

## Position Paper of the Platform on the revision of the HDV CO2 emission standards

July 2022

The Platform for Electromobility strongly welcomes the revision of the CO2 standards for heavy-duty vehicles (HDV). The Platform sees the Regulation as a fundamental tool for electrifying trucks and thus advancing the zero emission transition within the road freight sector. Currently, this sector is responsible for 24% of the EU's transport emissions, with trucks making up the largest part. The revision of HDV CO2 standards should align the CO2 targets for the sector with those of the EU's overall 55% GHG reduction target in 2030 and the climate neutrality target of 2050.

In order to transition the road freight sector to zero emissions, more ambitious standards are needed to set the correct pace and a clear trajectory for manufacturers, logistics operators and for the supply chains in the electromobility and automotive industry. Scaling effects in production and technology development in the e-mobility and transport sector all contribute to making electric HDVs more competitive and widespread.

The Platform calls upon the European Commission to adopt the following recommendations as part of the revision of the HDV CO2 standards:

### Strengthening the emission reduction targets to fully decarbonize the sector by 2050.

- **Almost all** newly registered **HDVs** (including long-haul) should be **100% zero emission by 2035** at the latest, given the average lifespan of a truck of approximately 15 years.
- An **exemption** should be considered for some niche **vocational** vehicles (such as those operating in remote areas or of abnormal weight) with a 100% Zero Emission Vehicle (ZEV) target by **2040, due** to their more complex operational requirements and usually significantly lower mileage, which postpones the year of cost parity for the total cost-of-ownership for those vocational vehicles.
- The introduction of an **intermediary CO2 target in 2027 of 30%** for medium and heavy lorries is necessary to accelerate the transition to electric trucks during the 2020s.
- **Strengthening** the ambition of the **2030 CO2 target** is crucial in providing momentum to, and further scaling up, the production and sales of ZETs. The 2030 target should be increased to an emission reduction level of at least **65%**.

### Extend the scope of the regulated HDV categories.

- **Medium-sized lorries** should be regulated through **CO2 reduction targets**, with the interim target of **30% in 2027** and the **2030 target of 65%**.
- **Small lorries** - as well as **urban buses** and **coaches** - should have a **mandated ZEV target**, as they are not included in either the VECTO monitoring, or the datasets are deficient and hence have no CO2 reduction targets.
- The Platform recommends including **small lorries** with a ZEV target of **35%** in 2027 and of **70%** by 2030.

- **Urban buses** can decarbonise faster, and hence **100%** of these should be ZEV by **2027**<sup>1</sup>.
- Finally, **coaches** will transition a bit slower - due to the different vehicle design - with **20%** ZEVs by 2027, **60%** by 2030 and **100% by 2035**.
- **Trailers** and semi-trailers will benefit from the introduction of **energy efficiency** targets, as this will unlock the deployment of zero-emission long-haul tractor-trailer combinations. The targets should be set where technically and practically feasible and as early as 2027. The full energy-efficiency potential of **12% for long-haul and 8% for regional delivery** should be reached by 2030.

Other regulatory elements.

- The zero or low emissions vehicles (ZLEV) mechanism should be transformed into a **ZEV-only mechanism** with an enhanced benchmark of **15%** by 2027. **After 2030**, the benchmark mechanism should be **removed**.
- The possibility of **pooling of resources should be explored** in the impact assessment, next to the introduction of a straight credit-trading scheme, which might allow for greater flexibility and less regulatory barriers.
- There should **not be an exemption for small-volume manufacturers**, as it risks creating a loophole for continuing to produce ICE-powered trucks.
- There should be **no mechanism for renewable and low-carbon fuels** to be included under this Regulation. Under such a mechanism, manufacturers could continue to produce ICE-powered trucks and delay the transition to ZEVs whilst not actually being able to control how fuels are ultimately being used (yet still being rewarded for it).

Ambitious charging infrastructure targets, as discussed in the Alternative Fuels Infrastructure Regulation (AFIR), are elementary for a successful rollout of ZETs. In addition, private as well as public investments will be needed to ensure higher grid capacity to serve the growing truck-charging demand. The revenues from excess emission premiums should be channelled back into the sector for the rollout of the infrastructure network. Related files, such as the Energy Performance of Buildings Directive (EPBD) can act as an enabler for a smooth deployment of electric trucks. The platform therefore recommends including infrastructure requirements for charging at depots and logistic hubs.

Investing in the reskilling of workers is essential, both for those currently employed in HDV manufacturing and therefore see a conversion of current skills, and new ones who will be increasingly specialised in the new production value-chain. It can reduce social risk and increase workforce resiliency. Other measures such as job-search assistance for jobseekers and income and early retirement support could make the transition more just and fair.

The positive effects of electrifying heavy trucks are far-reaching, and go beyond reducing Europe's GHG emissions; accelerating the zero-emission truck roll out also allows for drastic improvements to noise and air pollution. The high increase of energy efficiency in the case of battery-electric trucks is particularly beneficial when road transport accounts for 29% of the EU's final energy consumption. The Platform for Electromobility also wishes to highlight that the transition to electric trucks and buses provides a considerable opportunity for the European e-mobility value chain and the competitiveness of the economy. Ambitious targets would make Europe a leader in zero emission HDVs and thus accelerate the unlocking of the potential of the e-mobility value chain.

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<sup>1</sup> UITP is currently still considering its alignment with this objective.