

# ACEA COMMENTS ON NON-PAPER BY BELGIUM, DENMARK, LUXEMBOURG AND THE NETHERLANDS ON THE TRANSITION TO ZERO-EMISSION HEAVY-DUTY VEHICLES

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Belgium, Denmark, Luxembourg and the Netherlands have published a non-paper outlining their position on the expected review of the CO<sub>2</sub> emission standards for heavy-duty vehicles. The key messages include the call for

- a 100% zero emission target for new HDVs, in line with the EU's climate neutrality by 2050 objective,
- a strengthened 2030 target, building on the expressed ambitions of OEMs and fleet owners,
- an extension of the scope of the regulation to include more vehicle categories as the current regulation leaves out almost 35% of the sector's CO<sub>2</sub> emissions.

See here: <https://www.permanentrepresentations.nl/permanent-representations/pr-eu-brussels/documents/publications/2023/01/20/joint-non-paper-co2-standards-for-heavy-duty-vehicles>

ACEA would like to provide the following comments on the paper.

- It is encouraging to see that the paper recognises the **'pivotal importance' of enabling conditions**, such as
  - a 'robust deployment of charging/ refuelling infrastructure',
  - the need to create 'a balanced set of conditions and incentives across the value chain for a timely and ambitious transition' and
  - the 'growing number of zero-emission vehicles that are available and increasingly affordable'.
- **Decarbonising road transport requires more than strengthening CO<sub>2</sub> targets for manufacturers. Vehicles are not the bottleneck in the transition to climate neutrality.**
- Truck makers are strongly committed to **providing the right vehicles to help move Europe's road transport industry into fossil-free solutions by 2040, focused on battery-electric and hydrogen-powered vehicles.** To make this transition happen, a coherent policy framework and the support of all member states is urgently needed, specifically by
  - **Committing to ambitious AFIR targets for truck-suitable charging/ refueling infrastructure**

- Supporting **investments in infrastructure and expansion of grid infrastructure and capacity** where necessary
  - Speeding up permitting processes
  - **Swiftly implementing CO2 based road charges** (Eurovignette)
  - Supporting the **timely implementation of the ETS2**
  - **Supporting transport operators to invest early in zero-emission trucks and buses**
  - Helping manufacturers **focus efforts and investments by re-thinking the Commission's Euro VII proposal.**
- **Commercial road transport is a B2B market driven by demand.** Zero-emission trucks will be sold *en masse* as soon as operators can earn more money by driving a BEV/ H2-powered truck than a conventional diesel truck. So transport operators will transition swiftly if the charging/ refueling infrastructure is no longer considered a bottleneck and the total costs of ownership are clearly in favour of battery-electric/ hydrogen-powered vehicles. **Setting a 100% target or an ICE phase-out date will not address any of these crucial enabling conditions.** Besides their focus on zero-emission powertrains, manufacturers are convinced that 'internal combustion engines' (ICE), powered by fossil-free fuels, will continue to play an important long-term role in a small, but important range of heavy-duty applications.
  - A revised 2030 target should be set in line with the industry's ambitious yet feasible decarbonisation pathway while taking into account that **major uncertainties of the crucial enabling conditions persist**, especially in the early transition phase until 2030.
  - Targets for 2035 and 2040 can be set now but should be reviewed again in due time (2027) to assess the state of the enabling conditions.
  - As regards the extension of the CO2 emission standards, ACEA would like to point out that currently, about 72% of all new heavy-duty vehicles have to declare and report their CO2 emissions and almost three out of four new trucks are subject to the current CO2 reduction standards. **The currently regulated vehicles already represent more than 73% of the total CO2 emission from heavy-duty vehicles.**
  - The upcoming review will extend the CO2 standards to a range of additional vehicle segments, including **medium lorries, buses and coaches. These represent about 25% of the CO2 emissions from heavy-duty vehicles.** With this extension of the scope of the CO2 standards regulation, more than 98% of the sector's CO2 emissions will be regulated.

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