



## **IRU OBSERVATIONS ON THE EUROPEAN COMMISSION COMMUNICATION ON LOW-EMISSION MOBILITY**

*Adopted by the IRU Goods Transport Liaison Committee (CLTM) on 5 October 2016 and the IRU Passenger Transport Council (CTP) on 3 November 2016*

### **I. BACKGROUND**

On 20 July 2016, the European Commission (EC) published its long-awaited communication on Low Emission Mobility ([COM\(2016\)501](#)). This Communication is accompanied by an extensive [Commission Staff Working Document](#) (SWD) in support of the measures proposed in the communication.

The aim of the communication is to facilitate the transition to low-emission mobility and provide certainty for investors. It calls for regulatory change supported by decisive action in three domains: efficiency of the transport system, low-emission alternative energy sources and low and zero-emission vehicles. As the Commission considers that road transport is responsible for 70% of all greenhouse gas emissions in transport, its communication concentrates on measures for this mode of transport and contains a number of on-going or planned measures and initiatives aimed at greening transport and mobility. In particular, they touch on the regulatory framework for low-emission mobility and on the need to create an enabling environment.

### **II. IRU POLICY**

IRU policy on the reduction of CO<sub>2</sub> emissions and the fuel consumption of Heavy Duty Vehicles (HDVs) is determined by the [IRU 30-by-30 Resolution](#), adopted in 2009, which voluntarily commits IRU and its Member Associations, on the basis of innovative technologies and practices such as driver training and optimised weights and dimensions, to reduce CO<sub>2</sub> emissions by 30% by 2030 – calculated as transport performance in t/km and p/km and related to the base year 2007. The Resolution specifies that road transport operators cannot achieve this alone and calls upon vehicle and tyre manufacturers and telematics and energy providers to undertake parallel measures, which should contribute to achieving this target. The Resolution also calls on competent authorities to undertake initiatives to further facilitate and promote road transport's efforts to achieve this target.

Related to the 30-by-30 Resolution, the [IRU Position on the methodology for the calculation and declaration of energy use and Green House Gas \(GHG\) emissions](#) was adopted in 2011. This IRU Position sets out IRU priorities for a harmonised EU calculation and declaration methodology for CO<sub>2</sub> emissions and fuel consumption of HDVs.

In October 2014, [IRU Observations](#) on an earlier European Commission Strategy for Reducing HDVs Fuel Consumption and CO<sub>2</sub> emissions was adopted.

### **III. IRU OBSERVATIONS**

IRU has the following observations on the European Commission's Communication "A European Strategy for Low-Emission Mobility":

#### **1. General**

IRU welcomes the publication of the new Commission Strategy on Low-Emission Mobility. It is an important complement to the earlier [Strategy on reducing HDVs fuel consumption and CO<sub>2</sub> emissions](#), published in 2014, and also refers much more to the higher priority which needs to be given to HDVs, especially trucks. Given IRU and its Members' commitment to voluntarily reducing CO<sub>2</sub> emissions, it is key to enter into partnerships with other stakeholders and with governments to see how this objective can be accomplished in an optimal manner. It should be noted that in general, commercial road transport operators have a vested interest in reducing costs, including fuel consumption, and in continuously seeking to optimise operational efficiency, with the aim of using those savings to further

develop their businesses. Operators are less encouraged if the results of these efforts evaporate in additional taxes, charges and duties, higher vehicle and technology prices and reduced business. Therefore, a link should be created between low-emission mobility and economic benefits to encourage transport operators to get more actively involved than they are currently. IRU is willing to cooperate with the Commission to achieve this.

## **2. On proposed measures**

### *– Fair and efficient pricing in road transport*

IRU questions whether fair and efficient pricing in road transport could contribute to lower-emission mobility without fundamental change in the legislative approach. Firstly, scientific research is now available which proves that road freight transport operators are already paying more than necessary to match their use of infrastructure and externalities. There is no need to pay more and make road freight transport more expensive. However, no transparency exists as to whether the other modes also sufficiently pay for infrastructure usage and externalities. IRU is therefore calling for a non-discriminatory approach between the different freight transport modes. Furthermore, considering the huge expected investments to facilitate the transition to low-emission mobility, it should be further explored how some of the revenues from road infrastructure charging and internalisation could be used to help finance commercial road transport's transition. It should however be understood that using such revenues to cross-subsidise other modes is unacceptable.

