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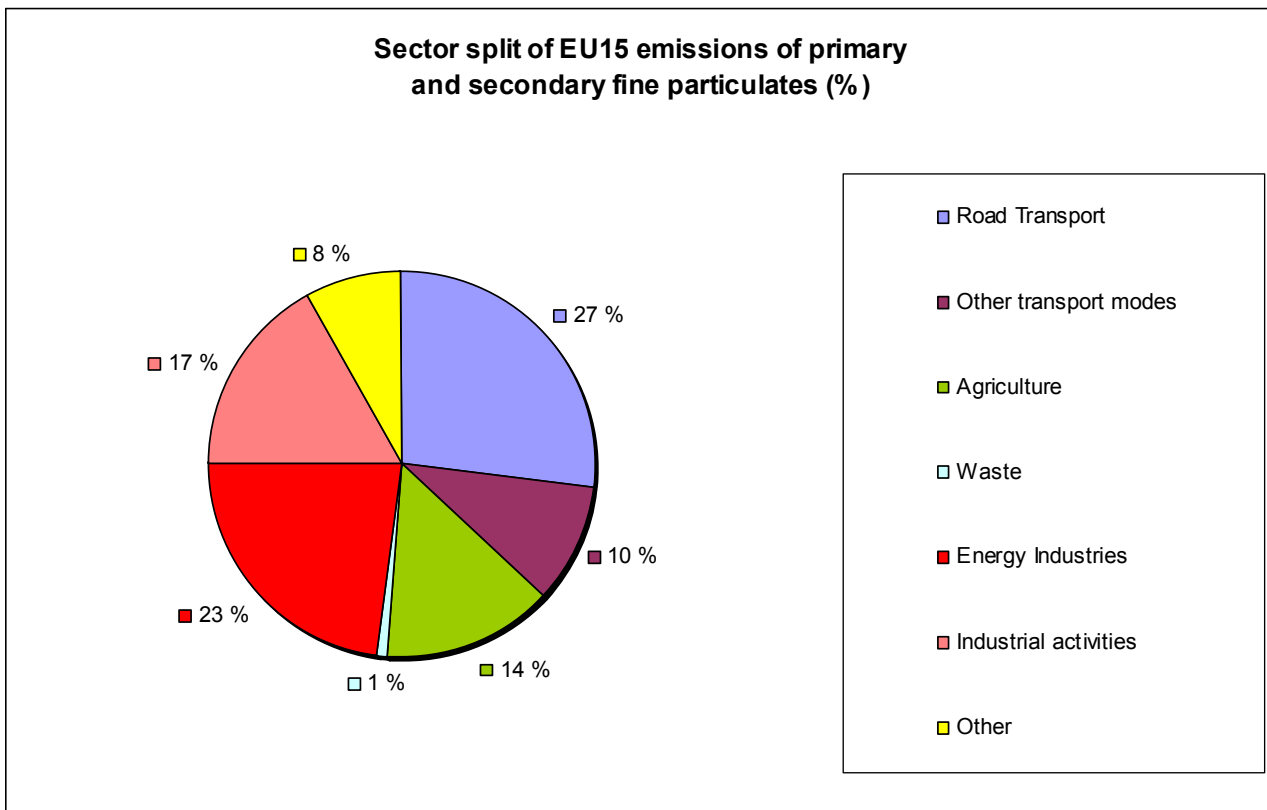
COMMON IRU POSITION ON FINE DUST CONCERNING GOODS AND PASSENGER TRANSPORT

IRU Position on the implementation of the EU Directives 1996/62/EC and 1999/30/EC on air quality to limit the emissions of fine dust from diesel engines.

I. ANALYSIS

- To maintain or improve the quality of ambient air, the European Union has:
 - established limit values for concentrations of sulphur dioxide (SO₂), nitrogen dioxide (NO₂) and nitrogen oxide (NO), particulate matter (PM) and lead, as well as alert thresholds for concentrations of sulphur dioxide and nitrogen oxide, in ambient air (Directive 1999/30/EC).
 - established limit values for benzene and carbon monoxide in ambient air (Directive 2000/69/EC).
 - established an alert and information threshold for concentrations of ozone in ambient air (Directive 2002/3/EC).
 - laid down common methods and criteria for evaluating those concentrations, and gathered appropriate information on such concentrations in order to keep the public informed (Directive 1996/62/EC).
- The date by which Member States had to meet the limit values for particulate matters was **1 January 2005** (cf. Annex III of Directive 1999/30/EC). Particulates are small, solid particles classified by their sizes. Atmospheric particles are usually measured as PM 10 or PM 2.5 (particulate matter less than 10 and 2.5 microns in diameter).
- As the result of EU legislation, much progress has been made in tackling air pollutants. However, despite a reduction in some harmful emissions, air quality continues to cause concern, mainly due to fine particulates.
- Atmospheric particles – often referred to as “fine dust” - present a health risk which is since 1 January 2005 of increasing concern in several EU Member States (Germany, Netherlands, Belgium, UK, Spain, Italy etc.) because the limit values, assessed in accordance with the Directive, are often exceeded.

