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– Opinion of the European Economic and Social Committee

Delegations will find attached a copy of the above-mentioned opinion.

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OPINION

European Economic and Social Committee

CO₂ emission class of heavy-duty vehicles with trailers

Proposal for a Directive of the European Parliament and of the Council amending Directive 1999/62/EC, Council Directive 1999/37/EC and Directive (EU) 2019/520 as regards the CO₂ emission class of heavy-duty vehicles with trailers
[COM(2023) 189 final – 2023/0134(COD)]

TEN/815

Rapporteur: **Bruno CHOIX**

Referral	European Parliament, 08/05/2023 Council of the European Union, 11/05/2023
Legal basis	Articles 91 and 304 of the Treaty on the Functioning of the European Union
Section responsible	Section for Transport, Energy, Infrastructure and the Information Society
Adopted in section	06/09/2023
Adopted at plenary	20/09/2023
Plenary session No	581
Outcome of vote (for/against/abstentions)	210/2/3

1. Conclusions and recommendations

- 1.1 The EESC recommends adding an indicator to Regulation (EU) 2019/1242 that would be mandatory Europe-wide on the deployment of H₂ refuelling infrastructure with regard to the number of alternatively powered commercial vehicles registered on the European market and the fleet limits for each five-year period.
- 1.2 The EESC calls for an earlier date of entry into force to be set for both the changes in the calculation of tolls based on the energy efficiency of trailers and semi-trailers and the mandatory taking into account of the energy efficiency of trailers and semi-trailers in determining which charging class should apply to vehicle-trailer combinations once the CO₂-based differentiation of charges becomes applicable to motor vehicles. The date proposed by the European Commission (1 July 2030) should therefore be brought forward.
- 1.3 The EESC calls for an assessment and consideration of the possible consequences of imposing tolls or user charges on all heavy goods vehicles, in particular when it comes to small and medium-sized enterprises (SMEs). The EESC would therefore recommend that the Member States provide for targeted exemptions from the charges.
- 1.4 The EESC calls for an assessment and consideration of the possible consequences of imposing multiple layers of taxation targeting CO₂ in tolls and user charges resulting from the application of the new CO₂-performance-based charging in parallel with the possibility of applying an external carbon tax.
- 1.5 Digital technologies can increase the safety, efficiency and inclusiveness of transport. The EESC considers that there is a need to further clarify the scope of trailers and semi-trailers that will or could be classified under the new framework, taking into account not only the dates of application of VECTO – the new simulation tool developed by the European Commission to determine the updated CO₂ emissions of heavy-duty vehicles for new registrations – but also the possibility of classifying existing trailers and semi-trailers, including those equipped with devices that improve their energy efficiency.
- 1.6 The EESC emphasises the need to use all possible means to reduce CO₂ emissions. For example, one way of cutting carbon emissions from heavy-duty vehicles with trailers is to shift the freight they carry to Europe's rail networks, which is a less carbon-intensive mode of transport, and another is to introduce alternative power sources, differentiated according to the type of transport involved (from local distribution to long-distance transport). Electric power can be suitable for vehicles used for short journeys, and hydrogen, renewable natural gas (RNG) and liquefied natural gas (LNG) can power heavy-duty vehicles for longer journeys.

