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Consultation on the revision of Regulation (EU) 2019/1242 setting CO2 emission performance standards for new heavy-duty vehicles

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Consultation on the revision of Regulation (EU) 2019/1242 setting CO2 emission performance standards for new heavy-duty vehicles

Consultation to collect the views of stakeholders and citizens on the revision of Regulation (EU) 2019/1242 setting CO2 emission performance standards for new heavy-duty vehicles

The term 'heavy-duty vehicles' (HDV) includes lorries, tractors, buses and coaches.

Introduction

As one of the key elements of the European Green Deal, the European Climate Law enshrines the EU's commitment to reaching climate neutrality by 2050 and the intermediate target of reducing net greenhouse gas (GHG) emissions by at least 55% by 2030 compared with 1990. The Sustainable and Smart Mobility Strategy calls for a shift to zero-emission mobility. These goals can be reached only by introducing more ambitious policies to reduce GHG emissions from transport by 90% by 2050.

To this end, in July 2021, the Commission proposed a package of legislative proposals based on a combination of pricing, rules and targets. This new initiative complements the package by addressing HDV emissions.

Regulation (EU) 2019/1242 (hereinafter 'the HDV Regulation') sets CO2 emission standards for new heavy lorries above 16 t (excluding special purpose and vocational vehicles). It requires manufacturers to reduce the average CO2 emissions of their fleet by 15% as from 2025 and by 30% as from 2030, compared with the baseline emissions of 2019. It also includes a review clause: by the end of 2022, the Commission is required to review the effectiveness of the Regulation and, where appropriate, submit a proposal to amend it.

The CO2 emission standards for HDV build upon the CO2 Certification Regulation (EU) 2017/2400 and the Monitoring and Reporting Regulation (EU) 2018/956.

This initiative is also linked with other EU policies, including the Eurovignette Directive, the Clean Vehicles Directive, the proposed regulation on deployment of alternative fuels infrastructure, the Renewable Energy

and Energy Efficiency Directives, the EU Emission Trading System, air pollutant standards for new HDV and the proposed new emission trading system for road transport and buildings.

Objective of the consultation

The Commission seeks views and opinions and invites feedback on the proposed initiative. The results of the consultation will be analysed, will feed into the preparation of the initiative and its accompanying **impact assessment** and will be made public as a synopsis report.

Guidance on the questionnaire

You will find some introductory questions related to your profile, followed by a questionnaire. **You are not obliged to respond to all questions in the questionnaire.**

At the end of the questionnaire, you are invited to provide any additional comments and to upload a file giving your position or views or those of your organisation. **The results of the questionnaire, as well as the uploaded position papers and policy briefs, will be published online.**

Please read the specific privacy statement attached to this consultation, which provides information on how personal data and contributions will be managed.

In the interest of transparency, if you are replying on behalf of an organisation, please register it, if you have not already done so, in the Transparency Register, a voluntary database for organisations seeking to influence EU decision-making. If you do not wish to register, your contribution will be treated and published together with those received from individuals.

Using the questionnaire

- The questionnaire is available in all official EU languages.
- Contributions may be submitted in any official EU language, though English is encouraged.

Disclaimer

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- ○ Environmental organisation
- ○ Non-EU citizen
- ○ Non-governmental organisation (NGO)
- ○ Public authority
- ○ Trade union

- ( ) Other

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* Surname

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* Organisation name

255 character(s) maximum

European Biogas Association

* Organisation size

- (•) Micro (1 to 9 employees)
- ( ) Small (10 to 49 employees)
- ( ) Medium (50 to 249 employees)
- ( ) Large (250 or more)

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* Country of origin

Please add your country of origin, or that of your organisation.

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- Antarctica
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- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
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- Serbia
- Seychelles
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- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
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The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

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Note that regardless of the option selected, your answers may be subject to a request for public access to documents under Regulation (EC) No 1049/2001.

Questions

A free text section is available at the end of some of the questions to enable you to provide additional comments.

1. Objectives

Transport is the only sector whose GHG emissions are higher than in 1990 and where emissions are growing. To contribute to the overall climate neutrality objective for 2050, transport sector GHG emissions need to be reduced by 90% by 2050. In the transport sector, the HDV sub-sector also shows increasing emissions.

