

TO:**Commission:** Carsten Bermig, Silvia Bartolini, Joanna Szychowska, Alex Paquot**European Parliament:** Albert Dess, Miriam Dalli, Nils Thorvalds, Keith Taylor, Leonora Evi, Jørn Dorhman**Council Presidency:** Katarína Butkowska, Milan Zvara**COPY TO:**

Maciej Szymanski, Dimitrios Savvidis, Tiziana Frongia, Adela Tesarova, Eddy Liégeois, Peter Handley, Polona Gregorin, TCMV members, environment attachés

RE: finalising the truck CO₂ test procedure (VECTO) and making it work for the transport industry

Transport & Environment, the IRU, Leaseurope, Eaton, Clecat, the Nordic Logistics Association and the Alliance for European Logistics are strongly concerned about the slowing down of the process to introduce the VECTO tool, which is designed to measure, calculate, report and monitor CO₂ emissions and fuel consumption from new heavy goods vehicles.

The Commission started developing the VECTO test procedure for heavy duty vehicles already in 2010. From the beginning, we have welcomed and supported the development of VECTO because we see it as an opportunity to bring more transparency, choice and competition to the market of new heavy goods vehicles. If well designed, VECTO could allow road freight transport operators to make better-informed investment choices for new vehicles. VECTO is also a prerequisite to achieve the goals outlined in the Commission's Low Emission Mobility Strategy, published in July 2016.

The deadline for the adoption of VECTO as the EU type approval test procedure for truck CO₂ emissions and fuel consumption was scheduled for autumn 2016. However, it has become clear this deadline will again be missed. The apparent reason for this renewed delay is the lack of progress in a parallel legislative dossier - *Commission proposal (2014)0028 on the reduction of pollutant emissions from road vehicles* – which will give the Commission the power to introduce VECTO in the type approval framework. Negotiations on this proposal have been stuck in trilogue discussions for months.¹

We strongly urge the co-legislators to renew their efforts to find an agreement on this in the coming weeks, to pave the way for the final adoption and implementation of the VECTO test procedure.

We also use this opportunity to reiterate our [July 2015 recommendations](#) for the development and finalisation of the VECTO test procedure:

First, VECTO needs to produce credible output results and should be future proof. This requires the simulation approach to be complemented by a real world test. Initial trials of such an on-road procedure by the Commission's Joint Research Centre (JRC) are promising and show good repeatability and low tolerances. Unfortunately, the Commission has referred the decision on the inclusion of such an on-road verification test to a later stage. **We want to see a clear commitment in the upcoming VECTO regulation that the on-road verification test will be introduced no later than 2017.** This would also ensure coherence with the Commission's plans for light duty vehicles (LDV) where the Commission

¹ proposal for amending Regulations (EC) No 715/2007 and (EC) No 595/2009 as regards the reduction of pollutant emissions from road vehicles (COM(2014)0028 – C7-0027/2014 – 2014/0012(COD))

has asked experts to advise on how to develop a “real-world test for LDV CO₂”, to ensure that the gap between laboratory and real world performance will remain within reasonable limits in the future.

Secondly, **the current VECTO procedure is a black box and needs to be opened up.** To actively use the VECTO software one needs access to the inputs (aerodynamic performance, rolling resistance of tires, exact weight, and engine efficiency). In its current form, only truck manufacturers and type approval authorities will have access to the input parameters. We are strongly concerned about this lack of transparency for three reasons:

1. The secrecy of the input parameters makes third party checks – e.g. by research institutes, fleets, transport companies, NGOs - of the simulated CO₂ and fuel economy figures impossible. The recent experience with car testing has demonstrated that third party checks - and decision-making on that basis - are vital to retain the credibility of the system.
2. The lack of transparency of the VECTO test procedure makes it prone to optimisation and even abuse – especially once taxes and regulations will be based on VECTO. This will undermine trust in the fuel consumption and CO₂ information provided by VECTO.
3. In its current form, the VECTO test procedure delivers little more than an average type approval CO₂ value. Such a value may well be representative for the average EU fleet, but may not necessarily be relevant for most individual fleets. To enable independent, tailor made VECTO calculations and decisions, fleets and third parties must be given access to VECTO and **all** its inputs.

We call on the Commission to *monitor all* of the relevant input parameters and *report* at least trucks’ aerodynamic and rolling resistance performance – as these are clearly not confidential and highly relevant. For the other inputs - e.g. engine efficiency maps – we urge the Commission to demonstrate convincingly why these cannot be made publicly available. Provided their commercial sensitivity is convincingly demonstrated, the Commission should explore how and under which conditions information could be made *available* to selected third parties whilst respecting the commercial sensitivity of particular datasets.

We would appreciate your views and remain at your disposal to discuss these issues in more detail.

On behalf of,

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