# Financing electric trucks and charging infrastructure

Opportunities and shortfalls of the CEF, InvestEU and Recovery and Resilience Facility

August 2020

#### **Summary**

In July 2020, European leaders have agreed on a historic EU financial deal to boost the European economy after the COVID-19 crisis. The new Recovery and Resilience Facility (RRF), as well as the negotiations on the new Multiannual Financial Framework (MFF) offer a unique financial opportunity to enable the decarbonisation of the road freight sector and the deployment of zero-emission trucks (ZET).

This briefing looks into how financial instruments can support zero-emission trucks, and in particular battery electric trucks that will be the first ones coming into the market. There are two existing instruments: the CEF Blending Facility and the CEF Debt Instrument - the latter will be incorporated in Invest EU in the next MFF -, and there will be the RRF. These should provide the right incentives for electric trucks, notably taking into account the increased upfront capital cost of these vehicles and the fact that 99% of road transport companies are SMEs with low-margins.

In order to achieve this goal, T&E is making the following recommendations to the European Commission, the European Investment Bank (EIB) and the Member States

#### - Increase and accelerate the roll-out of zero-emission trucks:

- Member States should set up financial support programmes within the national RRF plans to help truck manufacturers scale up manufacturing of zero-emission trucks and commit to reach 10% of sales production by 2025. They should also provide subsidies for the purchase or lease of zero-emission trucks, that can be combined with access to financing under the CEF Debt Instrument. No support to gas vehicles should be granted.
- As part of the CEF Blending Calls, the European Commission should revise the
  financial support for vehicles and introduce a voucher scheme for the purchase or
  lease of a zero-emission truck, as California did with its Hybrid and zero-emission
  truck and bus Voucher Incentive Programme (HIVP). To incentivise electric trucks
  with longer range, the voucher could set different levels of financial support, based
  on the range.

#### Deploy adequate infrastructure :

- The upcoming revision of the **Alternative Fuel Infrastructure Directive (AFID)** should not set targets for gas infrastructure for heavy-duty vehicles beyond 2025.
- The definition of publicly-accessible infrastructure should be adapted so that public and destination charging infrastructure are eligible for **CEF funding**.
- As part of upcoming **CEF Blending Calls**, the European Commission should increase the co-funding rates for zero-emission infrastructure and for the vehicle up to 50% in the next programming period (2021-2027).
- The **CEF programme** should allow synergies among the different CEF horizontal priorities, such as safe and secure truck parking and sustainable mobility.

#### - End financing of fossil fuels, including gas:

- The upcoming new **EIB Transport Lending Policy** should commit to end financing for fossil fuel energy projects, as it did for its Energy Lending Policy.
- The new **InvestEU** regulation should exclude the financing of internal combustion engines vehicles, including the ones running on gas.

#### - Enable SMEs to invest in the transition:

- A new EIB programme similar to the **CEF Debt Instrument** should be dedicated to SMEs (99% of the road transport companies) to help them invest in zero-emission technologies, as California did with its Truck Loan Assistance Programme.

#### 1. Introduction: decarbonising road freight without delay

#### 1.1. Electric trucks are entering the market

While representing only 2% of the vehicles on the European roads, trucks account today for 22% of road  $CO_2$  emissions, and this is expected to increase over the coming years<sup>1</sup>. To meet the 2030 targets and the 2050 climate neutrality objective, the road freight sector has to decarbonise, which means a stronger supply of zero-emission trucks and the roll-out of adequate infrastructure.

Driven by the adoption last year of the first ever  $CO_2$  performance standards for new trucks<sup>2</sup> and factors such as dropping battery prices and growing demand<sup>3</sup>, truck manufacturers are starting to shift to zero-emission vehicles. Looking at the announcements of truck manufacturers, it is clear that battery electric trucks will be the first types of zero-emission trucks entering the market (see info box below). Therefore this briefing is specifically focusing on the financing needs of battery electric trucks. In 2022, the  $CO_2$  performance standards will be revised, which is the opportunity to increase the ambition of the 2030 target and accelerate the supply of zero-emission trucks in Europe.

<sup>&</sup>lt;sup>3</sup> Public letter, call of 30 companies and associations for zero-emission trucks binding sales targets. Link.



