



European
Automobile
Manufacturers
Association

Mr Thierry Breton

**Commissioner for the Internal Market,
Industry, Entrepreneurship and SMEs**

European Commission

Brussels, 18 June 2020

Dear Mr Breton,

I am writing to you with respect to the Covid-19 impact on the automotive ecosystem and the possible 6-month postponement of the application dates of key EU standards, specifically Euro 6d TEMP for heavy vans and ambulances (currently 1 September 2020), Euro 6d ISC-FCM for passenger cars and light vans (currently 1 January 2021), Euro VI Step E for trucks, and the general safety regulation (clusters A and B).

As we explained during our conference call with Executive Vice-President Timmermans and yourself on 13 May, the shutdown of production and sales imposed by Member States to fight Covid-19 has caused a significant build-up of stocks at manufacturers, importers and dealers. These vehicles meet current emission standards but not the new standards that will enter into force in the coming months.

In total, we estimate that 600,000 produced vehicles will not meet Euro 6d ISC-FCM while nearly 40,000 vehicles will not meet Euro 6d TEMP. As sales had to be stopped to fight Covid-19, it is not clear when these vehicles will be sold.

In addition to the vehicles that were built already, manufacturers are gradually re-starting production to maintain European jobs. The grim reality is that many manufacturers have not been able to have their vehicles certified for meeting the new emission standards due to the disruption in the type approval process caused by government restrictions. We estimate that about 2,100 emission system type approvals are still pending for vehicles already meeting Euro 6d ISC-FCM. Obtaining these, together with the subsequent whole vehicle type approval, will easily take 6 months in our view.

Without postponement of the application dates, manufacturers will face a choice between stockpiling newly produced vehicles until the type approval process is completed and stopping (or, better, not re-starting) production of the vehicles concerned. It is clear the second option will have negative implications for workers, both at vehicle manufacturers and at suppliers.

We continue to believe postponement is objectively justified by the disruption caused by the COVID-19 situation. Other governments seem to think so, too. As you probably know, the Chinese government recently postponed the entry into force of the new particle number limit values for

light-duty vehicles in the China 6 emissions legislation by 6 months for exactly the same reasons while the Japanese government decided to postpone the date to switch from emissions and CO₂ tested on cycle JC-08 to WLTP for existing models by three months.

While we accept that pollutant emissions are a sensitive political matter, we would like to emphasize that the proposed postponement will have no impact whatsoever on the emission level of the vehicles concerned or on air quality. In many cases, it will just mean vehicles will not be equipped with a fuel consumption meter.

During our call, I had the distinct impression you understood how badly our sector was affected by the COVID-19 crisis and you were prepared to take the necessary measures to ensure the automotive ecosystem in Europe could survive, recover and prosper.

I personally believe the temporary postponement of the application dates of the forthcoming pollutant emissions and general safety regulations would be an objectively justified, proportionate and pragmatic response to an unfortunate situation which the European automobile industry finds itself in for reasons beyond its control.

If you were to make this decision, it would turn your supportive words into concrete action that would effectively help our industry in the short term.

The same would be true if you decided to prolong, in the way you did recently for non-road mobile machinery, the existing end-of-series arrangements for passenger cars, vans and trucks that expire in the course of this year by another six months so manufacturers can dispose of vehicles they were not able to sell during the shutdown.

I hope you will see it in the same way and look forward to hearing back from you.

Considering the importance of the matter and the need to obtain legal certainty rapidly, I remain at your disposal, together with the ACEA Director General, to discuss this in more detail with you personally at your convenience.

Kind regards,



Mike Manley
ACEA President,
CEO Fiat Chrysler Automobiles N.V.

Copy to: Ms Kerstin Jorna, Director General, DG GROW, European Commission