Hydrogen Europe position on the legislative proposal for CO₂ emission standards for cars and light duty vehicles

Hydrogen Europe welcomes the European Commission’s efforts of strengthening the European legislation with regard to CO₂ emission standards for cars and light-duty vehicles (LDVs), ensuring coherence with the Union’s energy and climate policies.

We share the Commission’s viewpoint that the current CO₂ emission standards for cars and vans have contributed to the reduction of CO₂ emissions from light duty vehicles but further efforts are necessary to continue reducing greenhouse gas emissions from road transport.

**Passenger and light-duty vehicle**

We support the European Union’s objectives of CO₂ reduction in 2030 (compared with 2021). Additionally, we welcome the dedicated incentive mechanism to introduce a smooth transition towards zero-emission mobility. This crediting mechanism should be designed so as to promote the deployment of zero- and low-emission vehicles. Furthermore, to have a tangible effect on the streets, Hydrogen Europe's members support the definition of 'zero- and low-emission vehicle' based on tailpipe emissions from zero up to 50 g CO₂/km, as determined in accordance with Regulation (EU) 2017/1151, and with their contribution towards the targets set based on the calculation described in point 6.3 of annex 1, part A & B as proposed by the Commission. Furthermore, we would like to highlight on the difference between cars and LDVs. LDVs are a working tool, often used by small and medium-sized enterprises (SMEs) and highly price sensitive. Consequently, any such emission performance standard on LDVs must be accompanied with a corresponding financial support for LDVs and its corresponding infrastructure deployment.

**Framework coherence**

It is necessary to ensure a coherent, environmentally-sound framework. Hydrogen Europe supports the Union’s efforts to encourage the use of low-carbon/emission fuels through, inter-alia, its CO₂ emissions standard regulation which would incentivise economic actors to switch to hydrogen and hydrogen-based fuels. Zero-emission vehicles, such as Fuel Cell Electric Vehicles, do not only contribute to the reduction of CO₂ emissions from road transport, but also deliver benefits in terms of air pollutant emission free and low noise emissions transport and enable economic growth through the creation of new supply chains whilst keeping high value-added jobs in Europe.

However, in order to successfully implement more stringent CO₂ emission performance standards on the automotive sector, there is a need to develop an appropriate infrastructure alongside such CO₂ emission standards so that the targets can be reached. Indeed, it is vital that the Deployment of Alternative Fuels Infrastructure Directive 2014/94/EU (DAFI) is inter-linked to this regulation and must be updated as to reflect the necessary changes with regard to hydrogen uptake:

- A level playing field between the fuels is necessary: hydrogen is to be a mandatory fuel on the list.
- It is needed to reduce the distance between Hydrogen Refuelling Station (HRS) from 300 to 150 km. This would be equal to the current km for compressed natural gas (CNG).
- Finally, following Art. 10 § 1 of the DAFI, Member States should report annually to the Commission on the implementation of the directive rather than every 3 years.

With this in mind, we welcome the report of the European Parliament’s on the Deployment Alternative Fuels Infrastructure Directive (2018/2023(INI)). We also support the call for a level playing field between zero emission vehicles and more specifically to extend the Battery Alliance initiative to other powertrains such as fuel cells in order to maintain the European technology leadership.

Furthermore, it is required to have a coordinated approach at national and EU level and ensure that the various plans are coordinated among all stakeholders like original equipment manufacturer (OEM), utilities,
public authorities and other relevant organisations such as consumer-oriented associations and community partnerships.

In order to achieve European climate and energy goals, the swift decarbonisation of the transport sector is necessary. Therefore, the rapid uptake of tailpipe zero emission vehicles should be encouraged. The post-2021 European legislative framework for transport decarbonisation should be based on a sound combination of legislations which work together in enabling an overall cost-efficient sector decarbonisation whilst ensuring that each economic actor can act in its direct capabilities to comply with the set objectives.

The need to stimulate the demand for zero-emission vehicles through legislation is key (e.g. financial incentives and non-financial incentives such as access to specific lanes or free/reduced fee parking) and coordination amongst key actors along such value chain will enable a faster mainstreaming of such vehicles.

For example, public authorities are the ideal first-movers to deploy zero-emission solutions as the higher utilisation rate of their fleet will enable the efficient usage of alternative fuels infrastructures such as HRs.

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ABOUT HYDROGEN EUROPE

Hydrogen Europe represents the European industry, national associations and research centres active in the hydrogen and fuel cell sector. The association partners with the European Commission in the innovation programme Fuel Cells and Hydrogen Joint Undertaking (FCH JU). We are promoting hydrogen as the enabler of a zero-emission society. For more information, please visit www.hydrogeneurope.eu

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