

## Reaction paper of the European Clean Trucking Alliance to the Commission's proposal for a revision of the HDV CO2 standards

The [European Clean Trucking Alliance](#) (ECTA) sees the regulation on CO2 standards for HDVs as the most important tool to drive the transformation of the sector towards zero-emission trucks. The ambition of the revision will determine whether and how Europe will advance the global race to zero-emission trucking. Importantly for actors in the freight and logistics sector, it will also dictate the level of supply of zero-emission vehicles, meaning the extent to which transport companies are able to purchase these vehicles. The higher the ambition in the short and medium term, the more zero-emission vehicles are produced and the quicker they become more affordable for all hauliers across Europe.

A quarter of the EU's road emission is caused by trucks in 2020, making up a total of 6% of the EU's emissions. In order to reach the EU's climate neutrality objective in 2050, the overwhelming majority of the emissions reduction will come from the sales of zero-emission vehicles. However, the sales of zero-emission vehicles have stalled at a very low level because very few zero-emission vehicle alternatives are currently available, especially for long-haul transport operations. The potential of zero-emission trucks to decarbonise the road transport sector is huge and offers economic and technological opportunities. The ECTA sees the need to strengthen the proposed targets of the revised proposal to first and foremost ensure alignment with the EU's climate ambition, meaning its -55% targets by 2030 as well as the overarching target of climate neutrality in 2050. The proposed CO2 reduction targets leave room to sell combustion trucks far after 2040 and create uncertainty on the road to decarbonisation for manufacturers and transport operators alike.

ECTA highlights the following shortcomings of the Commission's proposal for the revision of the HDV CO2 standards and urges co-legislators to significantly strengthen the proposal.

### **Strengthening the 2030 CO2 reduction target**

The large majority of Europe's truck OEMs have announced plans to enter mass production for electric trucks, including long haul, already in the first half of the 2020s. They aim at levels of zero-emission vehicle (ZEV) shares in 2030 of approximately 50% (Scania, MAN and Renault Truck), 60% in 2030 for Daimler or even up to 70% for Volvo Truck. The Clean Room talks between the German government and European OEMs underlined that ZET sales share will reach up to 63% for Europe.<sup>1</sup>

The 2030 target should hence mark at the very least the lower level of the OEMs plans to ensure that elementary series production for all truck classes are coming. This should translate into a **2030 CO2**

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<sup>1</sup> NOW GmbH (2023). Marktentwicklung Klimafreundlicher Technologien Im Schweren Strassen Güterverkehr. [Link](#)

**reduction target for all new vehicle sales of at least 65%**, on par with the announcement of the OEMs themselves.

### **The end goal needs to be 100% zero-emission**

Giving clear directions as well as setting a final destination on the journey to decarbonize road transport, allows for planning certainty for transport operators and truck producers alike. ECTA calls on regulators in Parliament and member states to draw a finish line to transition to **100% zero-emission in 2035**, meaning all new small, medium and heavy trucks sold are zero-emission. This gives freight actors a clear direction for the years to come and will ensure compliance with the EU's climate neutrality target in 2050 considering the average time of a truck on the road is 18 years. Vocational vehicles which are for example used for construction applications and waste management operations, have different needs in power output and lower mileage as well as lower emissions than a truck for the transport of goods. Hence, an additional 5 years to arrive to 100% zero-emission in 2040 enables them to transition as well.<sup>2</sup>

### **Extension of the scope of the regulation to cover also small trucks**

ECTA supports the addition of new vehicle classes into the scope of the regulation to regulate and eventually reduce the largest extent of the EU's truck fleet emissions. Small trucks (<5t) which are currently not covered in the regulation as they do not have VECTO certification can and should be effectively regulated with a ZEV target and reach a **100% ZEV mandate by 2030**.

### **Zero-emission means 'without emissions'**

The change of the 'zero-emission' definition as part of the Commission's proposal blurs the meaning of truly future-proof and clean emission-free technologies and waters down the ambition level. The new proposed definition of 5 gCO<sub>2</sub>/tkm for zero-emission vehicles creates a dangerous loophole for a continued sale of emitting dual-fuel vehicles running on diesel even after 2050 when the EU is expected to be climate-neutral. ECTA strongly advocated for **safeguarding** the zero-emission definition of the current HDV CO<sub>2</sub> regulation that defines Zero-Emission Trucks as emitting less than **1gCO<sub>2</sub>/kWh**.

