**UK | transport - adjustment review questions**

**ERT Question 2018.1 (08/06/2018)**

Pollutant: NOx  
NFR14: 1A3b  
Problem: Transparency  
Question: The ERT notes that in the IIR it is mentioned that because COPERT III did not include any information on Euro 5 vehicles, emission factors are assumed to be equal to Euro 4. Note that reduction factors for up to Euro 5 were actually included in COPERT III. Presumably these have been already used in your calculations as the emission factors for Euro 5 included in the accompanying spreadsheet are different from those for Euro 4. Could you please clarify this issue?

**Party Answer (16/06/2018)**

Response: The UK does not use COPERT software, but emission factors taken from COPERT reports and documentation and EMEP/EEA Emissions Inventory Guidebook. The documentation for COPERT III and both the 1999 and the 2002 versions of the Guidebook do not provide factors for Euro 5 light duty vehicles, but do include factors for Euro V heavy duty vehicles and on this basis, as stated in the IIR for the UK’s adjustment application, we have not included factors for Euro 5 light duty vehicles, but have for Euro V heavy duty vehicles. Section 3.5 of the 2002 version of the Guidebook does explicitly say in the section on legislation for diesel cars “As in the case of gasoline vehicles, Euro V standard is still under consideration and the present methodology reaches up to Euro IV”. A similar statement is made for light commercial vehicles and gasoline cars. Reduction factors for Euro 5 relative to Euro 4 were therefore NOT used in our calculations for adjustments for 2010. You have noted that the factors for Euro 5 in the accompanying spreadsheet are different from those for Euro 4. However, these are implied g/km emission factors and differ for other reasons, e.g. accumulated mileage effects and differences in the fleet composition on different roads. In the case of light commercial vehicles (1A3dii), the reason why the factors for Euro 5 and 4 vehicles are different is because the factors for Euro 5 in 2010 represent Class I vehicles since Euro 5 standards for Class II and III LCVs do not enter the fleet until 2011, whereas the factors for Euro 4 LCVs represents all size classes. This is mentioned in the spreadsheet. The UK understands that successful adjustment applications made by other Member States (e.g. Germany) have also been based on a calculation that excludes Euro 5 for light duty vehicles (i.e. assumes emission factors for Euro 5 are the same as Euro 4).

**ERT follow on Question (if needed) (DD/MM/YYYY)**

Not resolved:

**Party Answer (DD/MM/YYYY)**

Response:

**ERT Question 2018.2 (08/06/2018)**

Pollutant: NOx  
NFR14: 1A3b  
Problem: Transparency  
Question: The ERT notes that all pre-Euro 5 light commercial vehicles (from conventional up to Euro 4; both petrol and diesel) have been excluded from the adjustment calculations without providing any explanation/justification for this in the IIR or in the calculation spreadsheet. Could you please clarify this issue?

**Party Answer (16/06/2018)**

Response: The pre-Euro 5 light commercial vehicles were not excluded from the adjustment calculation, but they had a null effect. This is because the emission factors given in the COPERT III documentation and in the 1999 and 2002 versions of the Guidebook are the same as the factors currently used from the 2016 version of the Guidebook. In other words no changes have been made to these emission factors, so no adjustment can be made.

**ERT FINAL COMMENT (20/06/2018)**

Thank-you for your responses. Just to confirm that we have no further questions for you.