

Ursula von der Leyen
President of the European Commission
European Commission
Rue de la Loi 200 / Wetstraat 200
1040 Brussels
Belgium

By email

BR1061731/RMA

Brussels, 10 octobre 2025

Re: Call against mandatory zero-emission truck demand targets

Dear President von der Leyen,

The organisations co-signing this letter, representing road transport operators (IRU), freight forwarders (CLECAT), shippers (European Shippers' Council), and the cold chain sector (Global Cold Chain Alliance), share the European Union's objective to decarbonise transport. Our members are already investing heavily in zero-emission vehicles and technologies wherever the enabling conditions exist.

Evidence clearly shows this commitment in action. In the first half of 2025, overall heavy-duty registrations in the EU fell by 11%, yet sales of zero-emission heavy-duty vehicles increased by 40%. Even in a difficult market environment, the sector continues to accelerate its transition when the enabling conditions are present.

However, these enabling conditions remain far from adequate. Public charging infrastructure for trucks must grow tenfold to meet expected needs, while charging points remain prohibitively expensive compared with depot charging, and charging times are unpredictable. Depot infrastructure, which will cover the majority of regional and local transport (around 70% of freight movements), often faces grid connection delays and capacity limits. The forthcoming Grid Package will help, but its benefits will materialise only over several years.

The European Commission is considering legislation that would introduce mandatory purchasing or use targets for zero-emission trucks, either imposed directly on operators or indirectly through Member States or shippers. We urge you to reconsider this approach.

While we understand the Commission's desire to provide market signals, we strongly believe that investment decisions must be driven by underlying economics, technology maturity, and infrastructure readiness, not by regulation. Market operators invest sustainably when the business case is viable, not when compliance requires absorbing unmanageable risk or losses. We caution against the risk of stranded or unusable assets, which could emerge if demand obligations precede the availability of fit-for-purpose vehicles, charging networks, and power capacity.

EU clean-tech leadership should not be built on coercive rules, but on cost competitiveness, scale, and the ability to maintain operational efficiency across all transport sectors, especially in road transport, which is dominated by margin-constrained SMEs.

Such demand-side mandates would be counter-productive for several reasons, as follows:

- *Targets on Member States* would in practice translate into obligations on real market actors.
- *Targets on large transport operators* would effectively apply to the entire market. Europe's road-haulage sector is highly fragmented, with more than 600,000 operators, most of them SMEs or micro-enterprises. Any obligation on prime contractors would naturally cascade through

subcontracting chains, shifting the burden onto the smallest and least-resilient players. A significant share of road freight services for large companies relies on short-term, “on-the-spot” contracts to address seasonal demand or improve operational efficiency. This flexibility makes it exceptionally difficult for these companies to accurately track and report on all their subcontracted services, resulting in higher compliance costs and administrative burdens.

- *Targets on shippers* would similarly cascade downwards. In fiercely competitive markets, stronger contractual parties pass compliance costs onto smaller logistics partners, as current voluntary greening initiatives already often demonstrate.

In short, any form of mandatory demand target would ultimately place the heaviest burden on SMEs and microenterprises at the bottom of the logistics chain, those least able to absorb the cost or manage the risk.

Moreover, many segments of road transport are structurally harder to electrify due to operational or geographic specificities. The cold chain sector illustrates this vividly: a refrigerated 40-tonne truck requires, on average, up to 10% more electric power than a standard vehicle. There are also significant complexities in how to combine the traction and refrigeration systems in articulated vehicles. Similar challenges arise in construction logistics, chemical transport, and other specialised services. Electrification will expand over time. However, it is currently neither technically nor economically feasible across all use-cases. Imposing universal obligations would distort the market and destroy viable businesses, even though EU decarbonisation targets can still be met by focusing on enabling conditions and supporting sectors that can electrify more rapidly, such as urban and regional delivery.

Our sectors urgently need supportive measures, not coercion:

- targeted purchase incentives for vehicles that remain two to three times more expensive than diesel models,
- investment in recharging and refuelling infrastructure, especially depot-based networks. This involves increasing grid capacity, improving grid planning, accelerating connections, and pursuing solutions for more cost- and energy-efficient grid use, and
- a coherent financing framework, including the possibility of earmarking Eurovignette and ETS 2 revenues to road transport decarbonisation.

Madam President, the signatories represent the vast majority of Europe’s logistics and road freight ecosystem. We remain committed partners in achieving the EU’s climate goals. Yet we firmly oppose any legislative initiative introducing mandatory zero-emission truck demand targets in any form. Real progress will come from enabling conditions, not from punitive obligations.

We count on your understanding and leadership to ensure that future Commission proposals focus on creating the practical foundations for a sustainable, competitive and socially fair road transport transition.

Yours sincerely,

Raluca Marian
Director EU Advocacy/ General Delegate
IRU Permanent Delegation to the EU

Godfried Smit
Secretary General, ESC

Nicolette van der Jagt
Director General, CLECAT

Julie Hanson
Director of Europe, Global Cold Chain Alliance

Cc: Apostolos Tzitzikostas, Commissioner for Sustainable Transport and Tourism
Wopke Hoekstra, Commissioner for Climate, Net Zero and Clean Growth