

## Consultation to prepare legislation on the monitoring of HDV CO2 emissions and fuel consumption

The statistics provided in this document are meant to give an overview of the 118 replies\* received to the abovementioned consultation, which took place between 20 July and 28 October 2016.

A more extensive analysis of the replies received (including those submitted in the free text fields) will be provided in the future impact assessment.

\* It should be noted that 3 additional replies (two from a public authority and one from a professional organisation) were received outside the EU Survey and are not included in these statistics. However, these replies will also be taken into account for the further analysis.

### General information about respondents

#### In what capacity are you completing this questionnaire?

	Answers	Ratio
As an individual / private person	6	5%
Public authority	10	8%
Academic / Research institution	1	1%
International organisation	9	8%
Civil society organisation	20	17%
Professional organisation	31	26%
Private enterprise	21	18%
Other	20	17%
No Answer	0	0%

#### If private enterprise

##### If private enterprise

	Answers	Ratio
Yes - medium sized enterprise (i.e. having staff below 250, and/or turnover below €50m, and/or a balance sheet below €43m)	2	2%
Yes - small enterprise (i.e. having staff below 50, and/or turnover below €10m, and/or a balance sheet below €10m)	2	2%
Yes - micro enterprise (i.e. having staff below 10, and/or turnover below €2m, and/or a balance sheet below €2m)	1	1%
No	13	11%
I don't know	0	0%
No Answer	100	85%

#### If professional organisation

##### Where is your company located?

	Answers	Ratio
Austria	3	3%
Belgium	10	8%
Czech Republic	1	1%
Finland	1	1%
France	1	1%
Germany	1	1%
Hungary	3	3%
Ireland	1	1%
Netherlands	2	2%
Spain	2	2%
Sweden	2	2%
United Kingdom	2	2%
No Answer	89	75%




#### If civil society organisation

##### Please give your country of residence/establishment:

	Answers	Ratio
Austria	7	6%
Belgium	28	24%
Bulgaria	0	0%
Croatia	0	0%
Cyprus	0	0%
Czech Republic	1	1%
Denmark	1	1%
Estonia	0	0%

Finland		2	2%
France	■	9	8%
Germany	■	13	11%
Greece	■	0	0%
Hungary	■	6	5%
Ireland		4	3%
Italy		4	3%
Latvia	■	1	1%
Lithuania	■	0	0%
Luxembourg	■	0	0%
Malta	■	0	0%
Netherlands	■	7	6%
Poland		2	2%
Portugal		2	2%
Romania	■	1	1%
Slovakia	■	0	0%
Slovenia	■	1	1%
Spain		3	3%
Sweden	■	6	5%
United Kingdom	■	8	7%
Other		4	3%
No Answer	■	8	7%




**Please indicate your preference for the publication of your response on the Commission's website:**

	Answers	Ratio
		
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication	99	84%
		
Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication	16	14%
		
Not at all — please keep my contribution confidential (it will not be published, but will be used internally within the Commission)	3	3%
No Answer	0	0%

**Questions**




**Part A - Monitoring & reporting**

**Main problem to address** The May 2014 Strategy Communication on reducing Heavy Duty Vehicle (HDV) fuel consumption and CO2 emissions puts the emphasis on closing the knowledge gap regarding HDV CO2 emissions also with a view to contribute to reversing the emissions trend by encouraging the uptake of more energy efficient vehicles. In your view, how important is the following action?: Monitoring vehicle efficiency (both in terms of fuel consumption and CO2 emissions) in the EU in order to gather the necessary data to close the identified knowledge gap

	Answers	Ratio
	83	70%
	33	28%
	1	1%
Not important	0	0%
I don't know	0	0%
No Answer	1	1%

**The need for EU action** In the absence of EU-wide monitoring/reporting legislation, national authorities may adopt varied monitoring and reporting approaches or further measures to curb CO2 emissions. While the production of HDVs, as well as freight transport, are EU-wide markets, the lack of an EU-wide picture risks leading to market fragmentation.

**In your view, what would be likely to happen if no action is taken at EU level?:** Monitoring of HDV CO2 emissions would not take place

	Answers	Ratio
	67	57%
	20	17%
	30	25%
No Answer	1	1%







**In your view, what would be likely to happen if no action is taken at EU level?:** Member States would separately take the necessary measures to monitor and report HDV CO2 emissions

Answers Ratio







Likely		52	44%
Neutral		30	25%
Unlikely		33	28%
No Answer		3	3%

**Main policy objectives** On the basis of the certified data, information to end-users is expected to be available regarding new HDVs, facilitating the uptake of the most energy efficient HDVs. The increased push for fuel-efficient technology should also contribute to the competitiveness of the European HDV industry.