2. Background and Commission proposal

- 2.1 On 4 May 2023, the Commission presented a new proposal that incorporated trailers and semi-trailers into the new charging systems under Directive 2022/362/EC. However, it also states that it is only from 1 July 2030 that Member States will be required to take into account the impact of trailers and semi-trailers.
- 2.2 In 1999, Directive 1999/62/EC on the charging of heavy goods vehicles for the use of certain infrastructures was adopted, providing the EU with a framework to encourage Member States to use taxes and infrastructure charging systems in the most efficient and fair way possible in order to promote the "user pays" and "polluter pays" principles, as enshrined in the Treaties. That directive was amended in 2022 by Directive 2022/362/EC¹, which introduced for the first time a road charging system for heavy-duty vehicles based on the emissions-performance of the different vehicles. This new directive will be implemented in the majority of Member States between the end of 2023 and the end of March 2024. One expected effect is a substantial increase in road use charges for heavy goods vehicles as most of the current fleet will be classified in the least favourable charging class.
- 2.3 The mobility that transport systems provide across Europe plays an indispensable role and contributes to the free movement of Europeans, including for work. However, there is no escaping the fact that if we wish to maintain and improve the quality of transport infrastructure in order to make it cleaner, large-scale investment will be required.
- 2.4 Road transport figures for the European Union²: 5 million direct jobs (1.426 million temporary workers or 12.1% of the commercial services sector), almost 2% of EU GDP, 344 000 road passenger transport companies and more than 560 000 road haulage companies. In 2021, road freight transport rebounded. It increased by 6.5% in tkm to 1 921 billion tkm (+5% in tonnage to 13 688 million tonnes). Domestic journeys within the 27 Member States accounted for almost two thirds of this volume (61.3%), increasing by 6.3%.
- 2.5 Lorries, coaches and buses account for 6% of the EU's greenhouse gas emissions. It is important to step up efforts to reduce the environmental footprint of this economically important sector. In its 2019 European Green Deal, the Commission set the objective of making Europe climate-neutral by 2050. In 2020, the Commission presented a strategy comprising 82 initiatives to implement the Green Deal in transport.
- 2.6 The release of pollutants into the atmosphere – particularly PM_{2.5}, NO₂ and O₃ – from road transport has a serious impact on people's health and exacerbates the deterioration of ambient air quality in the EU. In 2018, prolonged exposure to those three pollutants caused 379 000, 54 000 and 19 400 premature deaths respectively in the EU, according to European Environment Agency estimates published in 2020.

¹ Amending Directives [1999/62/EC](#), [1999/37/EC](#) and [\(EU\) 2019/520](#) as regards the charging of vehicles for the use of certain infrastructures.

² <https://ec.europa.eu/eurostat/web/transport/data/database>

- 2.7 In order to raise real awareness when it comes to road transport and to reduce its environmental footprint, several strands of action need to be taken:
1. rejuvenate the vehicle fleet with diesel vehicles as close as possible to current standards;
 2. use compatible alternative fuels such as B100 and the synthetic fuels HVO and XTL;
 3. renew the fleet with clean vehicles: use alternative power technologies for heavy-duty vehicles that can replace fossil fuel-based internal combustion engines, such as battery electric vehicles (BEVs), hydrogen fuel cell vehicles (FCVs), hybrid electric vehicles (HEVs), plug-in hybrid electric vehicles (PHEVs), compressed natural gas (CNG) vehicles, vehicles running on biofuels, renewable natural gas (RNG) vehicles, vehicles running on liquefied natural gas (LNG, e-LNG);
 4. provide training to drivers in fuel-efficient driving techniques, such as smooth and regular acceleration, stopping engine idling, and optimising speed according to road conditions and the state of the roads;
 5. reduce road traffic by shifting freight transport to Europe's rail networks.

3. **General and specific comments**

- 3.1 The EESC recommends adding an indicator to Regulation (EU) 2019/1242 that would be mandatory Europe-wide on the deployment of H₂ refuelling infrastructure with regard to the number of alternatively powered commercial vehicles registered on the European market and the fleet limits for each five-year period. The objective of such an indicator would be to detect in good time possible discrepancies between the number of registrations of commercial vehicles and the availability of the infrastructure.
- 3.2 The focus here is heavy-duty vehicles in road transport, which are responsible for 25% of overall transport greenhouse gas emissions, although the other transport sectors must also contribute.
- 3.3 While it is clearly necessary for the road transport sector to contribute to the achievement of the EU's 2030 climate and energy targets, the fact that it takes a minimum amount of time to renew fleets must also be factored in. Regulation (EU) 2019/1242 of the European Parliament and of the Council sets targets for reducing CO₂ emissions from new heavy-duty vehicles for 2025 and 2030, of 15% and 30% respectively. Of course, the internal market must be fair, and thus rules are needed to iron out any competition gaps in the EU. In this respect, the Commission is seeking to introduce road tolls based on actual kilometres travelled in order better to reflect the "polluter pays" and "user pays" principles.
- 3.4 Four problems are tackled by applying these principles more broadly: the solution is to be found in fair and efficient road pricing, whereby the revenues generated are reinvested in the transport sector and its infrastructure, including the passenger and freight road transport sectors:
- road transport is responsible for 17% of the EU's CO₂ emissions and the level of use of low- and zero-emission vehicles is insufficient to meet the 2030 climate and energy goals;
 - the quality of EU roads is deteriorating because of falling infrastructure investment and delays in maintenance, with no account taken of the long-term economic impact;
 - some Member States have introduced temporary pricing (vignettes) that discriminates against occasional non-national operators;
 - the pollution and congestion generated by road vehicles entail significant costs for society.