<sup>&</sup>lt;sup>1</sup> European Commission (2018), Impact Assessment for the regulation setting CO2 emission performance standards for new heavy duty vehicles, p7. <u>Link</u>.

<sup>&</sup>lt;sup>2</sup> Regulation (EU) 2019/1242 setting CO2 emission performance standards for new heavy duty vehicles. Link.

#### INFO BOX: New electric truck announcements by manufacturers

Almost all European truck manufacturers have announced series production of battery electric trucks, and some are already selling them. Chinese BYD will also enter the European market this year.





Volvo Trucks<sup>4</sup> and Renault Trucks<sup>5</sup> have started production and sales in 2019 (both up to 300km range). Renault Trucks expects electric vehicles to account for 10% of its sales by 2025<sup>6</sup>.



Daimler<sup>7</sup> announced series production of electric trucks in 2022.



VDL, partner of DAF, already delivered several vehicles, including tractor-trailers<sup>8</sup> (100km range).



Traton claims "the future of urban transport is going electric". From the group, MAN<sup>9</sup> has announced small series production of the eTGM in 2019 (200km range) and Scania plans a hybrid truck with pantograph charging<sup>10</sup> and series production of its 20t electric truck in the first quarter of 2021<sup>11</sup>. (140km range).



Iveco currently focuses on the Daily Electric (200km range) van but has partnered with Nikola to deliver in 2021 battery electric trucks with a range of about 500 km<sup>12</sup>. They estimate that 8-10% of EU sales of vehicles above 16t will be zero emission in 2025<sup>13</sup>.



BYD will sell commercial electric vehicles this year including 7.5t and a 19t truck<sup>14</sup>.

<sup>&</sup>lt;sup>14</sup> BYD, LinkedIn post (5/05/2020), <u>Link</u>.



<sup>&</sup>lt;sup>4</sup> Volvo Trucks (6/11/2019) "Volvo Trucks launches sales of electric trucks for urban transport". <u>Link</u>.

<sup>&</sup>lt;sup>5</sup> Renault Trucks (29/06/2018) "Renault Trucks unveils its second generation of electric trucks". <u>Link</u>.

<sup>&</sup>lt;sup>6</sup> Electrive (3/03/2020) "Renault electric truck serial production picks up steam". <u>Link.</u>

<sup>&</sup>lt;sup>7</sup> Daimler (25/10/2019) "Daimler Trucks & Buses targets a completely CO2-neutral fleet of new vehicles by 2039 in key regions". <u>Link</u>.

<sup>&</sup>lt;sup>8</sup> DAF, Press release (18/12/2018, "Jumbo takes delivery of the first DAF CF Electric". <u>Link</u>.

<sup>&</sup>lt;sup>9</sup> MAN, (2/12/2019) "MAN produces small production run of all-electric trucks". <u>Link</u>.

<sup>&</sup>lt;sup>10</sup> Traton (29/11/2017) "Urban transport is going electric". Link.

<sup>&</sup>lt;sup>11</sup> Verkehrsrundshau (13/08/2020) "Scania testet electro-LKW in Dänmark". <u>Link</u>.

<sup>&</sup>lt;sup>12</sup> Reuters (2/12/2019) "CNH Industrial's Iveco unveils first electric truck in partnership with Nikola", Reuters. Link.

<sup>&</sup>lt;sup>13</sup> Hydrogen Europe, IVECO's presentation "Powering the transition towards green energy in Europe". <u>Link</u>.

#### 1.2. Existing barriers for the uptake of battery electric trucks

The business model of e-trucks, characterised by high capital and low operational costs, currently raises the issue of access to upfront financing. The current purchase price of an e-van is around 20% higher than a diesel equivalent<sup>15</sup> and up to three to four times higher for a 40t battery electric tractor truck<sup>16</sup>. The charging infrastructure deployment can also be costly depending on the electricity grid infrastructure already available. Potential upgrades of the grid, installation of transformers, electricity work on site and charging stations need to be considered. In the absence of public support, logistic companies have to face such costs<sup>17</sup>.