IRU is critical of the idea of including transport by bus and coach in such a framework. In 2011 in its White Paper on Transport, the Commission recognised the significant socioeconomic benefits and positive externalities of collective road passenger transport and set the objective of greater modal share for buses and coaches. As the Commission announces in this very strategy the further development of bus and coach services via the revision of Regulation (EC) No 1073/2009, IRU considers that planning to increase the fiscal pressure on bus and coach operators would be counterproductive with regard to these objectives, particularly as the fiscal treatment of bus and coach services in the EU is already less favourable than their less sustainable direct competitors (rail and air). Buses and coaches already fully cover their infrastructure costs on highways in fifteen EU Member States and suffer from less favourable treatment than other modes in terms of energy taxation, VAT and various subsidies.

### *– Promoting multimodality*

IRU supports multimodality providing that it is not forced in any way. Using the correct vehicle for a particular task is key; matching vehicle systems to the freight/passenger task is one approach with proven success. A mode-neutral, low-emission mobility policy approach should be pursued allowing every mode to innovate, reduce its environmental footprint and improve its efficiency. Transport modes are not by default or definition low-emission, rather it is the low-emission vehicles or propulsion systems that make them so. It should be ensured that all modes are sustainable in their operation in terms of economic performance, social acceptability and environmentally friendliness.

IRU is pleased that the EC is preparing action to allow for further development of bus and coach services, in accordance with the findings of the public-private European Citizens Mobility Forum that more collective mobility, including by bus, coach and taxi, is the fastest and cheapest way for society to reduce the carbon footprint of passenger transport.

### *– Alternative fuels and zero-emission vehicles*

IRU supports the "Clean Power for Transport" Directive, but regrets that Member States have watered down the deployment targets of the initial Commission proposal. Meanwhile, there are still a number of challenges in terms of the operational efficiency and the economic viability of alternative fuels and the scope of use of fuels like fossil-free fuel, hydrogen and electricity, including from renewable energy sources, which should be addressed in order to further facilitate widespread deployment of alternative fuel vehicles in commercial road freight and passenger transport. Identified challenges relating to the use of certain fuels in commercial vehicles, such as natural gas which performs well from a vehicle emission perspective, should not be considered as barriers. Solutions to these challenges should be actively explored. IRU welcomes the Commission's commitment to give more priority to HDVs in this respect. Member States should also give more priority to commercial vehicles in their national policy frameworks for the deployment of alternative fuels, vehicles and their infrastructure. IRU calls on Member States to take into account the different duty cycles of commercial vehicles and to avoid needlessly penalising commercial vehicles used for duty cycles for which no economically viable alternative fuels exist yet.

– *Fuel efficiency standards for trucks, buses and coaches*

IRU notes that the possible introduction of fuel efficiency or CO<sub>2</sub> performance standards for HDVs will be very complex and should be based on real driving cycles taking into account the fuel used in relation to the work done. Regretfully, the new Commission Strategy does not specify to which extent such standards would have to cover new as well as existing vehicles. For IRU, performance standards cannot be introduced before an EU methodology for the measuring, calculation and reporting of CO<sub>2</sub> and fuel consumption from HDVs, together with the certification of its output, has been developed and implemented. This is the case not only for new vehicles but also for existing ones, as operators should be able to continue to monitor CO<sub>2</sub> performance when on the road. Liability for not meeting the standards should also be defined. Considering the complex measurement process, a component-based standard with specific limits for each component is undesirable. It would make the whole process even more complex and would be difficult to implement. A standard for the whole vehicle combination is preferable as it provides manufacturers with the possibility to develop the most efficient fuel saving measures.

– *Research, innovation and competitiveness*

IRU supports the link between energy technologies, transport and industry and the intention to tackle disruptive low-emission options. Such activities should not only concentrate on smaller vehicles, but should also duly cover HDVs. In addition, opportunities should be created to further research and actively test potential low-emission options for HDVs that are currently considered by many as less feasible. In particular, further development of electrification of commercial vehicles should be encouraged more actively. In addition, vehicles equipped with the latest advanced technologies such as sensors and actuators, to enable automated control of the vehicles measuring the longitudinal and lateral position of the preceding vehicle, which include radars, fixed lidars, and cameras (Advanced Driver Assistance Systems or ADAS) can contribute to less congestion and improve traffic fluidity which in turn reduces fuel consumption and CO<sub>2</sub> emissions.

