



UNION EUROPÉENNE DES TRANSPORTEURS ROUTIER

UETR contribution on the Fit for 55 Package Proposal

UETR represents more than 200.000 road transport undertakings in Europe (Micro, Small and Medium Enterprises) with a total capacity of 430.000 commercial vehicles.

UETR believes that a number of proposals in the "Fit for 55" package ¹ represent a key step towards reaching the European Green Deal targets.

In order to create an enabling environment to ensure a successful transition to green economy, UETR would like to draw attention to the following remarks:

Inclusion of road transport in ETS ²

It is of paramount importance to ensure the operational, policy and regulatory framework is coherent with the competitiveness of EU's road transport SMEs.

UETR has some concerns about the risk of increase in fuel prices caused by the inclusion in ETS, which eventually could result in passing on the increased costs to customers, and thus to consumers. ³

Certainty is needed on the effectiveness and practicability of the proposed Climate Social Facility to fully mitigate the social and economic impacts on more vulnerable Micro Small and Medium transport companies.

Certainty is needed on the timeline of (any) ETS implementation is aligned with the roll out of alternative fuels infrastructure in Europe.

Guarantee is needed that a strict and full earmarking in the ETS will be adopted - for all revenue streams to be used for investments in road transport and infrastructure to meet Green Deal goals. Moreover, National recovery plans present a diversified picture in terms of financial support to road transport companies. A level playing field in financial support to SMEs is necessary.⁴

¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_21_3541

² COM (2021) 551 final

³ With fleet evolution very likely to maintain a significative number of ICE vehicles and diesel in the next 10 years, carriers might have no choice but to pass on the increased costs to customers, and thus to consumers. Trucks are on average 13 years old in the European Union (source: ACEA). There is investment made by small and medium companies and they cannot easily replace a truck.

⁴ Small haulers are facing a number of critical issues (rise of energy prices, shortage of drivers, COVID restrictions). The risk for innovative projects from SMEs are often riskier than traditional investments. SMEs need to rely upon Green finance- e. g. robust scrappage schemes tailored on micro and small companies' needs for investment in green/smart technologies access to know-how, finance and skills.



The ETS and emissions targets must take into account a realistic time for transition for micro small and medium enterprises.

Should ETS be introduced for road transport, then mechanisms should be provided for by the EU to predict the increase of costs for emissions per tonne of the years.

Energy Taxation Directive (ETD) ⁵

With ETS combined with the proposed revision of the ETD based on energy content and CO₂ emissions, there is risk that road hauliers will eventually pay additional money. Road hauliers have hardly any margins and will thus be compelled to reiterate any increase to their customers.

The EU has to set up a scheme which guarantees predictability of cost increase. Since the number of emission rights is to supposed be diminished from 2025 onwards, the price per emitted tonne of CO₂ is likely to increase. However the rate of this increase needs to be known in advance by the hauler. This should enable to predict the consequence i.e. the increase of the transport costs in long term cooperation between SME hauliers and their customers. It should also enable to calculate the competitiveness of ICE (Internal Combustion Engine) based vehicles versus their 0-emission alternatives over a longer period of time and thus enhance the predictability of Return of Investment over a longer period of time.

A global approach to carbon footprint should be followed, from production to consumption. Common benchmarks are to be put in place to avoid unbalanced competition between EU Member States on energy products. ⁶

Deployment of alternative fuels infrastructure ⁷

UETR welcomes the proposal for Regulation on the deployment of alternative fuels infrastructure (AFIR) and its pragmatic approach to electric infrastructure targets in relation to commercial vehicles registered in Member States. Reference to presence of recharging points for trucks in parking areas is also positive.

UETR supports energy mix and technology neutrality to be ensured taking into account both users and flows. Hydrogen is promising in the long term. In the short term, for the transition further support to deployment of LNG, which proved to be quality and reliable fuel compatible with road transport sector, is key for the ecological transition. CNG, NGV and bio NGV must also be encouraged.

Technical harmonization, use of digital technologies and full and transparent information are also important elements in the revised Directive to address the issue of different payment systems, and the lack of adequate information for hauliers.

Infrastructure with the same capacity must be available at the same time all over the EU. Adequacy is needed in terms of time (ultra fast charging) and power level (ensuring there are sufficient high-power chargers suitable for commercial vehicles, able to meet the needs of road hauliers and hence society and real economy).

⁵ COM(2021) 563 final

⁶ The possibility to grant professional diesel regime by EU MS should also be maintained – see Footnote 3.

⁷ COM(2021) 559 final

Binding targets are to be introduced upon not only for CO2 emission reduction level but also for investment and for sufficient infrastructure level across all EU member states.

At this stage EU should realistically prioritize the acceleration of development of alternative fuels infrastructure. Any possible inclusion of road transport in ETS would need as essential prerequisite the full deployment of such infrastructure.