**In your view, how important are the following policy objectives?: OBJECTIVE 1: reducing fuel consumption and HDV CO2 emissions**

		Answers	Ratio
Very important		101	86%
Important		14	12%
Somewhat important		2	2%
Not important		0	0%
I don't know		0	0%
No Answer		1	1%







**In your view, how important are the following policy objectives?: OBJECTIVE 2: Improving market transparency in the HDV sector**

		Answers	Ratio
Very important		68	58%
Important		33	28%
Somewhat important		9	8%
Not important		1	1%
I don't know		6	5%
No Answer		1	1%

**In your view, how important are the following policy objectives?: OBJECTIVE 3: Improving road transport competitiveness**

		Answers	Ratio
Very important		25	21%
Important		59	50%
Somewhat important		14	12%
Not important		13	11%
I don't know		4	3%
No Answer		3	3%

**In your view, how important are the following policy objectives?: OBJECTIVE 4: Ensuring competitiveness of the European HDV manufacturing sector**

		Answers	Ratio
Very important		56	47%
Important		38	32%
Somewhat important		13	11%
Not important		3	3%
I don't know		6	5%
No Answer		2	2%

**Options to consider for the EU monitoring/reporting of HDV fuel consumption and CO2 emissions** Currently the following options are being considered for the introduction of EU monitoring of HDV certified fuel consumption and CO2 values: option 1, that mirrors the monitoring already carried out for light-duty vehicles' CO2 emissions, with manufacturers reporting to national authorities and national authorities reporting to the Commission (or an EU designated agency such as the EEA), with the Commission publishing annual average values per vehicle type/manufacturer; and option 2, entrusting HDV manufacturers in charge of the monitoring, with reporting to the Commission (or an EU designated agency such as the EEA) and with the Commission publishing annual average values; and option 3, which is an intermediate option between options 1 and 2, whereby designated national authorities would report to the Commission (or an EU designated agency such as the EEA) individual HDV vehicle identification numbers ("VINs") of new registered vehicles. Based on the latter, the Commission or EEA would extract relevant monitoring information from vehicle manufacturers' data files.

**Please rank these options in order of how appropriate they are in view of the above policy objectives from 1 to 4, where 1 is the most appropriate to you and 4 is the least appropriate:: Option 1**

		Answers	Ratio
1: the most appropriate		36	31%
2: the second most appropriate		20	17%
3: the third most appropriate		29	25%
4: the least appropriate		19	16%
No Answer		14	12%

Please rank these options in order of how appropriate they are in view of the above policy objectives from 1 to 4, where 1 is the most appropriate to you and 4 is the least appropriate:: Option 2

	Answers	Ratio
1: the most appropriate	15	13%
2: the second most appropriate	35	30%
3: the third most appropriate	25	21%
4: the least appropriate	28	24%
No Answer	15	13%

Please rank these options in order of how appropriate they are in view of the above policy objectives from 1 to 4, where 1 is the most appropriate to you and 4 is the least appropriate:: Option 3

	Answers	Ratio
1: the most appropriate	50	42%
2: the second most appropriate	28	24%
3: the third most appropriate	16	14%
4: the least appropriate	8	7%
No Answer	16	14%

**Likely economic and competitiveness impacts of the EU monitoring and reporting According to the Inception Impact Assessment, Economic impacts related to the EU monitoring and reporting of HDV CO2 emissions are not expected to be sizeable. However, as indicated in the impact assessment that underpinned the HDV Strategy "A more transparent HDV market would contribute to an improved level playing field among HDV manufacturers and transport operators." This should foster competition to produce more energy efficient vehicles and innovation in the EU market and reduce transport costs for the benefit of the whole economy. Economic impacts of the various options are not expected to differ.**

**Do you agree with the following statements?: The economic impacts are expected to be positive even though limited**

	Answers	Ratio
Fully agree	40	34%
Tend to agree	45	38%
No strong view	24	20%
Tend to disagree	4	3%
Fully disagree	3	3%
No Answer	2	2%

**Do you agree with the following statements?: Economic impacts of the various options are expected to be broadly similar**

	Answers	Ratio
Fully agree	4	3%
Tend to agree	46	39%
No strong view	41	35%
Tend to disagree	22	19%
Fully disagree	1	1%
No Answer	4	3%

