

The ETB's response on the draft Regulation (EU) 2019/1242 with regards to strengthening CO2 standards for new trailers.

Introduction

The European Transport Board (ETB) represents decision makers from major European transportation and logistics companies controlling over 300,000 trucks and semi-trailers. Our focus areas are reducing environmental impact, congestion, and improving efficiency, safety, and competitiveness of road freight transport.

The European Commission recently proposed the first-ever legislative CO2 emissions reduction targets specifically for trailers under Regulation 2019/1242. This would mandate newly manufactured semi-trailers and trailers become 15% and 7.5% less carbon intensive respectively by 2030 relative to 2020. While supporting efforts to facilitate low-carbon freight transportation, these proposed targets far exceed what industry analysis indicates is technically achievable with current and near-future solutions.

The ETB recognizes the critical importance of reducing CO2 emissions from the transportation sector to address climate change. We support well-designed, ambitious yet achievable policies to facilitate the transition to low-carbon freight transportation across Europe. However, regarding the specific CO2 reduction targets for trailers proposed in the EU Regulation 2019/1242, we have several concerns that must be addressed in the upcoming inter-institutional negotiations:

Concerns with proposed targets:

1. Trailers themselves do not emit CO2, so they **cannot be regulated in the same manner as vehicles with combustion engines**. Any reduction targets for trailers should recognize this distinction.

2. According to manufacturer analyses¹ using the VECTO simulation tool, the **maximum technically feasible CO2 reduction potential is approximately 7.5% for some semi-trailers** and 5% for drawbar and center-axle trailers through 2030. This 7.5% target is already highly ambitious for most trailer types. Therefore, the proposed targets of 15% and 7.5% respectively across all trailer segments are not realistically achievable.
3. Regarding possible technical changes to trailers to reduce CO2 emissions, it must be considered **that transport modes like railways and ferries involved in intermodal transport are inflexible regarding adaptations to trailers**. However, policymakers strongly support multimodal transport.
4. Failure to meet unrealistic reduction targets would result in **over €3 billion annually² in non-compliance penalties** under the proposed regulation. This creates an existential threat for trailer manufacturers across Europe.
5. **Targets will substantially increase trailer costs** with impacts across the freight sector. To reach the 7.5% target, manufacturers indicate it would double the price of a standard trailer³. This increase in trailer acquisition costs would effectively increase the overall cost of road transport by an estimated 5-7%, with consequences for end consumers.
6. Achieving weight reduction to meet targets will shorten product lifecycles, **requiring more units over time to move the same freight volumes**. This will counteract emissions reductions when factoring cradle-to-grave emissions.

Recommendations:

In light of these concerns, the ETB makes the following recommendations regarding CO2 reduction targets for trailers:

¹ <https://www.eurotransport.de/artikel/schmitz-cargobull-schlaegt-alarm-wirbel-um-trailer-regulierung-11232281.html>

² Estimate from the RAI Vereniging considering all European manufacturers.

³ According to calculations made by several European manufacturers.

1. Adopt **technically feasible fleet-wide targets** for semi-trailers and other trailers through 2030.
2. Conduct further **study no later than 2025** to assess the potential for additional reductions through new technologies beyond 2030 before setting longer-term targets.
3. **Focus policy efforts on reducing emissions from tractor units** over trailers. More rapid adoption of zero-emission trucks will drive trailer-level reductions. VECTO for Vehicles already covers the potential emission reduction, this makes VECTO for Trailers less relevant and impactful.
4. Provide **incentives for the development and adoption of efficiency technologies** tailored to diverse use cases rather than taking a one-size-fits-all regulatory approach.
5. **Enable cross-border operation of Eco Combi** dual-trailer combinations to **incentivize adoption** of these proven alternatives that increase efficiency while posing little risk of adverse impacts. This will only be made possible if the maximum permitted weight of heavy-duty vehicles is increased. Please see our full position on the amendment of the Weights and Dimensions Directive [here](#).
6. Faster **permission of alternative propulsion systems and energy recuperation axles** for trailers across Europe. These technologies improve energy efficiency, lowering fuel consumption and associated emissions.
7. **Accept and stimulate usage of biofuels** like BioLNG and HVO100 in combination with Euro 7 engines to enable CO2 reductions for heavy and long-distance road transport, alongside electric vehicles for shorter distances.

Conclusion

The ETB and its members across the freight transportation ecosystem stand ready to constructively engage with policymakers to develop balanced, realistic policies that effectively address the climate impacts of commercial transport. We believe the recommendations outlined above represent the best path forward for trailer CO2 regulation.