



EV100+ position paper on the EU Regulation on CO2 emission standards for HDVs

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EV100+ position paper

EV100+ is a global initiative lead by Climate Group, which follows the EV100 initiative for passenger and light-duty vehicles. Its members are companies committed to procuring only zero-emission medium-duty vehicles by 2030 and to fully deploying zero-emission Medium and Heavy-Duty vehicles (MHDVs) by 2040 for owned and contracted operations.

MHDVs are responsible for a disproportionate source of global greenhouse gas emissions. Although heavy-duty trucks represent only 2% of the vehicles on European roads, their climate emissions account for more than a quarter of the EU's road transport emissions and have been increasing over the past decade¹.

The European Commission proposal to tighten CO2 emission standards for heavy-duty vehicles is an essential tool to achieve the EU climate targets.

It is a key mechanism to provide businesses with the regulatory certainty and assured supply that will allow them to invest with confidence in zero emission tailpipe trucks.

Furthermore, if ambitious and well implemented the Regulation will provide a clear pathway to decarbonising MHDVs at an EU-level, ensuring that Original Equipment

¹ <https://unfccc.int/topics/mitigation/resources/registry-and-data/ghg-data-from-unfccc>

Manufacturers (OEMs) increase research and development and scale up production of zero emissions trucks.

This is also a matter of sound industrial policy. With growing pressure to decarbonize transport, HDV users will increasingly look for zero emission solutions to reduce their linehaul environmental impact. The Regulation can provide the right market signal for European manufacturers to secure and increase production. International players are already scaling up their zero emission vehicles supplies, and it is vital for Europe to remain leader in transport innovation.

In order for the EU to reach its climate objectives, to reduce air pollution, to provide certainty to committed fleet operators and to contribute to a thriving, growing EU automotive manufacturing sector, EV100+ members call upon EU policy makers to increase the ambition of the Commission's proposal around EU Regulation on CO2 emission standards for HDVs. Our key recommendations are:

1. **100% emission reduction target by 2035**

A clear phase out date will encourage OEMs to scale up manufacture and sales of Zero Emission Trucks in line with clearly demonstrated demand. It will also provide companies operating fleets with the confidence to invest in Zero-Emission MHDVs at scale and now.

Meeting the EU's climate goals is dependent on the rapid transition towards zero-emission trucks. The 2035 phase out date is not just feasible but essential for the EU to reach climate neutrality by 2050. Several companies have set ambitious carbon reduction trajectories, in line with the Paris Agreement. For transporters and shippers, these trajectories can only be met with a substantial shift towards zero emission vehicles. Those companies cannot wait until 2040 for e-trucks to be available at scale, procurement will have to start well before then, to be able to meet carbon neutrality by 2050. Ambitious CO2 emission reduction targets would increase the availability of zero emission trucks and allow companies to fully decarbonise their fleet by 2040.

According to an analysis carried out by ICCT², the Regulation as proposed by the Commission would reduce emissions by 77% by 2050, which falls short of the

² <https://theicct.org/wp-content/uploads/2023/02/presentation-slides-eu-co2-standards-from-hdvs.pdf>

Commission's goal of reducing transport emissions by 90% by 2050 and to reach climate neutrality by 2050.

2. Reduce CO2 emissions by 65% by 2030

In order to ensure that the supply of zero emission vehicles increases in line with climate targets in the second half of the 2020s, the 2030 CO2 reduction target needs to be increased to 65%. Many EU truck manufacturers have already made voluntary announcements resulting in an aggregated zero-emission sales share in 2030 of 63%³.

3. Extend the scope of the Regulation to all trucks

All truck types should be included in the scope of the Regulation, including small trucks between 3.5-5 tonnes. This is necessary to reduce emissions from all vehicle categories as well as to ensure that the production of zero emission vehicles provides alternatives across all vehicle segments.

4. Keep e-fuels out of the scope of the Regulation

Recent debates around the role of e-fuels and biofuels are at risk of casting doubt on the path to decarbonisation of road transport. EV100+ believes that the Regulation should favour zero-emission tailpipe vehicles, such as Battery Electric Vehicles and Fuel cell electric vehicles (FCEVs), as the most effective way to considerably reduce emissions from road transport.

5. Reverse the definition of Zero Emission Vehicles

EV100+ members are concerned about the new definition of zero emission (5 gCO2/tkm) proposed by the Commission. In practice, this would put emitting vehicles in the same category as battery electric ones, which are truly zero emission.

³ The Clean Room talks between the German government and European OEMs underlined that ZET sales share will reach up to 63% for Europe. NOW GmbH (2023). Marktentwicklung Klimafreundlicher Technologien Im Schweren Strassen Güterverkehr. [Link](#)

We call on EU policy makers to keep the definition below 1 gCO₂/kWh to promote truly zero emissions technologies.



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