

## **Enhancing the Eurovignette Directive to Accelerate Decarbonisation of Commercial Road Transport**

We, the European Express Association (EEA), the European association of freight forwarders and logistics service providers (CLECAT) and PostEurop, welcome the European Commission's planned extension of the zero-emission road charge exemption under the Eurovignette Directive. However, further support is required under the second targeted amendment of the Eurovignette framework for low-emission technologies.

As committed supporters of the EU Green Deal objectives our members invest significantly in decarbonising their supply chains and operations – including zero-emission vehicles, sustainable fuels, intermodal transport, and route optimisation. Many of the companies we represent are also frontrunners in digital innovation, securing Europe's essential supply chains – from critical technologies to life-saving pharmaceuticals.

### **Welcomed support for the extension of the zero-emissions exemption until 2031**

We support the recent efforts from both the European Parliament and the Council to fast track and endorse the extension of possibility to exempt zero-emission vehicles from road tolls and charges until 30<sup>th</sup> June 2031. High vehicle costs, limited charging infrastructure, insufficient grid infrastructure, and supply chain constraints have unfortunately limited the use of zero-emission vehicles, and as a result limited the access to the exemption of road tolls. The extension of the exemption therefore opens up the possibility for operators to benefit from reduced operational costs as enabling infrastructure constraints are addressed; this will ultimately support efforts to reach a competitive Total Cost of Ownership (TCO) when investing in zero-emission solutions and further enable commercialisation of green solutions. Although efforts in this regard are welcomed, further support is needed to support transitional fuels under the second targeted amendment of the Eurovignette Directive.

### **Need to adjust Emissions Class 4 to reflect CO<sub>2</sub> savings of transitional fuels**

Whilst work continues to address shortcomings associated with zero-emission HDV deployment, more support is needed to incentivise the use of low-emission solutions to help reduce emissions immediately, bridging the gap between the use of traditional combustion engines, and widespread deployment of zero-emission technologies. So-called 'bridging technologies' such as range extenders, biofuels (e.g. HVO100), biogases (e.g. bio-CNG, bio-LNG) have the potential to reduce carbon emissions by up to 90% and as such have an extremely important role to play in reducing emissions in the next 5-10 years; significantly contributing to the EU's decarbonisation goals.

These transitional fuels can be rolled out almost immediately and are effectively already being used by the companies we represent to decrease their environmental footprint, but their CO<sub>2</sub> saving potential is not reflected in the legislative framework, and further regulatory support is needed to promote their use and reap their environment benefits.

In this respect, the Eurovignette remains one of the EU's most effective tools in which to support decarbonisation in the road sector, where support for bridging technologies within the framework is limited. Under article 7ga (3(c)) it is foreseen that under emission class 4 (low-emission HDVs), Member States have the possibility to reduce road charges by up to 50%. In a number of cases, the

50% threshold is either not implemented at national level or is not enough to provide a positive business case for certain bridging technologies, and is ultimately not representative of the environmental benefit that they provide. When considering the emission reduction potential of such solutions, this must be addressed.

**We therefore advocate for further support for low emission fuels within the Eurovignette Directive.** Specifically, we call for a proportional, science-based approach to Emissions Class 4 within the Directive, instead of the current flat-rate reduction that disregards the type or effectiveness of the alternative fuels used. For example, a 70% reduction in CO<sub>2</sub> emissions would represent a 70% reduction in the emissions component of road charges. This approach incentivises the most effective low-carbon technologies and sends a clear price signal to operators to select fuels based on their actual environmental performance. Existing certification procedures such as the European Commission's VECTO tool could be used to ensure reductions are based on verified, scientific data, and therefore ensuring only technologies that truly reduce emissions benefit from reduced road charges. The proportional system would expediate decarbonisation within the road transport sector and therefore better align the Directive's environmental objectives and support the EU Green Deal and Fit-for-55 goals.

We remain committed to the decarbonisation of the road transport sector. Further support, however, is needed for low emission fuel in tandem to efforts taken to address hurdles experienced with the transition to zero-emission technologies. Work must continue to support both low and zero emission technologies simultaneously to ensure that decarbonisation can truly take place in the short term while reaching zero-emission deployment in the long term.

Sincerely yours,

