

Opinion of the European Economic and Social Committee on the 'Proposal for a directive of the European Parliament and of the Council amending Directive 2000/25/EC as regards the application of emission stages to narrow-track tractors'

COM(2011) 1 final — 2011/0002 (COD)

(2011/C 132/09)

Rapporteur-General: **Mr BURNS**

On 2 February 2011, the Council, and, on 20 January 2011, the European Parliament decided to consult the European Economic and Social Committee, under Article 114 of the Treaty on the Functioning of the European Union, on the

Proposal for a Directive of the European Parliament and of the Council amending Directive 2000/25/EC as regards the application of emission stages to narrow-track tractors

COM(2011) 1 final — 2011/0002 (COD).

On 18 January 2011 the Committee Bureau instructed the Section for the Single Market, Production and Consumption to prepare the Committee's work on the subject.

Given the urgent nature of the work, the European Economic and Social Committee appointed Mr Burns as rapporteur-general at its 470th plenary session, held on 15-16 March 2011 (meeting of 16 March 2011), and adopted the following opinion by 147 votes with 7 abstentions.

1. Summary and recommendations

1.1 The European Economic and Social Committee (EESC) believes strongly that reducing harmful emissions of carbon monoxide, nitrogen oxides, hydrocarbons and particulates from engines intended for agricultural and forestry tractors is a vital step towards achieving the EU's air quality targets.

1.2 The EESC believes that legislation aiming to benefit human health and the environment must be founded on robust technical, economic and social assessments.

1.3 The EESC considers that the independent studies and the data collected by the Commission prove that it is necessary to allow additional time for the development of suitable after-treatment systems and their installation on specialised tractors that meet the requirements for farming high-quality crops, with the main focus on vineyards.

1.4 The EESC supports the proposal by the Commission that the dates given in Article 4 of Directive 2000/25/EC for the type approval and initial entry into service of Stages IIIb and IV should be delayed by three years for tractors of categories T2, C2 and T4.1

1.5 The EESC further believes that the investigations that led to the drafting of this proposal do not show with sufficient certainty that it is feasible for these tractors to comply with Stage IV.

1.6 The EESC recommends that the European Commission carry out – with sufficient lead time (recommend end of 2014) – a further investigation into the feasibility of Stage IV once

technology has developed sufficiently and, if relevant, that it propose further amendments to the requirements or timeline of Stage IV for narrow-track tractors.

1.7 The EESC recommends that any future developments in the exhaust emission legislation for NRMM and tractors be subject to joint detailed impact assessment and that legislation not be extended to other equipment types without adequate examination and possible revision.

1.8 Since any developments in the legislation on exhaust emissions from NRMM engines in Directive 97/68/EC are automatically transposed into the equivalent tractors Directive (2000/25/EC), the EESC recommends that the European Commission take into consideration the specific features of tractors in general, and of narrow-track tractors in particular, as part of any impact assessment, even though they are not included in the scope of Directive 97/68/EC.

2. Introduction

2.1 Directive 2000/25/EC deals with compression ignition engines ranging from 18kW to 560 kW for use in agricultural and forestry tractors. It sets limits for emissions of carbon monoxide, nitrogen oxides, hydrocarbons and particulates. The Directive sets increasingly stringent limits for the various stages, with corresponding compliance dates for the maximum levels of exhaust gases and particulates. The next stages set are IIIB (beginning 1 January 2011) and IV (beginning 1 January 2014).

2.2 The limits on exhaust emissions from agricultural and forestry tractors were amended in 2005. At the time the provisions defined for NRMM engines (Directive 97/68/EC,

amended by Directive 2004/26/EC) were transposed to agricultural tractors without any impact assessment specifically concerning the technical feasibility of those requirements. On the other hand, Article 4(8) of the Directive provided for a feasibility study to be carried out prior to Stages IIIB and IV becoming compulsory.

2.3 Specialised tractors have been developed in Europe over the last 40 years in order to guarantee mechanised operation in the specific terrain and layout characteristics of specific types of cultivation such as vineyards, orchards and similar, mainly in central/southern Europe. These operational requirements are exclusive to European cultivation and these specialised tractors are developed only for this market. The agricultural and forestry tractors used in these types of cultivation are classified by the tractors framework Directive 2003/37/EC as T2, C2 and T4.1 and generically denominated as narrow-track tractors (NTT).

2.4 In parallel with the developments in tractors, the specialised cultivation has been restructured⁽¹⁾ to optimise the yield and quality of the crops. This restructuring has relied on the availability of NTTs, such that today there is complete interdependence between tractors and some of the highest quality and most profitable cultivations in the EU.

2.5 The stringent requirements of Stages IIIB and IV entail fitting the engines with after-treatment systems that are very large in comparison with the size of the engine itself and whose installation is severely limited by their operating requirements. The engines used in these tractors are the same as in other kinds of tractors; the main difference is the engine compartment size available and the limitation in the overall area around the engine compartment itself.

2.6 Tractor manufacturers cannot install the engines including the after-treatment systems and at the same time continue to meet the operational requirements in terms of size and manoeuvrability that represent the fundamental design specifications for these machines.

2.7 These conclusions were confirmed by various studies carried out on behalf of the Commission suggesting either a total exemption of these tractors from Stages IIIB and IV or a delay of at least 5 years.

2.8 These tractors have sales of about 26 000 units per year and represent about 16 % of the new tractors market in the EU. Action is needed otherwise no more modern Stage IIIA-compliant tractors would be allowed onto the market. This would stop the environmental improvement they provide; it

would also expose around 80 000 people employed in agriculture to more severe safety risks, as older tractors do not have many of the new safety features available today. 3 000 jobs, all of them located in the EU, could be lost from the tractor-manufacturing industry and its components supply chain.

3. The proposed amendment to the Directive

3.1 The proposal would amend Directive 2000/25/EC to postpone by three years all the requirements of Stages IIIB and IV for tractors classified under categories T2, C2 and T4.1.

4. General comments

4.1 The EESC supports the Commission's approach along the lines of the Sixth Environmental Action Programme (COM(2001) 31 final)⁽²⁾, confirming the need to achieve air quality improvements by reducing exhaust emissions at the source, but also to draw on sound scientific knowledge and economic assessments and reliable and up-to-date data and information in defining those reductions.

4.2 The EESC supports the Commission proposal, which applies these principles for Stages IIIB and IV.

4.3 On the other hand, the EESC believes that it remains uncertain whether it will really be possible to install Stage IV engines on NTT tractors and still maintain their operational requirements. In fact, the Commission considers it important to monitor technical advancements in the industry over time, in order to track progress towards meeting the Stage IIIB and Stage IV limits.

4.4 The EESC recommends that, as part of the monitoring process suggested by the Commission, a report should be issued in advance of Stage IV becoming compulsory, demonstrating the feasibility of Stage IV for NTT tractors and proposing possible amendments to the Directive.

4.5 The EESC believes that the extension of Stages IIIB and IV from NRMM to agricultural and forestry tractors in general, and specialised tractors in particular, via the 2005 amendment to Directive 2000/25/EC, was not submitted to any impact assessment, and that it was this omission that resulted in the need for this subsequent amendment.

Brussels, 16 March 2011.

The President
of the European Economic and Social Committee
Staffan NILSSON

⁽¹⁾ Also with significant Community economic support as part of its general agricultural policy.

⁽²⁾ OJ C 154 E, 29.5.2001, p. 218.