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Heavy-duty vehicles new vehicle sub-groups for extra-heavy combination lorries

Finnish Forest Industries Federation (EU Transparency Register 39671713910-36) **welcomes the Commission's initiative** to add separate vehicle sub-groups for 'extra-heavy combination lorries' to the EU regulation that sets CO2 standards for heavy-duty vehicles (Regulation (EU) 2019/1242). We welcome the vehicle sub-groups presented as they better reflect the real use case of 76-tonnes timber truck widely used in Finland for raw wood supply. However, it is important that in the long run the development work is continued to ensure the level playing field for the heaviest and longest vehicle combinations in CO2 emission calculations.

Based on simulated results of VTT ltd (2/2025), using Long Haul driving cycle and the EHC reference payload of 42 000 kg would result in CO2 emission **calculation on average 25 % higher than the measured values of the typical timber truck**. The use of Long Haul mission profile with the increased payload closer to the actual use case values, around 50000−55000 kg, will provide specific emission results closer to the actual values of 8x4 trucks and show the effect of high-capacity transports.[1]

The work on sub-groups and realistic driving profiles needs to be continued in the long run to ensure that CO2 standards can be applied fairly and do not weaken incentives for automotive sector to produce energy-efficient 76-tonnes vehicle combinations as well as specialised vehicle combinations for forestry's use. Finnish forest industries have been actively involved in developing energy-efficiency measures to cut emissions per tonne-kilometre for over 25 years. Achieved results have proved that with optimisation of weights and dimensions road transportation can become substantially greener and cost-effective, leading to safer and more sustainable supply and value chains.

Alone developing weights and dimensions of vehicles to meet regional and industry needs has increased energy-efficiency and lowered fuel use in the forestry sector by 20% since year 2013 (weights arising from 60 tonnes to maximum 76 tonnes). The number of timber cargos on national roads has reduced by 25% substantially alleviating the driver shortage. No effects on national road safety have been noted.[2]

[1] VTT 28.2.2025: VECTO Simulation for 76-ton Vehicle Combinations - VTT's Research Information Portal

[2] Only in Finnish: https://www.metsateho.fi/wp-content/uploads/Raportti-270-Puutavara-ja-Hakeajoneuvojen-Massojen.pdf