific emissions targets for 2035 onwards

Specific emissions target = EU fleet-wide target₂₀₃₅ + a₂₀₃₅ · (TM-TM₀)

Where,

EU fleet-wide target₂₀₃₅ is as determined in accordance with point 6.1.3;

a₂₀₃₅ is a₂₀₂₁ · EU fleet-wide target₂₀₃₅ average emissions₂₀₂₁

where,

a₂₀₂₁ is as defined in point 6.2.1

average emissions₂₀₂₁ is as defined in point 6.2.1

TM is as defined in point 6.2.1

TM₀ is as defined in point 6.2.1

* The share of zero- and low-emission vehicles in the new passenger car fleet of a Member State in 2017 is calculated as the total number of new zero- and low-emission vehicles registered in 2017 divided by the total number of new passenger cars registered in the same year.';

Estensione delle deroghe per i piccoli costruttori

Article 1

Regulation (EU) 2019/631 is amended as follows:

[...]

~~(6) in Article 10(2), the first sentence is replaced by the following:~~

~~'A derogation applied for under paragraph 1 may be granted from the specific emission targets applicable until and including calendar year 2029.';~~

Justification: As stated in the Regulation's text agreed only two years ago, it is not appropriate to use the same method to determine the emissions reduction targets for large-volume manufacturers as for small-volume manufacturers that are considered as independent. Removing SVM derogations from 2030 would

mean asking for a reduction of more than 80% in 2030 compared to 2021. This level of improvement has never been required and is highly disproportionate.

To comply with provisions on CO₂ average fleet emissions, small volume manufacturers must intervene on substantial elements related to primary characteristics of their vehicles. These actions shall necessarily be coherent with the business model and investments sustainability. Moreover, SVM's are key contributors to technological innovation, therefore, removing the derogations means damaging a top-rated European business.

For these considerations, the efforts requested by the European Commission should be proportionate to the CO₂ emissions share for which each stakeholder is responsible, also considering that registrations of vehicles which benefit of current flexibilities represent less than 0,2% of the whole European circulating fleet. The real impact of SVM's fleet on CO₂ emissions would be even less considering the negligible contribution of high-performance vehicles registered in Europe due to the reduced typical average mileage (about 5 000 km / year), which should be a third of what is forecasted for a daily use vehicle.

Obiettivi di riduzione di CO2 dei Veicoli Commerciali Leggeri

ANNEX I Part B (Light Commercial Vehicles)

(a) in point 6.1, the heading is replaced by the following:

'The EU fleet-wide targets for 2025 onwards',

(b) in point 6.1.2, the heading is replaced by the following:

'The EU fleet-wide targets for 2030 to 2034',

(d) the following points 6.1.3 and 6.1.4 are added:

'6.1.3 The EU fleet-wide targets for 2035 onwards to 2039

EU fleet-wide target₂₀₃₅ = EU fleet-wide target₂₀₂₁ · (1- reduction factor₂₀₃₅) where:

EU fleet-wide target₂₀₂₁ is as defined in point 6.0;

Reduction factor₂₀₃₅ is as defined in Article 1(5a), point (b).

(New) 6.1.4 The EU fleet-wide target for 2040 onwards

EU fleet-wide target₂₀₄₀ = EU fleet-wide target₂₀₂₁ · (1- reduction factor₂₀₄₀) where:

EU fleet-wide target₂₀₂₁ is as defined in point 6.0;

Reduction factor₂₀₄₀ is as defined in Article 1(5b), point (a).'

Pendenza della curva limite dei veicoli commerciali leggeri

6.2.2 Specific emissions reference targets for 2030 to 2034

Specific emissions reference target = EU fleet-wide target₂₀₃₀ + α · (TM-TM₀)

Where,

EU fleet-wide target₂₀₃₀ is as determined in accordance with point 6.1.3.2

α is a_{2030,L} where the average test mass of a manufacturer's new light commercial vehicles is equal to or lower than

TM₀, and a_{2030,H} where the average test mass of a

manufacturer's new light commercial vehicles is higher than TM₀;

where:

a_{2030,L} is $\frac{a_{2021} \cdot \text{EU fleet wide target } 2030}{\text{Average emissions } 2021}$

Average emissions 2021

a_{2030,H} is $\frac{a_{2021} \cdot \text{EU fleet wide target } 2030}{\text{EU fleet wide target } 2025}$

average emissions₂₀₂₁ is as defined in point 6.2.1

TM is as defined in point 6.2.1

TM₀ is as defined in point 6.2.1',

α is a₂₀₃₀ where the average test mass of a manufacturer's new light

commercial vehicles is equal to or lower than TM_0 determined in accordance with point (d) of Article 14(1) and a_{2021} where the average test mass of a manufacturer's new light commercial vehicles is higher than TM_0 determined in accordance with point (d) of Article 14(1);

where:

a_{2030} is $a_{2021} \cdot \text{EU fleet-wide target}_{2030} / \text{Average emissions}_{2021}$

a_{2021} is as defined in point 6.2.1;

average emissions₂₀₂₁ is as defined in point 6.2.1;

TM is as defined in point 6.2.1;

TM_0 is as defined in point 6.2.1.