The HDV sub-sector represents about a quarter of road transport emissions. The HDV Regulation sets binding targets, applicable from 2025 and 2030 respectively, for some HDV categories. However, as indicated in the projections in the Reference Scenario 2020, CO2 emissions from the HDV sector will decrease by only around 7% and 12% in 2030 and 2050 respectively, compared with 2015. In particular, a higher uptake of than currently projected of zero-emission vehicles (ZEV) will be needed to achieve the EU climate goals. Note that a zero-emission heavy-duty vehicle is a vehicle without an internal combustion engine, or with an internal combustion engine that emits less than 1g CO2/km. Pure battery electric and hydrogen-powered vehicles are ZEV.

The HDV Regulation does not currently provide sufficiently clear long-term signals to channel the necessary investment to increase the market uptake of ZEV over time. In addition, CO2 emissions of several HDV categories are currently unregulated by the HDV Regulation.

In your view, how important (on a scale from 1-5, with 5 representing the highest importance and 1 no importance) are the following objectives for the future HDV CO2 Regulation?

Objectives	1	2	3	4	5
Reducing CO2 emissions from new HDV in a cost-effective way, in line with the 2030 overall climate target of at least -55%	○	○	○	○	◉
Reducing CO2 emissions from new HDV in a cost-effective way in line with the climate neutrality objective by 2050	○	○	○	○	◉
Fostering innovation in zero-emission technologies for HDV	◉	○	○	○	○
Promoting the market uptake of ZEV by making them more affordable	◉	○	○	○	○
Strengthening technical and industrial leadership and stimulating employment in the EU value chain of HDV	◉	○	○	○	○
Reducing fuel consumption costs of vehicles	○	◉	○	○	○
Reducing total costs of ownership of vehicles	○	◉	○	○	○
Contributing to the reduction of air pollution and other environmental problems	◉	○	○	○	○
Reducing EU energy consumption and import dependence on fossil fuels	○	○	○	◉	○

2. Future CO2 emissions targets for new HDV

The HDV Regulation currently sets CO2 emission standards for new heavy lorries and tractors with a technically permissible maximum laden mass exceeding 16 tonnes. It sets CO2 emission targets from 2025 and 2030 onwards.

The Commission will revise the CO2 emission standards for new HDVs to ensure an appropriate contribution to the overall climate targets. This section contains questions related to the future CO2 emission target levels for HDV.

1) Revising existing targets

In your view, how important are the following actions related to the future CO2 emission target levels for vehicle groups already regulated? (scale from 1 to 5 where 5 is highest importance and 1 no importance)

	1	2	3	4	5

Strengthening the CO2 emission targets for new HDV for the period before 2030 set under the current legislation	◉	○	○	○	○
Strengthening the 2030 CO2 emission targets for new HDV set under the current legislation	◉	○	○	○	○
Introducing new strengthened CO2 emission targets for new HDV for 2035	○	◉	○	○	○
Introducing new strengthened CO2 emission targets for new HDV for 2040	○	◉	○	○	○

2) Setting new targets for other types of vehicles

In your view, how important is it to set new CO2 emission targets for the following vehicle groups and categories? (Note: proposed grouping reflects the categories under type approval legislation) (Scale from 1 to 5 where 5 is highest importance and 1 no importance)

	1	2	3	4	5
Small lorries up to 5t	◉	○	○	○	○
Small lorries (between 5t and 7.5t)	○	◉	○	○	○
Medium lorries (between 7.5t and 16t)	○	○	○	◉	○
Heavy trailers	○	○	○	◉	○
Coaches	○	○	○	◉	○
Urban buses	○	○	○	◉	○
Vocational and special purposes vehicles e.g. refuse and construction trucks.	◉	○	○	○	○

3) Setting target for all new vehicles to be zero-emission

In your view, in order to contribute to the climate neutrality by 2050 objective, should the CO2 emission standards become so strict that all new HDV be zero-emission vehicles? If so, by when?

	2030	2035	2040	After 2040	The CO2 standards should not oblige all new HDV be zero-emission by a certain date
Urban buses	○	○	○	○	◉
Coaches	○	○	○	○	◉
Urban/regional delivery lorries	○	○	○	○	◉
Long-haul lorries	○	○	○	○	◉

4) Do you have any additional comments on the levels of the future targets? If so, please include them below.

1000 character(s) maximum

Any trajectory to reduce targets should not be based on a tailpipe approach, but on a well-to-wheel approach. A purely tailpipe approach would ignore the decarbonisation potential of some already viable and rapidly adaptable solutions, such as bio-NGV, which can even achieve negative CO2 emissions in transport. The use of biogas improves energy self-sufficiency and strengthens the production of domestic renewable fuels. This potential needs to be recognised in legislation, especially for sectors that are technically and logistically difficult to electrify, such as heavy transport, which requires powerful engines capable of covering long distances while carrying a large payload. Different solutions will be needed to cover the different needs of the market: while electric trucks can be relevant in some applications up to 500 km, provided that the electricity used is also decarbonised, other alternatives will be needed to cover long distance transport needs.

