

Response to the consultation for the draft multi-year program for the recycling of the truck tax

Who we are:

Einride is a freight technology company pioneering a new era of road freight by building a sustainable, safe and smart end-to-end shipping solution. Founded in Sweden in 2016, Einride is expanding to the rest of Europe and the United States. Einride operates Europe's largest fleet of battery electric trucks - a fleet of both manned and autonomous electric trucks. Einride is present in Sweden, Norway, Germany, Belgium, Netherlands, the UK and the U.S.

Einride is generally positive about the Multi-year Program for Sustainability and Innovation in the Transport Sector. We especially support the different initiatives and actions proposed to accelerate the transition to zero-emission freight transport and battery electric heavy goods vehicles (BE HGVs). HGVs account for 11% of CO₂ emissions in the Netherlands, thus zero-emission HGVs will play an important role in combating climate change.

As acknowledged in the *Roadmap - Towards an emission-free and innovative freight transport sector*, the purchase price of BE HGVs is still 3-3.5 higher than their fossil fuel equivalents. Higher purchase price also leads to higher Total Cost of Ownership (TCO), which is expected to decrease as the purchase price of BE HGVs decreases. However, until the TCO of BE HGVs decreases to the level of fossil fuel HGVs, incentives that help to bridge the gap between BE HGVs and fossil fuel HGVs is needed. Einride is therefore very happy to see that several incentives supporting the transition towards zero-emission freight transport are included in the draft of the Multi-year Program, some of which are already in place and accelerating the uptake of zero emission HGVs.

About the specific proposals:

Truck tax - In an industry, such as freight transport, where margins are razor-thin, any measure which helps to improve the business case is important. Since the TCO for BE HGVs is higher, incentives such as the truck tax where the rate is based on CO₂-emissions will improve the business case for BE HGVs and thus speed up the transition to zero-emission vehicles. The truck tax being charged per kilometer is also positive since that will require operators to increase their efficiency, which will have a positive impact on both emissions and congestion as the fill-rate of the average truck is, in general, only around 50%. However, Einride would like to see the truck tax per km be

implemented sooner than 2026 as everyday counts and the solutions to make the green transition already exist on the market.

Subsidy scheme - The subsidy scheme for the purchase of zero-emission trucks, AanZET, is an important contribution from the government to speed up the uptake of zero-emission HGVs in the Netherlands. Einride is one of the companies that has received funding to purchase zero-emission HGVs, which would not have been possible without the subsidy. It's essential that it remains in place until the purchase price is closer in parity with the fossil fuel HGVs.

Charging - When purchasing BE HGVs it is also important to know that there will be sufficient charging options. Since the majority of the charging for BE HGVs will be done at depot, it's very positive that a subsidy scheme for depot charging infrastructure will be implemented during 2024. Remaining charging is often done at public charging infrastructure, thus it is crucial that the build out of public charging infrastructure continues in the Netherlands. Einride has a lot of experience from subsidy schemes for charging infrastructure in other European markets and it is essential that the subsidy schemes are structured in the right way in order to minimize administrative burden and accelerate the build out of charging infrastructure. For example, it's important to consider application windows, permitted time for orders, application documents etc. Einride is happy to contribute with the knowledge gained from building subsidized charging infrastructure in other European markets, such as in Sweden. However, even with subsidies for construction of charging infrastructure, there are several challenges that remain, not least congestion in grid capacity and limited access to land. Therefore, it's important to also support companies in alleviating these challenges. For example, support in identifying land suitable for charging stations and subsidies for energy storage. Without a solution to these challenges, the risk is that the build out of charging infrastructure and roll-out of more BE HGVs is delayed.

Einride, is one of the leading companies in electrifying heavy duty transports in Europe, are willing to contribute with our learnings and data also to the Dutch Authorities on scaling the role of out of an electrified road transport system at scale.

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