– *Skills*

IRU supports the further encouragement of eco-driving as it can contribute considerably to reducing fuel consumption and CO<sub>2</sub> emissions. The FP7 funded “EcoEffect” project, which aimed at encouraging eco-driving and involved 2600 professional drivers, demonstrated that driver training alone could contribute to fuel savings of up to 20% and could provide long-term economic benefits to companies of 5-7%. During the EcoEffect project, which lasted close to 3 years, some 3.5 million euros worth of fuel was saved. Based on these results, IRU would strongly support initiatives aimed at further encouraging eco-driving.

– *Investment*

IRU welcomes the further opening up of EU investment tools to support the transition to low-emission mobility. It should also be ensured that newly emerging low-emission solutions in transport can be deployed in a sustainable way on a medium and long-term basis. IRU also stresses the importance of providing real business incentives for road transport operators to facilitate the market uptake of the latest and cleanest innovative transport technologies, best practices and training.

### **3. On measures missing from the European Commission Communication**

– *Integrated emission standards*

IRU notes that the Commission does not envisage replacing the legislation aimed at reducing toxic emissions, the so-called Euro norms, by legislation aimed at reducing fuel consumption. Whereas the Euro norms have substantially contributed to reducing the toxic emissions from HDVs by more than 95% since 1990, the further potential reductions with the latest rules are limited and the technology used to meet the latest standards often increases fuel consumption and CO<sub>2</sub> emissions. Therefore, IRU calls for an integrated approach to toxic emissions, CO<sub>2</sub> emissions and fuel consumption reduction.

– *Weights and dimensions*

IRU supports the 2015 adopted measures which would improve vehicle fuel efficiency, including through better aerodynamics (a redesigned cabin and the use of rear flaps) as they could lead to reductions in fuel consumption of 10% on average. However, it is essential that these measures remain voluntary and enter into force as soon as possible in order to give the opportunity to operators to buy these vehicles. Weight allowances for vehicles using low carbon technologies are also welcomed, but could be further extended in scope to cover not only rigid commercial vehicles but also

vehicle combinations. Furthermore, the use of the European Modular System (EMS) could contribute to reducing fuel consumption and CO<sub>2</sub> emissions as the load of three standard combinations can be carried by two EMS combinations. This has been proven during the trials and use of the EMS in different EU countries. The EMS can also carry more goods to and from multimodal transport terminals, reduce the number of road freight vehicles needed to service them and thereby increase the efficiency of multimodal transport.

– *Improving overall traffic fluidity*

In its 3 “i” strategy to achieve sustainable development, IRU underlines the importance of good infrastructure in order to ensure free flowing traffic, because without free flowing traffic, the encouragement of innovation and the creation of incentives to accelerate the market uptake of innovation and best practices in commercial road transport may not achieve optimal results. It should be noted that congestion as such is a penalty for the commercial road transport sector in terms of loss of resources, time and of additional costs. Heavy commercial vehicles do not represent a majority of road users. Congestion on the road network cannot be remedied by only tackling some of its users. Therefore, IRU calls on the Commission and Member States to take further measures to upgrade road infrastructure maintenance, to put in place new missing road infrastructure links and better traffic management systems in order to improve traffic fluidity on the European road network. So-called “smart roads”, which is an intelligent transportation system technology infrastructure, can generate traffic congestion relief and will drastically reduce distances between vehicles as the system measures the minimum possible distance or time between vehicles in a transit system without reducing speed. HDV platooning fits perfectly into this strategy.

– *Encouraging industry-led initiatives*

IRU also notes that many voluntary industry initiatives to reduce fuel consumption and CO<sub>2</sub> emissions, including in the field of carbon footprinting, have already been launched in several countries and have shown clear results. Heavy goods vehicle platooning, which was tested for the first time in real traffic conditions while the Netherlands held the EU Presidency during the first half of 2016, also has considerable potential to improve the general traffic flow and road network capacity as well as further improve the environmental performance of road freight transport. The Commission and national competent authorities should recognise such initiatives, further encourage them and take them into consideration more when developing new measures. IRU, together with its Member Associations concerned, are actively working to achieve such recognition.

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