3. Incentivising zero- and low-emission HDV

To contribute meaningfully to the climate objectives, the revised CO2 standards have to provide a strong incentive for the deployment of ZEV.

The current HDV Regulation contains a mechanism to incentivise the deployment of ZEV and LEV (low-emission vehicles): ZLEV. Through a one-way bonus-only mechanism, a manufacturer can gain credits if its share of ZLEV exceeds certain benchmarks. Until 2024, ZEV are counted as two vehicles while LEV are counted only as up to two vehicles and to be calculated as a function of its specific CO2 emissions and the low-emission threshold of the vehicle sub-group to which the vehicle belongs. From 2025, this will be determined on the basis of a 2% benchmark (to be reviewed as from 2030). Also, smaller trucks not yet regulated can contribute to these incentives.

Note that low-emission heavy-duty vehicles (LEV) are heavy-duty vehicles with specific CO2 emissions of less than half of the reference CO2 emissions of all vehicles in the given vehicle sub-group. 'Reference CO2 emissions' means the average of the specific CO2 emissions in the reference period, i.e. the reporting period of 2019.

1) In your view, what are the main barriers for market uptake of ZLEV? (Multiple answers possible)

- [x] Price
- [x] Total cost of ownership
- [ ] Price-quality ratio of key components like batteries
- [ ] Availability of recharging/refuelling infrastructure
- [x] Limited range
- [x] Duration of charging
- [ ] Availability of vehicle models
- [x] Reduced load capacity

☑ Other

If 'Other', please specify:

100 character(s) maximum

HDV are technically/logistically hard to electrify (considering using decabonised electricity)

2) Should the existing ZLEV incentive scheme set out in the HDV Regulation be amended for the period before 2030?

◉ Yes

○ No

If yes, how?

1000 character(s) maximum

Yes by defining zero emission on a WtW strategy. In this way the focus is on CO2 instead of on Nox and PM. It can be demonstrated whether or not a trucks runs on 100% biogas.

3) For the period as of 2030, please indicate to what extent you agree with the following statements on the ZLEV incentive scheme for HDV (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement). Not all statements need to be rated.

	1	2	3	4	5
In addition to the CO2 targets, a mechanism incentivising ZEV, and possibly ZLEV, should be maintained	○	○	◉	○	○

Vehicles eligible for the incentive system

	1	2	3	4	5
Only ZEV should be incentivised	◉	○	○	○	○
ZLEV should be incentivised as in the current Regulation	○	○	◉	○	○
Other	○	○	○	○	◉

If you selected 'Other', please explain:

500 character(s) maximum

We don't oppose the principle of incentive mechanisms for ZLEVs, but the definition of LEVs does not reflect market reality: only pure BEVs, H2 and FCEVs are currently able to comply. Such vehicles are still far from available at a sufficient scale. All vehicles with low overall emissions should be eligible for incentives.Other vehicles (such as biomethane-fueled vehicles) can even reach negative emissions, if measured on the whole life-cycle of the vehicle.The discussion is on CO2 not on NOx/PM

Incentive type

	1	2	3	4	5
A bonus system with benchmark should be maintained	○	○	◉	○	○
A bonus/malus crediting system with benchmark should be introduced	◉	○	○	○	○
An obligation should be introduced for each manufacturer to register a certain share of ZLEV (so-called mandate)	◉	○	○	○	○
Other	○	○	○	○	◉

If you selected 'Other', please explain:

500 character(s) maximum

We don't oppose the principle of incentive mechanisms for ZLEVs, but the definition of LEVs does not reflect market reality: only pure BEVs, H2 and FCEVs are currently able to comply. Such vehicles are still far from being present on the market at a sufficient scale. All vehicles with low overall emissions should be eligible for incentives. Other vehicles (such as biomethane-fueled vehicles) can even reach negative emissions, if measured on the whole life-cycle of the vehicle. Focus on CO2 WtW.

Link with the CO2 target

	1	2	3	4	5
The ZLEV benchmark levels should increase when targets levels become more stringent	◉	○	○	○	○

4) If any incentive scheme would be maintained, which vehicles types should be covered? (Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement)

	1	2	3	4	5
Heavy lorries (above 16 t)	○	○	○	○	◉
Small and medium lorries (up to 16 t)	○	◉	○	○	○
Coaches	○	○	◉	○	○
Urban buses	○	○	◉	○	○

Do you have any additional comment on the ZLEV or ZEV incentive system? If so, please add them below.