**Do you agree with the following statements?: No sizeable competitiveness impacts are expected in the Internal market**

	Answers	Ratio
Fully agree	2	2%
Tend to agree	36	31%
No strong view	32	27%
Tend to disagree	40	34%
Fully disagree	4	3%
No Answer	4	3%

**Do you agree with the following statements?: A more transparent HDV market would contribute to an improved level playing field among HDV manufacturers and transport operators**

	Answers	Ratio
Fully agree	53	45%
Tend to agree	50	42%
No strong view	11	9%
Tend to disagree	1	1%
Fully disagree	0	0%
No Answer	3	3%

**Do you agree with the following statements?: Marginal impacts on competitiveness are expected: comparability between manufacturers' vehicles energy efficiency may foster innovation**

	Answers	Ratio
Fully agree	34	29%
Tend to agree	61	52%
No strong view	13	11%
Tend to disagree	4	3%
Fully disagree	3	3%
No Answer	3	3%

**Do you agree with the following statements?: Fuel savings on more energy efficient vehicles would further foster lower transport costs in the EU, leading to (marginal) increased competitiveness of the transport sector**

	Answers	Ratio
Fully agree	36	31%
Tend to agree	50	42%
No strong view	19	16%
Tend to disagree	7	6%
Fully disagree	2	2%
No Answer	4	3%

**Do you agree with the following statements?: Increased competitiveness of the transport sector would and, by way of lower prices of intermediate goods, translate into increased (marginal) competitiveness of many other segments of the EU economy**

	Answers	Ratio
Fully agree	18	15%
Tend to agree	43	36%
No strong view	35	30%
Tend to disagree	15	13%
Fully disagree	3	3%
No Answer	4	3%

**Do you agree with the following statements?: There is no expected material direct impact on third countries**

	Answers	Ratio
Fully agree	1	1%
Tend to agree	30	25%
No strong view	53	45%
Tend to disagree	27	23%
Fully disagree	4	3%
No Answer	3	3%

**Do you agree with the following statements?: If as assumed above improvements in innovation uptakes and the industry's competitiveness are possible, this will (marginally) benefit the EU HDV industry's international competitiveness**

	Answers	Ratio
Fully agree	29	25%
Tend to agree	62	53%
No strong view	23	19%
Tend to disagree	0	0%
Fully disagree	0	0%
No Answer	4	3%

**Do you agree with the following statements?: Pass-through of lower transport costs to many sectors of the EU economy would (marginally) benefit EU exports and international competitiveness**

	Answers	Ratio
Fully agree	18	15%
Tend to agree	44	37%
No strong view	41	35%
Tend to disagree	7	6%
Fully disagree	3	3%
No Answer	5	4%

**Likely impacts on SMEs** There is no expected impact on SMEs from the manufacturing sector as HDV manufacturers on which the monitoring burden is expected to fall, particularly in the second and third option, are all very large international companies. However, transport companies, most of which are small SMEs operating only a few trucks or buses, would benefit from the monitoring of emissions as this would provide more transparency on the most energy efficient HDVs. Transport SMEs could take this into consideration in their purchase decisions, thereby realising fuel savings and reducing their operating costs. Impacts on SMEs of the various options are not expected to differ.

**Do you agree with the following statements?: There is no expected impact on SMEs from the manufacturing sector since HDV manufacturers on which the monitoring burden shall fall, are all very large international companies**

		Answers	Ratio
Fully agree		20	17%
Tend to agree		34	29%
No strong view		18	15%
Tend to disagree		22	19%
Fully disagree		22	19%
No Answer		2	2%

**Do you agree with the following statements?: Transport companies, most of which are small SMEs, are expected to benefit from the monitoring of fuel consumption and CO2 emissions as this would provide more transparency on the most energy efficient HDVs. SMEs could take this into consideration in their purchase decisions, thereby realising fuel savings**

		Answers	Ratio
Fully agree		69	58%
Tend to agree		24	20%
No strong view		17	14%
Tend to disagree		5	4%
Fully disagree		1	1%
No Answer		2	2%

**Likely social impacts** According to the Inception Impact Assessment, there is not really any expected material social impact from either option. The only possible impact on employment could be the few jobs related to the monitoring and reporting function in national authorities (option 1), vehicle manufacturers (option 2), for both under option3, and under all options in the agency in charge of the EU monitoring (presumably the EEA) and the Commission. Social impacts of options would hence only slightly differ in this respect.