This, while 99% of the transport companies have fewer than 50 employees, for which capital intensive investments can be an issue. The sector is also known for being extremely competitive with low profit margins<sup>18</sup>. To accelerate the transition, and have a meaningful number of electric freight vehicles on the road by 2025, significant financing support will be needed.

#### Tackling infrastructure needs: urban and regional delivery trucks should be prioritised by 2025.

To ensure that these battery electric trucks can be operated, Europe and its Member States need to start rolling out adequate charging infrastructure. The first infrastructure needs of electric trucks will be overnight private charging infrastructure at the depot and destination charging (while loading and unloading at logistic hubs or big supermarkets for example). Prioritizing urban and regional infrastructure would fulfill the need of battery electric trucks with a range up to 300km, which means that already half of the distance driven by trucks in the EU could be covered by electric trucks<sup>19</sup>.

However, EU legislative instruments and financial support, i.e. AFID the TEN-T guidelines, currently focus on publicly accessible infrastructure. In the case of e-trucks, this means mainly support for long-haul operations.

Truck manufacturers also recently called for "approximately 24,000 charging points with DC<100 kW capacity (of which 4,000 publicly-accessible and 20,000 private depot chargers), 11,000 public stations with DC350 kW and 2,000 public charging points with DC>500 kW" by 2025<sup>20</sup>.

<sup>&</sup>lt;sup>20</sup>ACEA Position Paper, (2020) "Charging and re-fuelling infrastructure required for heavy-duty vehicles". <u>Link.</u>



<sup>&</sup>lt;sup>15</sup>DP DHL Group's during T&E event (19/02/2020) 'Getting zero-emission trucks on the roads', Q&A.

<sup>&</sup>lt;sup>16</sup> Öko Institut, (2018) "Oberleitungs-Lkw im Kontext weiterer Antriebs- und Energieversorgungsoptionen für den Straßengüterfernverkehr" p44-45. <u>Link</u>.

<sup>&</sup>lt;sup>17</sup> FREVUE project (2014), Electricity grid infrastructure upgrade. <u>Link</u>.

<sup>&</sup>lt;sup>18</sup> IRU (2017), Commercial vehicle of the future: a roadmap towards fully sustainable truck operations, p24. <u>Link</u>.

<sup>&</sup>lt;sup>19</sup>T&E (2020) "Recharge EU trucks - time to act! A roadmap for electric truck charging infrastructure deployment". <u>Link</u>.

#### 1.3. EU funding mechanisms to accelerate the shift

This briefing focuses on how the EU can accelerate the transition towards zero-emission freight via its financial support. In 2016, the European Investment Bank (EIB) and the European Commission (EC) launched the **Cleaner Transport Facility (CTF)**, an initiative to support the deployment of cleaner transport vehicles and their associated infrastructure needs.

The Cleaner Transport Facility (CTF) covers three main instruments:

	How does it work?	Scope
CEF Blending operations	<ul> <li>A combination of:</li> <li>CEF support in the form of grants</li> <li>a loan from public banks (such as the (EIB) or a National Promotional Bank<sup>21</sup>) or a private sector investor</li> </ul>	Mostly publicly accessible infrastructure and public transport but private vehicles have also been supported in the 2017 and 2019 Blending Calls.
CEF Debt Instrument	The CEF budget acts as a guarantee to a loan provided by the EIB or a National Promotional Bank, in case of payment default.	Any kind of assets, be it public or private, vehicle and infrastructure with a focus on clean transport and future mobility.
EIB operations	Better loan conditions that usually include lower interest rates, longer grace <sup>22</sup> and payback periods than normal commercial banks.	Any kind of assets, be it public or private, vehicle and infrastructure.

This briefing analyses the two CEF instruments that are using the EU budget to leverage private investment. It identifies the shortcomings of these two instruments, as well as the opportunities of the RRF, to support effectively the market development of electric trucks, and formulates policy recommendations to the European Commission to address them.

#### 2. CEF Blending operations & their shortfalls for electric trucks

The CEF Blending facility is a combination of public support in the form of grants with a loan from public banks or private sector investors. It covers mostly publicly accessible infrastructure and public transport, but private vehicles have also been supported in the 2017 and 2019 Blending Calls.