6.2.3 Specific emissions reference targets for 2035 onwards for 2035 to 2039

Specific emissions reference target = EU fleet-wide target₂₀₃₅ + $\alpha \cdot (TM - TM_0)$

Where,

EU fleet-wide target₂₀₃₅ is as determined in accordance with point 6.1.3

α is $a_{2035,L}$ where the average test mass of a manufacturer's new light commercial vehicles is equal to or lower than TM_0 , and $a_{2035,H}$ where the average test mass of a

manufacturer's new light commercial vehicles is higher than TM_0 ;

where:

$a_{2035,L}$ is $a_{2021} \cdot \text{EU fleet-wide target}_{2035} / \text{Average emissions}_{2021}$

Average emissions₂₀₂₁

$a_{2035,H}$ is $a_{2021} \cdot \text{EU fleet-wide target}_{2035} / \text{EU fleet-wide target}_{2025}$

EU fleet-wide target₂₀₂₅

average emissions₂₀₂₁ is as defined in point 6.2.1

TM is as defined in point 6.2.1

TM_0 is as defined in point 6.2.1,

α is a_{2035} where the average test mass of a manufacturer's new light commercial vehicles is equal to or lower than TM_0 determined in accordance with point (d) of Article 14(1) and a_{2021} where the average test mass of a manufacturer's new light commercial vehicles is higher than TM_0 determined in accordance with point (d) of Article 14(1);

where:

a_{2035} is $a_{2021} \cdot \text{EU fleet-wide target}_{2035} / \text{Average emissions}_{2021}$

a_{2021} is as defined in point 6.2.1;

average emissions₂₀₂₁ is as defined in point 6.2.1;

TM is as defined in point 6.2.1;

TM_0 is as defined in point 6.2.1.

(New) 6.2.4 Specific emissions reference targets for 2040 onwards

Specific emissions reference target = EU fleet-wide target₂₀₄₀ + $\alpha \cdot (TM - TM_0)$

Where,

EU fleet-wide target₂₀₄₀ is as determined in accordance with point 6.1.4

α is a_{2040} where the average test mass of a manufacturer's new light commercial vehicles is equal to or lower than TM_0 determined in accordance with point (d) of Article 14(1) and a_{2021} where the average test mass of a manufacturer's new light commercial vehicles is higher than TM_0 determined in accordance with point (d) of Article 14(1);

where:

a_{2040} is $a_{2021} \cdot \text{EU fleet-wide target}_{2040} / \text{Average emissions}_{2021}$
 a_{2021} is as defined in point 6.2.1;
average emissions₂₀₂₁ is as defined in point 6.2.1;
TM is as defined in point 6.2.1;
TM₀ is as defined in point 6.2.1.

Pooling tra autovetture e veicoli commerciali leggeri

Article 4 and 6

Article 4

Manufacturers, other than manufacturers which have been granted a derogation, may form a pool or may trade credits for the purposes of meeting their obligations. For the purposes of determining each manufacturer's average specific emissions of CO₂, a potential over-achievement of a manufacturer's CO₂ target in one category (M1 or N1) could be combined with an exceedance in the other category (M1 or N1) by the same or another manufacturer.

Due to the different target definitions of M1 & N1, this specific credit transfer mechanism option can only combine the difference between a manufacturer's specific emission target and its specific emissions in one category (M1 or N1) with the difference between a manufacturer's specific emission target and its specific emissions in the other category (M1 or N1). When the credit trading in one category allows to compensate the exceedance of the other category, the combination shall be considered to have met the two specific emissions targets.

For fleet compliance, the maximum amount of grammes that can be traded between M1 and N1 segments of the same or a different manufacturer is capped to 7g WLTP.

Article 6, para 6

Paragraph 5 shall not apply where all the manufacturers included in the pool are part of the same group of connected manufacturers or where the credit transfer consists of only one manufacturer transferring respective credits between the passenger car and light commercial vehicle fleets.

6a. The respective individual manufacturer(s) targets shall be replaced by a modified target for the manufacturer(s) where there is credit transfer of passenger and light commercial vehicles differences between specific targets (M& or N1) and specific emissions (M1 or N1). The modification is defined as follows:

the difference between a manufacturer's specific emission target and its specific emissions in one category (M1 or N1) with the difference between a manufacturer's specific emission target and its specific emissions in the other category (M1 or N1). When the credit trading in one category allows to compensate the exceedance of the other category, the combination shall be considered to have met the two specific emissions targets.