1000 character(s) maximum

The intention to encourage electric vehicles isn'tconsistent with the Commission's general position that these technologies are already fully market-ready and offer more benefits than renewable and low-carbon fuel-based alternatives.NG HDVs are market ready and proven technology and when used with sustainable biomethane produced from manure, they can achieve negative CO2 emissions as defined in RED2. The incentive system in place until 2030 should not be revised to ensure regulatory stability. An incentive mechanism should recognise the role of renewable and low-carbon fuels, as defined and certified by sustainability criteria in the RED II.After 2030, an incentive scheme is maintained should be subject to two conditions: 1) it should only apply to those categories of vehicles for which ZLEVs are not yet present on the market on a sufficiently large scale 2) it should not be based on the tailpipe criterion alone - benefits of RE and LC fuels must be fully taken into account

4. Contribution of renewable and low-carbon fuels

Under the HDV Regulation, a manufacturer's compliance with its specific emission target is assessed against the average tailpipe CO2 emissions of its fleet, as determined under type approval legislation.

Other EU policies provide incentives for the deployment of renewable and low-carbon fuels in transport. These include the proposed revised Renewal Energy Directive, the proposed revision of the Energy Taxation Directive, the proposed new emissions trading system for road transport and buildings, and initiatives promoting sustainable aviation and maritime fuels.

Please indicate to what extent you agree with the following statement (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement)

	1	2	3	4	5
A mechanism should be introduced in the HDV Regulation so that compliance assessment takes into account the contribution of renewable and low-carbon fuels	○	○	○	○	◉

If a system to account for renewable and low-carbon fuels were to be introduced when assessing compliance, please indicate to what extent you agree with the following statements (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement) (Not all statements need to be rated)

1. With regard to its effects

	1	2	3	4	5
More renewable and low-carbon fuels will be made available for road transport	○	○	○	○	◉
Renewable and low-carbon fuels in road transport will come at the expense of other sectors facing steeper challenges to decarbonise (e.g. aviation/maritime)	◉	○	○	○	○

Incentives for these fuels will be incompatible with EU efforts to increase efficiency and reduce energy consumption in HDV	◉	○	○	○	○
Such an accounting system will no longer ensure clear responsibilities and accountability for vehicle manufacturers and fuel suppliers	◉	○	○	○	○
These incentives for deploying low-carbon and renewable fuels could weaken the development of innovation in zero-emission technologies	◉	○	○	○	○
The HDV Regulation would need to be made stricter more rapidly to foster the deployment of ZEV	◉	○	○	○	○
Air pollution co-benefits would not be achieved in the same degree	◉	○	○	○	○

2. With regards to the design of the mechanism

The possibility of developing a specific methodology to include the potential contribution to CO2 emissions reductions from the use of synthetic and advanced renewable fuels may be based in principle on two options:

1. The 'carbon correction' factors option would apply to the type-approved CO2 emissions of vehicles to reflect the carbon intensity and share of fuels used. This would lower the average specific emissions of a manufacturer's vehicle fleet. Therefore, in order to comply with its specific emissions target, a manufacturer would need to implement fewer technologies to reduce the tailpipe CO2 emissions of its vehicles put on the market and this would reduce compliance costs for manufacturers.

2. The 'fuel crediting system' option would allow an individual manufacturer, if additional quantities of fuels were used in road transport, to obtain credits for determining its average specific CO2 emissions and meet its specific targets. Such credits would have to be obtained from fuel suppliers marketing quantities of fuels that are higher than those required to comply with their obligations under the Renewable Energy Directive and their obligations under the RefuelEU Aviation and FuelEU Maritime initiatives. This option may trigger additional investments in low-carbon and renewable fuels.

If a mechanism were to be introduced, please indicate to what extent you agree with each of them (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement) (Not all statements need to be rated)

	1	2	3	4	5
'Carbon correction factors' to tailpipe emissions of vehicles should be applied per fuel type to reflect the GHG intensity and market share of the eligible fuels	○	○	◉	○	○
A 'fuel crediting system' should allow manufacturers to purchase credits generated by fuel suppliers that overachieve their targets for renewable and low-carbon fuels under the Renewable Energy Directive	○	○	○	○	◉

Do you have any additional comments, on the introduction of a possible mechanism for renewable and low-carbon fuels under the HDV Regulation? If so, please add them below.

