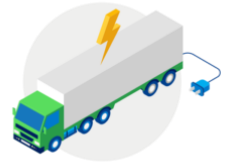


Platform for Electromobility's five recommendations to CO2 Standards for trucks and buses trilogue negotiators

January 2024



The members of the Platform for Electromobility welcome the position adopted in November by the European Parliament on the revision of the CO2 Standards for trucks and buses Regulation. Welcomed overall, the text provides a robust and ambitious yet realistic and business-friendly path toward decarbonisation of road transport in Europe. Ahead of trilogue negotiations, we hereby highlight key elements that negotiators should keep in mind to safeguard the Regulation's added value

1 First and foremost, **we urge negotiators to reach a conclusion before March 2024** to avoid losing one year in our collective fight against climate change. Considering the deadline of the text, a late agreement would delay its application by a full year, hence jeopardising our joint effort to reduce CO2 emissions and reach net-zero society in 2050. A timely resolution is paramount to providing certainty to the truck and bus industries, its customers as well as adjacent infrastructures and energy industries, enabling them to plan and invest in the necessary innovations for compliance.

2 Industrial certainty and environmental progress are also jeopardised by a potential loophole that could open the way for **unrealistic use and expectation of e-fuels and biofuels**. Both alternative fuels solutions are inherently inefficient¹ and **should remain out of the CO2 standards**. 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, and as a result should be limited where direct electrification is not feasible, namely in maritime and aviation sectors. These fuels are scarce resources sorely needed to reduce greenhouse gas emissions in the aviation and shipping sectors, whereas the road transport sector is well-suited for electrification. They do not provide a viable alternative to existing zero-emission solutions. In addition, e-fuels aren't currently produced at commercial volumes. Scaling up additional renewables, electrolyzers, direct air capture

¹ 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.

(DAC) and e-fuel production facilities would take time and larger e-fuel quantities would likely not be available before 2040.

3 Thirdly, considering that in 2022 30% of new buses in Europe were already zero emission, an urged **confirmation of the 100% Zero Emission mandate target at 2030 for urban buses, with no postponements**, is an optimal option, notably with the move of the two subcategories of urban buses, namely class II low-entry (i.e. 31L2 and 33L2) into the coach segment, as they are often used by local and regional authorities for longer distance public transportation. While reducing the CO₂ emissions of those groups of vehicles, this choice would also bring substantial public health benefits by lowering the amount of particulate matters (PM) emitted.

4 Fourthly, we praise the European Parliament's extension of the emission debts and crediting system from 2030 to 2040 gives additional flexibility to manufacturers to earn credits (when reducing emissions more than required) and use them to offset debts (if emissions are above what is required). Credits now can be used for 15 years to offset debts. Credit's lifetime should have a maximum of 5 years as do the debts. This would force manufacturers to continuously invest in reducing their CO₂ emissions. This mechanism is pivotal in encouraging industry players to adopt sustainable practices and contribute meaningfully to the reduction of greenhouse gas emissions.

5 Platform members also recognise the positive impact a **fleet mandate mechanism** would have on the decarbonation of heavy-duty vehicles. On this point, Platform members equally stress the importance of support mechanisms for the rollout of office-based charging, from subsidies to tax discounts.

With a timely conclusion, unequivocal standards without place for questionable alternative fuels, the strongest ambition on decarbonization of urban buses, an ambitious definition of zero-emission heavy-duty vehicles and fit-for-purpose emission debts and crediting system, the CO₂ Standards for trucks and buses would truly be the regulatory framework that promotes sustainability, innovation, and the accelerated adoption of zero-emissions road transport.

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/>