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The European Commission  
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## **European Forum of Northern Sweden's views on the proposal to revise the Regulation on CO<sub>2</sub> emission performance standards for new heavy-duty vehicles**

*European Forum of Northern Sweden (EFNS) is a network for politicians at the local and regional levels from Norrbotten, Västerbotten, Jämtland Härjedalen and Västernorrland. EFNS is a meeting place and knowledge arena where EU policies are analysed and discussed in respects where it affects northern Sweden. EFNS monitors European issues to influence EU legislation, EU strategies and action programmes, and the EU budget. The purpose of EFNS is to safeguard the interests of northern Sweden both in the European arena and in relation to national level issues with a clear European perspective.*

EFNS welcomes the proposal to revise the Regulation on CO<sub>2</sub> emission performance standards for new heavy-duty vehicles and believes it is positive to have a long-term focus on reducing emissions and tightening targets. EFNS hereby wishes to present its perspectives on the proposal.

EFNS' standpoints in brief:

- It is positive to have a long-term focus on reducing CO<sub>2</sub> emissions and tightening targets.
- EFNS wants to see technology-neutral and target-based regulatory systems.
- Sustainability assessments must take regional differences into account.
- The use of biomass from residual and side streams in the forest industry contributes to creating preconditions for a sustainable biofuel production, which is an important key in the transition to a sustainable energy system.
- Security and self-sufficiency matter.

### Long-term focus on reducing CO<sub>2</sub> emissions and tightening targets

EFNS welcomes the proposal to revise the Regulation on CO<sub>2</sub> emission performance standards for new heavy-duty vehicles and believes it is positive to have a long-term focus on reducing emissions and tightening targets. As road transports account for one fifth of EU's total greenhouse gas emissions, it is necessary to speed up the transition of these transports in the near future. 99 percent of EU's heavy-duty vehicles are powered by internal combustion engines, with imported fossil fuels making up a large part of the vehicles' energy type. In Sweden, the ambition for the transportation sector is to reduce emissions by 70 percent by 2030 (compared to 2010 emission levels), a target which is to be met through a combination of policies and incentives for both vehicles and fuels — but also through a transition to a more transport-efficient society. EFNS considers that it is positive to have a long-term focus on reducing emissions and tightening targets



for lorries and buses, as they account for more than 25 percent of total road transport emissions in the EU.

#### Technology-neutral and target-based regulatory systems

Electric and hydrogen vehicles as such do not guarantee freedom from fossil fuels. Instead of requiring zero emissions at the tailpipe level, the entire lifecycle of the whole vehicle and fuel must be evaluated when assessing climate performance. A lifecycle approach would entail that energy-intensive production steps – such as battery cell production – are included in the total evaluation, thus promoting the production of renewable (i.e. green) electricity.

An overall electrification requires both new production of green electricity and a strong expansion of the electricity grid, which takes a long time to construct. A rapid energy transition of the transportation sector requires all types of green energy, not just electrification.

Northern Sweden's municipalities and regions strive to meet the Swedish target of reducing emissions from the transport sector by at least 70 percent by 2030. Investments towards this have already commenced, including investments in biofuels extracted from residues from the forest industry, food waste collection, and other types of organic waste. It is therefore important that the focus on reducing CO<sub>2</sub> emissions from the transport sector is not directed towards a specific technology such as electrification, but rather supports sustainable energy production and avoids restrictions on the use of biofuels.

There is room for increased Swedish production and use of biofuels based on residues from the forest industry. This enables biofuels and electrofuels to continue to be part of the solution towards reaching fossil freedom within the transport sector. Achieving the national targets requires further investments in the production of biofuels. Swedish industries call for long-term and stable conditions for these investments to be able to take place.

EFNS holds that the European Commission should set requirements for reducing climate impact from a life-cycle perspective, and not steer towards specific technologies.

#### Sustainability assessments must take regional differences into account

Europe's countries and regions are very different. Northern Sweden faces particular challenges with its vast distances, sparsely populated counties (under 12 inhabitants/km<sup>2</sup>) and a partly Arctic climate. Some of the challenges are the large transport mileage and distances between charging and filling stations. It is therefore important that Northern Sweden has a well-functioning charging infrastructure and access to different biofuels, as all kinds of solutions are needed if we are to meet our climate goals. Not one particular type of fuel solution stands out as the most sustainable end-game solution from a holistic perspective. Absolute requirements for electrification are not the solution, but rather the answer lies in applying the right fuel solution for the right purpose, where different fuel solutions can complement each other in order to enable a green energy transition.



### Biomass from residual and side streams in the forest industry

Northern Sweden is one of Europe's most forest-rich areas and boasts large rivers. The use of biomass from residual and side streams in the forest industry contributes to creating preconditions for a sustainable biofuel production, which is an important key in the transition to a sustainable energy system.

What is considered a sustainable use of renewable resources in one place can be considered unsustainable in another, depending on varying preconditions. EFNS underlines that a sustainability assessment must take regional differences into account.

The role of municipalities and regions in the transition of the transport sector and the need for legislative support and policy instruments need to be taken into account. It is important that there is an understanding of what is feasible to be implemented at the local and regional level. Municipalities and regions need long-term and clear directions, however not at a detailed level.

### Security and self-sufficiency matter

Liquid fuels, such as biofuels, allow for storage possibilities. However, it is not possible to store electricity in the same way, which creates problems if the electricity system were to be knocked out.

Biogas production in Sweden is largely based on residual waste. The process also contributes to by-products in the form of a nutrient-rich digestion residue that can be used as bio-manure and plant-based protein for animal feed. All this increases local self-sufficiency rates in times of unrest and contributes to regional development, not least in our sparsely populated counties.

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