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By email

BR1059507/RMA

Brussels, 27 juin 2023

SUBJECT: Call to support regional public transport: intercity buses must be excluded from the definition of urban buses and treated as other categories of heavy duty vehicles under the CO2 Standards for Heavy-Duty Vehicles (HDVs)

Dear Mr Canfin,

On behalf of the International Road Transport Union (IRU), the International Association of Public Transport (UITP), and the European Automobile Manufacturers' Association (ACEA), we call for your support to exclude intercity buses (Class II low floor buses) from the definition of '*urban buses*' in the Revision of the CO2 emission standards for HDVs so they can be subject to the same targets as other categories of heavy-duty vehicles.

The CO2 standards for HDVs are a key instrument in promoting cleaner and sustainable transport. The European Commission's proposal is extended to new vehicle categories, including buses and coaches, for the first time. While we generally support including new vehicle segments as step towards the decarbonisation of road transport, it is crucial to carefully consider the grouping of certain vehicle segments, in particular that of Class II buses.

Definition of an '*urban bus*' and consequence thereof:

The European Commission's proposal includes in the definition of urban buses both Class I & A and Class II buses with low floors. However, unlike the former category, which is used exclusively in the urban space, Class II buses are used for regional public transport.

The consequence of defining both categories as urban buses is that the 100% zero-emission mandate for manufacturers under Article 3b, referring to the point 4.3 of Annex I, applies to all these vehicles.

Why is a Class II bus not an urban bus?

Class II buses with low floor and interurban profiles (vehicle categories 31-L2 and 33-L2) are not urban buses.

Class II buses with an intercity profile have more similarities to coaches than urban buses. These buses are typically larger than Class I buses, are frequently deployed on longer routes, spanning up to 600 km, and cater to different transport needs compared to standard urban bus routes. Their operations require specific conditions, such as charging and refueling infrastructure along the route. Therefore, interurban buses (standard and articulated) falling under Class II and coaches under Class III should be grouped together and be subject to the same targets.

The distinction between Class I and II buses is also recognised in the Clean Vehicle Directive (CVD). Given the different functionalities and purposes, the CVD only sets fleet purchase targets for zero-emission vehicles in Class I & A buses. Class II buses are not covered by EU procurement targets.

Why is setting a 100% reduction target for Class II buses in 2030 not realistic and counter-productive?

The CVD procurement targets for ZEVs primarily focused on Classes I and A urban buses, making the market for zero-emission urban buses already quite mature. Including Class II buses with low floor in the definition of urban buses would mean that the level of ambition for Class II buses would go from 0% to 100% by 2030 in one single step.

This could lead to negative consequences such as:

- Difficulties to operate such buses given the lack of charging infrastructure dedicated to buses on regional roads;
- Disincentives for adopting other low-emission technologies, and, ultimately
- Reduced availability of suitable transportation options for intercity and regional travel.

Considering the above, we kindly call for your support in removing Class II low floor buses (vehicle categories 31-L2 and 33-L2) from the definition of urban buses under the CO2 standards for HDVs, as proposed in the Annex below. This adjustment would enable more targeted solutions aligned with the distinct operational needs of Class II low floor buses while maintaining robust emission reduction goals for urban bus fleets.

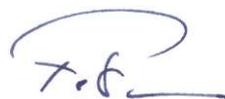
Signatories



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[IRU](#) is the voice of more than 900,000 road transport companies in the EU, including truck, bus, coach and taxi companies, which operate about 35 million vehicles. IRU is the official social partner recognised by the European Commission to engage in negotiations with trade unions on behalf of road transport employers in the EU. In total, the road transport sector employs over 5 million people.

[UITP](#) is the international association representing public transport stakeholders. In the European Union, UITP brings together more than 450 urban, suburban and regional public transport operators and authorities from all Member States. We represent the perspective of short distance passenger transport services by all sustainable modes: bus, regional and suburban rail, metro, light rail, tram and waterborne.

[ACEA](#) is the European Automobile Manufacturers' Association (ACEA) representing the 14 major Europe-based car, van, truck and bus makers: BMW Group, DAF Trucks, Daimler Truck, Ferrari, Ford of Europe, Honda Motor Europe, Hyundai Motor Europe, Iveco Group, JLR, Mercedes-Benz, Renault Group, Toyota Motor Europe, Volkswagen Group, and Volvo Group.