### **An effective incentive mechanism for zero-emission**

The current ZLEV mechanism is in place to accelerate the initial update and create an equally incentivising context for low as well as zero-emission trucks. The alliance agrees with the proposal of having such a mechanism in place only until 2030 to ensure the incentive is in place until ZET market maturity has been reached. Yet, the incentive should be a **ZEV-only** incentive to safeguard a faster

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<sup>2</sup> Based on the ICCT study 'The CO<sub>2</sub> standards required for trucks and buses for Europe to meet its climate targets'. [Link](#)

adoption of truly clean technologies and future-proof technologies, which means low-emission vehicles (LEVs) should be excluded from the incentive mechanism.

#### Other regulatory elements

- The **transferring of vehicles** between small scale manufacturers and big OEM should be **maintained** as it allows to **significantly** accelerate innovation and increases competition as the new market entrant companies which produce zero-emission trucks on a smaller scale are **incentivised and rewarded for their early action**.
- The **exemption for small volume manufacturers** with volume numbers in the range of **<100 vehicles** should be **applied**.
- **A credit and debts system should offer flexibility without slacking ambition**. The crediting and debts system, allowing further flexibility to manufacturers on their CO2 reduction performance, has been extended till 2040 as part of the Commission's proposal. ECTA generally supports the idea to leave OEMs space to overperform on reducing their fleet CO2 emissions (and gain credits) to offset potential downfalls in CO2 performance in another period (and accumulate debts). Yet, the two pools of **credits and debts should have the same 5-year cycle**. The proposed 15-year lifetime of credits compared to a 5-year lifetime of debts gives the option of having high ambition early on but little ambition in after 2025 by truck makers.

#### Enabling policies pave the way for the zero-emission trucking transition

- **Rapid installation of infrastructure**  
The recent agreement of the Alternative Fuels Infrastructure Regulation (AFIR) for the deployment of infrastructure to recharge and refuel zero-emission vehicles is an important step to **unlock** a wider transition to zero-emission trucks across Europe by 2025. Member States will have to deploy a sufficient number of charging points on their territory to allow for ZETs to be rapidly deployed and crucial for our industry to use and operate a large number of zero-emission vehicles in 2030.
- **Increase share of renewable energy sources to match truck demand**  
The increasing demand for electricity to charge battery-electric vehicles and produce hydrogen, should be matched by increasing production of truly renewable energy sources and incentives by energy taxation.
- **A just trucking transition**  
Even though the economic competitiveness of zero-emission trucks looks very promising with TCO parity expected in the middle of this decade for electric trucks in specific Member States, the barrier of the high capital costs of vehicles remains a hurdle for some truck operators and particularly SMEs. Higher targets under the revision of the CO2 standards will allow for economies-

of-scale which will lower the vehicle prices. But law makers should consider additional **support mechanisms** (such as purchase incentives and loans) for transport companies to enable them to transition in the most time effective manner.

- **Steering revenues back into the sector**

Part of the revenue from excess emission premiums could be used to support the transition of the road freight sector to zero-emission, including accelerating the deployment of zero-emission HDV infrastructure across the EU. A fund to foster technology innovation in the freight transport sector should be created.

In short, the CO<sub>2</sub> standards can be an effective tool to set the pace for the ZEV transition for truck OEMs as well as providing much needed certainty to companies operating in the freight and logistics sector. The European Parliament and Council now need to step in and strengthen the Commission's proposal, guiding the zero-emission transition of the sector with ambition and foresight for decades to come.

## More about the Alliance

The **European Clean Trucking Alliance** is a coalition of over 35+ companies and organisations active in logistics, consumer goods, manufacturing, retail and supply chain management from across Europe calling for zero-emission road freight.

For more information, please visit the website: [www.clean-trucking.eu](http://www.clean-trucking.eu)



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