**Do you agree with the following statements?: No material social impact is expected from either option**

		Answers	Ratio
Fully agree		21	18%
Tend to agree		40	34%
No strong view		45	38%
Tend to disagree		7	6%
Fully disagree		3	3%
No Answer		2	2%

**Do you agree with the following statements?: Social impacts of options would only slightly differ**

		Answers	Ratio
Fully agree		21	18%
Tend to agree		42	36%
No strong view		49	42%
Tend to disagree		2	2%
Fully disagree		1	1%
No Answer		3	3%

**Administrative burden of monitoring HDV CO2 emissions** No simplification of administration and related costs can be expected as HDV CO2 emissions are not currently monitored or reported. An administrative burden is expected (on the top of the administrative burden attached to the certification of HDV CO2 emissions under type approval legislation) for: vehicle manufacturers under all three options, as they would have to format their IT systems along monitoring requirements and devote human resources to the monitoring and reporting function; for public authorities, namely national authorities (in most Member States, registration authorities) as well as the European Commission and possibly the European Environment Agency.

**Do you agree with the following statements ? : Manufacturers of heavy-duty vehicles should bear the essential administrative burden of monitoring HDV fuel consumption and CO2 emissions.**

		Answers	Ratio
Fully agree		14	12%
Tend to agree		10	8%
No strong view		28	24%
Tend to disagree		46	39%
Fully disagree		18	15%
No Answer		2	2%

**Do you agree with the following statements ? : Public authorities should bear the essential administrative burden of monitoring HDV fuel consumption and CO2 emissions.**

Answers Ratio

Fully agree		15	13%
Tend to agree		21	18%
No strong view		34	29%
Tend to disagree		42	36%
Fully disagree		4	3%
No Answer		2	2%

**Do you agree with the following statements?: Manufacturers of heavy-duty vehicles and public authorities should share the administrative burden of monitoring HDV fuel consumption and CO2 emissions.**

		Answers	Ratio
Fully agree		34	29%
Tend to agree		30	25%
No strong view		37	31%
Tend to disagree		12	10%
Fully disagree		3	3%
No Answer		2	2%

**Likely environmental impact on CO2 emissions** As indicated in the impact assessment that underpinned the 2014 HDV strategy, the effectiveness of certification, monitoring and reporting of HDV CO2 emissions in curbing HDV fuel consumption and CO2 emissions "is expected to be real even though limited: this action would establish a reliable track record of whole HDV emissions, independent from each manufacturer's measurement, providing reliability and transparency to the market as to real vehicle performances. This would be expected to increase awareness among fleet operators on the most cost effective vehicles to operate, and influence decision making in purchasing new HDVs. While a precise quantification of this action's effect over time (this would apply only to new vehicles and only progressively affect the whole HDV fleet) on HDV fuel consumption and emissions in the EU is not possible (there is no reliable methodology for such an assessment), its impact is however not expected to be considerable in curbing HDV CO2 emissions in view of the Transport White Paper's objectives. Emissions may only be reduced by a maximum of a few percentage points." Environmental impacts on CO2 emissions of the various options are not expected to differ.

**Do you agree with the following statements?: Real but limited effect on reducing HDV fuel consumption and CO2 emissions**

		Answers	Ratio
Fully agree		32	27%
Tend to agree		57	48%
No strong view		12	10%
Tend to disagree		12	10%
Fully disagree		4	3%
No Answer		1	1%

**Do you agree with the following statements?: Establishment of a reliable and transparent track record of whole HDV CO2 emissions, independent from each manufacturer's measurement**

		Answers	Ratio
Fully agree		34	29%
Tend to agree		59	50%
No strong view		13	11%
Tend to disagree		7	6%
Fully disagree		3	3%
No Answer		2	2%

**Do you agree with the following statements?: Increased awareness among fleet operators on the most effective vehicles to operate**

		Answers	Ratio
Fully agree		46	39%
Tend to agree		57	48%
No strong view		9	8%
Tend to disagree		3	3%
Fully disagree		2	2%
No Answer		1	1%

**Do you agree with the following statements?: Influence decision making in purchasing more effective HDVs**

		Answers	Ratio
Fully agree		46	39%
Tend to agree		57	48%
No strong view		10	8%
Tend to disagree		1	1%
Fully disagree		2	2%
No Answer		2	2%

**Do you agree with the following statements?: No differentiated environmental impacts of the various options on CO2 emissions**

