



Gemeente Amsterdam



Comune di Bologna



City of  Enschede



City of Gothenburg



Executive Vice-President of the European Commission  
Mr. Frans Timmermans

Commissioner for Transport  
Ms. Adina Vălean

Commissioner for Environment  
Mr. Virginijus Sinkevičius

Commissioner for the Internal Market  
Mr. Thierry Breton

Commissioner for Cohesion and Reforms  
Ms. Elisa Ferreira

25 March 2021

Dear Executive Vice-President, dear Commissioners,

**Subject: Cities and civil society ask for at least half of new vans to be zero-emission in 2030**

Vans are the Achilles' heel of the European road transport policy. They are the fastest growing road<sup>1</sup> transport sector in the EU, and a rising source of air and climate pollution, especially in urban areas. Yet, they are often exempt from safety and environmental policies, such as driving regulations or tolls (unlike trucks) and benefit from less stringent CO<sub>2</sub> targets than cars. To clean up the air in cities - and meet the EU climate neutrality objective - we, the undersigned, call for the European Commission to **urgently prioritise zero-emission vans** in the upcoming revisions of the CO<sub>2</sub> standards Regulation and the Alternative Fuel Infrastructure Directive (AFID).

**Van use is booming.** Sales of new vans (light commercial vehicles) increased 57% between 2012 and 2019<sup>2</sup>. This trend is set to continue with more and more vans used to transport goods, as the surge of e-commerce during the pandemic has shown<sup>3</sup>. Vans today represent 14% of NO<sub>x</sub> emissions from vehicles in cities<sup>4</sup>. Based on data from Paris, vans emit on average around three quarters more NO<sub>x</sub> per kilometer compared to passenger cars<sup>5</sup>. With 70% of Europeans living in urban areas,<sup>6</sup> NO<sub>x</sub> and other pollutants coming from the rising number of vans must be tackled without delay. Vans are also the fastest growing source of CO<sub>2</sub> emitted from road transport. Since 1990, while CO<sub>2</sub> emissions from cars and trucks have

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<sup>1</sup> Source: Member states reporting to the UNFCCC.

<sup>2</sup> EEA, Monitoring of CO<sub>2</sub> emissions from vans – Regulation 510/2011. [Link](#)

<sup>3</sup> OECD, *E-Commerce in the time of COVID-19*. [Link](#).

<sup>4</sup> T&E calculations based on JRC, Urban NO<sub>2</sub> Atlas [Link](#).

<sup>5</sup> T&E calculations based on remote sensing by the ICCT in Paris found the average light commercial vehicle emitted 0.8gNO<sub>x</sub>/km as compared to the average passenger car at 0.46 g/km. [Link](#).

<sup>6</sup> Eurostat, urban and rural living in the EU. [Link](#).

both increased by around 20%, vans emissions have grown 58%<sup>7</sup>. **To clean-up the air and meet our EU climate target, we need zero-emission vans as soon as possible.**

In 2020 only 2% of new vans were electric<sup>8</sup>, despite cost parity with diesel already for smaller vans<sup>9</sup>. Cost parity for medium and larger vans will be reached in 2022 and 2023. Demand will therefore grow sharply during the 2020s while the key barrier remains a lack of supply. Fleet operators have been ordering electric vans from start-ups because traditional manufacturers are not able to meet the demand, e.g. UPS has ordered 10,000 e-vans from Arrival<sup>10</sup>. **This shows that the current van CO<sub>2</sub> standard regulation is not driving the market.** Ambitious CO<sub>2</sub> targets to reduce emissions are the solution as the car market has shown: in 2020, 10.5% of new car sales in the EU were electric, more than tripling the 3% share of 2019, despite the pandemic<sup>11</sup>.

To achieve climate neutrality by 2050, and to clean up the air as soon as possible, we are calling on the Commission to include the following measures as part of the revision of the CO<sub>2</sub> standard regulation for vans and the AFID:

- **All new vans must be zero-emission by 2035 at the latest.** Cities are leading the way with access restrictions for internal combustion engine vehicles, setting a clear pathway to phase out diesel and petrol vans, some of these restrictions applying in 2025 and many more following by 2030<sup>12</sup>. The EU should endorse this movement with an EU-wide phase-out date for internal combustion vans.
- **To unlock the supply, at least 50% of new vans sold must be electric in 2030** and ideally significantly more than 50% considering the growing number of cities introducing zero-emission zones,<sup>13</sup> for which sufficient e-van output is vital.
- **Incentives for plug-in hybrid electric vans (PHEVs) must be avoided**, noting the lessons from passenger cars where the average real-world emissions of plug-in hybrids are two to eight times higher than those recorded in lab testing.<sup>14</sup>
- Accelerated deployment of charging infrastructure is needed to support the uptake of zero-emission vans. To achieve this, an ambitious revision of the Alternative Fuels Infrastructure Directive (AFID) should deliver on setting **binding national targets on the number of public fast and ultra-fast chargers for electric vans** with chargers located in active collaboration with cities.

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<sup>7</sup> Source: Member states reporting to the UNFCCC.

<sup>8</sup> Based on Dataforce data.

<sup>9</sup> Already today there is evidence of e-van leasing contracts offered for less than the cost of the equivalent diesel van. [Link](#).

<sup>10</sup> Electrive (2020), UPS invests in Arrival and orders 10k electric vans, 30 January. [Link](#).

<sup>11</sup> Transport & Environment (2020). Mission (almost) accomplished. [Link](#).

<sup>12</sup> The ICCT (2020), The end of the road? An overview of combustion-engine car phase-out announcements across Europe. [Link](#).

<sup>13</sup> Website summarizing urban access regulations in the EU. [Link](#).

<sup>14</sup> The ICCT, Fact sheet: Real-world usage of plug-in hybrid electric vehicles. [Link](#); Transport & Environment (2020), Plug-in hybrids in new emissions scandal as tests show higher pollution than claimed. [Link](#)

- For a comprehensive charging ecosystem, **support should also be provided for the deployment of charging infrastructure at the depot** (overnight charging) and **at distribution hubs** (charging while loading and unloading).

Finally, we urge you to find an effective legislative solution to allow EU cities to exchange the data needed to enforce zero- and low-emission zones against vehicles registered in other Member States, and we are strongly concerned about the length of time it is taking to find a solution<sup>15</sup>.

The forthcoming proposals to revise the van CO<sub>2</sub> emission performance standards and the AFID represent a once in a decade opportunity to decarbonise vans - and we urge you to take it.

Yours sincerely,

**Signatory cities:** Amsterdam, Bologna, Eindhoven, Enschede, Gdynia, Gothenburg, Groningen, Haarlem, Leiden, Lisbon, Łódź, Nijmegen, Palermo, Paris, Porto, Rotterdam, s’Hertogenbosch, the Hague, Tilburg, Turin, Utrecht, València, Walbrzych, Warsaw, Wrocław, Zaanstad, and Zwolle.

**Signatory organisations:** POLIS, Transport & Environment

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<sup>15</sup> We understand that the Commission (DG MOVE) declined the option of extending the directive governing the cross-border exchange of information related to traffic offences, but [tendered](#) for pilot projects involving the sharing of information.

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