

Impact Assessment on Heavy Duty Vehicles (HDV) CO₂ emission standards

Fields marked with * are mandatory.

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The July 2016 Commission's strategy for low-emission mobility recalls that mobility is an essential component of the shift to the low-carbon, circular economy needed for Europe to stay competitive and be able to cater to the mobility needs of people and goods. The strategy set the ambition for the transport sector to reduce greenhouse gas emissions at least by 60% compared to 1990 by mid-century and be firmly on the path towards zero. Action on vehicles' fuel/CO₂ emission performance is one of the key levers to tilt the transport sector in the right direction.

The 2030 climate and energy framework agreed by EU Heads of State and Government in October 2014 requires a 30% reduction in non-ETS sector GHG emissions by 2030 compared to 2005. Road transport represents 1/3 of the non-ETS GHG emissions and heavy-duty vehicles contribute to about 1/4 of road transport emissions and some 5% of total EU GHG emissions.

The May 2014 Strategy Communication on reducing HDV fuel consumption and CO₂ emissions ([COM/2014/0285](#)) emphasises the importance of closing the knowledge gap regarding the CO₂ emissions of lorries and buses with a view to improving market transparency.

The July 2016 Strategy for low-emission mobility furthermore announced that there is a need to curb CO₂ emissions from HDVs.

On 11 May 2017 the Technical Committee for Motor Vehicles has approved under type approval legislation a certification procedure for the determination of the CO₂ emissions and fuel consumption of new HDVs, using the results from [VECTO simulations](#), which has been developed by the European Commission since 2010. HDV manufacturers will have to run VECTO at the end of the production line and declare such information at the time of registration as of 2019.

On 31 May 2017, as part of the Europe on the Move set of initiatives, the Commission adopted a proposal for the monitoring and reporting of such HDV CO₂ emissions and fuel consumption. The data collected will be made publicly available by the European Environment Agency, starting in 2020 to cover data monitored in 2019.

This [inception impact assessment](#) will look into different options for setting the first EU measures to actively curb CO₂ emissions from HDVs, including CO₂ emission standards.

It should be noted that EU manufacturers account for some 40% of global production. Furthermore, other parts of the world, such as the United States, China, Japan and Canada, have already introduced HDV fuel economy standards, and some European manufacturers participate in these schemes.

For the purposes of the present consultation the term HDV should be understood as including (For the definition of vehicle categories see [Directive \(EC\) 2007/46](#), Annex II, part A):

- goods vehicles of categories N2 and N3 and
- passenger vehicles of categories M2 and M3 and
- all trailers of categories O3 and O4.

The Commission is carrying out this consultation in order to be properly informed by public opinion in preparation for possible future legislative action in the area of CO₂ emissions from HDVs, the results of which will be published in consolidated form.

Parts 1 to 5 of this consultation are intended to be completed by every respondent to the extent possible.

Part 6 is mainly intended for experts in the field but of course every respondent may complete it as he wishes.

If data, other information or studies are available which are relevant to the assessment, these can be submitted as part of a stakeholder's general comments or directly to the mail box.

1. General information about respondent

* 1.1. In what capacity are you completing this questionnaire?

Civil society organisation

1.4. If civil society organisation

* If civil society organisation, please indicate your main area of focus:

200 character(s) maximum

Environment & Climate Protection; Transport Policy

* 1.5. Please give your name if replying as an individual/private person, otherwise give the name of your organisation:

Text of 3 to 200 characters will be accepted

Naturschutzbund Deutschland e.V. (NABU)/ German Nature and Biodiversity Conservation Union

1.6. If your organisation is registered in the [Transparency Register](#), please give your Register ID number:

20 character(s) maximum

0285583802-96

If your organisation is not registered, you can [register now](#). Please note that contributions from respondents who choose not to register will be processed as a separate category 'non-registered organisations/business'.

* 1.7. Please give your country of residence/establishment:

1.8. If your organisation is involved in the implementation of the HDV legislation, please indicate its role (e.g. manufacturer, system supplier, technical service,...):

200 character(s) maximum

* 1.9. Please indicate your preference for the publication of your response on the Commission's website: (Please note that regardless of the option chosen, your contribution may be subject to a request for access to documents under [Regulation 1049/2001](#) on public access to European Parliament, Council and Commission documents. In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable [data protection rules](#).)

- ☒ 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
- ☐ 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

Questions

The questions below are based on the initial analysis carried out by the Commission and presented in its Inception Impact Assessment to which you may refer for further background on each specific question. Fuel consumption and CO₂ emissions of Heavy-Duty Vehicles' (HDVs) are treated together as they are strongly correlated and proportional: both would be certified and monitored together.

