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European Commission proposal to include trailers and semi-trailers in the Eurovignette Directive

IRU position on the European Commission proposal to include trailers and semi-trailers in the CO₂ rate variation scheme of the Eurovignette Directive

I. IRU POSITION

IRU welcomes, in principle, the European Commission's proposal to include trailers and semi-trailers in the CO₂ rate variation scheme of the Eurovignette Directive on road user charging. This could lead to lower infrastructure charges when energy-efficient trailers and semi-trailers are used, acting as a positive incentive to further invest in such vehicles. However, the proposal requires amendments to prevent it from turning into a negative incentive: commercial road transport operators may be subject to substantially higher user charges and external costs and face additional administrative challenges.

IRU calls on legislators to improve the following issues:

- **Set an earlier start date for changes in the toll calculation based on energy-efficient trailers and semi-trailers:** The mandatory consideration of the energy efficiency of trailers and semi-trailers to determine the charging class of a vehicle combination must apply as soon as the CO₂ rate variation framework becomes applicable for motor vehicles. The date proposed by the European Commission (1 July 2030) should therefore be brought forward. If this cannot be done, a postponement of the application of the CO₂ rate variation for motor vehicles should be considered until the application of the incentive provided by this proposal becomes compulsory.
- **Further clarifying the scope** of the trailers and semi-trailers that will or could be classified according to the new framework, considering not only the application dates of VECTO – the new simulation tool developed by the European Commission to determine CO₂ emissions and fuel consumption from heavy-duty vehicles – and the updated CO₂ standards for heavy-duty vehicles for first registrations, but also the possibility to classify existing trailers and semi-trailers, including ones with retrofitted devices which improve their energy efficiency.
- **Establish a system of mutual recognition of emission/energy-efficiency class certificates by Member States:** The certification of the vehicle by the Member State of registration should be valid throughout the EU.
- **Establish a single digital window with information on motor vehicle, trailer and semi-trailer emission classes** to minimise the burden of registering multiple vehicle combinations with toll service providers. Information relating to the energy efficiency/emission class of a vehicle or combination should be easily accessible to drivers, commercial road transport operators, vehicle owners and toll service providers. Registration with toll service providers should be done using the vehicle's licence plate number. The emission class of the vehicle combination should then be automatically determined and shared with the driver and transport operator.

II. ANALYSIS

[Directive \(EU\) 2022/362](#) amending the Eurovignette Directive introduces a new framework to vary charging rates, based on the energy efficiency and CO₂ emissions of motor vehicles (Article 7ga). Member States operating road user charging will have to use this new rate variation framework from 25 March 2024 onwards¹.

On 4 May 2023, the European Commission tabled a [new proposal](#) (+[annex](#)) to include trailers and semi-trailers in the new rate variation framework². The objectives of this proposal are:

- to recognise the impact of trailers and semi-trailers on the operation of a motor vehicle, and
- to encourage the market uptake of energy-efficient trailers and semi-trailers by introducing an incentive mechanism that reduces user charges when a motor vehicle tows an energy-efficient trailer or semi-trailer.

2. A welcome incentive to reduce user charges

In principle, IRU welcomes the incentive proposed by the European Commission. It should be noted that the life cycle of a trailer or semi-trailer is longer than that of a motor vehicle. Therefore, owners of trailers and semi-trailers may wait longer to invest in new material, particularly when it concerns highly specialised and expensive vehicle units.

The new proposal foresees three energy-efficiency classes for trailers and semi-trailers: Class 3, the most favourable, is for trailers and semi-trailers equipped with a device actively supporting their propulsion [without an internal combustion engine (ICE)] or those with an ICE emitting less than 5 g CO₂/kWh. Classes 2 and 1 will have to be determined by delegated acts. This delays the deployment of the new incentive scheme.

In addition, road transport operators using motor vehicles do not always decide which trailer or semi-trailer to use as the trailer/semi-trailer can be owned by another party in the logistics chain. Road transport operators will pay the user charges but could depend on another party to invest in more energy-efficient vehicle units and could be forced to share the benefits of lower user charges with that party. This will not only further complicate contractual relationships between parties in the logistics chain, but also delay new investments in energy-efficient trailers and semi-trailers and the achievement of the proposal's objectives.

It should be noted that new or retrofitted energy-efficient trailers or semi-trailers equipped with aerodynamic devices are more vulnerable in combined or multimodal unaccompanied transport operations. The aerodynamic devices are more prone to damage during transshipment processes. Adequate measures should be considered to address these challenges to allow these energy-efficient vehicles to be also used in combined and multimodal transport.

3. Set an earlier start date for changes in the toll calculation based on energy-efficient trailers and semi-trailers

IRU is strongly concerned about the proposal not foreseeing a speedy deployment of the incentive scheme for two reasons:

- The classification framework for trailers and semi-trailers is not ready. It will be finalised in a delegated act.
- Member States will only be obliged to consider trailers and semi-trailers in determining the charging class of a vehicle combination starting 1 July 2030.