#### 2.1. Co-financing mechanism

The 2019 CEF Blending Call offers the co-funding rates indicated in Table 1. For mobile assets, it covers the cost difference of the alternative fuel-powered vehicle versus a conventional solution<sup>23</sup>.

<sup>&</sup>lt;sup>23</sup> European commission (15/11/2019), 2019 CEF Blending Call. Link.



<sup>&</sup>lt;sup>21</sup> Up until now the NPB of Spain, Poland, France, Slovenia and Hungary are participating in the programme.

<sup>&</sup>lt;sup>22</sup> A grace period is the length of time after the due date during which payment may be made without penalty.

#### Co-funding rates of the Action

Type of Alternative Fuel technology Infrastructure		Mobile assets		
		Trucks and buses	Vessels	Railway vehicles
CNG	10%	10%	/	/
LNG	10%	10%	15%	/
Electricity	15%	20%	20%	/
Hydrogen	20%	20%	20%	20%

Table 1: Co-funding rate of the 2019 CEF Blending Call for alternative fuel priority

**Co-financing rates for the vehicle and infrastructure:** infrastructure costs are highly capital intensive, and can be a significant burden for SMEs. In a scenario where a diesel truck costs around €80 000 and a battery electric truck with 400 km range around €250 000<sup>24</sup>, the CEF Blending co-financing rates offer a €34 000 subsidy. This support is a good first step, however this incentive is likely not to be sufficient. In comparison, the State of California offers purchase subsidies for zero-emission trucks up to \$150 000, covering almost the entire price difference.<sup>25</sup>

The new CEF Regulation for the next programming period (2021-2027) states that "the amount of Union financial assistance shall not exceed 30 % of the total eligible cost. The co-financing rates may be increased to a maximum of 50 % [...] for actions related to new technologies and innovation" The Commission should consider this possibility to increase the co-financing rate for zero-emission infrastructure. Providing the right level of support for these upfront costs would be a real game changer, especially for SMEs.

**Calculating the vehicle co-financing rate**: The system to calculate the co-financing rate for the vehicles, i.e. the difference of the alternative fuel-powered vehicle versus a conventional solution, is rather complex and burdensome for hauliers and small SMEs. We recommend to simplify and streamline this support, using a voucher system<sup>27</sup>, as it is the case with the Californian scheme mentioned above. To incentivise electric trucks with a longer range and efficiency improvements, the voucher could be based on the range of the vehicle, calculated by the VECTO tool. Electric trucks will be integrated in the VECTO tool over the coming year, as agreed in the adopted truck CO2 standards regulation<sup>28</sup>. As it is the case today, the vouchers should be available on a first-come first-served basis to stimulate the market.

<sup>&</sup>lt;sup>24</sup> Öko-Institut e.V. (2018), p132. Link.

<sup>&</sup>lt;sup>25</sup> CARB, Proposed Fiscal Year 2017-18 Funding Plan for Clean Transportation Incentives, p105. <u>Link</u>.

<sup>&</sup>lt;sup>26</sup> Political agreement of the Connecting Europe Facility Programme regulation (2020-2027), article 14. Link.

<sup>&</sup>lt;sup>27</sup> The EU also uses this voucher financing scheme (called "unit contributions") for proposals addressing European Rail Traffic Management System (ERTMS), another CEF priority that is financed by the CEF Blending operations.

<sup>&</sup>lt;sup>28</sup> Regulation (EU) 2019/1242 setting CO2 emission performance standards for new heavy duty vehicles. <u>Link</u>.

#### 2.2. Shared infrastructure should also be eligible

There are three different charging needs for trucks: private charging at the depot, shared charging at the distribution hub or logistics center and public charging. Under the current definition set by the AFI directive, only public chargers are eligible for funding.

Public means a non-discriminatory access, i.e. no contract is required to access the charging facility. It can be on private premises and may include different terms of authentication, use and payment, as long as a driver is not contractually bound to have access to these premises. This fits well with the needs of destination charging for cars, such as supermarkets or urban parking facilities. However, this de facto excludes destination charging for trucks, as hauliers and shippers are bound by a contract, giving them access to, for example, a logistics hub.