2. Main problem to address

The following 3 key problems have been identified in the context of the Inception Impact Assessment where more detailed information can be found. In your view, how important are the problems to be addressed?

	Very important	Important	Somewhat important	Not important	I don't know/ no views
Growing GHG emissions from the heavy-duty vehicle sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing competitiveness challenges for vehicle manufacturers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Transport operators and their clients miss out on possible fuel savings and reduced fuel bills	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Are there other key problems to be addressed?

200 character(s) maximum

3. The need for EU action

There is a single market for HDVs across the EU. If no EU action was taken to address the problem, Member States might adopt individual approaches to reduce HDV CO₂ emissions, in order to achieve the needed reductions for the non-ETS sector. In your view, what would be likely to happen without EU action?

	Likely	Neutral	Unlikely
Member States would individually implement legislation to reduce HDV CO ₂ emissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation introduced by individual Member States would lead to market fragmentation and higher costs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States would have difficulty to achieve the necessary reductions to meet EU climate goals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Are there other potential effects?

200 character(s) maximum

4. Main policy objectives

The following 3 key policy objectives have been identified in the context of the Inception Impact Assessment where more detailed information can be found.

1. Reduce the climate impact of HDVs in line with the requirements of EU climate policy and the 2030 climate and energy framework.
2. Contribute to the improvement of the competitiveness of HDV and component manufacturers (suppliers to HDV manufacturers)
3. Facilitate a reduction in the total cost of ownership for transport operators, most of which are SMEs.

In your view, how important are the following policy objectives?

	Very important	Important	Somewhat important	Not important	I don't know
Reduce the climate impact of HDVs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contribute to the improvement of the competitiveness of the European HDV and component manufacturers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate a reduction in the total cost of ownership for transport operators	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Are there other key objectives to be reached?

200 character(s) maximum

5. Form that action should take to reduce HDV CO₂ emissions

Please indicate, by order of importance, your preferred options to reduce new HDVs CO₂ emissions, and contribute to the 2030 Energy and Climate Targets (with 1st being your most preferred option and 7th the least preferred)?

	1 st	2 nd	3 rd	4 th	5 th	6 th	7 th	8 th
Legislation setting HDV CO ₂ emissions targets at EU level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation defining a CO ₂ labelling scheme at EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of vehicle or fuel taxes or other incentives by Member States to affect vehicle choice and use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A voluntary agreement with industry to reduce new vehicle CO ₂ emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Member State actions to influence vehicle choice and use in other ways such as labelling schemes based on VECTO, best practice dissemination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development of international standards for HDV fuel economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other option	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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6. Options to consider for regulating CO₂ emissions of HDV

If CO₂ emissions of HDVs will be regulated by defining binding targets, the following options are considered.

6.1. Options for the basic regulatory approach

- Option A: CO₂ emission standards would be defined for the engines only.
- Option B: CO₂ emission standards for the whole vehicles, to be based on VECTO simulations
- Option C: Separate CO₂ emission standards for engines and complete vehicles

Please indicate the order of your preference (numbers 1, 2, 3) for the different options:

	1 st	2 nd	3 rd	4 th
A	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
B	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
C	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other option	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other, please specify:

200 character(s) maximum

A zero emission vehicle mandate or benchmark by 2025 should be a complementary part of the regulation.

Comments on your choices on options for the basic regulatory approach:

300 character(s) maximum

EU should introduce ambitious 2025 full vehicle and engine standards as the regulatory burden for engine standards is limited and the potential high. A second option is to propose 2025 full vehicle standards in 2018. In 2020, 2030 targets, engine and trailer standards shall be proposed.

6.2. Options for the types of targets

- Option A: targets at the level of each individual vehicle; CO₂ emissions would be limited at the level of individual vehicles/engines (i.e. specification of limit values)
- Option B: average targets per vehicle group on the basis of the vehicles placed on the market by each manufacturer (similar approach as for cars and light commercial vehicles)

Please indicate the order of your preference (numbers 1, 2, 3) for the different options:

	1 st	2 nd	3 rd
A	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
B	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other option	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments on your choices on the options for the types of targets:

300 character(s) maximum

A target for each individual vehicle is too complex. Therefore an average target per vehicle group should be introduced. For each vehicle group we need a representative weighting of the results of the vehicle certification for different mission profiles and payloads.

