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NLA's position on new Euro 7 standard: Must be pragmatic and long lasting

On 10 November 2022, the European Commission published a proposal for a new Euro 7 pollutant emission standard for motor vehicles with the aim to further reduce air pollution from new vehicles sold in the EU.

The proposal introduces stricter emission standards, aims to reduce complexity of the current Euro standards, and improve control of real-world emissions.

The Nordic Logistics Association (NLA) representing more than 16.000 transport companies in Denmark, Norway, Sweden and Finland are committed to reduce air pollution but has several reservations on introducing a new Euro norm.

The Euro-standard legislation has served us well for many years and led to a tremendous reduction in air pollution. And while the step from Euro 6 to Euro 7 will not deliver the same historically significant improvements as with the previous Euro norms, there are still important environmental benefits to be gained with a new norm. Having said that it is important that a new Euro standard is not used to restrict access to city centers for specialised vehicles driving on older Euro standards. Such vehicles represent significant investment for truck owners and carry out essential tasks such as sewage operation or cranes used in the construction sector.

Importantly, a new norm provides an opportunity for transport operators to invest in vehicles running on combustion engines with the latest emission technologies, and thereby meet public demand to further reduce air pollution in the next decades. This is not least important since the current alternatives to the internal combustion engine are still expensive and not viable solutions for most types of commercial road goods transport. Battery electric trucks have a much lower payload and range with longer idle time for recharging compared to fuel. In addition, the recharging infrastructure is not in place while it is still an open question whether the electricity grid will have the needed capacity to sustain battery driven vehicle fleets in Europe. For all these reasons it is essential that hauliers can invest in vehicles running on combustion engines in the coming decades. This will enable goods transport to fulfill its role of delivering goods in Europe while living up to society's expectations to reduce air pollutants.

Finally, it is important that the cost of investment for vehicle owners is looked at compared to the environmental benefits. The entire road freight transport sector is concentrating strongly on adjusting to the green transition and new climate-neutral technologies. In this sensitive environment, our member companies need planning and investment security.



For this reason, the question arises as to how useful it is to introduce a new Euro standard, which will require high levels of investment, while the development of alternative propulsion technologies, such as battery electric and hydrogen cell trucks, including roll out of the necessary infrastructure, is still ongoing. We therefore need pragmatic solutions and certainty that an eventual new Euro 7 standard will be in line with the realities of the road freight transport sector. Below follows NLA's perspectives and recommendations on how to improve the Euro 7 proposal to ensure it helps reducing air pollutants in a pragmatic and practical way.

Sensors

As regards on-board diagnostics (OBD) and on-board monitoring (OBM) we are concerned that relying solely on sensors can be very costly for vehicle owners. Today the OBD system often incorrectly triggers malfunctions and force unnecessary repairs, which is costly for hauliers, as it negatively impacts the productivity of the truck. OBD fault codes should not be the base for determining vehicle inspection but rather be a guide to service personnel in a garage to analyse the need for maintenance services or repair/updates of a vehicle. The ownership of data must also be taken into account, not least truck owners' right to decide which data is shared, with whom and for what purposes. In addition, a close analysis of the lifetime requirements is needed to make sure they are aligned with the realities of professional roads goods transport.

Particles from tyres and brakes

For the first time, the Commission proposes to include regulation of particles from tyres and brakes in the Euro 7 Regulation. While it is important to reduce such particles in the environment, we do not believe the Euro 7 Regulation is the right place to regulate them. It is unclear how such rules shall be enforced in practice. And it will leave hauliers in uncertainty as to whether their vehicles live up to the demands when it comes to replacement of tyres and brake linings and pads. These open questions should not be dealt with by empowering the Commission via delegated acts, as suggested in the proposal. Instead, we believe that regulation of particles from tyres and brakes should be dealt with in a separate legislative regime with full democratic scrutiny and not under the Euro norm regulation.

Trailers

The Commission proposes to include the energy efficiency of trailers of O3 and O4 categories within the scope of the Euro 7 Regulation. With more than 20 million trailers in Europe with approximately 6,2 million trucks it is unrealistic to monitor the energy efficiency of trailers. Indeed, the proposal does not describe how this would work in practice, but instead suggests giving the Commission power to adopt implementing acts to establish the methods to determine the energy efficiency of O3 and O4 category trailers.

Implementing and delegated acts

The proposal suggests giving the Commission very extensive use of implementing and delegated acts to amend articles of the Euro Regulation at a later stage. This includes use of implementing acts laying out methodology on the energy efficiency of trailers and delegated acts for the regulation of particles from tyres and brakes as mentioned above. This approach risks disconnecting experts, stakeholders and the co-legislators from the legislative process,



threatening the legitimacy of the Euro 7 Regulation. We therefore encourage the European Parliament and EU Member States to ensure that they will be involved in future amendments to the regulation.

CO2 emissions

The Euro norm regulation do not regulate CO2 emissions. It is therefore important to ensure that a new emission class does not increase CO₂ emissions compared to Euro 6 vehicles. New pollutant limits of NOx particles can for example imply installation of equipment on vehicles that lead to an increase in fuel use and thus CO₂ emissions. This would have a negative impact on the climate targets. It is also important that new Euro 7 regulation is coordinated with the review of the CO₂ emissions standard regulation for heavy-duty vehicles, not least to recognise the importance of renewable fuels in order to achieve the climate targets.

Nordic Logistics Association (NLA): is the joint Brussels representation of the leading road haulage associations in the Nordics representing around 16.000 member companies with more than 85.000 heavy-duty vehicles in Denmark; Dansk Transport og Logistik (DTL), Norway; Norges Lastebileier-Forbund (NLF) and Sweden; Sveriges Åkeriföretag (SÅ) in close cooperation with its associated member Finnish Transport and Logistics (SKAL).