Platform for electromobility warns against the inclusion of renewable and low-carbon fuels and a carbon correction factor in the CO2 Standards for trucks and buses

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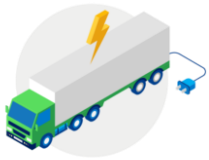

Ahead of the vote on the CO2 Standards for trucks and buses Regulation in Plenary of the European Parliament on the 21st November, the members of the Platform for electromobility would like to express their deep concern regarding the potential introduction of low-carbon fuels (advanced biofuels), synthetically produced fuels (e-fuels) and a Carbon Correction Factor (CCF) to account for them, in the CO2 Standards for Heavy-Duty Vehicles (HDVs). We urge you to carefully consider the implications of such a measure and, in the best interests of our regulatory framework and environmental goals, reject its introduction unequivocally.

Opening the door to these fuels into the revisions of the CO2 Standards poses significant challenges. The introduction of a Carbon Correction Factor (CCF) to account for them would be equivalent in lowering the average specific emissions of a certain manufacturer, as per the Impact Assessment of the EC[1]. Since the Renewable Energy Directive - REDIII already rewards the use of low-carbon fuels like bioethanol, bio-methane or synthetic fuels produced from renewable electricity, with the strongest possible economic incentives by setting sales mandates for the deployment of such low-carbon fuels across all sectors, including freight transport, this would mix well-to-tank (fuels and electricity from RED) and tank-to-wheel (vehicle tailpipe emissions from CO2 standards) regulation, leading to potentially regulatory inconsistencies and, at its worst, result in unenforceable legislation. This would blur the roles and responsibilities of different market participants, even though this regulation primarily applies to vehicle manufacturers, potentially constituting double counting, as highlighted by NGOs[2] and studies[3]

Moreover, beyond the immediate concern of CO2 emissions, the introduction of a CCF could adversely impact air quality, especially in urban areas. Allowing last-mile delivery trucks to emit more pollutants in cities could contradict existing legislation, such as the Air Quality Directive, which was recently adopted in the European Parliament. The directive aims to achieve improved air quality, particularly in cities, by 2030, aligning with the World Health Organization (WHO)

[1] compared to the medium ambition scenario (TL Med), the average CO2 emissions per tkm of the new vehicles fleet of this option increases by around 13% in 2030 and leads also to a higher uptake of ICEV instead of ZE ones. All in all, the CO2 tailpipe emissions during the period 2031-2050 increase by about 8% of the cumulative emissions in TL_Med. In addition, food- and crop-based biofuels are associated with significant indirect climate emissions, causing higher GHGs than their fossil counterpart (ICCT, 2017 link) and e-fuels, would not be able to reduce air pollutant emissions in any meaningful way (T&E 2021 link).

[2] "A carbon correction factor for trucks? Don't be fooled by the oil industry's latest con " Transport & Environment. October 12th 2023. Link.

[3] ICCT 2018 Decarbonization potential of electrofuels in the European union

standards and ultimately striving for zero pollution by 2050. Lowering the ambition of the CO2 standards for HDVs would run counter to these efforts to enhance air quality.
We understand that there has been debate regarding the competitive advantages of e-fuels compared to battery-electric technologies. However, it is important to note that battery-electric technologies can already satisfy almost all of European freight road transport needs, a share that will likely increase with the growth of intermodal logistical systems.

Furthermore, we emphasize the inherent inefficiency of e-fuels. Renewable and low carbon fuels and, most notably, e-fuels will not be carbon-neutral in time to decarbonize the road transport sector and meet our climate targets. It is worth noting that these fuels are scarce resources sorely needed to reduce greenhouse gas emissions in the aviation and shipping sectors, whereas the road transport sector can easily be electrified. As a result, e-fuels do not provide a viable alternative to existing zero-emission solutions. Estimates indicate that the electricity requirements for the production, transportation, and distribution of various e-fuel types are significantly higher, ranging from approximately 1.6-1.8 times greater for compressed gaseous hydrogen to between 2.2 and 6.7 times higher for liquid e-fuels, in comparison to the direct use of electricity, depending on the specific fuel type. When we account for not just the fuel production phase but also the efficiency losses within the vehicle powertrain during e-fuel usage, the overall efficiency diminishes even further. In addition, E-fuels aren't currently produced at commercial volumes[4]. Scaling up additional renewables, electrolysers, direct air capture (DAC) and e-fuel production facilities would take time and larger e-fuel quantities would likely not be available before 2040.[5]

In conclusion, we urge Members of the European Parliament to carefully consider the potential ramifications of introducing a Carbon Correction Factor in CO2 Standards for Heavy-Duty Vehicles, as it would not bear significant results, while setting a dangerous precedent and creating great uncertainty for European truck manufacturers. We believe that maintaining a clear and consistent regulatory framework, along with our commitment to improving air quality, should guide our decisions in this matter. We appreciate your attention to this critical issue and look forward to further discussions.

In addition, we would like to remind the key recommendations from previously published position:

- keep the ambition of the CO2 emission reduction targets (final and intermediate), to fully decarbonize the sector by 2050, at least as per EC proposal;
- The proposed 2030 target of -45% is lacking ambition and is below what manufacturers have announced. It should be increased to an emission reduction level of at least 65%.
- The proposal's new definition of zero emission (5 gCO2/tkm) creates a dangerous loophole for continuous sales of emitting vehicles even after 2050. The Platform strongly advocates to keep it as it is (1 gCO2/kWh).
- Keep the 100% ZEV mandate target at 2030 for urban buses, including an intermediary target with a 70% ZEV mandate by 2027 . Two subcategories of urban buses, namely class II low-entry (i.e. 31L2 and 33L2), should be moved into the coach segment.

[4] Production sites, including experimental facilities are 18 at the moment. E-Fuel Alliance. link
[5] Odenweller et al. (2022). Probabilistic feasibility space of scaling up green hydrogen supply. Link.

Members of the Platform for electromobility

More about the Platform for electromobility

The Platform for electromobility is a unique alliance of Europe-based producers, infrastructure managers, operators, transport users, cities and environmental civil society organisations from across industries and transport modes. Our overarching goal is to reach a sustainable, multimodal transport system in which people and goods are moved across land, inland waterways, sea and air in Europe using exclusively fossil-free electricity. To reach its vision, the Platform unites all sectors constituting the electromobility ecosystem to pragmatically ensure the conditions for the full electrification of new light-duty vehicles by 2035, and build a sustainable European zero-emission transport system by collectively sharing their expertise, challenges and solutions.

For more information about the platform and its members, please visit:

https://www.platformelectromobility.eu/