

Commissioner Mr Karmenu Vella

Dear Commissioner Mr Karmenu Vella,

For the last decades we have worked hard in the European Union to ensure a legislative framework that promotes cleaner vehicles in Europe.

This framework includes setting stricter emissions limit values for heavy-duty vehicles which has led to the use of advanced emission reduction systems for heavy-duty vehicles placed on the European market.

Unfortunately, there has been increasing evidence of excessive tampering with equipment on heavy-duty vehicles mainly to avoid the costs of adding reagent and the costs of maintaining the emission control system.

Furthermore, there has also been evidence that some distributors of emulators actively recommend removing the particulate filter to their customers. The removal of the particulate filter leads to high emissions of carcinogenic diesel soot.

In Denmark almost 25% of the heavy-duty vehicles selected for roadside inspection had their aftertreatment systems manipulated. The main part of those trucks (25 %) were used for import/export of goods and registered in other EU countries.

Recent studies in Denmark indicate that disconnecting the engine emission control system increases NOx emissions by a factor of 45 with 60 % engine load¹.

Other Danish studies estimate that tampering with heavy-duty trucks leads to 9% increased air pollution from road traffic. The same studies show that the negative health impact of tampering leads to additional 7,500 premature deaths per year in Europe². These estimates assume that 25% of the trucks have discarded the Selective Catalytic Reduction (SCR) system, as found by the Danish Police.

The development described above gives rise to significant increases in emissions which again lead to negative health impact. This has to be taken very seriously and

¹ Investigation of NOx manipulation in heavy-duty vehicles:
<http://www.fstyr.dk/DA/Databases/~media/0A59E51D39FE4D52BA354057D297855A.pdf>

² Measurements of cheating with SCR catalysts on heavy duty vehicles:
<https://www2.mst.dk/Udgiv/publications/2018/06/978-87-93710-42-9.pdf>

actions have to be launched. We, therefore, see the need for swift and effective joint European efforts in this area. From a Danish point of view it is key that we find common solutions and have better European-wide legislative framework and enforcement in place to tackle the excessive tampering.

With up to 100 different providers of reagent emulators, it is relatively easy to acquire an emulator device. Although Chinese manufacturers top the list of providers, there are also a large number of providers on the European continent, and at prices between 80 and 500 euro, there is an emulator for every budget. Whereas the cheapest emulators are simple to use and often easy to detect, the more expensive models are often very advanced devices in sophisticated packaging and leave very few traces.

Based on these facts, Denmark urges the Commission to:

- Prohibit the placing on the market of tampering equipment which effects the emission of the vehicles.
- Support development of enforcement systems or equipment with regard to NOx-emissions at roadworthiness inspections or roadside inspections.
- Launch a swift upgrade of the roadworthiness directive with regard to emission control. There is a huge gap in the stringency of type approval scheme and the roadworthiness regulation. This needs to be addressed.

We look forward a continuous dialog with the Commission on this matter and in a first instance to hearing back from you on the view taken by the Commission on this issue. The Dieselgate and now this tampering issue create mistrust in our regulation and enforcement which we hope to address in a European context.

For your information we have sent similar letters to Commissioner Ms Elżbieta Bieńkowska and Commissioner Ms Violeta Bulc.

Yours sincerely,



Jakob Ellemann-Jensen

Minister for Environment and Food



Ole Birk Olesen

Minister for Transport, Building, and Housing