

# **JOINT DECLARATION AND PETITION**

## **of the CEOs of Europe's Leading Trailer Manufacturers**

### **on the Review and Adaptation of Regulation (EU) 2024/1610**

Adopted at Koningshooikt (Lier), Belgium, 1 July 2026

We, the undersigned chief executives and senior representatives of European trailer manufacturers, gathered in Koningshooikt on 1 July 2026 to address the consequences of Regulation (EU) 2024/1610, hereby make the following joint declaration:

We fully support the European Union's climate objectives and the transition towards more sustainable road transport. We are committed to playing our part in achieving them. At the same time, we are convinced that climate policy can only succeed if it is technically sound, economically viable and based on the operational realities of the industries it governs.

#### **The concerns we share**

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1. Trailers do not emit CO<sub>2</sub> directly. Nevertheless, manufacturers are being held responsible for simulated emissions over which they have only limited influence.
2. The VECTO methodology relies on standardized reference loads and mission profiles that do not sufficiently reflect the operational realities of European road transport, the diversity of trailer applications, real-world payload and loading requirements, and the rapidly increasing use of low- and zero-emission tractor units.
3. In order to meet the targets, manufacturers may be pushed towards design changes that reduce usable load capacity. This would result in more journeys, more empty runs and ultimately more CO<sub>2</sub> rather than less, the opposite of what the regulation intends. In addition, the reduced load efficiency would require a higher number of vehicles on the road to transport the same volume of goods, further increasing traffic density and associated emissions.
4. From 2030, the excess CO<sub>2</sub> emissions premium of €4,250 per gCO<sub>2</sub>/tkm above the target, multiplied by every vehicle registered, would expose manufacturers to penalties running into millions of euros each year. For many companies this represents a substantial threat to their competitiveness and very existence.
5. Around 70,000 jobs across Europe depend on a viable trailer-manufacturing industry. In its current form, the regulation places them at risk and marks yet another milestone in the deindustrialization of the European Union.

#### **What we call for**

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We therefore call upon the European Commission, in particular DG CLIMA and DG MOVE, and the European Parliament to:

1. Bringing forward the §15 review of the heavy-duty vehicle fleet regulation, currently scheduled for 2027, to 2026 is absolutely essential. Immediately after the monitoring, the reference values must be published and the fleet targets reduced to achievable levels, for example to 5 percent from 2030, with a phased introduction.

2. A phased introduction of the fleet targets from 1 July 2030 is imperative in order to avoid the resulting market distortions and a foreseeable loss of jobs.
3. A moratorium on the penalties: The level of the current penalty bears no relation to the market price of the vehicles and must be adjusted to a proportionate level in the review to be brought forward.
4. Revision of the VECTO trailer simulation tool so that a fair comparison of vehicles with a comparable intended use becomes possible, taking into account the transport efficiency of multifunctional vehicles. In addition, the methodology must reflect the increasing share of zero-emission tractor units, as combinations with such tractors already operate without direct CO<sub>2</sub> emissions, which is currently not adequately accounted for. Consequently, trailer fleet targets and premiums must decrease in proportion to the market adoption of zero-emission tractors, phasing out entirely once these tractor units reach a 70 percent market share.
5. The announced credit-and-debit system for the next four years is almost entirely ineffective, because the CO<sub>2</sub>-reduction technologies available for trailers cannot be brought to market in meaningful volumes within this time period to undercut the still-unknown baseline to earn credits. On the one hand, the market is not yet prepared to sufficiently finance the additional costs; on the other, only a few technologies are genuinely market-ready. Development takes time. A gradual phasing-in of the fleet targets would be more realistic and more predictable here.

In a spirit of European unity and shared responsibility, we stand ready to contribute our technical expertise constructively, so that the regulation can deliver genuine emissions reductions while safeguarding a strong, innovative and competitive European trailer-manufacturing industry.