The definition for non-discriminatory access should therefore be based on the criteria of shared infrastructure, so that destination charging for trucks is also eligible. Co-financing rates for shared destination charging could be lower than the ones for public charging to avoid market distortion and encourage the rollout of public charging networks too.

## 2.3. Synergies should be allowed across the different priorities of the CEF programme

CEF Transport calls are designed in silos, according to the different CEF horizontal priorities. For instance, on the one hand, a first CEF Transport Call launched in October 2019 earmarks €500 million for Safe and Secure Infrastructure for trucks. It foresees the development of sanitary facilities and surveillance systems for truck parking areas all across Europe. On the other hand, the call does not include financing for the deployment of alternative fuel infrastructure, another horizontal priority, in such new or renovated parking areas. This, even though parking operators could have an economic benefit in providing at the same time alternative fuel infrastructure. Allowing synergies between different priorities would lower costs and make the programme much more effective.

# 3. CEF Debt Instrument shortfall: not fit for supporting trucking companies

In the CEF Debt instrument, the CEF budget acts as a guarantee to a loan provided by the EIB or a National Promotional Bank, in case of payment default. It covers any kind of assets, be it public or private, vehicle and infrastructure, with a focus on clean transport and future mobility. It is a key instrument to offer access to finance to haulier SMEs that will face high upfront costs when shifting to zero-emission mobility. In the next programming period (2021-2027), it will be part of InvestEU.

#### 3.1. A minimum threshold that is not manageable for road freight SMEs

A minimum financing threshold for a project to apply is set at €7.5 million<sup>29</sup>, to cover administrative costs and low interest rates. In practice, the EIB rarely directly funds projects below €25 million<sup>30</sup>. Below this threshold, financial intermediaries such as commercial banks, leasing companies or national promotional banks can also request a loan to pass it on to smaller companies. This is a good way to bring EIB loans closer to SMEs, but the €7.5 million is still too high for the big majority of road transport companies, owning only a dozen trucks. Depending on the power of the chargers and on the type of vehicles, this represents the installation of 300 to 2,300 chargers<sup>31</sup>.

There are other EU guarantee instruments specifically targeting SMEs, such as the COSME loan guarantee<sup>32</sup>. However, unlike under the CEF Debt Instrument, transport is not prioritised under the COSME programme, thus road freight transport companies have to compete with other sectors.

Here again, California offers a good alternative with a guarantee scheme specifically targeting road transport SMEs. The Truck Loan Assistance Programme<sup>33</sup> is also a guarantee mechanism but reserved for truck fleets with 10 or fewer trucks, having less than 100 employees and generating less than \$10 million in annual revenue. We recommend the creation of such a scheme in Europe as well.

### 3.2. Loan schemes alone are not enough to make the shift to zero-emission trucks

The European Commission and the EIB should encourage the combination of different financing instruments for SMEs, such as access to EIB loans (or from its financial partners) with subsidies from EU, national or regional level, especially for heavier trucks. This is the case in California, where the loan assistance programme can be combined with the voucher programme to cover the high vehicle costs.

#### 4. CEF Debt and CEF Blending shortfall: supporting gas projects

Trucks running on gas are not a long-term clean alternative that will decarbonise the road freight sector<sup>34</sup>. A T&E report published in 2018<sup>35</sup> identified that, for heavy-duty vehicles, the overall (well to wheel) GHG performance ranges from -2% to +5% compared to diesel trucks, depending on the fuel (CNG or LNG) and engine technology. Indeed, poor gas engine efficiency often offsets the benefit of the fuel already at tailpipe level. Uncertainties also exist regarding methane leakage, mostly from a well to tank perspective. Methane is a very powerful greenhouse gas, being 28 times more harmful than CO2

<sup>&</sup>lt;sup>35</sup> Transport & Environment (2018), "Natural gas-powered vehicles and ships - the facts". Link.



<sup>&</sup>lt;sup>29</sup> EIB, Connecting Europe Facility Debt Instrument webpage (consulted on 2020, April 20th). Link.

<sup>&</sup>lt;sup>30</sup> EIB, Apply for a loan webpage (consulted on 21/04/2020). Link.