These elements will delay obligatory application by Member States. Meanwhile, Euro VI motor vehicles, which are now in the most favourable charging class, risk being

¹ Unless a Member State decides the opposite because it applies an external cost charge for CO₂ emissions.

² Complying with Preamble 31 of Directive (EU) 2022/362.

downgraded to the least favourable charging class once the CO₂ rate variation framework for motor vehicles is applied. Some Member States plan to already begin applying it by the end of 2023. Only those Euro VI vehicles first registered since 2019 will have an emission class³ certificate. Based on figures provided by Eurostat, Euro VI vehicles registered since 2019 represented only 13% of the total heavy-goods vehicle fleet in 2021, a very small proportion of the total fleet. There is no certainty that these vehicles would not end up in the least favourable charging class. It is not clear what will happen with motor vehicles without emission class certification; they could automatically end up in the least favourable charging class under the new CO₂ rate variation framework. Most heavy-duty motor vehicles will end up paying much higher user charges than today, unless the newly proposed incentive scheme is applied rapidly and implemented by Member States to moderate the increase. For example, a vehicle combination consisting of a motor vehicle belonging to charging classes 1, 2 or 3 (the least favourable charging classes for motor vehicles) and a trailer or semi-trailer belonging to class 3 (the most favourable energy-efficiency class) could be considered as belonging to charging class 4 (the charging class for “low-emission vehicles”, the second most favourable class).

IRU calls for:

- Mandatory consideration of the energy-efficiency class of trailers and semi-trailers by Member States as soon as the CO₂ rate variation framework becomes applicable for motor vehicles. The two frameworks must be applied in parallel from the beginning. This must be a positive incentive, rather than a negative one.
- Postponement of the application of the CO₂ rate variation for motor vehicles until the application of the incentive provided by this proposal can be applied in parallel with the framework for motor vehicles.

4. Further transparency needed for the classification of trailers and semi-trailers

The most commonly used trailers and semi-trailers (curtain-side and box) have been included in VECTO since August 2022. It is not clear whether the proposed classification will only apply to trailers and semi-trailers first registered since that date or after the entry into force and application date of the amended EU rules on CO₂ standards for heavy-duty vehicles? Or whether it will apply to existing vehicles, and if so, how? For example, would it be possible to retrofit an existing trailer or semi-trailer with energy-efficient technology and obtain an energy-efficiency/emission class certificate?

IRU calls for:

- Further clarifying the scope of the trailers and semi-trailers that will or could be classified according to the new framework, considering not only the application dates of VECTO and the updated CO₂ standards for heavy-duty vehicles for first registrations, but also the possibility to classify existing trailers and semi-trailers, including ones with retrofitted devices which improve their energy efficiency.

5. Mutual recognition of the classification of trailers and semi-trailers is essential

It is not yet fully clear how Member States will determine the emission class of motor vehicles and the energy-efficiency class of trailers and semi-trailers, given that the Directive (EU) 2022/362 offers Member States some flexibility for the classification of motor vehicles, such as for vehicles first registered prior to 2019. The proposed classification for semi-trailers and trailers raises the same questions as the details of the classification system, which will be finalised in a delegated act.

IRU is concerned that the flexibility granted to Member States can lead to a disjointed implementation and force road transport operators to get vehicle units certified in several Member States if they wish to benefit from the proposed incentive. A system of

³ Entry into force of [Regulation \(EU\) 2019/1242](#) on CO₂ standards for heavy-duty vehicles.

mutual recognition of emission certifications for vehicles for road user charging purposes is essential.

IRU calls for:

- Member States to establish a system of mutual recognition of emission or energy-efficiency class certification which is valid across the EU.

6. Additional administrative burden must be avoided

Considerable additional administration for commercial road transport operators can be expected. Motor vehicles frequently change trailers and semi-trailers. Following every change, the vehicle combination will have to be registered with relevant toll service providers prior to the start of each journey. Currently, only the motor vehicle must be registered.

The driver and road transport operator will become responsible for registering the vehicle combinations. In some cases, the owner of the trailer or semi-trailer will have to provide information on the emission class of the trailer or semi-trailer. The proposal does not indicate who is responsible for providing the correct evidence of the trailer or semi-trailer's class and where this information will be found. In general, the information is available with the competent vehicle registration authorities of Member States or the European Environmental Agency (EEA) ([database](#)). But the national competent authorities are only obliged to communicate this information to the EEA once per year. A single digital window providing easily accessible energy-efficiency or emission class information to drivers, road transport companies, vehicle owners and toll service providers can facilitate a solution. Information should be made available in a very simple and transparent way to road transport operators for registration purposes. Road transport operators should not pay higher tolls because the owner of a trailer or semi-trailer cannot provide the required emission-class information.

IRU calls for:

- The creation of a single digital window for information on the emission class of motor vehicles, trailers, and semi-trailers to minimise the burden of having to register multiple vehicle combinations with toll service providers. Information relating to the energy efficiency/emission class of a vehicle or combination should be easily accessible by drivers, commercial road transport operators, vehicle owners and toll service providers. Registration with toll service providers should be done using the vehicle's licence plate number. The emission class of the vehicle combination should then be automatically determined and shared with the driver and transport operator

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