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Executive Vice-President for the European Green Deal  
European Commission  
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1040 Brussels  
Belgium

**By email**

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Brussels, 1 February 2023

**Re: Call for preserving essential technology options to move logistics chains**

Dear Vice-President Timmermans,

The undersigned, IRU, ESC and Fuels Europe, representing road transport operators, shippers and energy suppliers, are strongly committed to contribute to the decarbonisation of the EU's transport industry. Our sectors support the objective of achieving carbon neutrality by 2050 and stand ready to contribute to the regulatory framework to achieve this objective.

However, the attainment of the carbon neutrality goal will very much depend on the technology options allowed by the upcoming legislation. Logistics chains should not be subject to an experiment which could jeopardise the stability of supply: *the EU should recognise carbon neutral fuels in the upcoming CO2 standards for heavy-duty vehicles (HDV) as a long-term solution for sustainable road transport alongside electrification and hydrogen.*

**Combustion and current fuels**

Today, liquid fuels provide energy security for highly resilient and flexible HDV transport and logistics chains. This has proven to be critical for the efficient operation of the single market, including for emergency responses to crises of all types. Today, the vast majority<sup>1</sup> of trucks sold have an internal combustion engine using liquid fuel.

Out of the total fleet of over 6 million HDVs used to transport goods in the EU, about 2 million vehicles are used in the long-haul transport of goods. With these vehicles, transport operators and drivers ensure the security of vital supplies across the EU, including on major South-North and East-West food corridors. Most of these vehicles weigh 40 tonnes or more. In the Nordic countries, loaded vehicles can reach up to 76 tonnes.

**Electric batteries and hydrogen fuel cells**

There is no doubt that European truck manufacturers will make great progress in developing new electrification and hydrogen technologies, enabling a wide offering of new alternatives for operators.

However, completely switching from the 1,500km driving autonomy of a liquid fuel 40-tonne truck to an electric truck's autonomy of 300km, with uncertain charging infrastructure and grid availability, will pose serious risks, at the very least on some long-haul routes. The electric power required to recharge a single large truck's battery is equivalent to the daily electricity needed to power more than 100 households.

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<sup>1</sup> [Fuel types of new trucks: diesel 95.8%, electric 0.5%, alternative fuels 3.6% share full-year 2021 - ACEA - European Automobile Manufacturers' Association](#) (ref. 2021)

Hydrogen should also be an option, but it has limitations and cannot alone be a complete substitute. For example, a thorough risk analysis is needed regarding the potential use of hydrogen vehicles for the transport of dangerous goods. Equally, many ferry companies currently prohibit the boarding of electric and hydrogen vehicles for safety reasons, which is a major issue for island Member States. Furthermore, resourcing green hydrogen for a huge truck fleet may pose serious practical difficulties.

Therefore, a proposal for Europe's logistics sector that moves completely away from combustion can only be described as an experiment with unnecessary risks.

### Carbon neutral fuels

Liquid fuels of non-fossil origin are progressively replacing fossil fuels. Whether they come from biomass (biofuels) or a combination of recycled CO<sub>2</sub> and clean hydrogen, such alternative fuels have one essential property in common: when burned, they release only the same amount of CO<sub>2</sub> which was originally absorbed from the atmosphere. In other words, they do not increase the CO<sub>2</sub> concentration in the atmosphere and can therefore be labelled "carbon neutral fuels". It is clear that, in a well-to-wheel approach, some CO<sub>2</sub> is released during the production phase of these fuels, but the same can be said for electricity and hydrogen. However, under a "tailpipe" regulation model like the HDV CO<sub>2</sub> standards, releasing recycled CO<sub>2</sub> or releasing no CO<sub>2</sub> at all needs to be considered as "neutral" for the climate (unlike fossil fuels that release linear CO<sub>2</sub>).

Carbon neutral fuels are also the most realistic option to decarbonise aviation, most maritime transport and the existing fleet of road vehicles. The availability of sustainable biomass is more than sufficient to satisfy the demand in advanced biofuels for the three transport modes<sup>2</sup>. To quickly scale up the production of carbon neutral fuels, it is essential that investors can build their business case assuming that these fuels will first mainly satisfy demand in road transport, and then progressively move on to aviation and maritime.

Today, there are 124,000 liquid fuelling stations across the EU, each one with multiple pumps. They will all be capable of delivering 100% renewable fuels when production is scaled up. In terms of infrastructure, this is highly cost effective.

Finally, the combustion of H<sub>2</sub> in internal combustion engine vehicles should also not be arbitrarily excluded, as their CO<sub>2</sub> emissions from vehicles are negligible.

### Call for options and safe choices

Considering the arguments above, IRU, ESC and Fuels Europe call for the **full and equal recognition of carbon neutral fuels and hydrogen combustion in HDV CO<sub>2</sub> regulation, as viable long-term solutions alongside electrification and H<sub>2</sub> Fuel Cells. For a well-functioning and stable EU logistics sector, we urge the EU to allow logistics chains to decide which technology is the most suitable for their various types of operations to achieve our common goal, which is carbon neutrality.**

Raluca Marian



General Delegate of IRU to the EU

Godfried Smit



Secretary General  
European Shippers' Council

John Cooper



Director General  
Fuels Europe

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<sup>2</sup> [Sustainable Biomass Availability in the EU, to 2050 - Imperial College London Consultants for Concawe](#)

**IRU** is the world road transport organisation and the voice of one million transport operators in the European Union, connecting societies with safe, efficient and green mobility and logistics.

**FuelsEurope** represents with the EU institutions the interest of companies manufacturing and distributing liquid fuels and products for mobility, energy & feedstocks for industrial value chains in the EU.

**European Shippers' Council** was founded in 1963 to represent the logistic interests of manufacturers, retailers, and wholesalers, collectively referred to as shippers, in all modes of transport. ESC members are national shippers' councils, key European commodity trade associations, and corporate members.