



September 2017
AK Position Paper

Mobility Package „Europe on the Move“

Monitoring and Reporting of CO₂ Emissions from
and Fuel Consumption of new heavy-duty vehicles

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About us

The Austrian Federal Chamber of Labour is by law representing the interests of about 3.6 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore the Austrian Federal Chamber of Labour is a part of the Austrian social partnership. The Austrian Federal Chamber of Labour is registered at the EU Transparency Register under the number 23869471911-54.

The AK EUROPA office in Brussels was established in 1991 to bring forward the interests of all its members directly vis-à-vis the European Institutions.

Organisation and Tasks of the Austrian Federal Chamber of Labour

The Austrian Federal Chamber of Labour is the umbrella organisation of the nine regional Chambers of Labour in Austria, which have together the statutory mandate to represent the interests of their members.

The Chambers of Labour provide their members a broad range of services, including for instance advice on matters of labour law, consumer rights, social insurance and educational matters.

More than three quarters of the 2 million member-consultations carried out each year concern labour-, social insurance- and insolvency law. Furthermore the Austrian Federal Chamber of Labour makes use of its vested right to state its opinion in the legislation process of the European Union and in Austria in order to shape the interests of the employees and consumers towards the legislator.

All Austrian employees are subject to compulsory membership. The member fee is determined by law and is amounting to 0.5% of the members' gross wages or salaries (up to the social security payroll tax cap maximum). 816.000 - amongst others unemployed, persons on maternity (paternity) leave, community and military service - of the 3.6 million members are exempt from subscription payment, but are entitled to all services provided by the Austrian Federal Chambers of Labour.

Rudi Kaske
President

Christoph Klein
Director

The AK's position in detail

The present proposal introduces an EU-wide system for the monitoring and reporting of CO₂ emissions from and fuel consumption of new heavy-duty vehicles. The establishment of a central database for all newly registered vehicles, starting in 2020, at the European Environment Agency aims to help achieve a greater level of transparency, innovation and competition. This proposal is embedded in EU initiatives on climate action and forms the basis for a new EU CO₂ standard for heavy-duty vehicles. Manufacturers of heavy-duty vehicles will have to calculate their vehicles' CO₂ emissions themselves, using the VECTO software tool, and transmit the data to the competent authorities.

In principle, the Federal Chamber of Labour (BAK) welcomes initiatives for increased fuel efficiency of heavy-duty vehicles, as the projected road freight volumes will pose a tremendous climate action challenge for our society. At first sight, the proposal does not affect any employee or consumer interests. However, the demand that a future CO₂ standard for lorries should be a requirement for tax or toll concessions as well as other public subsidies, and that therefore not only manufacturers and buyers of heavy-duty vehicles will be affected, is already foreseeable. For this reason, this Regulation has to seamlessly guarantee transparency, verifiability of CO₂ data by third parties and public control of manufacturers' data. The calculation of unrealistic CO₂ emissions, as happened with new passenger cars, must not be repeated in the case of heavy-duty vehicles. From

a technical point of view, BAK requests that stationary air conditioning and heating systems be taken into consideration when it comes to CO₂ efficiency, in particular of tractor units, as without such systems professional lorry drivers have to leave the engine running in the driver's cab while resting during the night or at the weekend.

CO₂ efficiency and engine-independent air conditioning of lorries

From an employee point of view, the failure of the current development status of VECTO to take into consideration the use of motor-independent stationary air conditioning units, in particular in tractor units, for the purpose of reporting CO₂ efficiency has to be criticized. BAK points out that it is unacceptable, not only for reasons of occupational health and safety but also under environmental policy, that drivers work and sleep in the cab without such units. If no such stationary air conditioning units are available, professional drivers have to leave the lorry's engine running at idle in order to have air conditioning and by doing so consume up to 3,000 litres of diesel per year during the statutorily required rest periods during the night and weekends. Therefore, BAK demands that commercial vehicles with engine-independent and, in the best case, electrically operated, air conditioning, may assert this improvement of CO₂ efficiency when obtaining certification and, as a consequence, become eligible for subsidies.

Central register for data on heavy-duty vehicles (Article 6)

According to the current version of the Regulation not all data records regarding a heavy-duty vehicle will be publicly available. From our point of view, however, full access to the data and the related input factors must be facilitated at all times, at least for the purpose of verification by the Commission and by public authorities in Member States where the vehicle was not type-tested. This is indispensable for reasons of transparency and the precise implementation of market surveillance surveys, also with a view to similar problems currently occurring with passenger cars.

Data quality (Article 7)

From our point of view, CO₂ certification by manufacturers is only acceptable if adequate verification is performed. According to the current version there is only the possibility of verification by the Commission, which, according to Article 9, might be specified by conferring the relevant implementing powers. However, BAK takes the view that this legal basis is not sufficient in order to guarantee effective control and deterrent sanctions in the Member States.

Verification of CO₂ certifications in real driving mode

What BAK misses in the operational articles and the authorizations for future decisions is the slightest attempt to review and/or further develop the VECTO software tool in real driving mode through test drives on the road. This should be done in particular in commercial vehicles segments with a high mileage (e.g. tractor-trailers, coaches).

Should you have any further questions
please do not hesitate to contact

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