



Consultation new GBER.

Hytruck Consult & Partners appreciates the opportunity to put forward our views on the new GBER. As we are specialists in zero-emission (road) transport, we will focus on zero-emission vehicles, as they are very relevant to transport companies.

The transition to zero-emissions transport has barely begun. Zero-emission vehicles are still very expensive. Also, in addition to buying a battery-electric vehicle, the transporter generally will have to invest in charging infrastructure. To get the transition moving, for the foreseeable future subsidies will be needed for vehicles and infrastructure. This makes a good new GBER very welcome.

Especially in this phase of the transition in transport it is of high importance that as many as possible transport companies be given an opportunity to gain experience with zero-emission vehicles in their own daily work. From that perspective, it would be better to subsidise 10 companies that want to buy one vehicle each, than one company that wants to invest in 10 vehicles. Therefore, the new GBER should allow for subsidy schemes that are sufficiently easy to apply for to make it worth the companies' while to invest in only one vehicle. Also, these subsidy schemes must allow applicants to know they will receive their subsidy *before* they order a new zero-emissions vehicle.

Transport companies come in all kinds and sizes. Many of them belong to the category of SME's. Many of those companies need all their attention on their core-business: transporting goods (and staying afloat in the process). For this category especially it is of the utmost importance that subsidy schemes for zero-emission vehicles are made very easy to apply for.

Transport companies service both cities and long distance routes. The advantages of zero-emission vehicles are even larger inside cities than outside. Any subsidy scheme for zero-emission vehicles must allow for a sufficient share of transport inside cities.

Vehicles come in very varying sizes, weights, daily trip profiles and annual distances covered. Hence, their costs vary, too. All these different vehicles should have equitable access to subsidy schemes. The new GBER should guard against implicitly favouring some types of vehicles over others – as might easily be the case if article 36 ter sub 4 is implemented.



In order to speed up the transition to zero-emissions transport, it is essential to award subsidies that are neither too small nor too lavish. The deficit in the TCO varies widely with different types of zero-emission vehicles. A smaller battery-electric truck that travels over shorter distances needs far less subsidy than a heavy fuel-cell electric truck. A subsidy that is tailored to the deficit in the Lifetime Total Cost of Ownership would be best.

It is our considered opinion that the bidding procedure described in the current proposal for article 36 ter sub 4 would inescapably result in subsidy schemes that will be very difficult to apply for, and hence would implicitly:

- make it harder for smaller companies to successfully compete for subsidies they really need; and
- make it harder to ensure a fair share of the subsidies for transport in cities.

We would appreciate it if this part of the proposal is replaced with an approach that is easy and fair for all companies (and vehicles).