1000 character(s) maximum

We question the neutrality of the questionnaire on the topics of alternative fuels; the question regarding the possible effects of crediting renewable and low carbon fuels almost only lists negative effects, which seems to be a rather biased position.

5. Other elements

A pooling mechanism is a type of agreement in which targeted manufacturers can group together, and act jointly, to meet their respective CO2 emissions targets, provided they respect the rules of competition law. Where manufacturers form a pool, they should be deemed to have met their targets if the average emissions of the pool as a whole do not exceed the specific emissions target for the pool. For light-duty vehicles, pooling has proved to be a cost-effective way to achieve compliance with the CO2 emissions targets.

In your opinion, should pooling provisions be included?

The Regulation should allow for pooling

○ Yes ○ No ◉ Neutral

In your opinion, regarding small-volume manufacturers:

An exemption for small-volume manufacturers with less than a certain number of vehicles registered per year should be included, since extending the targets obligation to small manufacturers would impose a disproportionate administrative burden

○ Yes ○ No ◉ Neutral

Currently, type approval legislation for determining the energy efficiency of trailers and semi-trailers is being developed. This development opens up the possibility to set minimum efficiency requirements for trailers to satisfy the mandate under Article 15 of the HDV Regulation.

In your opinion, regarding trailers and semi-trailers

Should energy efficiency standards be set for trailers and semi-trailers?

◉ Yes ○ No ○ Neutral

If ‘Yes’, what standards should be set? If not, why not?

1000 character(s) maximum

In your opinion, regarding the revenues from excess emission premiums, how they should be allocated? (Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement)

	1	2	3	4	5
They should be allocated to a new or existing specific fund or a relevant programme with the objective of ensuring a just transition towards a climate-neutral economy, in particular to support reskilling, upskilling and other skills training and reallocation of workers in the transport sector	○	○	○	○	◉
They should continue to be considered as revenue for the general budget of the Union	◉	○	○	○	○
Other	○	○	○	○	○

Are there other aspects of the Regulation that need to be addressed? If so, which ones?

1000 character(s) maximum

6. Impacts

Do you agree with the following statements on the likely impacts of strengthened CO2 standards for HDV? (1 do not agree, 5 strongly agree). Not all statements need to be rated.

	1	2	3	4	5
EU industry will increase investments in zero-emission technologies	○	○	◉	○	○
A growing supply of zero-emission HDV will bring down their costs over time	○	○	◉	○	○
EU industry competitiveness on the global market will increase	◉	○	○	○	○
EU import dependence on fossil fuels will decrease	○	◉	○	○	○
Macroeconomic benefits can be expected	◉	○	○	○	○
Manufacturing job losses can occur due to decreasing production of conventional powertrains	○	○	○	○	◉
New jobs would be to produce different power trains and batteries or to provide new services	○	○	◉	○	○
New skills and qualifications for workers will be needed	○	○	○	○	◉
Sufficient training is provided to ensure the necessary reskilling and upskilling of the existing workforce in the transport sector	○	◉	○	○	○
Sufficient measures are in place to attract skilled workers to the transport sector, helping to deploy fully the potential of ZEV	○	◉	○	○	○
Co-benefits in terms of better air quality can be expected	○	◉	○	○	○
Co-benefits in terms of energy dependency can be expected	○	◉	○	○	○
Innovative SMEs will benefit from new business opportunities	○	○	◉	○	○
Growing offers of ZEV, combined with other measures strengthening sustainable corporate governance, will influence transport operators to purchase more ZEV	○	○	○	◉	○

Which other impacts are relevant in your opinion?

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Relying solely on tailpipe emission reduction technologies may not lead to an effective reduction of CO2 emissions, taking into account the still high carbon intensity of the EU electricity grid (which will not decrease significantly in the coming years), and the production process of batteries.
Biomethane is a locally produced RE fuel that has a huge largely untapped potential in Europe. To fully utilise this source is to reduce energy dependency. It also means utilising waste streams that not only decreases methane leakage but brings a circular economy. For this market to mature and grow we need to have a wide variety of users of biomethane. ZLEV-norms for HDV would disrupt if not even seriously delay the efficient emergence of a competitive biomethane market.
Many zero tailpipe CO2 technologies rely on rare earth materials, mainly imported from outside the EU. Other solutions, such as internal combustion engine vehicles running on biomethane, are much less exposed

What additional measures should be set up to ensure a just transition towards zero-emission mobility (e.g. investments in reskilling and upskilling and promoting attractive working conditions in the sector)?

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7. Any additional comments

Please insert any supplementary information below.

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