

Nordic Logistics Association Position Paper



Brussels 16 May

NLA position on to the Commission's proposal on CO₂ emission performance standards for new heavy-duty vehicles

NLA fully supports the green transition of the transport sector, which is a great and crucial challenge. We note that CO₂ standards should help to push for low carbon solutions and at the same time allow technology neutrality, to enable transport operators to choose between different low carbon-based fuel options and eventually zero-emission technologies, once these technologies are mature and market proven.

NLA is convinced that many renewable and sustainable alternatives are needed to cope with the immense challenge of climate change and the challenge to reach our common environmental goals. There is not one single solution that can replace petrol and diesel as used today. We need Biomethane, Ethanol, HVO and other sustainable alternative fuels that can help us to reduce emissions already today. This is particular true for heavy-duty vehicles and we recall to this end the advantages of higher weights and dimensions to allow the road transport sector to be more energy efficient with high-capacity vehicles. We do not know today, which will be the alternative fuels that will be used in the future, and the EU regulation should thus include some degree of flexibility and openness to using existing solutions.

The EC's focus on battery electric and hydrogen fuelled transport will only allow for reaching the targets of the Green Deal if the renewal rate of vehicles is strong enough to convert the whole European fleet (about 7 million HDVs on EU roads) and if enough green electricity and green hydrogen will be available. As the development and large-scale production of ZEV and charging infrastructure will take considerable time, low-carbon and carbon-neutral fuels should be encouraged as they provide immediate benefits and accelerate the decarbonisation of road transport. The "all or nothing" approach will make road transport captive to a polluting pattern for an extensive time and should be avoided.

NLA regrets that The EC is following a tank-to-wheel (TTW) approach aimed at reducing carbon emissions at the tailpipe. We believe that EU legislation should be built around research-based well-to-wheel or life-cycle analysis on climate emissions. The tailpipe approach, as proposed by the Commission fails to look at the overall global emissions and thus fails to give society the full picture needed in order to bring down emissions across all industry sectors. Moreover, the approach steers towards specific technologies rather than towards reduced climate impact and improved energy efficiency, and it is thus competition-distorting and far from technology neutral. This is not the approach needed to guide society towards reduced climate emissions and away from fossil fuels.

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It is thus vital to introduce a mechanism that take the positive effects of renewable fuels into consideration, in order to create a more accurate and technology neutral assessment of climate impact that can be incorporated into the CO2 emission performance standards and allow the road transport sector to reduce emissions with existing technologies today.

Finally, we welcome that the Commission has committed itself to propose, a Delegated Act specifying how E-Fuels-only vehicles would contribute to the CO2 emission reduction targets, in relation to the regulation of CO2 emission standards for cars and light duty vehicles. We encourage the Commission and the co-legislators to take a similar approach in the work with proposal on CO2 emission standards for heavy-duty vehicles and in this regard also recommend that the use of sustainable advanced biofuels as defined in Renewable Energy Directive Annex IX part A is incentivised in the CO2 legislation.



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 Sweden; Sveriges Åkeriföretag (SÅ), Denmark; Dansk Transport og Logistik (DTL), and Norway; Norges Lastebileier-Forbund (NLF) in close cooperation with its associated member Finnish Transport and Logistics (SKAL).