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European Commission, Directorate General for Transport

Members of the expert group for safe and secure trucks parking areas

14 July 2020

**Re: European standards for safe and secure truck parking areas and widening the scope to zero-emission trucks and refrigerated trailers**

Dear European Commission,

Dear representatives of the EU Member States, members the expert group for safe and secure trucks parking areas,

The ongoing European Commission initiative to develop new standards for safe and secure truck parking areas in Europe, is highly relevant, to ensure safe and good resting conditions for European truck drivers. We therefore very much welcome this initiative. However, in the context of the European Green Deal and given the urgency to decarbonise the road transport sector to reach climate neutrality in 2050, the co-signatories of this letter are concerned that, in the standards presented in the study of the European Commission in May 2019<sup>1</sup>, the current needs of refrigerated trailers and the future needs of zero-emission trucks are not taken into account.

To decarbonize the road freight sector and drastically reduce air pollution, trucks will have to be electrified, either by the means of batteries or hydrogen fuel cells. Therefore, charging and refueling infrastructure will have to be developed along the motorways. Already today, the first steps can be taken to facilitate the future deployment of charging and refueling infrastructure on parking areas and reduce costs. Indeed, requesting the map of existing electricity grid capacity, when parking facilities are built or renovated, will optimise the choice of the location of new parking areas and enable better planning of future needs, while avoiding delays and unexpected costs in the future. This will therefore make these parking areas future-proof.

Moreover, 95% of equipment used on refrigerated trailers in Europe are equipped with a plug but cannot charge or run on electricity during rest times, because of a lack of infrastructure. The refrigerator can switch

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<sup>1</sup> European commission (May 2019), Study on Safe and Secure Parking Places for Trucks Final report. [Link](#).

over from diesel operation to electric operation when connected to a 400V net when it is parked. Equipping all parking areas with access to electrical plug for electric cooling could save 69% CO<sub>2</sub>, 93% NO<sub>x</sub> and 96% of PM emissions per net operating hour<sup>2</sup>. Further emissions savings would result as the share of renewables in the power mix increases. It will also improve the quality of the mandatory drivers' rest periods due to significant reduction in noise and vibration when diesel engines are switched off<sup>3</sup>

We very much believe that the currently discussed standards for safe and secure parking areas are an opportunity that cannot be missed to overcome the issues mentioned above and align them with the goals of Europe's Green Deal. **We therefore strongly urge you to include the following aspects in the delegated acts on standards for safe and secure parking:**

- Assessment of the existing grid capacity: All operators of the parking areas requesting EU funding (new ones and the ones undertaking upgrades) and EU certification should make an assessment of the available grid capacity to add new load to the electricity distribution network. This will be a first step to facilitate the future deployment of charging infrastructure or an on-site hydrogen production and enable better planning of the future needs, in a cost-effective way. The information should be made public on the website <http://www.eu-parking.eu/> so that it is easily accessible for charging point operators that would like to deploy new services. **Ultimately, it will be needed to connect those parking areas to the medium voltage grid.**
- Optimisation by location for new parking sites: To limit costs in the future, the closest proximity with the medium voltage grid should be favoured when deciding on the location of the new parking areas to be created (100 000 parking places).
- Plug-in stations for refrigerated trailers: We ask all new parking areas and the ones undergoing upgrades that are requesting EU certification and EU funding, to install one socket per 10 parking spots for refrigerated trailers (22 kW)<sup>4</sup>. This will save CO<sub>2</sub> emissions, significantly reduce local air pollution and improve the quality of resting times for drivers. The EU already financed a successful pilot project in this regard<sup>5</sup>.
- Charging requirements need to be linked to CEF funding: Assessing grid capacity and deployment of plug-in facilities and charging stations for refrigerated trailers should be part of the mandatory services of the EU standards for safe and secure truck parking areas. Only SSTPAs or third parties offering these mandatory services should have access to CEF funding. Indeed, CEF funding provides a significant incentive to finance the upgrades and building of new parking areas and the absence of such a prerequisite would make the mandatory services to a large extent voluntary.

We remain at your disposal for any further information, as well as for a meeting for discussing the issue.

Yours sincerely,

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<sup>2</sup> CE-Delft, Electrical Trailer Cooling during Rest Periods, analysis of emissions and costs, December 2015. p32 [Link](#).

<sup>3</sup> *Ibid*, p27 [Link](#).

<sup>4</sup> This is proportionate to the market share of refrigerated trucks.

<sup>5</sup> CEF project 2013-NL-92070-S, Electricity Connection Points - Greening the European temperature controlled transport network. [Link](#).