		Answers	Ratio
Fully agree		11	9%
Tend to agree		35	30%
No strong view		52	44%
Tend to disagree		13	11%
Fully disagree		4	3%
No Answer		3	3%

**Do you agree with the following statements?: HDV CO2 monitoring should be focussed only on the main petrol and diesel fuels**

		Answers	Ratio
Fully agree		0	0%
Tend to agree		6	5%
No strong view		8	7%
Tend to disagree		48	41%
Fully disagree		55	47%
No Answer		1	1%

**Do you agree with the following statements?: The scope of the HDV CO2 monitoring should be broadened to incorporate alternative fuels such as biofuels, CNG or LPG**

		Answers	Ratio
Fully agree		64	54%
Tend to agree		33	28%
No strong view		9	8%
Tend to disagree		9	8%
Fully disagree		1	1%
No Answer		2	2%

**Do you agree with the following statements?: HDV CO2 monitoring should focus on tailpipe (tank-to-wheel) emissions**

		Answers	Ratio
Fully agree		32	27%
Tend to agree		27	23%
No strong view		16	14%
Tend to disagree		19	16%
Fully disagree		22	19%
No Answer		2	2%

**Do you agree with the following statements?: HDV CO2 monitoring should incorporate a comprehensive approach on well-to-wheel emissions, to better reflect the lower carbon content of some alternative fuels**

		Answers	Ratio
Fully agree		35	30%
Tend to agree		23	19%
No strong view		29	25%
Tend to disagree		11	9%
Fully disagree		18	15%
No Answer		2	2%

**Likely environmental impact on non-CO2 emissions (exhaust gases and particulate matter – PM) As regards other emissions (exhaust gases, particulate matter), the Inception Impact Assessment considered that if increased vehicle efficiency and hence reduced fuel consumption (even though limited) leads to reduced emissions from other exhaust gases, this impact may be favourable. One should however not anticipate any straightforward impact on pollutant emissions: as indicated in the above mentioned impact assessment attached to the 2014 HDV strategy: "only negligible environmental impacts (related to other exhaust gases and PM already regulated under Euro VI) can be expected. While the relationship between total non-CO2 pollutant emissions and energy consumption may not be linear since pollutant emissions per kWh may vary, it seems reasonable to assume that pollutant emissions will slightly decrease. Quantitative estimates cannot be provided at this stage." Options were not expected to have any differentiated environmental impacts.**

**Do you agree with the following statements?: Increased fuel efficiency of vehicles would lead to limited reduction of other non-CO2 emissions**

		Answers	Ratio
Fully agree		21	18%
Tend to agree		45	38%
No strong view		33	28%
Tend to disagree		10	8%
Fully disagree		8	7%
No Answer		1	1%



**Do you agree with the following statements?: No differentiated environmental impacts on non-CO2 emissions**

		Answers	Ratio
Fully agree		5	4%
Tend to agree		12	10%
No strong view		56	47%
Tend to disagree		38	32%
Fully disagree		5	4%
No Answer		2	2%

**Part B - CO2 emissions / fuel efficiency standards**

**Do you agree with the following statements?: In view of the importance of fuel costs for transport freight activities, market competition between manufacturers will provide sufficient incentives to curb emissions**

		Answers	Ratio
Fully agree		21	18%
Tend to agree		27	23%
No strong view		15	13%
Tend to disagree		24	20%
Fully disagree		30	25%
No Answer		1	1%

**Do you agree with the following statements?: Certification and monitoring/reporting will not be enough to sufficiently curb fuel consumption and CO2 emissions of this sector in light of the EU 2030/2050 objectives**

		Answers	Ratio
Fully agree		44	37%
Tend to agree		39	33%
No strong view		15	13%
Tend to disagree		17	14%
Fully disagree		2	2%
No Answer		1	1%

**Do you agree with the following statements?: The EU should set up standards setting limits on fuel consumption and/or CO2 emissions**

		Answers	Ratio
Fully agree		49	42%
Tend to agree		26	22%
No strong view		18	15%
Tend to disagree		6	5%
Fully disagree		16	14%
No Answer		3	3%

**Do you agree with the following statements?: The EU should adopt other measures than standards to reduce HDV fuel consumption and CO2 emissions**

		Answers	Ratio
Fully agree		46	39%
Tend to agree		37	31%
No strong view		13	11%
Tend to disagree		17	14%
Fully disagree		3	3%
No Answer		2	2%