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IRU Position on the EU Mobility Package – Technical analysis and recommendations relating to the monitoring and reporting of CO₂ emissions from Heavy Duty Vehicles

Additional technical analysis and IRU recommendations to European legislators on the Commission proposal for a Regulation on the monitoring and reporting of CO₂ emissions from Heavy Duty Vehicles

I. BACKGROUND

Increased transparency of VECTO data is welcomed by IRU as a means to close the knowledge gap for transport operators.

The monitoring and reporting of CO₂ emissions from new commercial Heavy Duty Vehicles (HDVs) will benefit transport operators by providing them with more information for their purchasing decisions and by increasing market transparency. It could also lead to a boost in innovation in fuel efficient technologies. IRU therefore fully supports this [proposed Regulation](#).

It is also a crucial step in the establishing of CO₂ emissions reductions and fuel consumption standards for HDVs. It will be essential that there is an effective Regulation ensuring the monitoring of VECTO output data and the reporting to the Commission. It is important that so long as it is not commercially sensitive this data is made publically available and freely accessible via a digital platform.

It will also be important to ensure a strong link with the verification of the VECTO results. Therefore, IRU supports the need for independent data verification to validate the results and thereby provide certainty for operators.

II. EUROPEAN COMMISSION PROPOSAL FOR A REGULATION ON THE MONITORING AND REPORTING OF CO₂ EMISSIONS FROM HDVS

1. Measurement should reflect the productivity of the vehicle

Regarding the measurement of CO₂ emissions, IRU welcomes that the draft Regulation takes into account grammes of fuel by tonne per km (g/t-km), passenger per km (g/p-km) and volume per km (g/m³-km) as this provides valuable information on the productivity of the vehicle. However, pallet area per km (g/m²-km) should also be considered to gain a comprehensive picture. This is particularly important as the current calculation does not fully reflect the emissions reductions that are possible through the use of Higher Capacity Vehicles.

From a broader perspective, it is also of essential importance that all modes measure their CO₂ emissions and that these measurements are comparable. Ideally, there

should be an integrated approach that shows transparent values of complete logistics operations and the services they provide.

2. Data should be reliable and credible

IRU supports that the EC intends to pursue this policy option as it ensures that the burden and responsibility is shared between manufacturers and public authorities and is not placed on transport operators. It is not only important that the monitoring and reporting is of minimal administrative burden but also that it is cost-effective.

It should also be ensured that sufficient guarantees are built into the system to ascertain the reliability of the data that is being communicated. Therefore, IRU considers that all data inputs, including the axle, transmission and engine efficiency data should be made available to the EC and to independent verifiers. It is essential that VECTO output is verified as reliable and credible in order for operators to have confidence in the VECTO certificates.

The purpose of data accessibility is ultimately to inform operators and thereby to drive the uptake of more fuel efficient vehicles. It should not be misused by public authorities to create restrictions that are unrealistic. Data accessibility can only play a role as an incentive for fleet renewal if it is supported by robust business cases making a direct link between cleaner fleets and economic benefits.

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