

## Response to the consultation for the Amendment to the Truck Tax Act

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.*

General view:

Einride is positive about the proposed amendment to the truck tax act where a maximum discount will be given on the rate for emission-free trucks. HGVs account for 11% of CO<sub>2</sub> emissions in the Netherlands, and thus zero-emission HGVs will play an important role in combating climate change.

About the specific amendment:

*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 are needed.*

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 CO<sub>2</sub>-emissions will improve the business case for BE HGVs and thus speed up the transition to zero-emission vehicles. It is positive that the government proposes an exemption from the truck tax for emission-free trucks up to 4,250 kg. However, it would be even better if this exemption also included heavier emission-free trucks above 4,250 kg in the initial phase of the truck tax. This will for example be implemented initially in Flanders, Belgium, where the tax rates will increase gradually for emission-free trucks.

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.

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 out of an heavy duty electrified road transport system in Europe, including Netherlands.

Stockholm 2024-01-08