<sup>&</sup>lt;sup>31</sup> A charger for a big battery BETs charging at 50kW overnight is around 25k€ when a charger for a smaller BET (or a van) charging at 11-22kW overnight costs around 3.3-6.6k€ per charger. This includes installation, equipement and grid connection. T&E, Unlocking electric charging in the EU: recharging in cities. Link.

<sup>&</sup>lt;sup>32</sup> European Investment Fund, COSME - Loan Guarantee Facility (LGF), consulted on 30/04/2020. Link.

<sup>&</sup>lt;sup>33</sup> CARB (26/11/2019) Facts about CARB's Truck Loan Assistance Program. Link.

<sup>&</sup>lt;sup>34</sup> Transport & Environment (2019), "Do gas trucks reduce emissions?". Link.

over a period of 100 years. Given that its climate benefits are minimal and in some cases non-existent, fossil gas should not receive EU financing support anymore.

Biomethane and power-to-methane can have significantly lower GHG emissions than fossil gas and diesel, but are no better regarding air-quality. Moreover, sustainable feedstocks for biomethane (wastes, residues) are limited and cannot be sustainably scaled. Assuming that the maximum sustainable potential production of biomethane is allocated to transport - which is very unlikely - this could only cover 6.2- 9.5% of transport's energy needs by 2050<sup>36</sup>.

Notwithstanding these facts, both CEF Blending and CEF Debt Instrument have been financing gas truck projects over the last few years.

Project	Support	Details
BioLNG EuroNet <sup>37</sup>	€25,4 million CEF Blending	Build 39 LNG refuelling sites along the Core TEN-T corridors from southern Spain to eastern Poland, via France, Belgium, the Netherlands and Germany. Provide leasing solutions for 2,000 LNG trucks. Build a BioLNG plant in the Netherlands.  N.B. No insurance is given to trace the fuel used - biomethane or fossil gas - at the 39 LNG stations or in the 2,000 LNG trucks.
Blue Stations network <sup>38</sup>	€5,5 million CEF Blending	Deploy 15 CNG and LNG stations in France, Italy and the United Kingdom.
ECO-Net <sup>39</sup>	€1,3 million CEF Blending	Equip 23 conventional refuelling stations in Spain with alternative fuels. Deploy 42 LCNG, 16 CNG and 1 hydrogen refuelling point.
Grupo Ruiz <sup>40</sup>	€28 million CEF DI	Purchase 32 electric and 141 CNG busses and the construction of associated infrastructure needs.

<sup>&</sup>lt;sup>40</sup> EIB (2019, November 28th), Grupo Ruiz Clean Bus fleet. Link.



<sup>&</sup>lt;sup>36</sup> Transport & Environment (2018), "Natural gas-powered vehicles and ships - the facts". <u>Link</u>.

<sup>&</sup>lt;sup>37</sup> INEA website, last modified April 2020. <u>Link</u>.

<sup>&</sup>lt;sup>38</sup> INEA website, last modified April 2020. Link.

<sup>&</sup>lt;sup>39</sup> European Commission, Press Corner, Boosting the EU's Green Recovery: EU invests over €2 billion in 140 key transport projects to jump-start the economy. Link.

#### 5. RRF: new opportunities for zero-emission trucks

As part of the EU Recovery Fund, Member States will submit **national Recovery and Resilience Plans** between October 2020 and April 2021. The money injected into the economy will shape the European industrial strategy in the medium term. The EU Recovery plan is therefore a unique opportunity to clearly prioritise climate change mitigation.

It is highly important that these plans are compliant with the EU's target of climate-neutrality by 2050 and existing or upcoming 2030 climate legislation, such as emission standards for vehicles. Support measures for trucks, should only go to zero-emission technologies - following the example of California in its Advanced Truck Regulation adopted in June 2020<sup>41</sup>.

As part of the EU Recovery Package, the European Commission also submitted a new proposal for the **InvestEU** programme.<sup>42</sup> It created a new spending window "Strategic European Investment Policy Window" and aligned the rest of the text with that of the partial agreement<sup>43</sup>. InvestEU is the main programme supporting investment in the EU. It is therefore equally important that it exclusively supports zero-emission technologies for trucks.

