

EBB position paper on: CO₂ standards for heavy duty vehicles

Introduction

On 20 December 2021, the European Commission (EC) launched a public consultation ⁽¹⁾ with a “call for evidence for an impact assessment”, preparing for a new EU Regulation on CO₂ emission performance standards for new Heavy-Duty Vehicles (HDVs).

The future CO₂ standards for HVs most likely will be developed as an amendment to the existing EU Regulation 2019/1242 ⁽²⁾, the first version of the EU CO₂ standards for HDVs.

In this position paper, EBB would like to:

- Share its views and concerns with respect to the existing regulation ⁽³⁾; and
- Put forward initial policy proposals for the future proposal for CO₂ standards for HDVs.

Limitations of the tailpipe approach

Current EU CO₂ standards for vehicles only account for tailpipe emissions (Tank-To-Wheel). This restrictive approach distorts competition between powertrain technologies and misleadingly labels electromobility as emissions free. It fails to incentivise biofuels and biogas with a lower GHG footprint and renewable content by not recognising their biogenic energy content.

Regulation 2019/1242 requests EU Member States to publish CO₂ tailpipe emissions per vehicle manufacturer on a yearly basis. The tailpipe emissions are not subject to any correction factor for biogenic emissions, nor do they consider emissions from vehicle production, electricity production, battery production or fuel production.

¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13168-Reducing-carbon-emissions-review-of-emission-standards-for-heavy-duty-vehicles_en

² <https://eur-lex.europa.eu/eli/reg/2019/1242/oj>

³ In January 2022, the EBB has published its High-level position on FF55, explaining its views on the different proposals published by the EU Commission in July 2021 under the name “Fit-for-55”, including the proposal for CO₂ performance standards for cars and light-duty vehicles. The ideas presented in the current paper can be seen as an addition to this high-level EBB position, since the future proposals for CO₂ performance standards for heavy-duty vehicles can be seen as a complement to the FF55 package.



The discussion only makes sense for EBB if the CO₂ values move away from a tailpipe approach. To create an effective system of incentives for emission reduction, the CO₂ emissions should be based in the long term on an LCA methodology. In this sense, the introduction of ZLEV definition including renewable and sustainable fuels, a crediting system, or a carbon correction factor, could be a first step.

In the case of HDVs, these comments are even more important from the perspective of supporting the most economical powertrain technology, in a sector that is of vital importance for the European economy.

Why transition to a Well-to-Wheel and/or a Life Cycle Assessment (LCA)

In the sector of professional road transport, total cost of ownership is a decisive element. Diesel engines, and engines powered by natural gas, are amongst the most economical options in this sector. In other words, in addition to maritime and aviation transport, professional road transport by heavy-duty vehicles is an “*hard-to-decarbonise*” sector. By supporting liquid and gaseous fuels through a fair correction for the biogenic fraction, a Well-to-Wheel and/or a Life Cycle Assessment (LCA), these technologies would get a fair support and a fair chance.

The EBB proposals on an LCA-based approach would also help to reduce the CO₂ emissions of the existing fleet. Indeed, CO₂ standards based on a sound LCA approach, would create a clear path for further development of a market for sustainable biodiesel and other sustainable low-carbon fuels. Some of these fuels can be used also in higher blends in the existing fleet and help to speed up the decarbonisation of professional road transport.

EBB policy proposals:

To address the abovementioned concerns, In the upcoming revision of the EU CO₂ standards for HDVs, the EU should consider an approach that:

- i) Accounts for the nature of the energy powering vehicles (Well-to-Wheel);
- ii) Distinguishes between fossil and biogenic CO₂; and
- iii) Accounts for the production and end-of-life emissions of the vehicles.

In the meantime (e.g., by 2030), an incentive to account for the renewable component of the fuel could also be introduced.



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EUROPEAN BIODIESEL BOARD

The European Biodiesel Board (EBB) is a non-profit organisation established in January 1997. Today, the EBB gathers 48 members across 17 Member States, which represents 75% of the European output. Biodiesel is the main European solution to reduce emissions from transport and dependence on imported oil. EBB aims to promote the use of biodiesel in the European Union and is committed to fulfil International standards for sustainability in GHG emissions and sustainable feedstock. The EBB is constantly working towards the development of improved and greener technologies.



@ebb_biodiesel

Contact person:

Xavier Noyon | **Secretary General**
xavier.noyon@ebb-eu.org