- 3.5 The EESC calls for an earlier date of entry into force to be set for both the changes in the calculation of tolls based on the energy efficiency of trailers and semi-trailers and the mandatory taking into account of the energy efficiency of trailers and semi-trailers in determining which charging class should apply to vehicle-trailer combinations once the CO₂-based differentiation of charges becomes applicable to motor vehicles. The date proposed by the European Commission (1 July 2030) should therefore be brought forward. If this is not possible, postponing the application of the CO₂-based differentiation for motor vehicles should be considered until the application of the incentive provided for in this proposal becomes mandatory.
- 3.6 The EESC calls for an assessment and consideration of the possible consequences of imposing tolls or user charges on all heavy goods vehicles, in particular when it comes to small and medium-sized enterprises (SMEs). The impact will be twofold. It will be financial, given the increase in charges that will have a knock-on effect on prices, which will mean that key investments linked to the green and digital transitions will not go ahead. It will also have consequences in rural areas, which involve longer journeys for these businesses. Therefore, the EESC calls for the possibility for Member States to provide for targeted exemptions from the charges.
- 3.7 The EESC calls for an assessment and consideration of the possible consequences of imposing multiple layers of taxation targeting CO₂ in tolls and user charges resulting from the application of the new CO₂-performance-based charging in parallel with the possibility of applying an external carbon tax.
- 3.8 Digital technologies can increase the safety, efficiency and inclusiveness of transport, but there is a need to further clarify the scope of trailers and semi-trailers that will or could be classified under the new framework, taking into account not only the dates of application of VECTO³ – the new simulation tool developed by the European Commission to determine the updated CO₂ emissions of heavy-duty vehicles for new registrations – but also the possibility of classifying existing trailers and semi-trailers, including those equipped with devices that improve their energy efficiency. The different sub-groups of trailers should be distributed fairly according to their calculation capacity as determined in the VECTO calculation method. Moreover, trailers, like lorries and coaches, must gradually move towards a final CO₂ limit value for the fleet in five-year phases from 2030 onwards. This will give trailer manufacturers the opportunity to gradually introduce new technologies and to continue developing them after 2020.
- 3.9 However, it is also necessary to create a digital one-stop shop containing information on the emission classes of motor vehicles, trailers and semi-trailers, in order to reduce the burden of registering several combinations of vehicles with toll service providers. Information on the energy efficiency and emission class of a vehicle or combination of vehicles should be easily accessible to drivers, commercial road transport operators, vehicle owners and toll service providers. Registration with toll service providers should be carried out using the vehicle's registration number. The emission class of all vehicles should then be automatically determined and communicated to the driver and the transport operator.

³ [Analysis of VECTO data for Heavy-Duty Vehicles \(HDV\) CO₂ emission targets](#) (2018).

- 3.10 The EESC draws attention to the fact that a reduction in CO₂ emissions from heavy-duty vehicles with trailers can also be achieved through efforts to shift the freight they carry to less carbon-intensive modes of transport. Reducing road traffic and thus carbon emissions can go hand in hand with shifting freight to Europe's rail networks. This can have significant environmental benefits: rail transport is generally more energy efficient and emits less greenhouse gases than road transport.
- 3.11 The EESC highlights the need for a focus on introducing alternative power sources, taking into account heavy-duty vehicle trailers. The EESC also recommends a differentiated approach to introducing alternative power sources for heavy-duty vehicles with trailers, as electric power can be suitable for vehicles used for short journeys, and hydrogen, renewable natural gas (RNG) and liquefied natural gas (LNG) can power heavy-duty vehicles for longer journeys.
- 3.12 When switching to clean power sources, consideration should be given to whether the alternative power source in question is the best option for each of the individual types of heavy-duty vehicle in terms of the power source/technology/performance ratio. Each of these alternative power technologies presents advantages and challenges. Their large-scale uptake requires continuous investment in research, development and infrastructure to support the phasing out of fossil fuel-based internal combustion engines in heavy-duty vehicles.
- 3.13 The EESC recommends that transport companies with a large fleet plan the allocation of transport capacity using load-distribution and logistics software in order to optimise vehicle performance and minimise emissions. Planning optimised transport routes and load-distribution can minimise fuel consumption and environmental impact. Maximising the load capacity of vehicles involves assessing whether each vehicle can operate at its maximum load capacity, thus reducing the need for additional vehicles and, consequently, cutting emissions.

Brussels, 20 September 2023.

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The president of the European Economic and Social Committee