

DAIMLER  
TRUCK



V O L V O



Gothenburg, Munich, Södertälje, Stuttgart

6 Oct.2023

*Dear Chancellor Scholz,*

*dear Minister Habeck,*

*dear Minister Lemke,*

*dear Minister Wissing,*

Introducing a Carbon Correction Factor (CCF) in the Regulation on CO2 Standards for heavy-duty vehicles risks undermining the objective of the Regulation and creating an unpredictable regulatory environment for automotive manufacturers and customers.

It is important that EU legislation supports decarbonization in all parts of the automotive value chain, spanning fuels, renewable electricity, infrastructure and the vehicles themselves. However, the CO2 Standards Regulation only regulates automotive manufacturers, whose compliance is enforced through financial sanctions. It is therefore crucial that the Regulation only regulates what automotive manufacturers can address, namely the vehicles.

Adding a CCF to the Regulation creates uncertainty over the manufacturers' CO2 results, making predictions and planning complex and effectively making the manufacturers financially liable for the availability of low-carbon fuels. Uncertainty over the effect of the CCF on the future roll-out of zero-emission vehicles could also increase the perceived risk of investing in the needed charging and refuelling infrastructure, and thereby delay the transition to zero-emission road transport. Electrification is the future for heavy-duty road transport.

The undersigned parties therefore urge policymakers to refrain from introducing a CCF or other fuels mechanism in the CO2 Standards for heavy-duty vehicles and instead focus on the vehicles themselves.

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