6.3. Options for the timing of the targets

- Option A: fixed dates of application
- Option B: annual reduction targets

	1 st	2 nd	3 rd
A	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
B	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other option	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments (please indicate also your suggestions for the first application date of targets as well as the quantitative annual reductions (for option B)):

300 character(s) maximum

Fixed year of application is the most effective way to reduce truck emissions (e.g. 2020-2025). With annual reduction targets and banking & borrowing, OEMs could profit from less stringent targets/baseline and use credits from "over-compliance" e.g. after 2025 to weaken the overall CO₂ targets.

6.4. Options for the setting of the quantitative targets

- Option A: Targets (initial values and annual reductions, if applicable) are defined ex-ante by the legislation by relative technology improvements over some baseline (as for cars and vans)
- Option B: Targets for the year $y + n$ ($n \geq 1$) are defined by the performance of a certain percentile of best performing vehicles in the year y ("top runner" approach) with a minimum yearly target

	1 st	2 nd	3 rd
A	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
B	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other option	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments your choices on options for the setting of the quantitative targets:

300 character(s) maximum

A top-runner approach would lead to lower ambition levels as the difference between an average and premium vehicle (tractor trailer) is around 11%. This while the cost-effective 2025 potential for the tractor only already goes up to 20%.

6.5. Options for the scope of the legislation

VECTO and the underlying type approval legislation will provide certified CO₂ emission values for the four main groups of HDVs (Vehicle groups 4, 5, 9 and 10 as defined in Table 1 of Annex I of the [draft Commission Regulation](#) implementing Regulation (EU) No 595/2009 as regards the determination of the CO₂ emissions and fuel consumption of heavy-duty vehicles, which are responsible for about 65% of all HDV CO₂ emissions), which would also be addressed by the first step of regulatory binding targets. Currently VECTO provides the CO₂ emission values for these trucks only for the long haul and regional delivery mission profiles.

However, there are also a limited (between 2 – 10% (indicative figures to be confirmed in the IA)) number of vocational vehicles in these groups, which serve for special purposes, for instance construction sites or waste collection.

- Option A: the targets are applied to all vehicles within the 4 main vehicle groups, regardless of their use and on the basis of the long haul and regional delivery mission profiles
- Option B: Separate targets are applied to vocational vehicles within the 4 main vehicle groups, on the basis of VECTO urban, municipal and construction mission profiles
- Option C: certain vocational vehicles to be specified are excluded for this first regulatory step

Please indicate the order of your preference (numbers 1, 2, 3) for the different options:

	1 st	2 nd	3 rd	4 th
A	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

B	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other option	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments on your choices on options for the scope of the legislation:

300 character(s) maximum

Separate targets based on specific mission profiles should be introduced for these types. The EC should come forward with a reliable methodology to properly define vocational vehicles during the type approval process. Option C is not the right way forward as we need to avoid creating loopholes.

Can you suggest technical criteria for the definition of 'vocational' trucks?

200 character(s) maximum

Axle ratio or cabin type could possibly be good criteria. However, the share of exemptions should be as limited as possible.

6.6. Options for the metric for expressing the targets

The CO₂ emission targets will have to be formulated in terms of a certain "metric", meaning that the regulatory target corresponds to CO₂ mass emissions divided by some "transport utility parameter", e.g. mileage travelled (km), mileage travelled times weight (km x t) or volume (km x m³) transported.

- Option A: targets expressed in g CO₂/km,
- Option B: targets expressed in g CO₂/(km x t)
- Option C: targets expressed in g CO₂/(km x m³)
- Option D: targets expressed in a combination of several metrics listed in options A to C

	1 st	2 nd	3 rd	4 th	5 th
A	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
B	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
C	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
D	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other option	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments on your choices on options for the metric for expressing the targets:

300 character(s) maximum

In this Regulation it is the OEMs' primary responsibility to apply measures that are within their sphere of influence. The metric should focus on these aspects and therefore a g/km is the right metric. The EC shall also work with default payloads in the Regulation.

Would you suggest any other metric for expressing the targets?

200 character(s) maximum

6.7. Options regarding mission profiles

For mainstream HDVs used for the transport of goods, VECTO simulations provide four different CO₂ emission values: for a regional delivery and long haul driving pattern, each driven "empty" and a "typically full" payload. Targets may apply to each of these four emission profiles separately or as a weighted average.

	YES	NO	Neutral
Should all four mission profiles be applied to all HDVs?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the targets be defined for each mission profile separately?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Should the targets be compared with a weighted average of the mission profiles?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If no, according to what criteria should certain mission profiles not be applied and to what sorts of HDVs?

200 character(s) maximum

The mission profiles need to strike a right balance between a. driving patterns (e.g. long haul and regional) and b. the payload of different trucks.

If yes on the last question, how should the mission profiles be weighted?

