

Fredrik Svensson
Fredrik.svensson@akeri.se

Helsingborg 2021-12-08

Answer to the review of the General Block Exemption Regulation (State aid): revised rules for State aid promoting the green and digital transition

The Swedish Association of Road Transport Companies – Sveriges Åkeriföretag, has taken part of the above proposal. We thank you for the opportunity to contribute comments, and hereby present our opinion in accordance with the consultation about the targeted review of the General Block Exemption Regulation (State aid): revised rules for State aid promoting the green and digital transition, published the 06.10-21.

Article 2(102f-g)

This article proposes definitions of “clean vehicle” and “zero-emission vehicle”. The requirements for maximum CO₂ emissions are made according to CO₂ emissions in vehicles’ exhaust gases (tailpipe emissions of CO₂), even in those cases where the proposal refers to definitions in other regulations.

The Swedish Association of Road Transport Companies opposes the proposal to formulate maximum CO₂ emissions purely on the basis of local emissions from vehicles (that is, tailpipe emissions), since this method does not take the origin of the fuel into consideration. We believe that both European and Swedish legislation should instead be based on a research-based Well to Wheel or Life Cycle Analysis - approach to climate emissions. The outdated tailpipe perspective does not take into account whether electricity is derived from fossil or renewable origin and neither does it take the positive effects of sustainable biofuels and electrofuels into consideration. It is not a technology neutral method to measure CO₂ emissions and it hinders the use of sustainable renewable biofuels and electrofuels. The tailpipe perspective in EU regulations makes the task of mitigating climate change more difficult.

Article 36

The changes proposed in Article 36 are closely linked to the changes proposed in Article 2, (102f-g) (see the comments above). The changes to Article 36a and the new Article 36b are limited almost exclusively to electrical and hydrogen technologies. Refueling infrastructure for other sustainable renewable fuels is not included, and in most cases, neither are vehicles powered by other renewable alternatives (due to the unfortunate tailpipe perspective adopted in Article 2(102 f-g)). We are concerned that these technologies will not be covered by other parts of Article 36, or by other parts of the regulation, as the proposal currently stands.

The Swedish Association of Road Transport Companies believes that the regulation should include support for refueling infrastructure for a wider range of sustainable renewable fuels and for vehicles powered by a wider range of renewable alternatives. Commercial road transports will require a wide range of alternative fuels and sufficiently available vehicles for different types of operations in order to reduce the greenhouse gas emissions in the most effective way. A flexibility in the choice of fuels is essential for the sector given the very large operational scope in which these vehicles are operating.

Best regards

Fredrik Svensson
Head of Sustainability