



Position paper of the European Clean Trucking Alliance on the European Commission's 'Fit-for-55 Package'

Fit for 55: the essential building blocks of a zero-emission future for freight

'Availability of infrastructure for zero-emission trucks and vans is one of the biggest challenges to decarbonising our fleets - only ambitious regulations and policy support can turn this into the greatest opportunity of the decade'

The members of the European Clean Trucking Alliance welcomed the Smart and Sustainable Mobility Strategy last December, including a much-awaited steer towards zero-emission road transport in Europe. However, the Strategy falls short of clearly showing the path to achieve 90% greenhouse gas emission reduction in the transport sector by 2050 compared to 1990, to be in line with climate neutrality. In particular, it does not provide the right level of ambition for the **policy framework to enable emission-free road freight transport**.

The Alliance therefore calls on the European Commission to take the opportunity of the upcoming proposals under the '*Fit-for-55 Package*' to fill the ambition gap with concrete and **future-proof legislation**.

The milestone of 80,000 zero-emission lorries on European roads by 2030, included in the Strategy, is far from ambitious, considering both how fast truck makers are coming out with pledges and sales targets, and the eagerness of fleets like ours to decarbonise. The Alliance is looking forward to the review of the **CO2 emission standards for heavy-duty vehicles** in 2022 to include zero-emission vehicle targets along the CO2 emission targets, to ensure a steady and increasing supply of zero-emission trucks. A critical mass of vehicles must become available for purchase in the very near future. At the same time, the **infrastructure** needed to operate these vehicles should start to be deployed now.

In this respect, the members of the European Clean Trucking Alliance, which represent fleets of more than 380,000 vehicles and employ more than 2,3 million people, urge the European Commission to:

- 1. [Revise the Alternative Fuel Infrastructure Directive \(AFID\), as well as the TEN-T and TEN-E regulations, to enable seamless cross-border zero-emission trucking across the EU as soon as possible](#)**

Currently there is no legal framework for deploying infrastructure for zero-emission trucks. The revision of the AFID should urgently provide it. The directive should be turned into a **regulation**, to ensure Member States deploy in a harmonised way the infrastructure to make zero-emission trucking possible. This means building with no delay sufficient **charging infrastructure** as well as **green hydrogen refuelling stations**.

The revised AFID should set **binding national targets** to guarantee an even distribution of infrastructure allowing for seamless zero-emission cross-border transport in the EU. The Commission's recently published application report regarding the implementation of the current AFID has shown that there are large differences between Member States' plans, and that not all national policy frameworks set clear and sufficient targets and objectives, supported by comprehensive measures. Also, there is a clear lack of a binding common methodology to inform target setting and measure development. We must act now and ensure that zero-emission trucks are able to transport goods from one Member State to another without hurdles.

Different use cases have different infrastructure needs and the market is at different stages of maturity. For the decarbonisation of **urban and regional deliveries**, battery electric trucks have proven to be the dominant technology pathway. Given the maturity of the technology, for such applications charging infrastructure should be prioritised.

For **long haul** applications the technological race is still open, battery electric trucks with or without dynamic charging as well as fuel cell hydrogen trucks are the current technology options. This means that both charging and refuelling stations will be needed along the highways, as well as Electric Road Systems where overhead catenary infrastructure could make most economic sense. The investments in charging and refuelling infrastructure should be considered complementary and not alternative.

The upcoming revision of the **TEN-T Regulation** should be the opportunity to identify **road freight urban nodes**, hotspots of freight activity in Europe. In the next five years, deployment of charging infrastructure at urban nodes should be prioritised to unlock zero-emission urban and regional delivery operations.

In particular, the revised **AFID** should set the following targets: a **minimum of 2 public charging stations per freight urban node by 2025**, increasing to a **minimum of 10 charging stations by 2030** (with a power of at least 500 kW)¹. For destination charging, all medium and large logistics hubs should have at least one opportunity charger from 2025.

The TEN-T core network corridors should become zero-emission freight corridors. Sufficient public charging stations, including high power chargers, compatible with the upcoming Megawatt Charging System standard, as well as green hydrogen refuelling infrastructure should be deployed at the latest by 2027 to enable zero-emission long haul trips on the TEN-T core network. A minimum

¹ Based on analysis of EU truck traffic flows (Transport & Environment (2020). Unlocking Electric Trucking in the EU: recharging in cities, [study](#)).

coverage of truck charging and refuelling infrastructure along the **comprehensive network** should be completed **by 2030**, to be further expanded in the following years.

