

Memorandum on Heavy Duty Vehicle CO₂

The upcoming Commission proposal on the heavy duty vehicle CO₂ type approval procedure (VECTO) has the potential to help transforming the European commercial road transport industry. It is not only an opportunity to bring more transparency and competition to the industry but also to road freight operations. This would benefit the transport industry's competitiveness, image as well as the EU economy and the environment.

Since 2010-2011, the Commission has worked on the development of a type approval procedure to measure CO₂ emissions from new vehicles. This work has resulted in the VECTO simulation tool, which the Commission plans to include in the EU type approval framework. The CO₂ values are referring to a vehicle combination and its specific mission such as long haul, regional delivery, urban delivery, municipality, construction and bus/coaches. A proposal was announced for 2016 and stakeholders have been invited to participate in the DG Growth editing board to help drafting a proposal reflecting the Commission's priorities.

Since the easy availability of information on fuel economy and CO₂ emissions would strengthen market forces to favour the most efficient vehicles, we consider that the Commission proposal should focus on two objectives.

The first objective is to deliver a type approval procedure that is demonstrably transparent, accurate, credible, future proof as well as cost-effective. Reliable information, trust and market buy-in are essential if VECTO is to have a positive impact on business choices. Robust, in-compliance verification of the simulated values would help ensuring the simulated values reflect real world conditions as closely as possible since this would almost entirely remove incentives to exploit testing flexibilities.

As part of the VECTO proposal, the Commission should provide all commercial road transport operators with cost-effective tools, i.e. certified fuel economy meters on board new trucks, to help them better monitor their fuel consumption and CO₂ emissions. VECTO can produce a range of output values regarding the efficiency and CO₂ of road freight vehicles. Balancing the energy used versus the work done offers one very useful method of presenting the efficiency of road transport vehicles.

The second objective is to deliver a type approval procedure that "*removes market barriers by increasing market transparency and vehicle comparability thus stimulating competition among manufacturers and end-user awareness*" as the Commission set out to do in its May 2014 truck CO₂ strategy.

We are convinced that the introduction of VECTO should also enable small road transport companies (85% of the fleet) to *independently* consult and compare different vehicle combinations, CO₂, fuel consumption and energy use, where possible online. Currently road transport operators almost exclusively rely on their own experience, information obtained from their local dealer or from specialised magazines. Online information is scarce. **With VECTO, comparing different vehicles, vehicle combinations and individual fuel saving technologies or components should become much simpler.** This will not only increase choice and competition, but also lead to new business opportunities.

The current VECTO tool is only a standardised software programme for type approval procedure Original Equipment Manufacturer (OEM). Other potential users, including the transport operators or suppliers, would require access to the input parameters (e.g. aerodynamic performance, rolling resistance, engine map) in order to benefit from it. A key objective of the editing board must therefore be to explore how to best overcome or circumvent this barrier, for example by making the input values, completely or partially, accessible to third parties. It should be thoroughly assessed whether certain input

parameters are confidential and if this is the case, how confidential data should be handled in a way that still enables third parties to effectively use VECTO.

In conclusion, the Commission has an opportunity to make commercial road transport more transparent, competitive and sustainable. In this respect, it is essential to try to optimise the benefits VECTO would have to offer, not only to vehicle manufacturers, and certification agencies, but also to third parties, in particular the transport operators. This opportunity must not be missed and we urge the Commission to clearly specify the targets and objectives of the editing board and ensure the final proposal is in line with the targets and objectives outlined in this memorandum.

