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**Non-Paper on the Modalities for Reaching the 2020 Target  
for CO<sub>2</sub> Emissions from New Passenger Cars**

At the third informal trilogue on 24 June 2013, a package was discussed regarding the proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 443/2009.

We fully support the implementation of ambitious CO<sub>2</sub> emission targets in the transport sector as an integral part of EU climate protection policy. We also welcome Super-credits as a clear incentive for technological innovation. It is important, however, that the respective regulation is designed in a way that manufacturers are enabled to reach the 2020 target in the most cost-effective way. Therefore they need more flexibility in the transition phase between 2020 and 2023, esp. in 2020 and 2021.

We acknowledge the efforts made to find a compromise within the informal trilogue. Nevertheless, the issue of **flexibility** has **not** yet been **sufficiently addressed**. In addition to the trilogue-package, we thus suggest to introduce the following **phase-in-model** for the target of 95 g CO<sub>2</sub>/km in 2020 into the regulation:

**For the purposes of determining each manufacturer's average specific emissions of CO<sub>2</sub>, the following percentages of each manufacturer's new passenger cars registered in the relevant year shall be taken into account: 80 % in 2020, 85 % in 2021, 90 % in 2022, 95 % in 2023 and 100 % in 2024.**

This approach would allow to combine the reduction target, which would remain the basis of the regulation, with the necessary flexibility in the introductory phase.