#### 6. Conclusion: policy recommendations

#### 6.1 CEF Blending operations: make it fit for electric trucks

- The European Commission should apply the **50% co-funding rates** for projects deploying zeroemission infrastructure and vehicles, as the article 14 of the new CEF regulation (programming period 2021-2027) allows it.
- In this new programming period, the European Commission should revise the financial support for vehicles and introduce a **voucher scheme** for the purchase or lease of a zero emission truck. To incentivise electric trucks with longer range, the voucher could set different levels of financial support, based on the range determined by the VECTO tool.
- The European Commission should make the necessary changes to the programme to allow synergies among the different CEF horizontal priorities, such as safe and secure truck parking and sustainable mobility. This should already be implemented in the first three-year work programme of the new programming period (2021-2023).
- The definition of publicly-accessible infrastructure should be adapted so that **shared charging infrastructure** is eligible for CEF funding. This should be reflected in the upcoming revision of the AFI directive as well as in upcoming CEF blending operations.

#### 6.2. CEF Debt Instrument: make it accessible to trucking companies

- The existing €7,5 million minimum threshold is a big barrier for SMEs to apply for EIB loans with an EU guarantee. The EIB should create a **specific mechanism targeting SMEs** with 10 trucks or less to help them invest as from today in the transition to zero-emission trucks, as California

<sup>&</sup>lt;sup>41</sup> CARB, Advanced Truck Regulation, June 2020. Link.

<sup>&</sup>lt;sup>42</sup> European Commission, New proposal for a regulation establishing the InvestEU Programme. Link.

<sup>&</sup>lt;sup>43</sup> Political agreement for the InvestEU programme (2021-2027), Annex V-B-(12). Link.

did<sup>44</sup>. This should be reflected in the upcoming delegated act on the investment guidelines for the SMEs (art 7 of InvestEU regulation)<sup>45</sup>.

#### 6.3. Phasing out support for fossil gas

- **EIB Transport Policy:** In November 2019, the EIB launched its new climate strategy and published its updated Energy Lending Policy, in which it commits to end financing for fossil fuel energy projects<sup>46</sup>. A similar decision should be made for transport projects in the revision of the EIB transport policy announced for Q4 2020. These lending policies are approved by the EIB Board of Directors, which consists of representatives of the 28 EU member states and the European Commission.
- **AFID revision:** The upcoming revision of the Alternative Fuel Infrastructure Directive should not set targets for gas infrastructure for heavy-duty vehicles beyond 2025.

The following amendments should be introduced to the **new InvestEU regulation**<sup>47</sup>:

- The exclusionary list in InvestEU (Annex V) should include internal combustion engines vehicles, including the ones running on gas.
- Only zero-emission mobility should be eligible for any transport-related guarantees in InvestEU's new "Strategic European Investment Policy Window" (Art. 7.1.e).
- The eligible activities under Annex II for the other four spending windows, including the Sustainable Infrastructure Policy Window, should be amended to remove unsustainable biofuels, and fossil gas for trucks.

#### 6.4. RRF: giving clear signals for the roll-out of ZET

**National Recovery and Resilience Plans** should be compliant with the EU's target of climateneutrality by 2050 and existing 2030 climate legislation (e.g. emission standards for vehicles):

- Member States should set up financial support programmes to help truckmakers scale up manufacturing of zero-emission trucks and commit to reach 10% of sales production by 2025.
- They should also provide subsidies for the purchase or lease of ZET, such as the California HVIP Programme<sup>48</sup>, that can be combined with the CEF Debt Instrument.

#### **Further information**

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<sup>&</sup>lt;sup>44</sup> CARB, Truck Loan Assistance Programme, last consulted in August 2020. Link.

<sup>&</sup>lt;sup>45</sup> Political agreement for the InvestEU programme after inter institutional negotiations (24/05/2019), art. 7. Link.

<sup>&</sup>lt;sup>46</sup> EIB, (14/112019) "EU Bank launches ambitious new climate strategy and Energy Lending Policy." Link.

<sup>&</sup>lt;sup>47</sup> For more information, please see T&E paper on "Securing a Sustainable Recovery". Link.

<sup>&</sup>lt;sup>48</sup> CARB and Calstart, HVIP Programme. Link.