- The discussions over air quality focus mainly on the emissions of fine dust caused by the road transport industry. In several European cities (e.g. Dortmund, Munich, Frankfurt, Berlin, Brussels, Amsterdam, Rotterdam, Madrid, Paris, London, Milan) the limits were exceeded more than once and for several days, which could consequently lead to transport restrictions or bans on trucks and touring coaches in city centres, and the introduction of alternating traffic or even a so-called “Fine Dust” city charge.
- In this context, the IRU wants to draw to the attention of the European Commission (DG Environment) the following facts:
 - Road transport is only one out of many causes of pollution, as the chart below illustrates (Source: European Environment Agency, 2001) and should consequently not be blamed solely.



- Most fine dust is not produced on the spot. 63% of measured particles are not produced in cities but at the regional level or beyond. They are caused by industrial activity, agriculture, shipping, etc. The fact that fine dust is mostly caused by weather conditions and nature is not properly shown by the chart.
- The figure of 27 percent for road transport represents ALL road transport, meaning cars, heavy good vehicles, buses, coaches, vans and motorcycles. According to analyses made in the Netherlands, Germany and Austria, one may say that fine dust emission caused by trucks fluctuate between 7 and 13%.
- With regards to passenger transport, a feasibility study on the introduction of a Low Emission Zone in 2008 in London found that the share of emissions of buses, coaches and taxis in total road transport emissions was marginal. The study also found that for the period 2005-2010, buses and coaches will have a higher reduction rate of PM 10 emissions in comparison to private cars.

- The road transport industry has committed itself to accelerate the purchase of Euro 4 and 5 vehicles, which provide a reduction in gas emissions of more than 50% in NOx and 75% in particles, in comparison to the Euro 2 standard.
- The direct link between fine dust and emissions caused by diesel engine vehicles may be questioned as high PM 10 concentrations in the atmosphere can also be found in rural areas without dense traffic.
- A level playing field for all modes of transport is required. A Low Emission Zone project like the one in London, which is considering exempting cars, despite the fact that they constitute 94% of traffic in the capital, would be unacceptable.
- Cutting the particulate output by means of a filter would impose an extremely heavy financial burden road transport operators – the average price of 8000 Euro/vehicle plus the price of maintenance (the filter has to be cleaned out every year) – and lead to higher fuel consumption (an average increase of 500 liters per year / vehicle), which in turn would mean higher CO² emissions. Any genuinely innovative technological solutions should be accompanied by incentives to promote their use and a sufficient time frame for operators to comply with them.
- The specificity of the various sectors should be taken into account. Regulations allowing buses and coaches to start and run their engines shortly before departure would increase substantially passengers' comfort and safety. Providing adequate infrastructure and parking spaces would also significantly improve the situation as would urban transport plans which take into account all vehicles, including tourist coaches.
- The proliferation of own-initiatives of various kinds at the municipal level within the context of an increasingly integrated European market for trade and tourism calls for a better coordination and harmonization at EU level, to avoid segmentation and the additional costs to EU citizens, tourists and businesses.
- Creating an EU-wide public-private platform, under the aegis of the European Commission, to exchange experience and best practices between public and private stakeholders at EU level, would be the first and necessary step to bring EU added value to the process.

II. IRU POSITION

To reduce the impact of road transport on the environment, the IRU and its Members have always supported Euro standards as an efficient system to ensure a massive reduction in vehicle emissions. Considerable efforts have been made by the road transport industry and the industry remains committed to further innovative, at source measures if they are cost-effective, e.g. low sulphur fuel and the accelerated acquisition of cleaner Euro 4 and 5 vehicles through incentives.

Local authorities should tackle the problem of air quality in a fair and balanced way without transport restrictions in cities to compensate for the absence of a shared burden of responsibility, equally shouldered by other road users and industry players.

An interactive policy must be developed for consultations between the road transport industry, local authorities and their administrations to develop urban transport plans, based on innovation, incentives and infrastructure conforming to the IRU's 3 "i" strategy, in order to avoid unbalanced economic and financial restrictions for professional road transport operators.