200 character(s) maximum

The weighted averages of the payloads should be in line with the average real world operation of trucks in that vehicle group. EU data for example show that 20% of trucks run empty.

If you think that the weighing of the mission profiles should depend on some technical characteristics of the vehicles, please explain and suggest these characteristics:

200 character(s) maximum

Axle ratio: 4x2 (cat 5) are mainly long haul tractor trailers. Based on this one can design a specific mission profile (e.g. 90% long haul) and loading ratio (efficiency should not be overestimated).

6.8. Options regarding utility parameters

Any future legislation defining targets aims at achieving a certain level of CO₂ savings for the least overall costs while ensuring that the requested transport utility is still available. If the design of a vehicle (e.g. stronger engine or higher transport volume) has an impact on CO₂ emissions and the vehicle's utility, it may have to be factored into the applicable target (e.g. by choosing appropriate utility factors and formulas setting the targets as a function of thereof). In the case of cars and vans, mass is used as an utility parameter in the current legislation on CO₂ emission standards.

Should utility parameters be used for regulating CO₂ emissions from HDVs?

☐ YES ☒ NO ☐ Neutral

6.9. Options for elements supporting cost-effective implementation of the targets

Several options can be considered to support the cost-effective implementation of the targets, which may however also create additional administrative burden:

- Pooling: Several manufacturers may decide to combine their vehicle fleets for assessing the compliance with the regulatory targets (as in the case in the cars and vans CO₂ legislation.)
- Banking and borrowing: A manufacturer may compensate non-compliance with targets in a given calendar year by over-achievements in previous ("banking") or future ("borrowing") years according to well defined regulatory rules.
- Trading: a manufacturer over-achieving its targets may sell corresponding credits in order to facilitate compliance of other manufacturers.
- Transfer of credits between vehicle groups of a manufacturer. In the case of targets set at the level of each vehicle group, a manufacturer may transfer credits between the different groups of its vehicles.

What are your views on these options?

	YES	NO	Neutral
Pooling of manufacturers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Banking and borrowing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Trading between manufacturers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transfer of credits between vehicle groups of a manufacturer	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide your comments on these or possible other elements for supporting cost-effective implementation:

500 character(s) maximum

To meet the goal of this regulation no transferring between groups should be allowed. We need to avoid OEMs investing in categories where they can achieve fast reductions but don't necessarily have a high mileage and CO₂ reduction potential. Trading could be allowed but only between the same categories. Pooling is not the way forward as the number of OEMs dominating the trucking market today is already very small. Banking and borrowing have the risk of creating hot air.

7. Governance - HDV CO₂ certification and real driving emissions

Under the current process, CO₂ emissions of HDVs are certified on certain pre-defined mission profiles, the design of which is inspired by real driving data.

What are your views:

	YES	NO	Neutral
Will it be important to develop processes assessing the certified CO ₂ emissions against real driving emissions of HDVs?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
If such processes are being developed, should there be some ex-post feedback mechanism requiring compliance of the certified CO ₂ emissions with real driving emissions (within certain tolerances)?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Can you suggest such a process?

500 character(s) maximum

The following testing requirements shall be introduced:

- 1: Mandatory Conformity of Production (CoP) performed by the OEM of the full vehicle.
- 2: In-service conformity (ISC) test by TAA.
- 3: ISC third party testing: The test shall also be open to accredited third parties who can, on a voluntary basis, perform in-service conformity tests and also testing of the air drag value on a production vehicle. The legal basis for ISC testing shall be introduced in this HDV standards proposal.

8. Additional comments and Upload of Documents

If you wish to add further information, comments or suggestions – within the scope of this questionnaire – please feel free to do so here:

1000 character(s) maximum

Ambitious fuel efficiency standards for heavy duty vehicles play an important role in reducing emissions from this sector. ICCT research shows that 20% tractor efficiency improvements by 2025 is possible and costeffective.

Standards shall aim at achieving this maximum cost-effective potential by 2025.

Transport will need to be zero by 2050 if we want to meet our Paris climate targets. Of all options possible, the most efficient, by far, would be to fuel trucks with electricity. Therefore, beyond standards, the Commission should introduce a ZEV mandate or benchmark in its proposal.

A mandate shall entail a bonus and malus system where OEMs overachieving the target will be rewarded while manufacturers that not achieve the target need to do more on the CO₂ part. This would effectively increase the uptake and sales of ZEVs. There should also be a cap on the benefits of overachieving the target. The value of a ZEV credit should also be based on the mileage of vehicles.

In addition, you could also upload a document providing further information, comments or suggestions.

The maximum file size is 1 MB

Contact

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