

Dear Commissioner Cañete,

To:

European Commission: Commissioner Bieńkowska, Silvia Bartolini and Carsten Bermig
European Parliament: Damiano Zoffoli, Christofer Fjellner, Julie Girling, Nils Torvalds, Rebecca Harms, Eleonora Evi and Nicola Caputo
Presidency: Helena Hinto

On the 31st of May the European Commission presented its proposal on the [monitoring and reporting of CO2 emissions and fuel consumption of new heavy-duty vehicles](#). This proposal comes after the adoption of VECTO test procedures that oblige truck manufacturers to measure fuel consumption of trucks in a standardised way from 2019.

With the Monitoring and Reporting regulation, fuel consumption data of newly type-approved trucks will be monitored and reported in a standardised way. Some of the data will be made publicly available. This will enable the Commission to create more transparency for the transport sector and authorities, and increase competition between different truck manufacturers.

Meaningful transparency, reliability of the VECTO values, and fair competition in the vehicle market are necessary. The long term objective should be a system where operators can get reliable, certified information as easily as possible on the vehicle they are planning to buy. To achieve this objective a period of transparency allowing development of the system and the use of the system will be important, without releasing information which would not be in the public interest.

In line with this, we urge the European Parliament and the Member States to further strengthen the proposal as follows.

It is important, and welcome, that aerodynamic performance and rolling resistance are to be monitored, reported and made publicly accessible. However, CO2 related conformity of production results should also be made publicly available or on demand accessible to 3rd parties. Furthermore, engine, axle and transmission efficiency, should be reported to the Commission and average values that are a good representation of the efficiency made publicly accessible. An online digital portal where the overall efficiency profile of the new vehicle is available, based on data collected under the Monitoring and Reporting Regulation, is also vital.

Enhancing the proposal in this way will bring the following benefits:

- Transport operators will get better information about the full efficiency profile of the truck (taking into account engine as well as transmission and axle efficiency) and why one is performing better than the other. This is very valuable information that will assist purchasing decisions.

- New trucks can be grouped in best and worst in class performers which would increase choice and emissions performance.
- Without including engine efficiency data in this Regulation, a meaningful engine standard will not be possible.
- The transparency of the input parameters enables third party checks of the simulated VECTO CO2 and fuel economy figures thereby ensuring the reliability of the data. Earlier research shows that there are no reasons to keep these input parameters secret.

Finally, we note the [joint letter from](#) the Nordic Ministers for Climate, Transport and Environment to the Commission calling for third party testing. This reform opportunity should also be used to give transport operators and third parties a better insight into the real world performance of vehicles. Therefore, we call on the Commission to introduce an on-road test in the next phase of VECTO - and for these values to be reported and made publicly available through the Monitoring and Reporting Regulation. This will allow the Commission and third parties to understand to what extent OEMs are using the flexibilities in the current VECTO proposal.

We also would like to stress that CO2 efficiency gains can and should come from many sources and that the road haulage industry is very much dependent on what the market can offer. Further work is needed particularly at EU level to ascertain how non-vehicle gains (e.g. alternative fuels and enhanced logistics efficiency) can best be realised across Europe.

Making truck fuel consumption and CO2 emissions of new type-approvals more transparent is imperative. Transparency, not secrecy, should be the starting point. An ambitious Monitoring and Reporting Regulation can be the first important step to achieve this.





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