



The Danish Government's position to the public consultation on the revision of the Regulation setting CO₂ emission standards for new heavy-duty vehicles

Denmark strongly welcomes the European Commission's plan to present a proposal for a revision of the Regulation setting CO₂ emission standards for new heavy-duty vehicles.

The transport sector accounts for almost a quarter of all EU greenhouse gas emissions, and road transport alone is responsible for a fifth of the emissions in the EU. The transport sector is a major cause of air pollution in our cities. Ambitious and swift action is needed to spur the transition necessary to reach the EU's 2030 climate target and climate neutrality by 2050.

It will be crucial to adopt legislation that is fully in line with the EU's climate objectives and provides certainty for manufacturers, investors, consumers, and citizens by clearly signaling the transition towards zero-emission road transport.

Strengthened CO₂ emission targets

A revision of the regulation setting CO₂ emission performance standards for new heavy-duty vehicles should include a thorough examination of which elements in the current legislation that can be strengthened to ensure more ambition – from the CO₂ emission targets, the incentive mechanism, the pooling mechanism and to the various derogations. Moreover, an interim target before 2030 could be considered in order to ensure a timely and continuous phase in of zero emission heavy-duty vehicles. With the transition towards zero-emission road transport in mind, it is clear that the current CO₂ emission targets must be strengthened significantly.

Extension of the scope of the Regulation

Trucks accounts for almost a quarter of CO₂ emissions from road transport, while in 2019 they only accounted for less than 2 pct. of the vehicles on the road in Europe¹. The scope of the regulation should be extended to more of the currently unregulated vehicles categories, in order to increase the CO₂-reduction from road transport.

Mechanism to provide incentives for zero- and low-emission vehicles

The industry is already investing in the green transition. Several truck manufacturers have announced plans to transition to zero emissions vehicles, i.e. by ending

¹ Source: ACEA



the development of the internal combustion engines for trucks as well as by setting sales targets for zero emission heavy-duty vehicles. In light of the current energy situation, focusing on the transition to zero emissions vehicles has become even more important. The regulation should facilitate the transition to zero emission vehicles.

Excluding the contribution of renewable and low-carbon fuel

Renewable and low-carbon fuels are regulated under the Renewable Energy Directive II contributing with greenhouse gas reductions from fossil-based fuels used in fossil-fueled vehicles. Allowing a mechanism to take into account contributions from renewable and low-carbon fuel in the regulation on CO₂ emissions standards for heavy-duty vehicles could lower the incentives to develop and produce zero emissions vehicles. The regulation in question should provide the framework for the transition to zero emission heavy-duty vehicles. Therefore, the option should not be included but regulated separately as a transitional measure on the road to climate neutrality.

Cost-effective implementation of the standards

If the level of ambition is set sufficiently high, all manufacturers will have to ensure the transition of their vehicle fleet. The pooling mechanism can ensure that manufacturers are granted flexibility to implement the CO₂ emission standards in a cost-effective manner.

The use of revenues from any fines to a specific fund

The excess emissions premiums to be paid by manufacturers if their average specific emissions of CO₂ exceed their targets must continue entering the general budget of the Union as other revenue and thereby be part of the overall prioritisation of expenditure in the general budgetary procedure.