

### **Non-paper by Belgium, Denmark, Luxembourg and the Netherlands on the transition to zero-emission heavy duty vehicles**

We welcome the Commission's intention to revise the CO<sub>2</sub> standards for heavy duty vehicles (HDV). An ambitious revision is much needed to contribute to a reduction of the emissions of road transport in line with the Paris Agreement, the European Climate Law and Member States targets under the Effort Sharing Regulation (ESR). Currently, emissions from road transport are clearly not on a Paris aligned trajectory. At the same time, there are vast opportunities to abate the emissions of the sector given the increasingly growing availability of cost-effective solutions. An increasing number of European manufacturers (OEMs) in the heavy duty segment have already made public commitments to increase the roll-out of zero-emission vehicles (ZEVs) in the near future. The technology is there. This also gives confidence that total cost of ownership (TCO) parity of long-haul zero-emission HDVs will be reached within the foreseeable future.

We recognise the pivotal importance of ensuring charging infrastructure deployment keeps pace with the uptake of ZEVs. A robust and adequate roll-out of charging and refuelling infrastructure will be key to give manufacturers and fleet owners confidence in the operational viability of ZEVs. The ongoing negotiations on the Alternative Fuels Infrastructure Regulation (AFIR) offer the opportunity to align charging infrastructure targets with the increased ambitions for the HDV sector. Creating a balanced set of conditions and incentives across the 'logistical chain' will be pivotal for a timely and ambitious transition.

In addition, the upcoming revision of the CO<sub>2</sub> standards for HDVs provides a unique opportunity to send a strong signal to the market and incentivise a timely transition. The revised CO<sub>2</sub> standards for light duty vehicles have demonstrated the benefits of this approach. In our view, to be consistent with the European Climate Law and to support Member States to achieve their ESR targets, the Commission proposal should contain three core elements:

1. **A 100% zero emission target for new HDVs in the EU**, in line with the EU objective of climate neutrality by 2050.
2. **A strengthened 2030 target**, building on the ambitions expressed by frontrunning OEMs and fleet owners.
3. **Application of the CO<sub>2</sub> standards to more vehicle categories than covered under the current scope**. The current CO<sub>2</sub> reduction targets are only applicable to a small share of freight vehicles on the road, leaving almost 35% of emissions out of scope.

In reaching these targets a technology-neutral approach in setting the new standards for tail pipe emissions continues to be appropriate.<sup>1</sup>

We are encouraged by the growing number of ZEV HDVs that are already available and increasingly affordable. The upcoming revision offers the opportunity to build on that and bolster the transition that is taking shape. Doing so is needed for the climate, while ensuring the sector's long-term competitiveness. But it will also contribute to reducing our energy dependence and increasing energy security, while improving air quality and health, and resulting in significant cost reductions to fleet owners and society as a whole. We therefore call on the Commission to publish the proposal to revise the CO<sub>2</sub> standards for HDVs as soon as possible.

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<sup>1</sup> This includes the notion that the means of energy transfer should also be technology neutral, opening up the possibility of energy transfer while the vehicle is in motion.