



Mr Cosmin BOIANGIU

Deputy Permanent Representative of Romania to
the European Union

107 Avenue de Cortenbergh

B - 1000 Brussels

BELGIUM

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Dear Ambassador,

This letter intends to express some of our proposals for improvements in these final stages of the legislative process on emission performance standards for new heavy-duty vehicles. BusinessEurope would like to underline that any legislative proposals on the future of zero- and low-emission mobility in the transport sector must be accompanied by a clear view on the effects of legislation.

Therefore, our recommendation is to:

- **Apply conditions when reviewing ambition.** State a set of clear conditions that have to be met in order to open the door for more ambitious targets than those proposed by the European Commission. There are many factors over which zero- and low-emission vehicle manufacturers have little to no control, but which are crucial to reach the proposed ambitious targets on emission performance standards for heavy-duty zero- and low-emission vehicles (ZLEVs). For example, there needs to be sufficient demand for ZLEVs, as well as sufficient infrastructure to quickly recharge and refuel them in a reliable and affordable way. Currently this is simply not the case. Therefore, the 2022 review should be used to assess whether real steps are made in the coming years to change the ambition, either upwards or downwards.
- **Allow CO₂ pooling.** Since the current proposal set for HDVs will very likely be difficult to reach, manufacturers should be allowed to deploy any means possible to try and reach the targets. This includes a mechanism that allows for the pooling of CO₂ emissions within each HDV group (trucks, buses, coaches) so that within each group manufacturers are jointly able to reach the targets rather than having to rely completely on themselves. This is only logical from the point of view that investments should flow to where they have the highest added value compared to the lowest cost to society.
- **Keep the super credit system until 2030.** The ability of manufacturers to reach the targets will heavily depend not only on infrastructure, but also on effective



incentives. This is even more important for HDVs than for other road transport, since the market for heavy-duty ZLEVs is not yet very developed. In the Commission proposal, super credits would allow manufacturers to allow heavy-duty ZLEVs to count up to 2 times when calculating the zero- and low-emission factor of the manufacturer. The Parliament proposal to introduce a benchmark/malus system is counterproductive and unjustified. We need to make a business case out of the new technologies that are not yet commercially viable, and this needs an incentive rather than a malus system.

- **Stay technology and fuel neutral.** In this energy transition, we need all solutions to be able to compete with one another. Therefore, alternative fuels, synthetics fuels, e-fuels and other options should already be included now rather than only be an option in the 2022 review.

We hope that you are able to take these industry-wide perspectives into consideration, which are crucial to drive zero- and low-emission solutions to Europe's economy while attracting the investments needed to create sustainable and competitive supply chains. On these and other issues, we stand ready to work with you constructively.

Yours sincerely,



Markus J. Beyrer