Truck parking areas will need to be connected to the medium voltage grid. Synergies should be made with the requirements for new or renovated safe and secure truck parking areas, introducing the requirement for every new or renovated truck parking area financially supported by the EU to be pre-equipped for charging facilities. In particular, truck parking areas will represent the crucial locations to deploy overnight public chargers (~75-100kW), which together with high power and megawatt public chargers will be essential to enable the electrification of long-haul trips.

Interoperability of software and hardware infrastructure will be key. International standards for charging infrastructure (Megawatt Charging System) and for hydrogen refuelling stations should be developed and implemented as soon as possible.

The Commission should also ensure synergies with the forthcoming revision of the **TEN-E Regulation**. Electricity will be needed along the highways, be it for Megawatt chargers or for on-site production of green hydrogen, thus **reinforcement of the electricity grid** should be planned accordingly. Grid planning should take into account the integration of locally produced renewable energy and allow vehicle-to-grid.

Last but not least, to enable the energy transition in transport, new technologies must come with long-term investment certainty for end users. To generate a successful market shift, regulatory **incentive schemes** for zero-emission vehicle technology and infrastructure must focus on reliable long-term frameworks, especially in the early market development phase. In particular regarding infrastructure, Member States should direct **funding from the Recovery and Resilience Facility** according to the Recharge and Refuel flagship. Truck and van charging takes many forms: **depot, destination charging** (i.e., at logistic hubs or distribution centres) and **public charging** (high power, megawatt and overnight charging). All need to be addressed and recognized in the revised AFID, so that the various charging forms become eligible for public funding, with the required grid upgrades.

Furthermore, both the EU Strategic Rollout Action Plan expected alongside the AFID (which includes flanking measures for accelerating the roll-out of infrastructure) and Member States recovery plans should also propose complementary measures to stimulate the demand in zero emission trucks and vans.

2. Revise the Energy Taxation Directive to support the business case of zero-emission road freight transport and reflect the climate impact of fossil fuels

Use the revision of the Energy Taxation Directive to introduce adequate incentives to speed up the switch from fossil fuels to zero emission. Member States should be allowed to apply tax **discounts or exemptions for the renewable electricity** used for charging trucks and for producing green hydrogen according to the environmental benefit.

The revision should also include an obligation for Member States to reflect the climate impact in the taxation rates for conventional fossil fuels in road transport, removing the possibility to apply

to them total or partial exemptions or reductions, and add an obligation to keep fuel taxes linked to inflation.

3. Revise the CO₂ emission performance standards for light commercial vehicles to ensure at last the needed supply of zero-emission vans, including an EU-wide phase-out of internal combustion engine vans by 2035

The current CO₂ emission performance standards for vans are not driving the market towards zero-emission: only 1.4% of new vans registered in the EU in 2019 was electric and according to preliminary data only 2% in 2020². The targets are not sufficiently ambitious, especially considering the very generous starting point and the flexibility concerning the mass, which is driving the market towards heavier and more polluting vehicles.

Demand for zero-emission vans is growing, thanks to the proliferation of low and **zero-emission zones**. However, the offer of e-van models from traditional van manufacturers is very limited and not adapted to the needs of the different van users. Companies have difficulties in sourcing the vehicles and are placing orders with start-ups to make sure they get the right vehicle for their use-case, with a favourable total-cost of ownership.

In order to reach the EU climate neutrality objective by 2050, it is absolutely crucial that the CO₂ standards for vans are strengthened to boost supply of zero-emission vehicles. At least 50% of new vans sold in 2030 should be zero-emission and **by 2035 all new vans sold should be zero-emission**.

Sufficient **charging infrastructure for vans** should be deployed at the same time to ensure a shift towards zero-emission city logistics is possible already within this decade, in line with the goal of CO₂-free city logistics in major urban centres by 2030, identified by the 2011 European Commission White Paper on Transport. This target, omitted from the Sustainable and Smart Mobility Strategy, should not be forgotten.

The members of the European Clean Trucking Alliance strongly encourage the European Commission to consider these recommendations as a matter of urgency: the future of road freight transport is at stake, only if the right decisions will be taken now will we be able to make the shift towards zero emission a reality.

We remain at your disposal to discuss these issues in more detail.

² 2020 van registration data from Dataforce, analysis by Transport & Environment (February 2021)

On behalf of:

