



# Impact Assessment of the Transition to Zero-Emission Trucks in Europe

BCG study

SEPTEMBER 19, 2023



## Executive summary

- The truck industry is a central part of Europe's economy, contributing €75B in GDP and 577K jobs in 2022, causing ~ 4% of Europe's CO<sub>2</sub> emissions. Zero-emission vehicle technology provides new opportunities to achieve climate ambitions while retaining economic contribution. Previous BCG research shows an expected rise to 55% ZEV in 2030 and 77% ZEV in 2035.
- Regulation mandates the baseline for the shift from ICE to ZEV, resulting in demanded adoption rates of at least 49% by 2035 (base case: EU commission), or 97% by 2035 respectively (more ambitious T&E case). In this study, we investigate the economic impact of both regulatory scenarios on GDP and employment development in Europe.
- Shift to ZEV has potential to create up to €32B in GDP and 30K additional jobs in Europe by 2035 (T&E case) versus 2022. Key drivers are battery cell production and the shift from foreign fossil fuels to domestically produced electricity.
- Despite an overall positive effect on Europe's economy, a redistribution of value and jobs is created by the shift from ICE to ZEV, impacting current suppliers and OEMs, moving away from ICE components and periphery manufacturing toward battery cells, electric drive, power electronics, and less labor-intensive module packaging.
- Key levers for strong positioning of the EU in light of new industry dynamics entail a buildup of domestic battery cell production, reskilling of labor force, charging infrastructure readiness, and affordable renewable electricity.
- Technology shift enables market entry for new, foreign ZEV players. While exports represent starting point to compete in major markets, localized production becomes crucial for long-term dominance. Negative impact from non-European ZEV players on GDP and employment depends on the concrete scenario, esp. no. of entrants, localization degree etc., while benefits from transitioning to ZEV along the full value chain are expected to outweigh losses from new competition.

# The European trucking sector's shift to ZEVs could create up to €32 billion GDP and add 30,000 jobs by 2035

### OEMs

Could lose up to 35,000 positions related to making ICE, while GDP contribution is positive. Requires a substantial workforce transformation towards new capabilities to produce and market ZEVs.

+€3B  
GDP

-35,000  
Jobs

### Suppliers

Expected to add value by switching from making ICE to ZEV components, in particular battery cells, electric drives, which will be needed for 400,000 ZEV trucks by 2035. Requires distinct new capabilities for supplier base.

+€6B  
GDP

+3,000  
Jobs

### MHDT-related utilities

Need to ramp up renewable electricity generation from <1 TWh in 2022 to > 160 TWh in 2035 to fuel up to 1.8M BEV trucks on the road. Major driver of positive economic impact due to high European added value for renewable electricity generation, compared to fossil fuel import.

+€22B  
GDP

+55,000  
Jobs

### ZEV infrastructure players

Will contribute towards GDP and job growth. Need to install up to 185,000 charging points by 2035 and overcome implementation hurdles to ensure sufficient charging network coverage.

+€1B  
GDP

+6,000  
Jobs

Sources: Statista; BCG analysis.  
Notes: GDP and employment increases from 2022 to 2035 under high adopt scenario.

# Preface: What this study is—and what it is not

## In scope

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**Medium- and heavy-duty trucks (in following referred to as MHDTs)**  
Heavy-duty (HDT > 15 t GVW), medium-duty (MDT 6-15 t GVW)

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**EU-27 + UK, Switzerland, Norway and Iceland**  
US and China in extended scope to understand competitive landscape

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**Powertrain-related value chain steps**  
Suppliers, OEMs, ZEV infrastructure, and MHDT-related utilities

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**Contribution of defined value chain steps to European GDP**  
Components and production of new MHDTs (supplier, OEM), ZEV charging infrastructure hardware, and energy consumption for MHDT ops. (utilities)

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**Employment in Europe for defined value chain steps**  
Components and production of new MHDTs (supplier, OEM), ZEV charging infrastructure hardware, and energy consumption for MHDT ops. (utilities)

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**Truck-level trade flows from and into Europe**  
Focus on imports and exports from and to US and China

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## Out of scope

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Vehicles used for passenger transport, buses and coaches, trailers, and other light commercial vehicles (LCV < 6 t GVW)

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Other regions of the world

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Raw materials and impact on value chain steps with no major dependence on powertrain (e.g., after sales), included via steady state assumption

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Raw materials, one-time expenses for buildup of H<sub>2</sub> stations and energy grid, filling stations; after sales, fin. services, platform services, transport solutions, resale, reuse, and recycling kept constant in timeframe

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Raw materials, one-time expenses for buildup of H<sub>2</sub> stations and energy grid, filling stations; after sales, fin. services, platform services, transport solutions, resale, reuse, and recycling kept constant in timeframe

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Trade of components and detailed analysis of worldwide trade flows between other regions

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# This study covers the shift of the MHDТ industry in Europe toward zero emissions



## MHDТs across 3 powertrain technologies



MDТ (6-15 t)



HDT > 15 t



Diesel



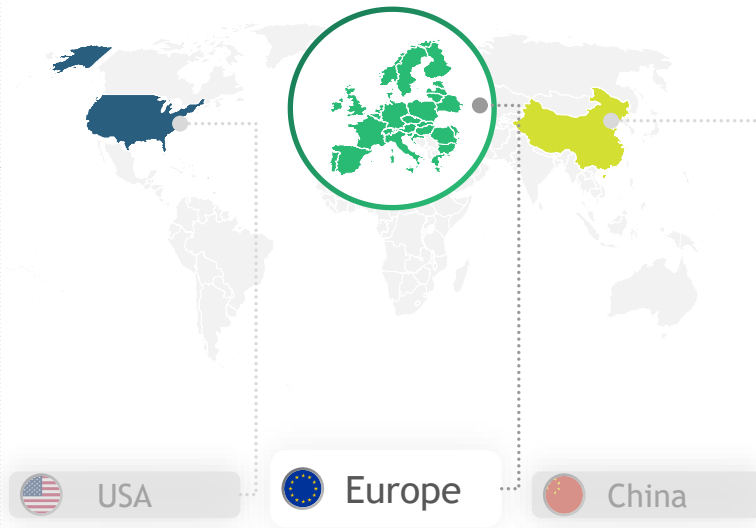
BEV



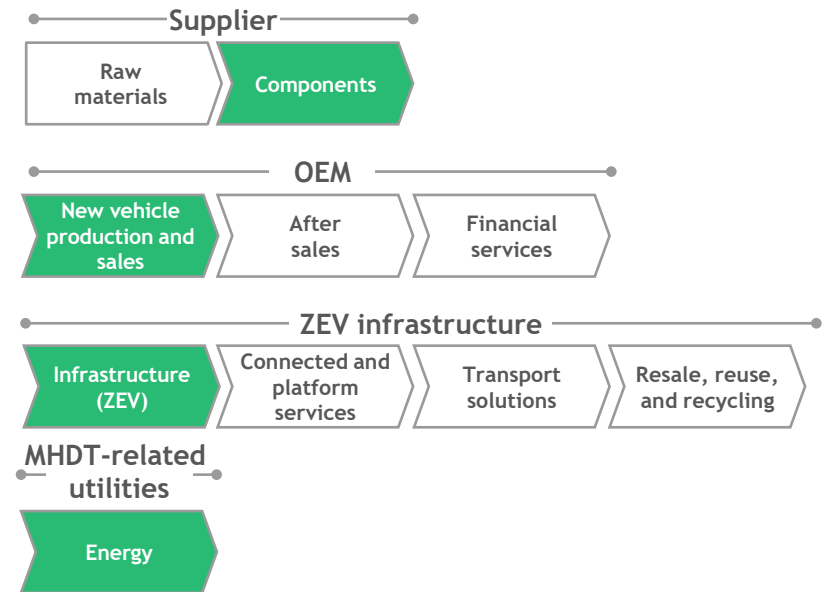
H<sub>2</sub>



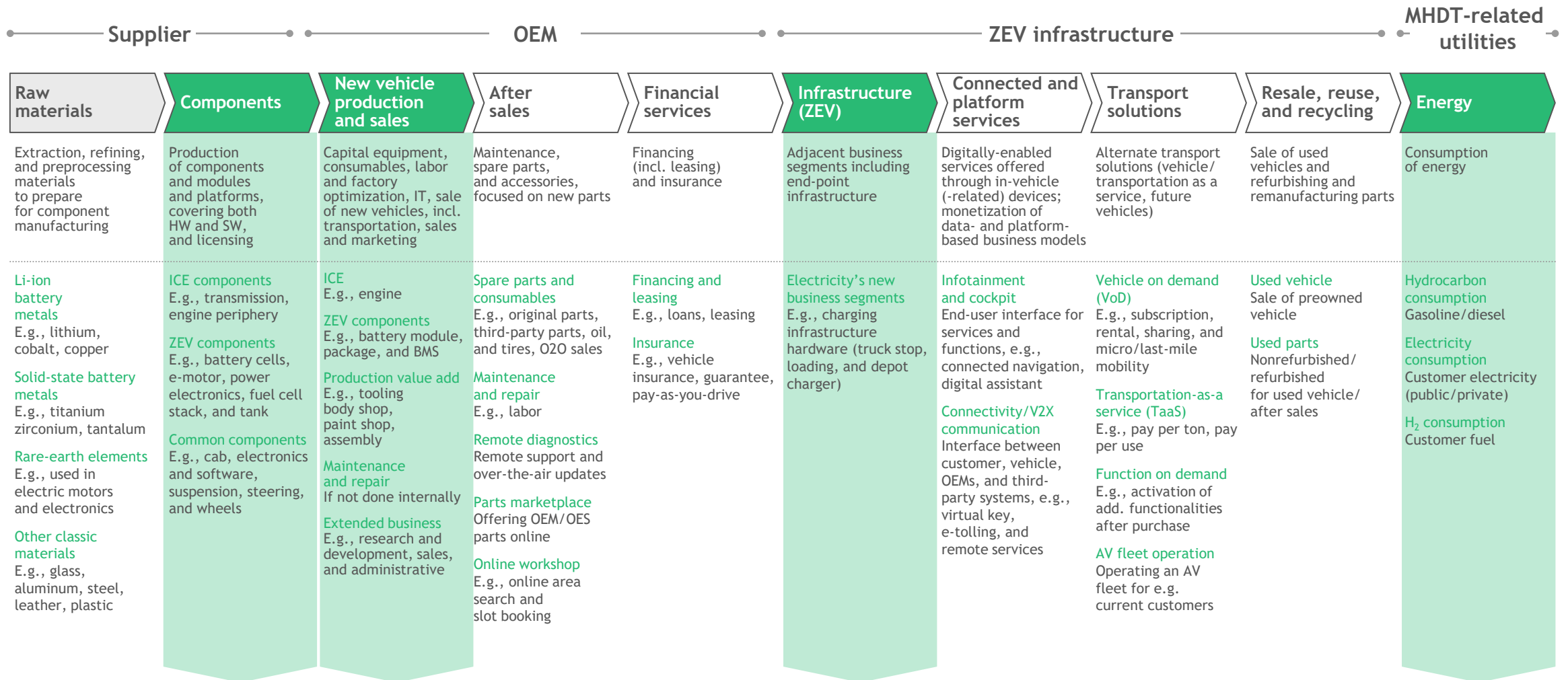
## Focus Europe—US & China in extended scope



## Value chain from suppliers to utilities



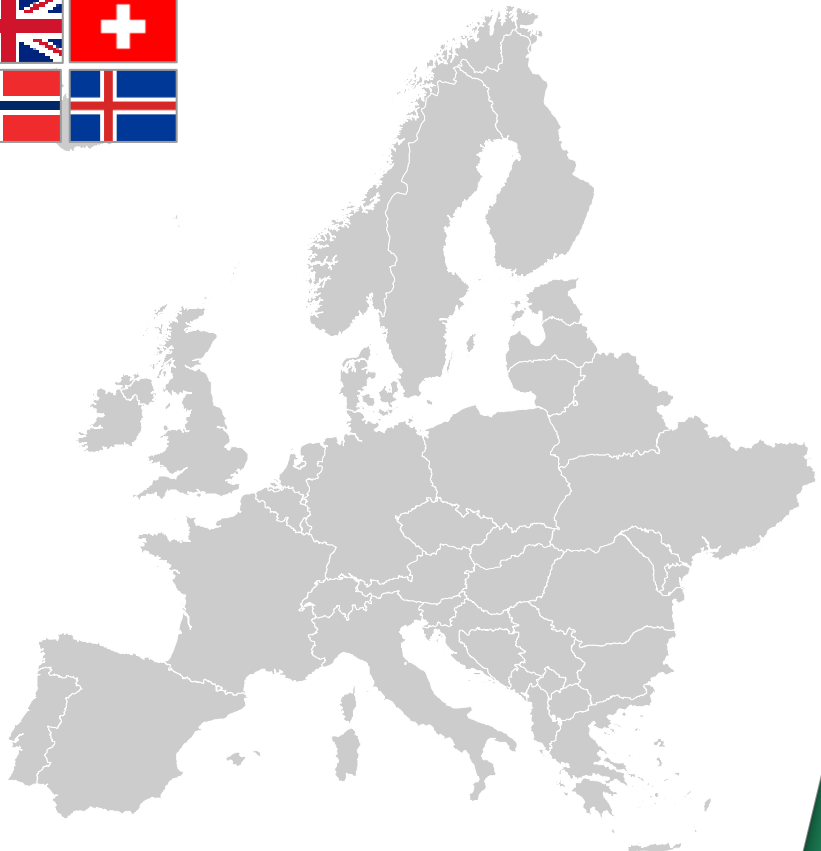
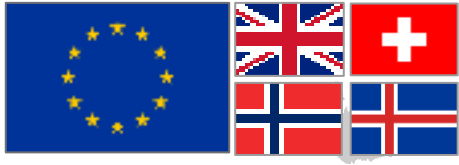
# Along the value chain, the study focuses on shifts in powertrain-related elements



Source: BCG

▶ Shift assessed throughout study
 ◻ Kept constant throughout study
 ◻ Not included in study

# Impact of ZEV adoption on competitiveness of Europe's truck industry<sup>1</sup> until 2035 ...








€75B

GDP (2022)

577K






Jobs (2022)

## ... presented along five building blocks

-  Current state of the European truck industry 1
-  Shift to ZEV and underlying key drivers 2
-  Impact of ZEV shift on European economy on GDP and employment until 2035 3
-  Supporting the shift to zero emissions 4
-  Emerging competition from ZEV trend in US and CN 5

1. Consisting of EU-27 + UK, Norway, Switzerland and Iceland, covering suppliers, OEMs, ZEV infrastructure, and CV-related utilities  
Source: Statista; BCG

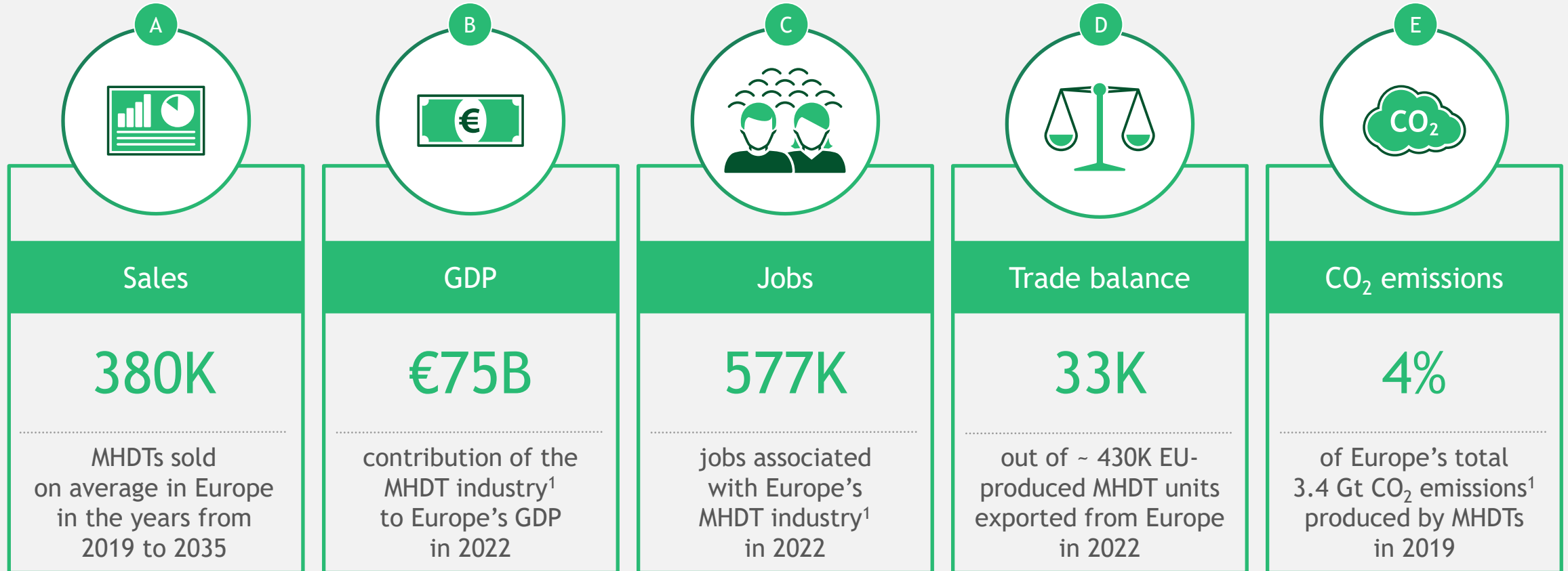
# Agenda

-  **Current state** of the European truck industry 1
-  **Shift to ZEV** and underlying key drivers 2
-  **Impact** of ZEV shift on European economy until 2035 3
-  **Supporting** the shift to zero emissions 4
-  **Outlook:** Emerging competition from new non-European ZEV players 5





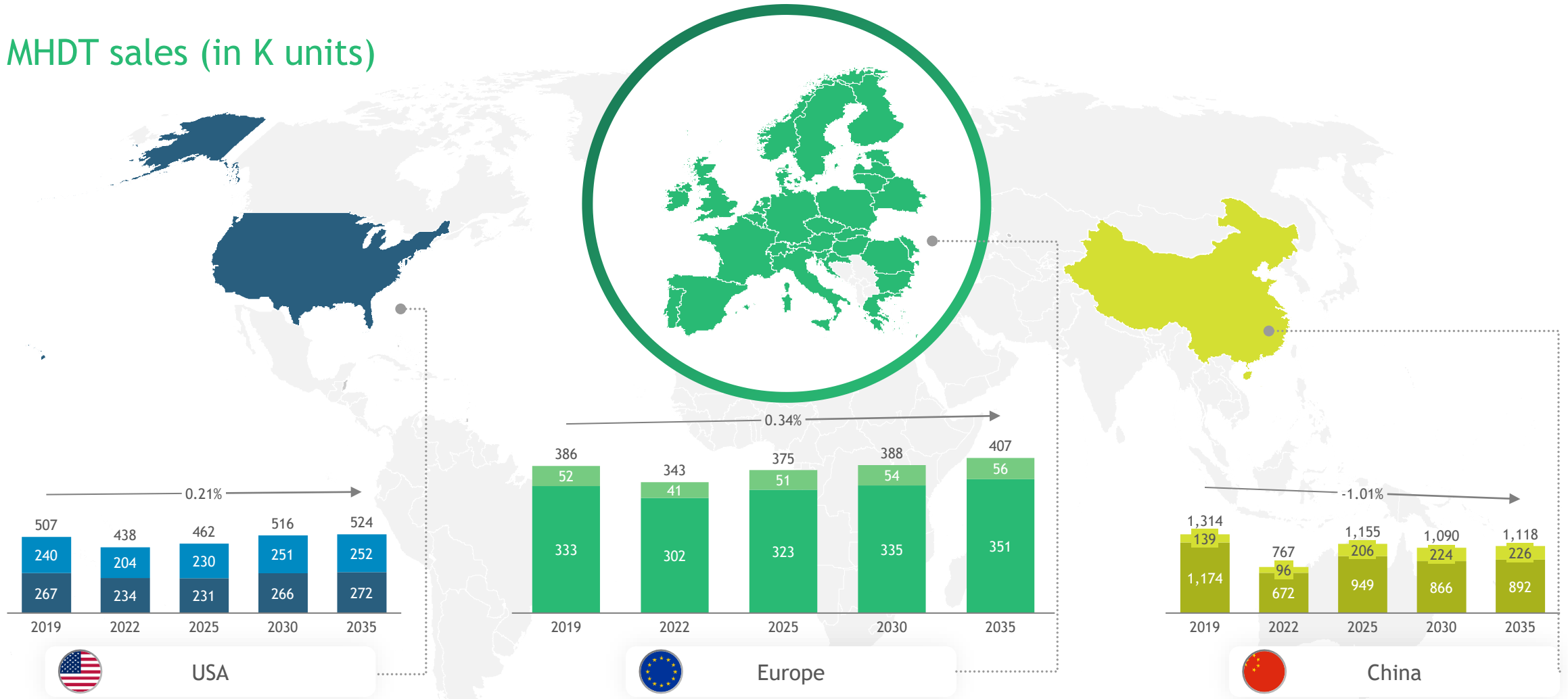
# Europe's truck industry in figures



1. In considered value chain elements 2. For EU-27, excludes the sector "Land use, land-use change, and forestry" (6.9%)  
 Source: Eurostat; European Environmental Agency (EEA); IHS Markit (Feb 2023); Statista; World Bank; BCG

# ~ 380K MHDTS sold every year in Europe at a mostly stable rate until 2035

## MHDT sales (in K units)

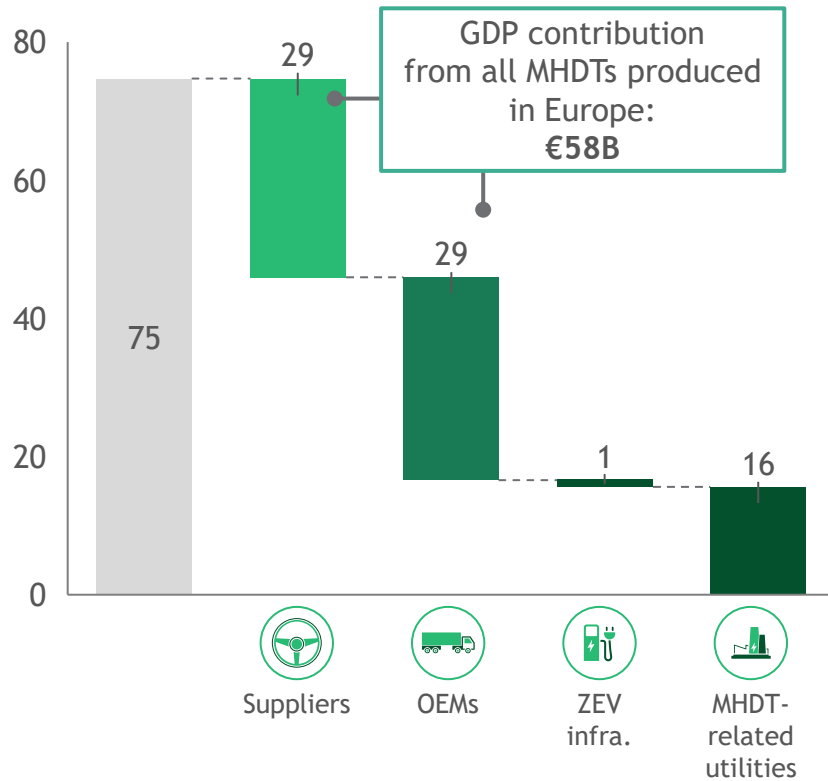


Note: EU-27 + UK, Switzerland, Norway, and Iceland  
 Source: IHS Markit (Feb 2023); BCG

■ > 15 tons  
■ 6-15 tons

# Along the four core value chain elements, the industry currently contributes ~ €75B to Europe's GDP in 2022

Total GDP contribution in Europe in 2022 (in B€)



**€75B** GDP in Europe generated by 4 clusters along the value chain ...



... of which **€29B (39%)** GDP is associated with **suppliers**,<sup>1</sup> including firms like ZF, Continental, and Knorr-Bremse



... of which **€29B (39%)** GDP is associated with **OEMs**,<sup>2</sup> including firms like Daimler Truck, Scania, and MAN



... of which **> €1B (< 1%)** GDP is associated with **ZEV infrastructure**,<sup>3</sup> including firms like ABB, sender, and Milence



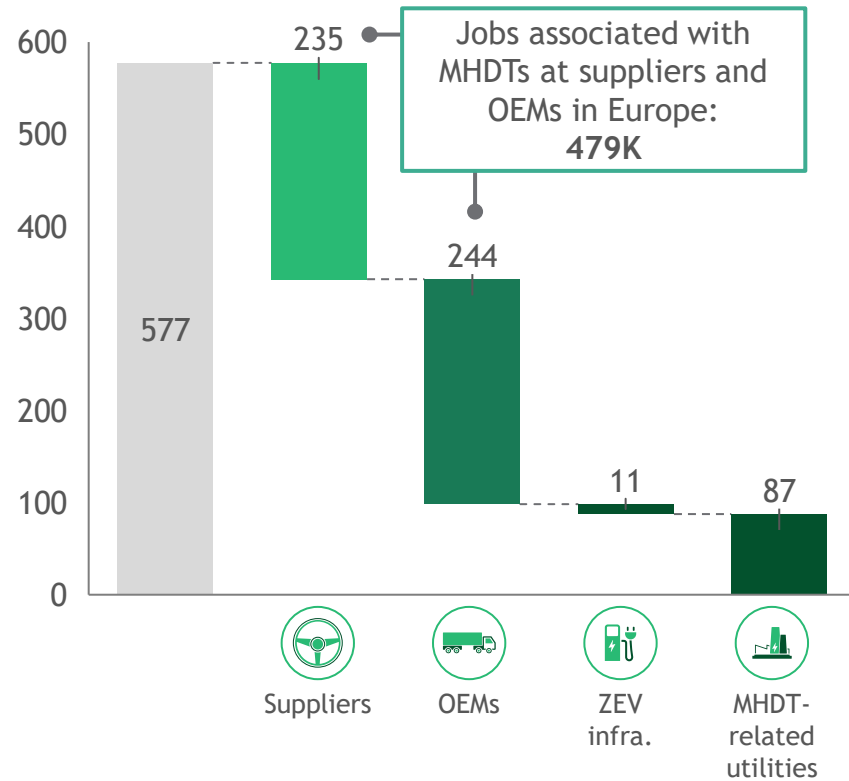
... of which **€16B (21%)** GDP is associated with refining of diesel and generation of **electricity**, including firms like Shell and E.ON



1. Incl. (after) sales of motor vehicle parts and accessories 2. OEMs generate value via ICE, production value add (e.g., assembly, tooling), and nonproduction elements (e.g., SG&A and R&D), including (after) sales and maintenance 3. Base including infrastructure, connected and platform services, transport solutions, and resale, reuse, and recycling  
Source: Eurostat; BCG

# In 2022, ~ 577K jobs are associated with Europe's MHDT industry

Total number of jobs in Europe in 2022 (in K)



**577K** jobs in Europe associated with 4 clusters along the value chain ...



... of which **235K (41%)** jobs are associated with **suppliers**,<sup>1</sup> including firms like ZF, Continental, and Knorr-Bremse



... of which **244K (42%)** jobs are associated with **OEMs**,<sup>2</sup> including firms like Daimler Truck, Scania, and MAN



... of which **< 11K (2%)** jobs are associated with **ZEV infrastructure**,<sup>3</sup> including firms like ABB, sender, and Milence



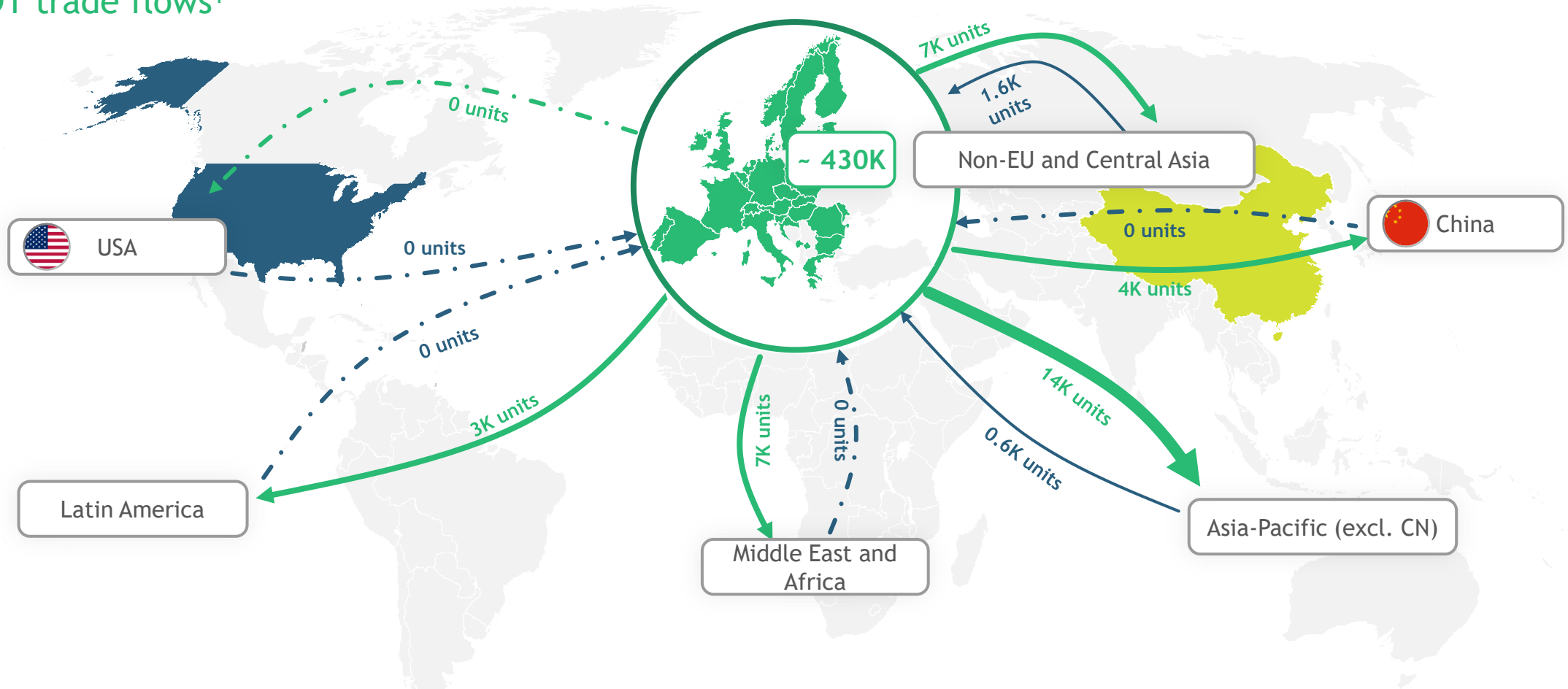
... of which **87K (15%)** jobs are associated with refining of diesel and generation of **electricity**, including firms like Shell and EON



1. Incl. (after) sales of motor vehicle parts and accessories 2. OEMs generate value via ICE, production value add (e.g., assembly, tooling), and nonproduction elements (e.g., SG&A and R&D), including (after) sales and maintenance 3. Base including infrastructure, connected and platform services, transport solutions, and resale, reuse, and recycling  
Source: Eurostat; BCG

# EU net exports totaled 33K units to small markets in 2022—CN and US dominated by domestic players

MHDT trade flows<sup>1</sup>



1. Excluding component business (suppliers and OEMs)  
 Note: EU 27 + UK, Switzerland, Norway and Iceland; new trucks only  
 Source: IHS Markit (May 2023); World Bank; BCG

← Imports   ← Exports   ← - - No significant trade   □ Units produced in Europe in 2022

# European OEMs operate and produce locally in key regions, trade with low relevance for European GDP

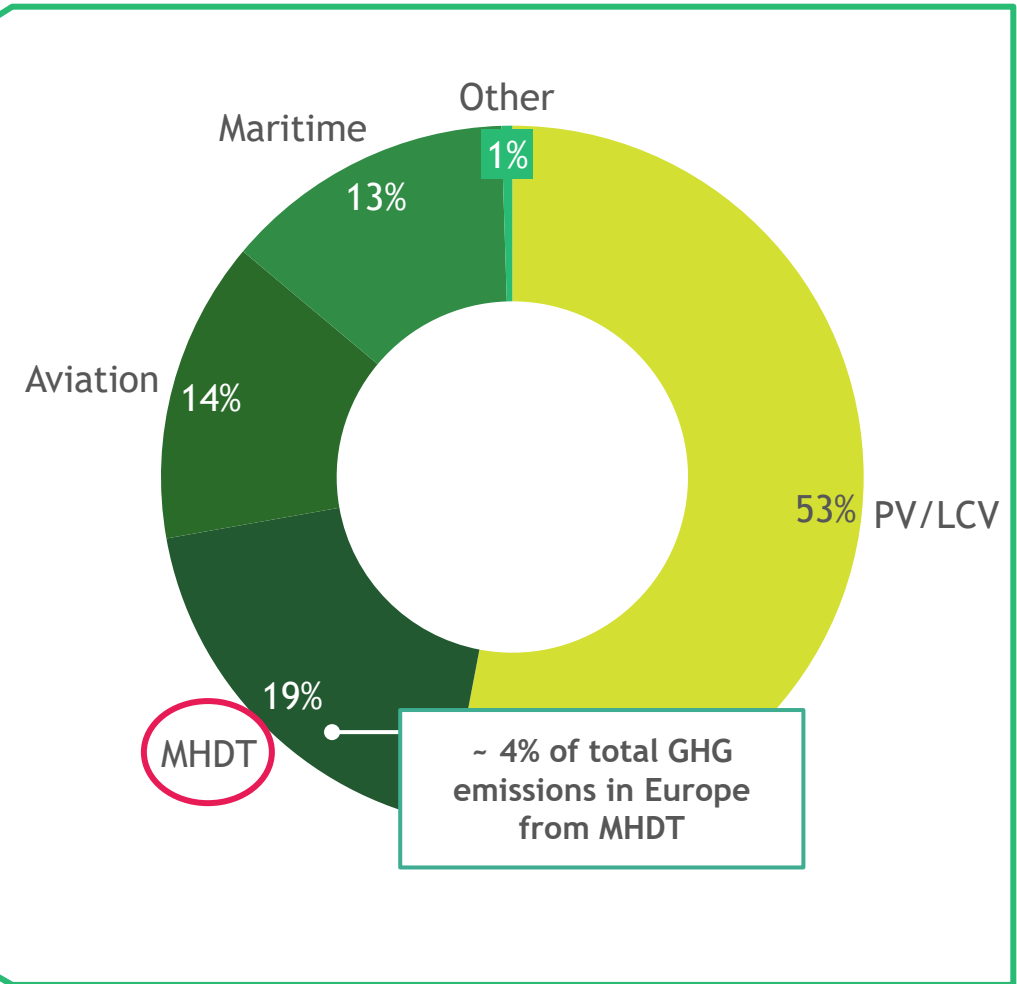
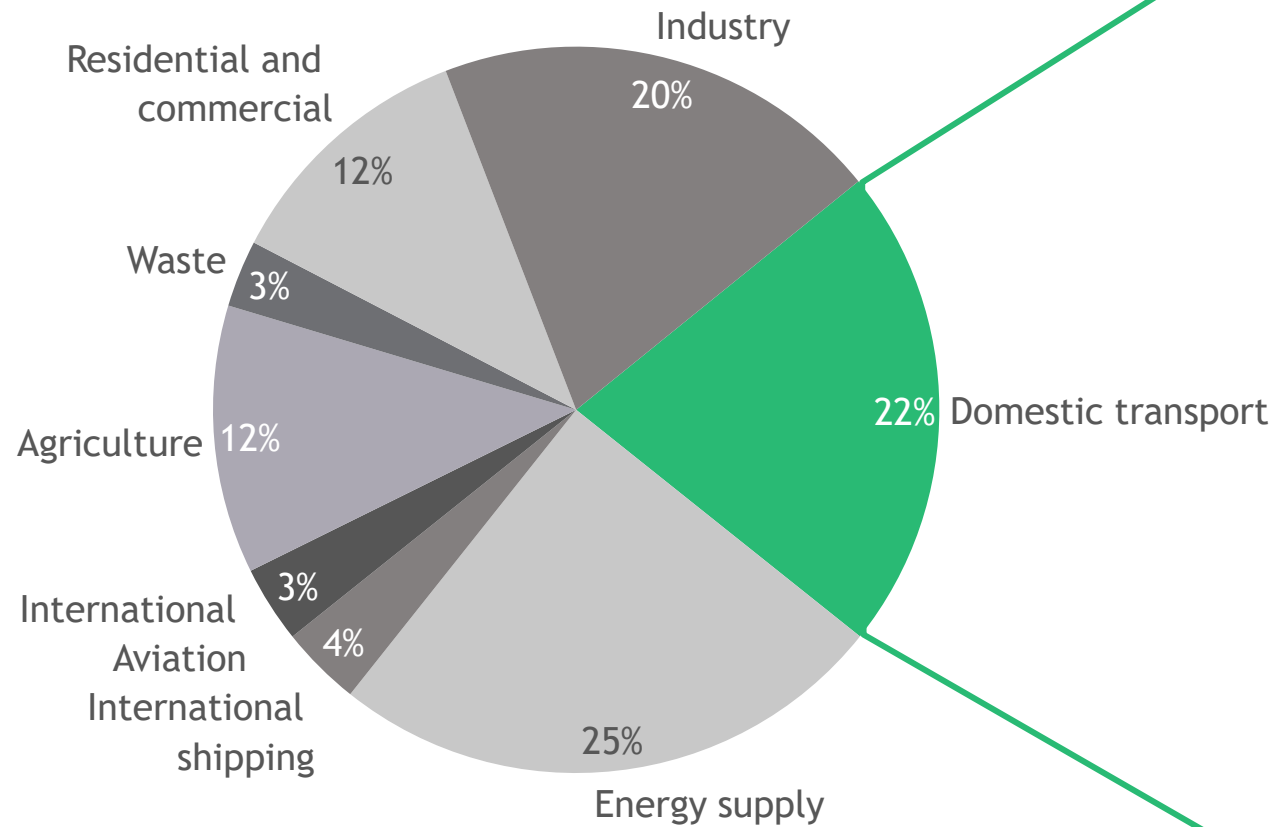
## Global footprint of selected European MHDT OEMs



Note: Logos indicate own brands as well as associates (equity stakes) and alliances for MDT  
 Source: BCG

# MHDTs responsible for ~ 4% of Europe's GHG emissions

## EU-27 GHG emissions by sector<sup>1</sup> (2019<sup>2</sup>)



1. Excludes the sector "Land use, land-use change, and forestry" (-6.9%) 2. Most recent available study  
 Note: GHG = greenhouse gas  
 Source: European Environmental Agency (EEA), April 2021; BCG

Three major trends will drastically shape current market landscape

Focus



Electrification

Gradual replacement of ICE drivetrain with BEV and H<sub>2</sub> drivetrains



ZEV powertrain the next big change in MHDT sector



Digitalization

Increased relevance of digitalized controls and fleet monitoring



Push for telematics and fleet management systems



Autonomous vehicles

Increased activity and value potential in MHDT highly automated driving development

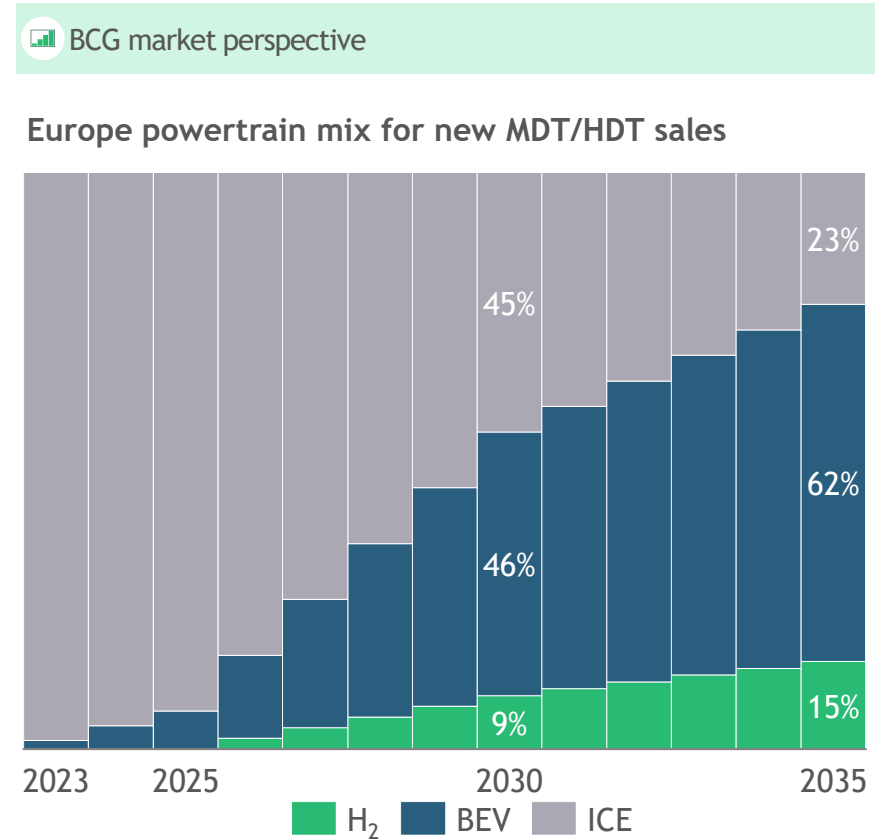
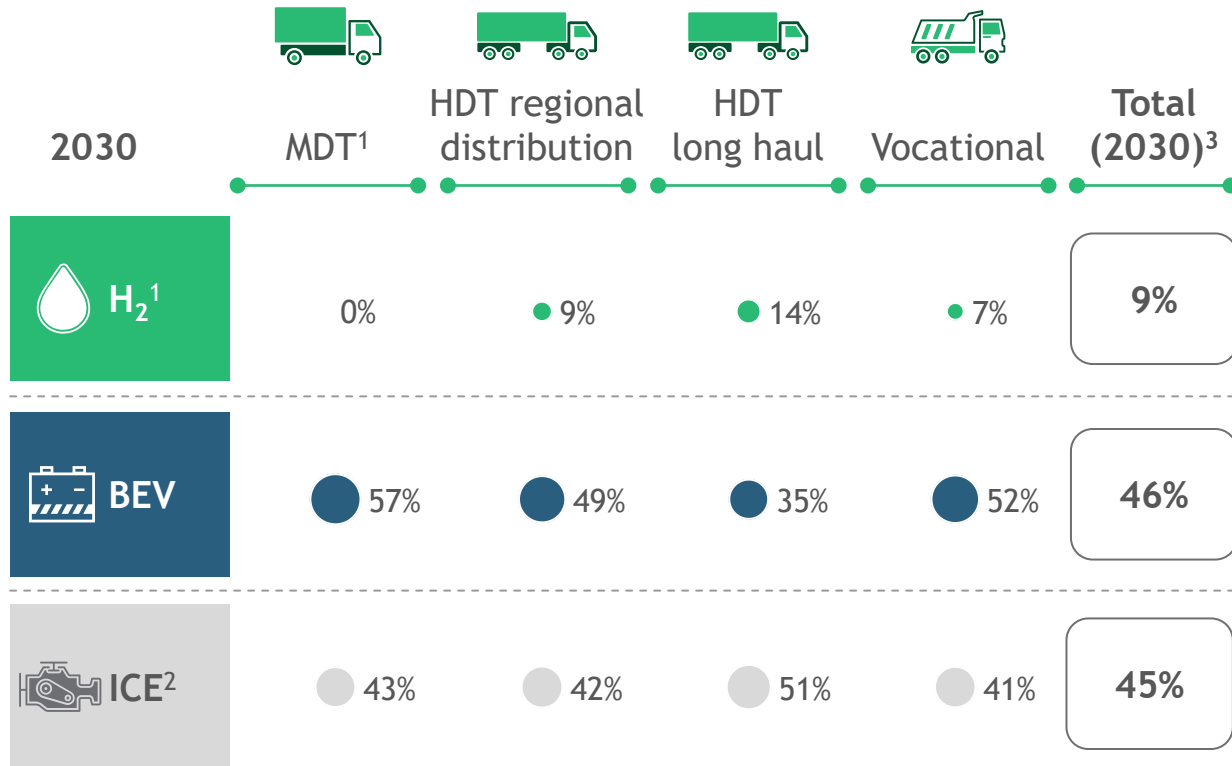


New highly automated driving vehicle concepts










# Market perspective shows an expected rise to 55% ZEV in '30 and 77% ZEV in '35



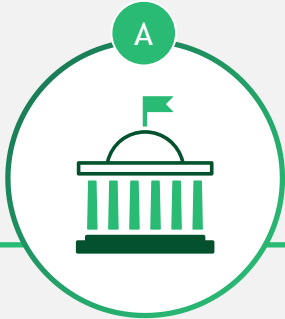
1. H<sub>2</sub> includes both H<sub>2</sub> ICE and FCEV 2. ICE contains diesel and xNG 3. Weighted by respective share of each type in overall sales  
 Note: TCO = total cost of ownership; H<sub>2</sub> = hydrogen; BEV = battery electric vehicle; ICE = internal combustion engine  
 Source: BCG market model

# Agenda

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# Shift to ZEV for MHDT mainly driven by four factors

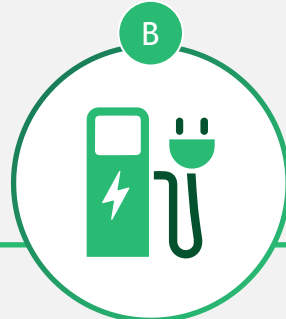


## Regulation: MHDT CO<sub>2</sub> standards tightening further

EU set goal to reach **climate neutrality by '50**, addressing high-polluting sectors in particular

**CO<sub>2</sub> reduction targets for MHDT in '30** to increase from 30% to ~ 45% based on EU Commission proposal<sup>1</sup>

Call for additional intensification of **CO<sub>2</sub>-reduction targets** to reach 100% by '35<sup>1</sup> (T&E case)



## Infrastructure ramp-up

AFIR<sup>2</sup> sets **legally binding nat'l and EU-wide targets** for deployment of alternative fuels infrastructure

**Complete charging infra. coverage of TEN-T<sup>3</sup> core network** to be completed by '30

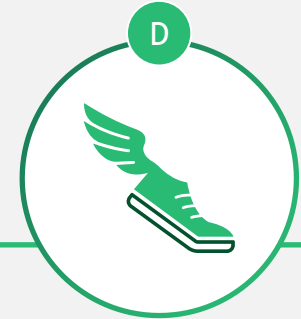
**Major players to invest** in buildup of truck charging infrastructure (e.g., €500M by Milence, comprising Volvo, Daimler, and Traton)



## TCO shift toward ZEV

**TCO for electric trucks to outperform diesel** around '25/'26 in Europe

**BEV cost to decrease by over 40% until '35** (vs. '22), while range and charging capabilities improve



## OEMs prepare for ZEV

ZEVs offered/announced by major OEMs—**33 BEV models** to be offered by European OEMs by '25

EU OEMs, incl. Daimler Truck, Scania, and MAN set **objectives to achieve 100% ZEV sales** by '40

**Partnerships among OEMs** formed to manage high R&D costs (e.g., e-mobility JV between Traton and Hino)

1. Compared to 2019 levels 2. Alternative Fuel Infrastructure Regulation 3. Trans-European Transport Network outlines strategic connections linking the most important nodes in Europe  
Source: Company websites; EU Commission; T&E; BCG

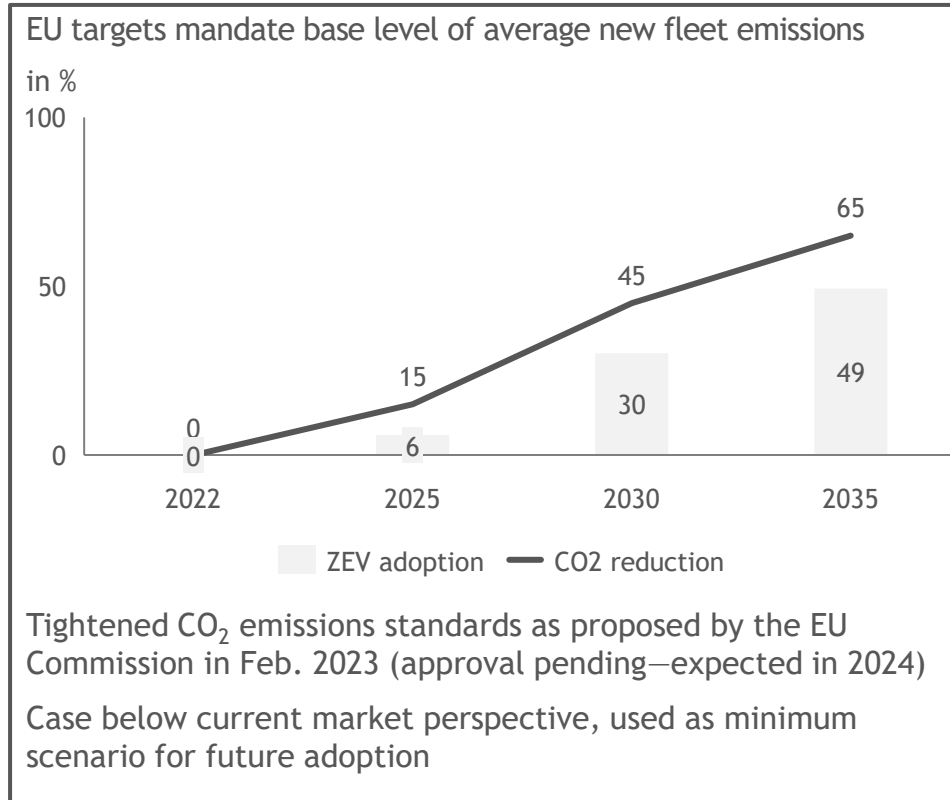


# Regulation: With higher CO<sub>2</sub> standards, ZEV adoption could reach 97% by 2035

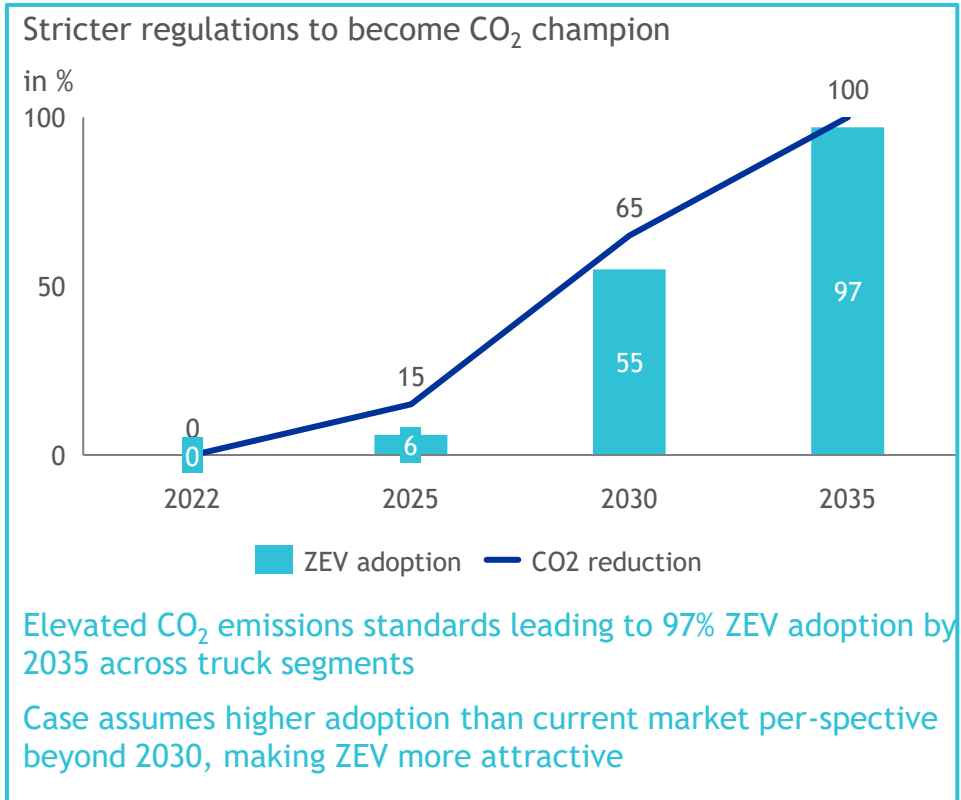
These cases are the base for the GDP and employment impact analysis in the next chapter



**Base case:**  
Proposed EU Commission CO<sub>2</sub> standards<sup>1</sup>



**T&E case:**  
Elevated CO<sub>2</sub> standards (beyond EU Commission)<sup>2</sup>




1. Not covering unregulated MHDT segments (e.g., vocational, noncertified) 2. Incl. unregulated MHDT (under EU Commission)  
Note: CO<sub>2</sub> reduction consists of both ZEV adoption, efficiency improvements of ICE MDHT, supercredits (until 2024), and benchmarked-based crediting systems (from 2025)  
Source: T&E; BCG




# Infrastructure: Mandatory deployment targets established via Alternative Fuel Infrastructure (AFIR) Regulation for road transport

## EU Green Deal regulation to deploy alternative fuel infrastructure



**European Green Deal: ambitious new law agreed to deploy sufficient alternative fuel infrastructure (AFIR)**



**Regulations**

- Every 60 km along the TEN-T core network, MHD<sup>1</sup> charging pools of at least 3,600 kW must be installed by 2030
- Four recharging points in each safe and secure parking lot by 2030
- H<sub>2</sub> refueling infrastructure must be deployed by 2030 in all urban nodes and every 200 km along the TEN-T core network

## TEN-T<sup>1</sup> core network corridors

Network corridors	km
Baltic-Adriatic	2,410
North Sea-Baltic	3,800
Mediterranean	5,390
Orient-East Mediterranean	4,360
Scandinavia-Mediterranean	5,610
Rhine-Alpine	1,690
Atlantic	4,240
North Sea-Mediterranean	2,260
Rhine-Danube	4,540



- TEN-T<sup>1</sup> core network outlines strategic connections linking the most important nodes; expected to be completed by 2030
- Nine core network corridors (CNCs) identified to streamline development

1. TEN-T = Trans-European Transport Network  
 Note: Map only covers 9 strategic corridors of TEN-T—not exhaustive  
 Source: EU commission; T&E; BCG



# TCO parity for ICE and BEV expected in 2025/26

## Example HDT: Key assumptions on critical cost drivers



General (for all technologies):

- Annual mileage: 120,000 km
- Driver cost: €50,000 p.a.



Powertrain costs:

	2023	2030	2035
• Batteries (€/kWh):	226	112	112
• FC (€/kW):	130	70	60

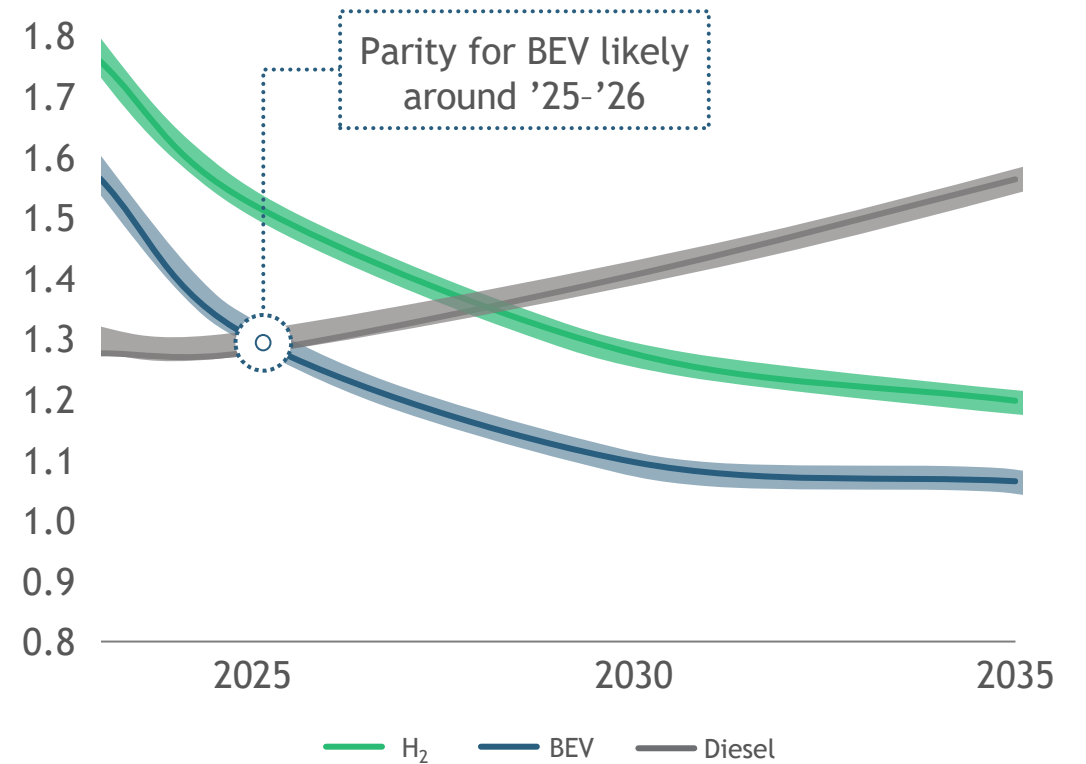


Fuel sources (excl. VAT)<sup>1</sup>:

	2023	2030	2035
• Diesel (€/l):	1.31	1.74	2.25
• Electricity (€/kWh) <sup>2</sup> :	0.28	0.23	0.20
• Hydrogen (€/kg):	11.50	7.00	7.00

## Total cost of ownership on HDT

€/km



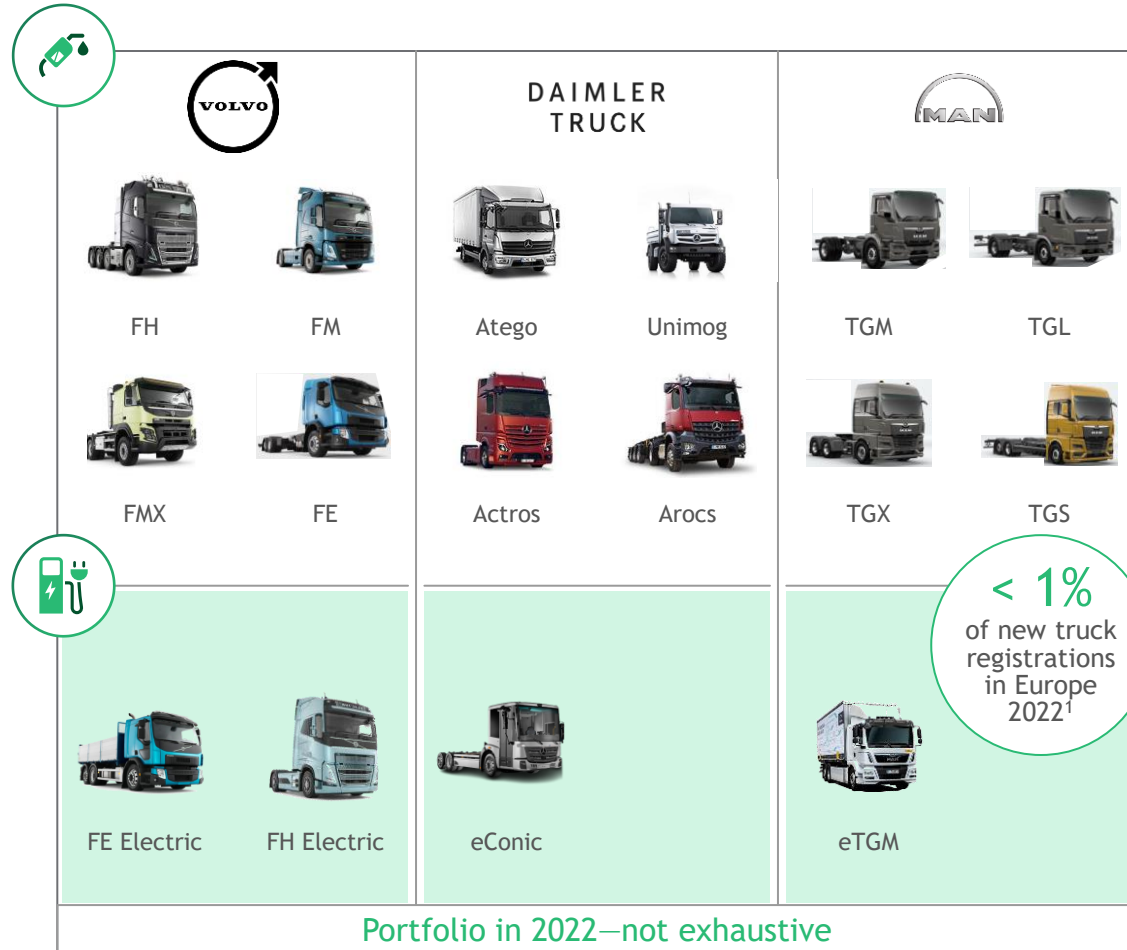
1. Avg. price between Western and Eastern Europe 2. Price without surcharge, assuming up to 100% surcharge for public fast-charging services, leading to an end-customer price of up to 0.56€/kWh

Note: Energy costs assumptions: 2023 actuals; from 2025-28, return to pre-crisis levels by extrapolating historical growth rates with 2019 as the starting point

Source: BCG analysis

# OEMs introduce first ZEV trucks in portfolio and announce further commitments

European OEMs offer first ZEV trucks ...



... and communicate objectives for 2030 and beyond  
Selected statements of OEMs



Objectives to achieve 100% ZEV sales by 2040<sup>2</sup>

1. 2022 new truck registrations for EU-27, UK, Norway, Iceland, and Switzerland  
 2. Announcements of Daimler, Scania, and MAN  
 Source: IHS; ACEA; company websites; BCG

# OEMs are adapting their business models with partnerships emerging to manage high investments and R&D costs

*Update: Iveco fully acquires JV with Nikola on BEV and H<sub>2</sub> trucks to effectively buy out Nikola from European markets—yet ties remain (May 9, 2023)*

Jan 2022

## ISUZU and Cummins FCEV collaboration

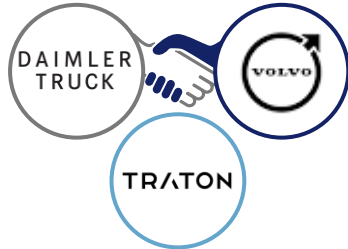


- Agreement to create a **prototype MD battery electric truck**
- Battery electric truck to be **introduced in North America**
- **First zero-emission solution of partnership formed in May 2019**



Jul 2021

## Daimler, Volvo, TRATON: Milence charging network



- 3 largest players agreed on developing & operating a **charging network**
- Agreement is basis for a **JV starting operations in 2022**
- Plan is to install **1,700<sup>1</sup> charging points within 5 years**

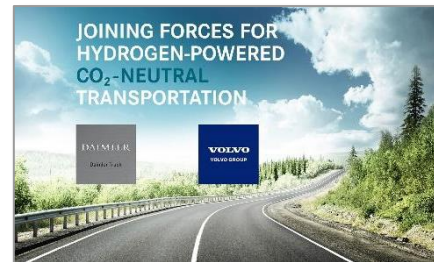


Nov 2020

## Daimler and Volvo: FCEV JV cellcentric



- **Volvo Group acquired 50% of existing Daimler Truck Fuel Cell**
- Ambition is to become a **leading global manufacturer of fuel cells**
- Focus is on **development of fuel-cell systems for use in HDT**



Oct 2020

## TRATON and Hino: E-mobility JV



- **Hino and TRATON drive sustainable transport with e-mobility JV**
- Focus is on **BEV, FCEV, and EV platform development**
- Activities will be launched in **Sweden first and then Japan**



Sep 2019

## IVECO, FPT, Nikola: FCEV and BEV JV



- **IVECO, FPT, and Nikola JV to achieve zero-emission transport**
- Nikola provides **fuel-cell and advanced-technology expertise**
- IVECO contributes **eng. and manuf. knowledge to industrialize ZEVs**



1. High-performance charging points  
Source: Company webpages; Reuters; BCG



# Agenda



Current state of the European truck industry

1



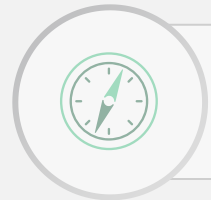
Shift to ZEV and underlying key drivers

2



Impact of ZEV shift on European economy until 2035

3



Supporting the shift to zero emissions

4

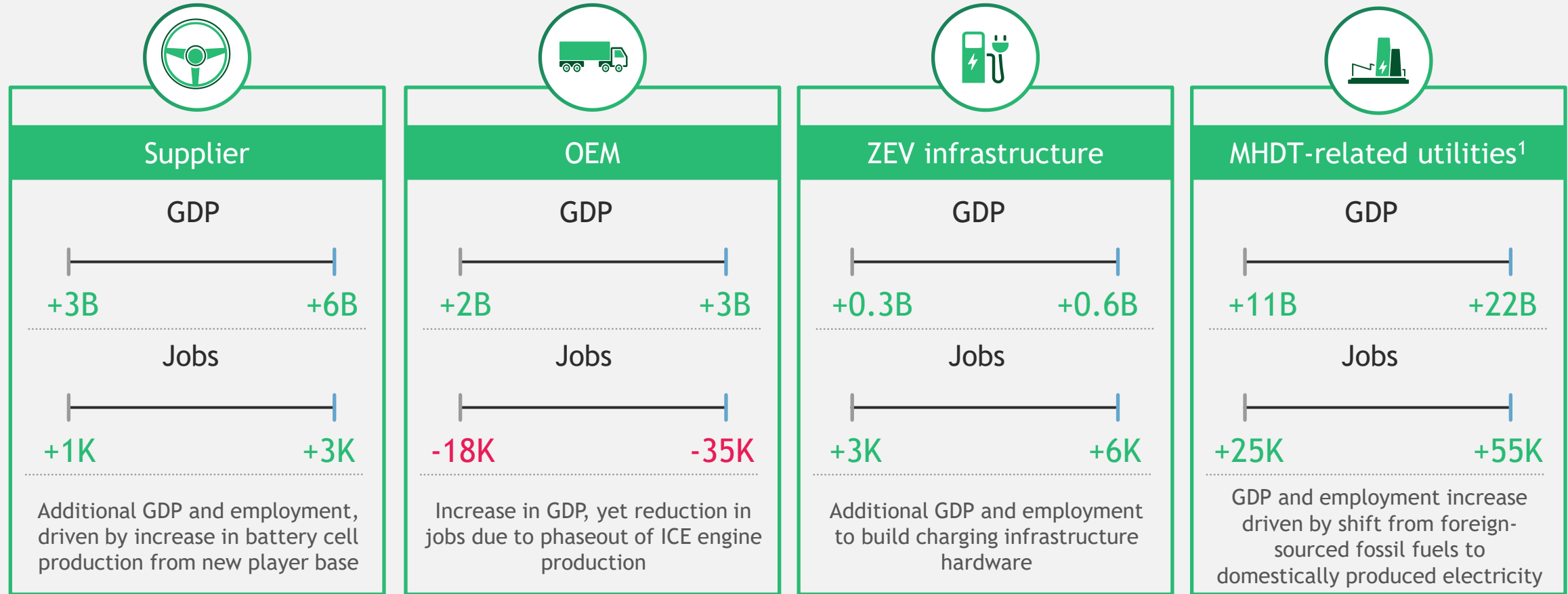


Outlook: Emerging competition from new non-European ZEV players

5



# Overall positive GDP and employment development along MHDT value chain in Europe 2035 versus 2022



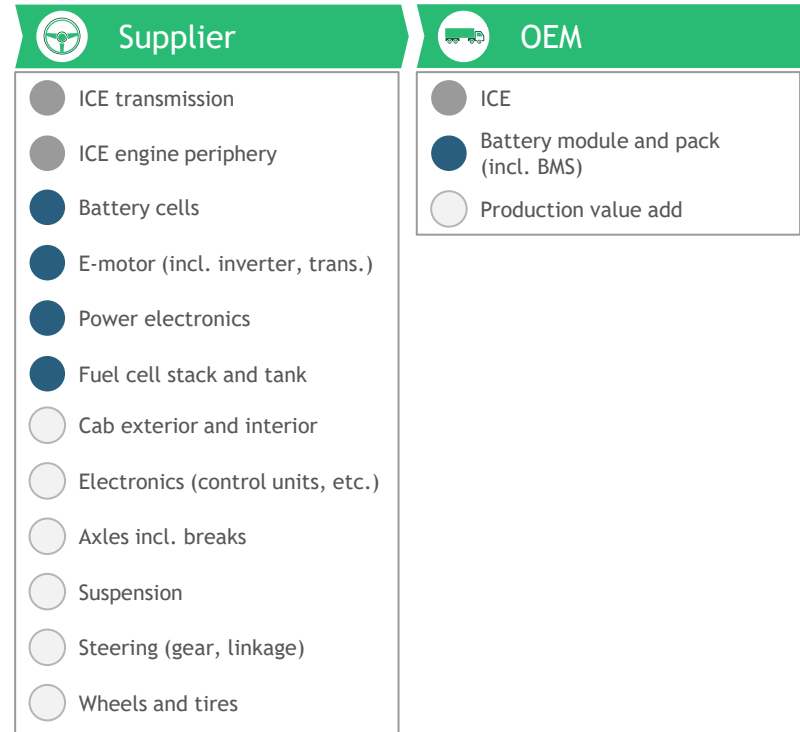
1. Assuming share of renewables from total electricity production ~ 88% in Europe in 2035  
 Note: Assuming no strategic changes to current OEM business model  
 Source: BCG

Base case | T&E case



# Depending on ZEV adoption rates, changes along MHDT value chain impact EU economy to different extents

## Change in vehicle components, ...

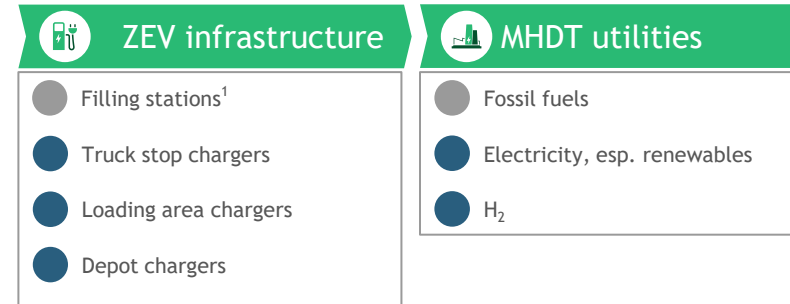


New/omitted components lead to redistribution of value creation and labor requirements in the industry

1. As a majority of the fleet remains ICE until 2035, no substantial change for filling stations associated with MHDT transition in considered time frame

Source: BCG

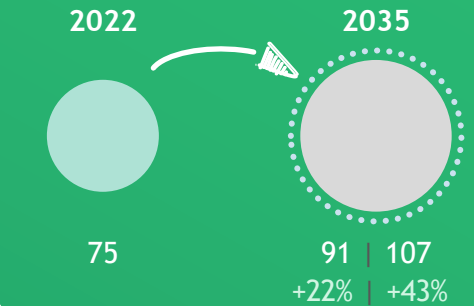
## ... infrastructure, and utilities due to ZEV



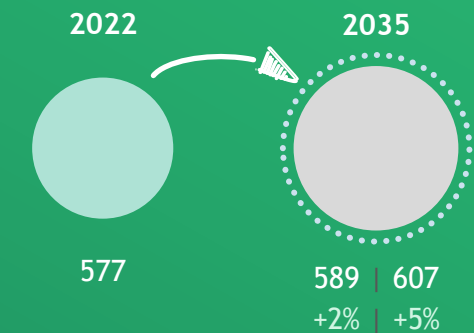
New infrastructure and MHDT-related utility need to support ZEV shift, adding to European GDP with high value add

● ZEV component   
 ● ICE component   
 ● Common ICE & ZEV

## € GDP



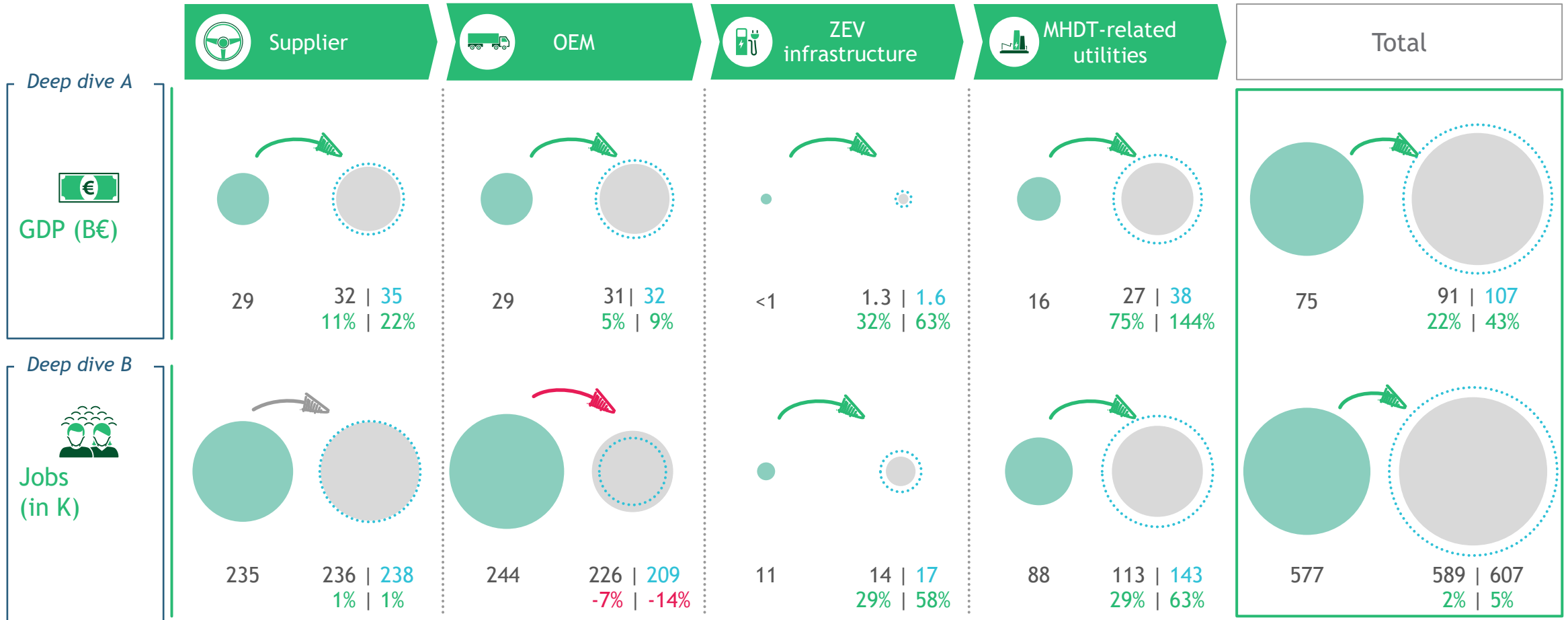
## Jobs



Base case

T&E case

# Shift to ZEV has potential to create up to €32B in GDP and 30K additional jobs in Europe by 2035 versus 2022



Note: Size of circles indicative; assuming no strategic changes to current OEM business model  
Source: BCG

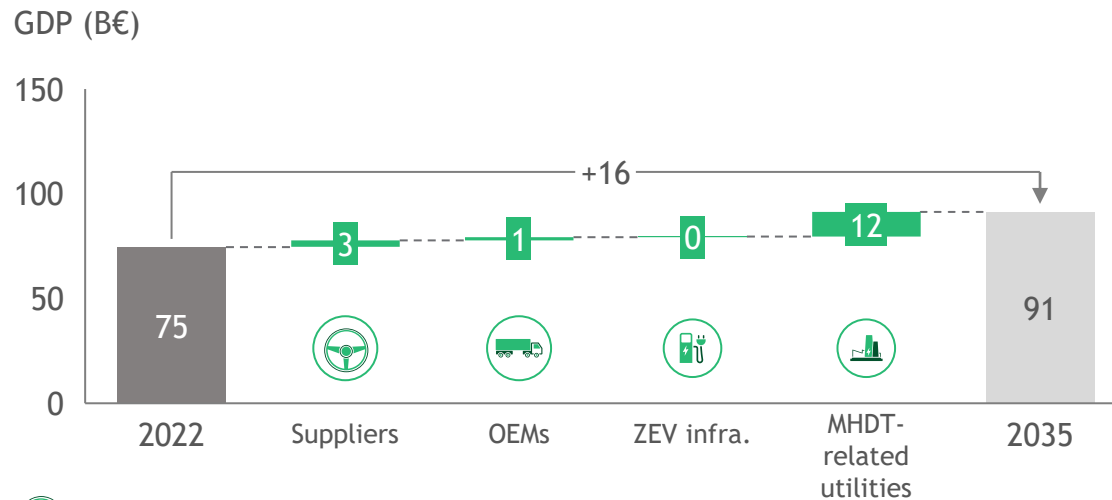
2022

Base case

T&E case

# Deep dive A (1/3): GDP increase of up to ~ €32B in Europe by 2035 possible, driven by significant uptake in energy sector

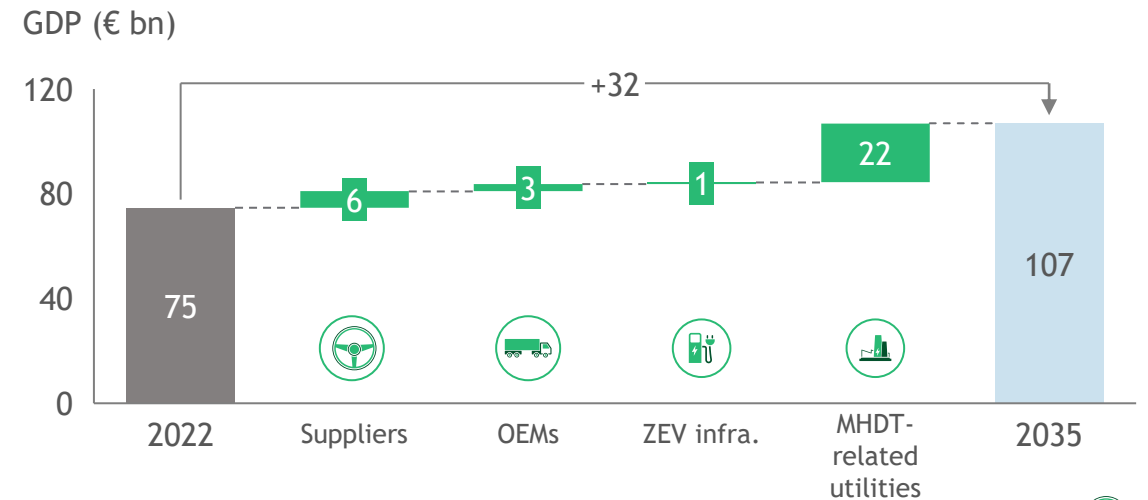
**Base case:**  
Current EU commission proposal



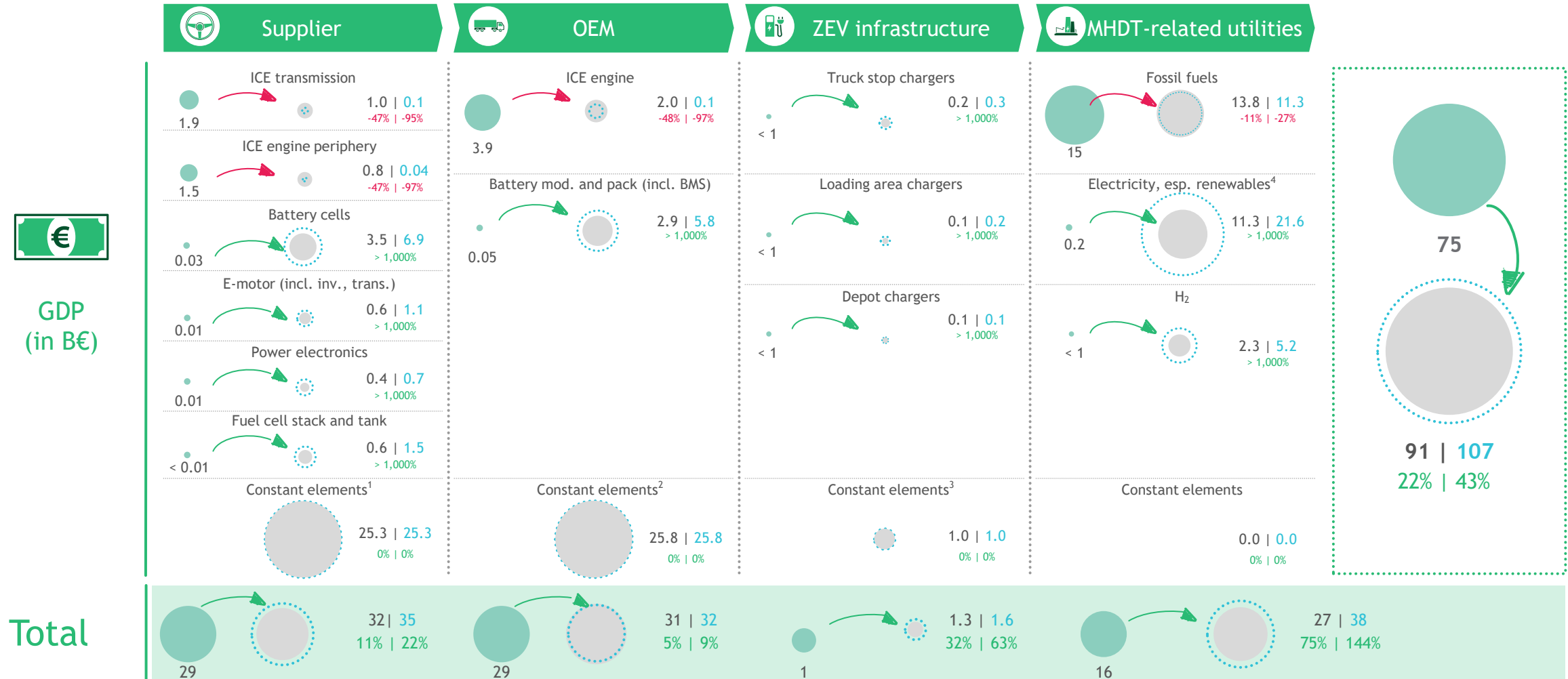
- +3.1B** Higher GDP contribution from suppliers in Europe from 2022 to 2035, due to increased value generated via battery production **+6.3B**
- +1.4B** Marginally increased GDP at OEM associated with shift to ZEVs, driven primarily by production of battery module and pack **+2.8B**
- +0.3B** GDP increase based on new charging infrastructure hardware **+0.6B**
- +11.7B** Additional GDP created based on energy mix driven by shift from fossil fuels to (renewable) electricity produced primarily in Europe<sup>1</sup> **+22.5B**

1. Assuming share of renewables from total electricity production ~ 88% in Europe in 2035  
 Note: Production volumes adjusted for cyclicity; assuming no strategic changes to current OEM business model  
 Source: BCG

**T&E case:**  
Increased CO<sub>2</sub> regulations

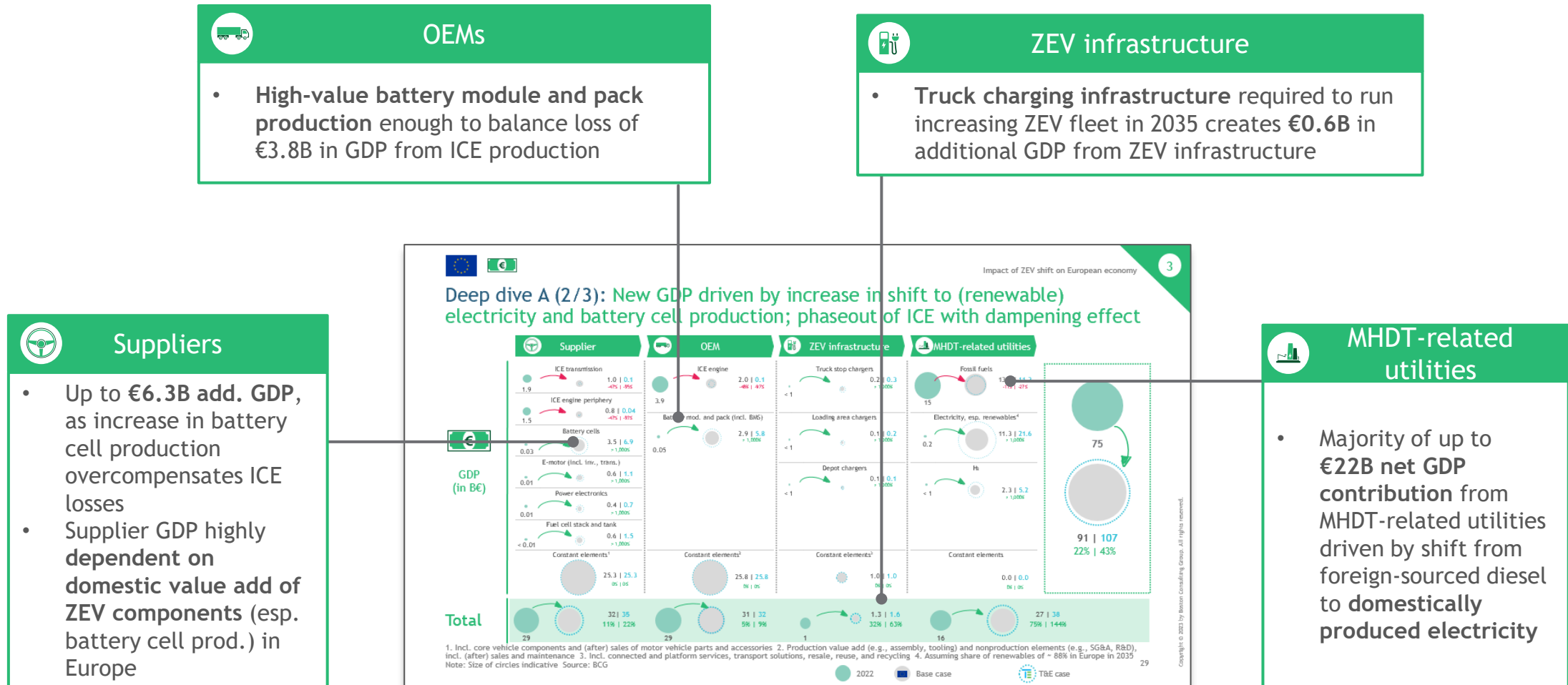


# Deep dive A (2/3): New GDP driven by increase in shift to (renewable) electricity and battery cell production; phaseout of ICE with dampening effect



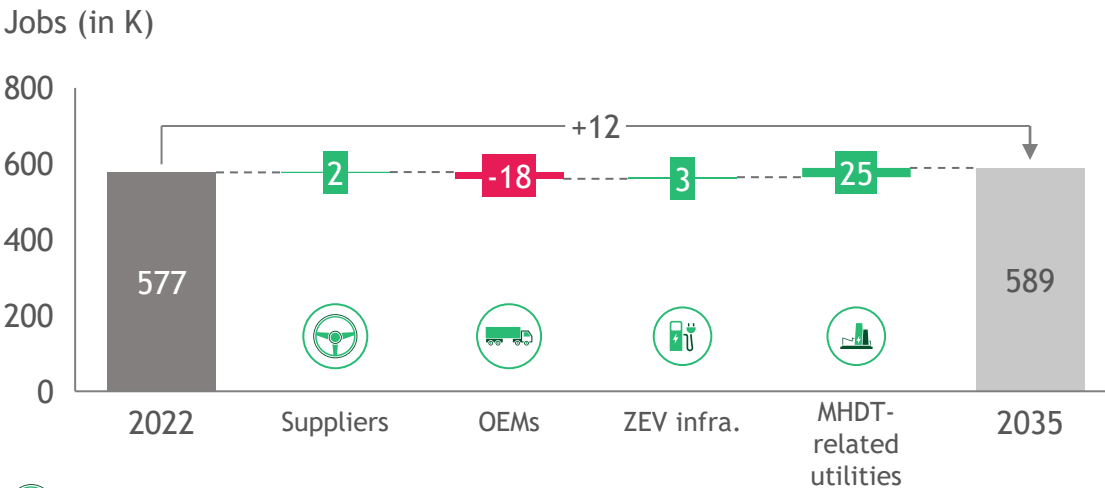
1. Incl. core vehicle components and (after) sales of motor vehicle parts and accessories 2. Production value add (e.g., assembly, tooling) and nonproduction elements (e.g., SG&A, R&D), incl. (after) sales and maintenance 3. Incl. connected and platform services, transport solutions, resale, reuse, and recycling 4. Assuming share of renewables of ~ 88% in Europe in 2035  
 Note: Size of circles indicative Source: BCG

# Deep dive A (3/3): GDP contribution highly dependent on shift to domestically produced electricity and battery cells



# Deep dive B (1/3): Shift to new energy sources drives job creation until 2035 in both scenarios, overcompensating job losses at OEMs

**Base case:**  
Current EU commission proposal



+1.6K

Additional jobs at suppliers based on increased battery production needs in Europe

-17.7K

Jobs lost at OEM; increase in production of battery modules and packs cannot offset losses from ICE<sup>1</sup>

+3.2K

Job increase driven by new charging infrastructure hardware

+25.1K

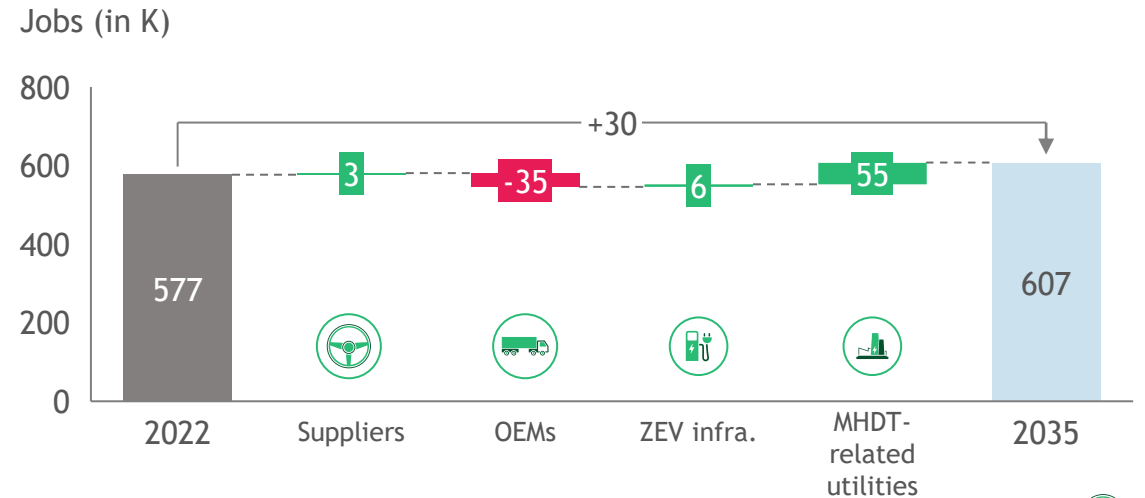
Job increase based on energy mix driven by shift from fossil fuels to (renewable) electricity produced primarily in Europe<sup>2</sup>

1. Assuming no further changes in business model 2. Assuming share of renewables from total electricity production ~ 88% in Europe in 2035

Note: Production volumes adjusted for cyclicity; assuming no strategic changes to current OEM business model

Source: BCG

**T&E case:**  
Increased CO<sub>2</sub> regulations



+3.4K

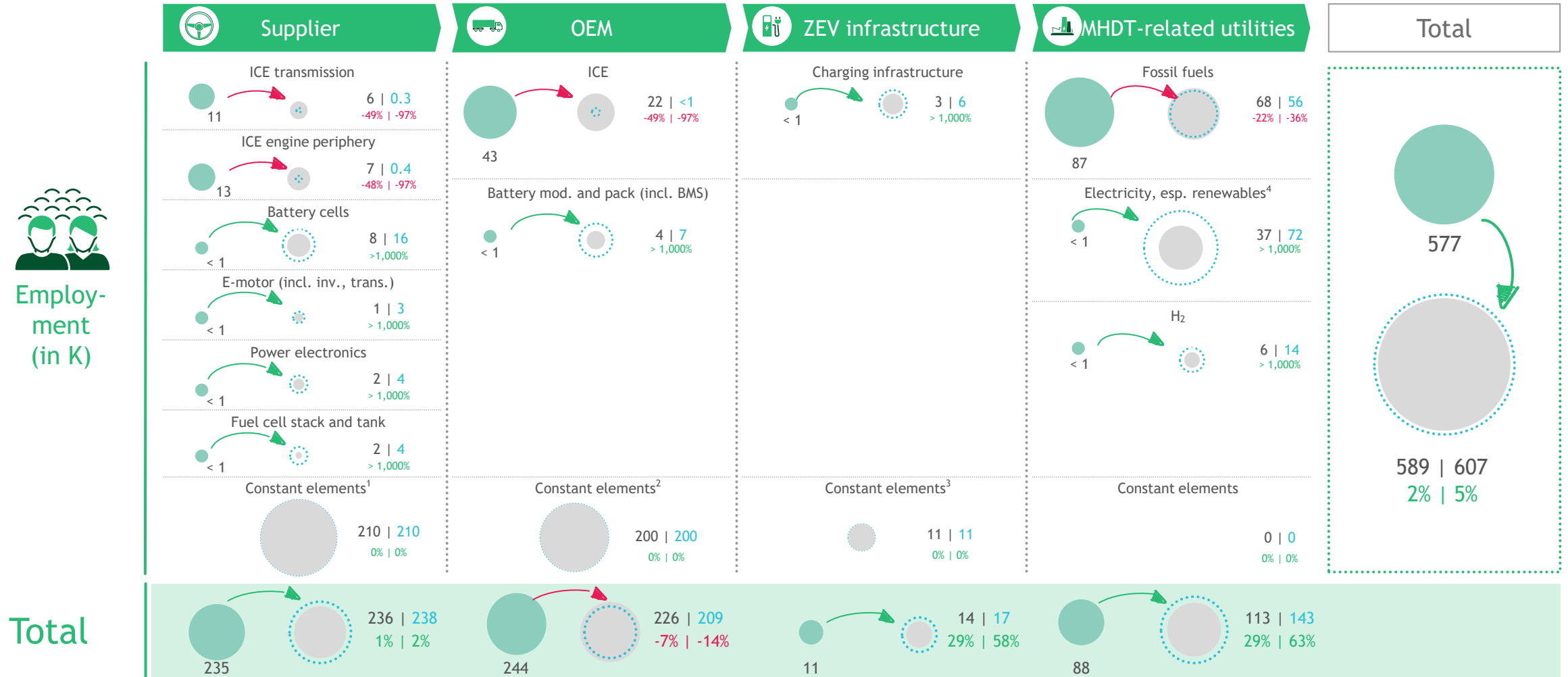
-35.1K

+6.2K

+55.2K



# Deep dive B (2/3): Job reduction due to shift from ICE overcompensated by new demands in MHTD-related utilities; major shift across value chain steps



Employment (in K)

Total

1. Incl. core vehicle components and (after) sales of motor vehicle parts and accessories 2. Production value add (e.g., assembly, tooling) and nonproduction elements (e.g., SG&A, R&D), incl. (after) sales and maintenance 3. Incl. connected and platform services, transport solutions, resale, reuse, and recycling 4. Assuming share of renewables of ~ 88% in Europe in 2035  
 Note: Size of circles indicative Source: BCG

# Deep dive B (3/3): High value add of electricity production main driver for net employment gain, overcompensating losses from phaseout of ICE

### OEMs

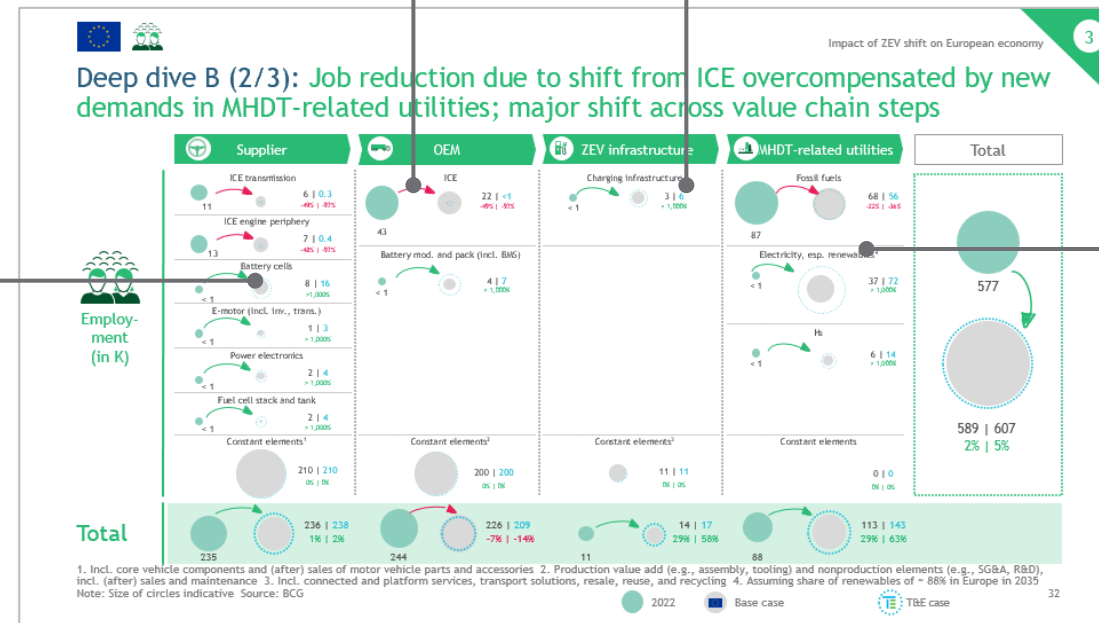
- Phaseout of ICEs leads to ~ 42K lost jobs until 2035
- Due to **reduced number of parts and lower production complexity, battery and module can only replace ~ 16% of lost jobs at OEM**

### ZEV infrastructure

- No employment reductions from diesel infrastructure** (i.e., filling stations)—will continue operations to cater to ICE vehicles, comprising major share of truck fleet by 2035
- ~ **6K additional employees** for charging infrastructure hardware required to enable widespread ZEV usage

### Suppliers

- Net employment gain** based on production of BEV and H<sub>2</sub> components
- Battery cell** represents key driver of employment gains, compensating over **60% of lost ICE-related jobs**



### MHDT-related utilities

- Job increase due to electricity production** overcompensates losses from reduced diesel need required to run smaller ICE fleet in '35
- Higher domestic value add of (renewable) energy production** versus fossil fuels main driver for net job increase

# Agenda



**Current state** of the European truck industry

1



**Shift to ZEV** and underlying key drivers

2



**Impact** of ZEV shift on European economy until 2035

3



**Supporting** the shift to zero emissions

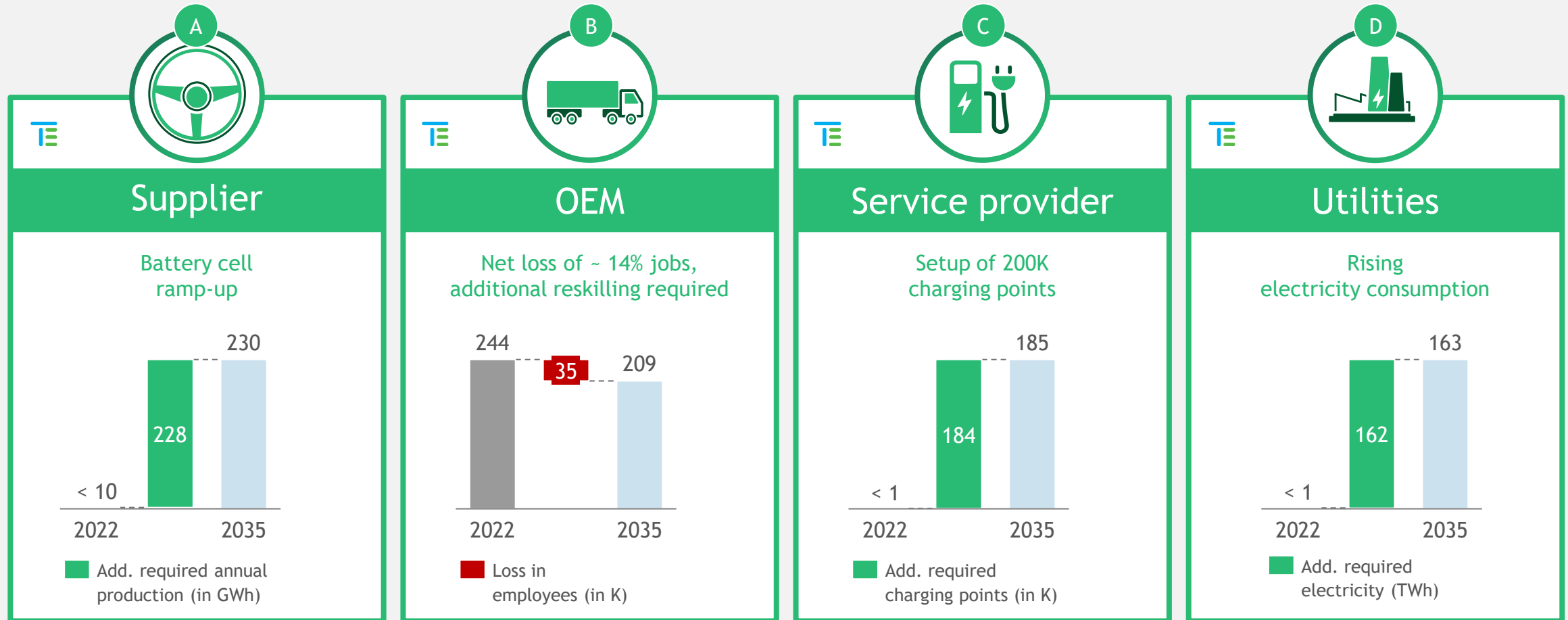
4



**Outlook:** Emerging competition from new non-European ZEV players

5

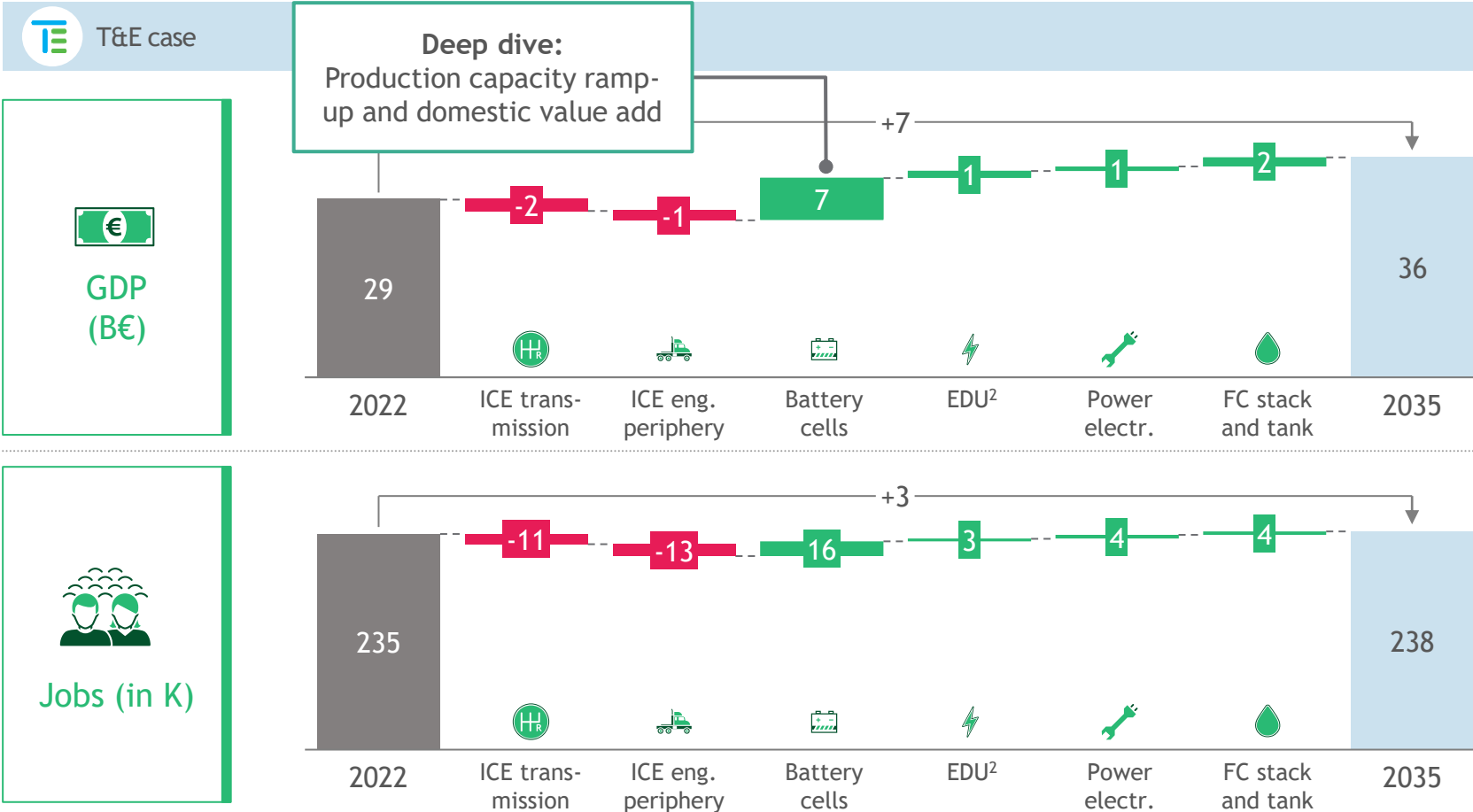
# Various challenges across value chain to support shift to zero emissions



1. Average gigafactory 45 GWh  
 Source: RWTH Aachen Battery Atlas 2022; annual reports; International Trade Association; BCG



# Supplier (1/2): ZEV shift brings new economic opportunities to suppliers; battery cell production being the main driver



Note: 2035 figures based on ZEV adoption in T&E case  
Source: BCG

**230**  
GWh

Battery cell production capacity need for ZEV<sup>1</sup> in 2035

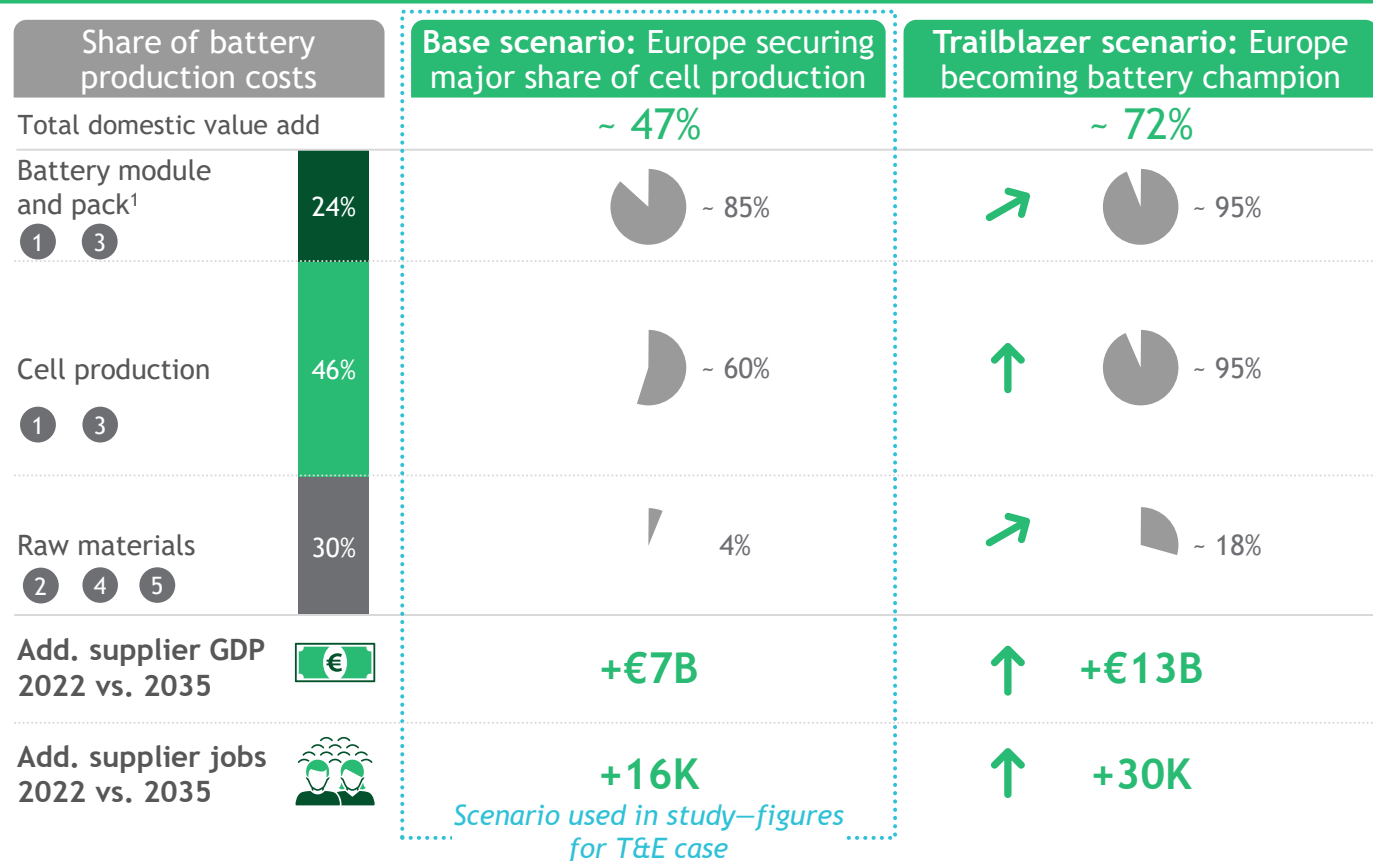
**70**  
jobs/GWh

For battery cell production in Europe in 2035

# Supplier (2/2): Besides securing 230 GWh battery capacity in 2035, strengthening cell production key for resilient battery supply & contrib. to EU economy

## 2035: Battery key value-add lever to support MHDT industry

## Policies

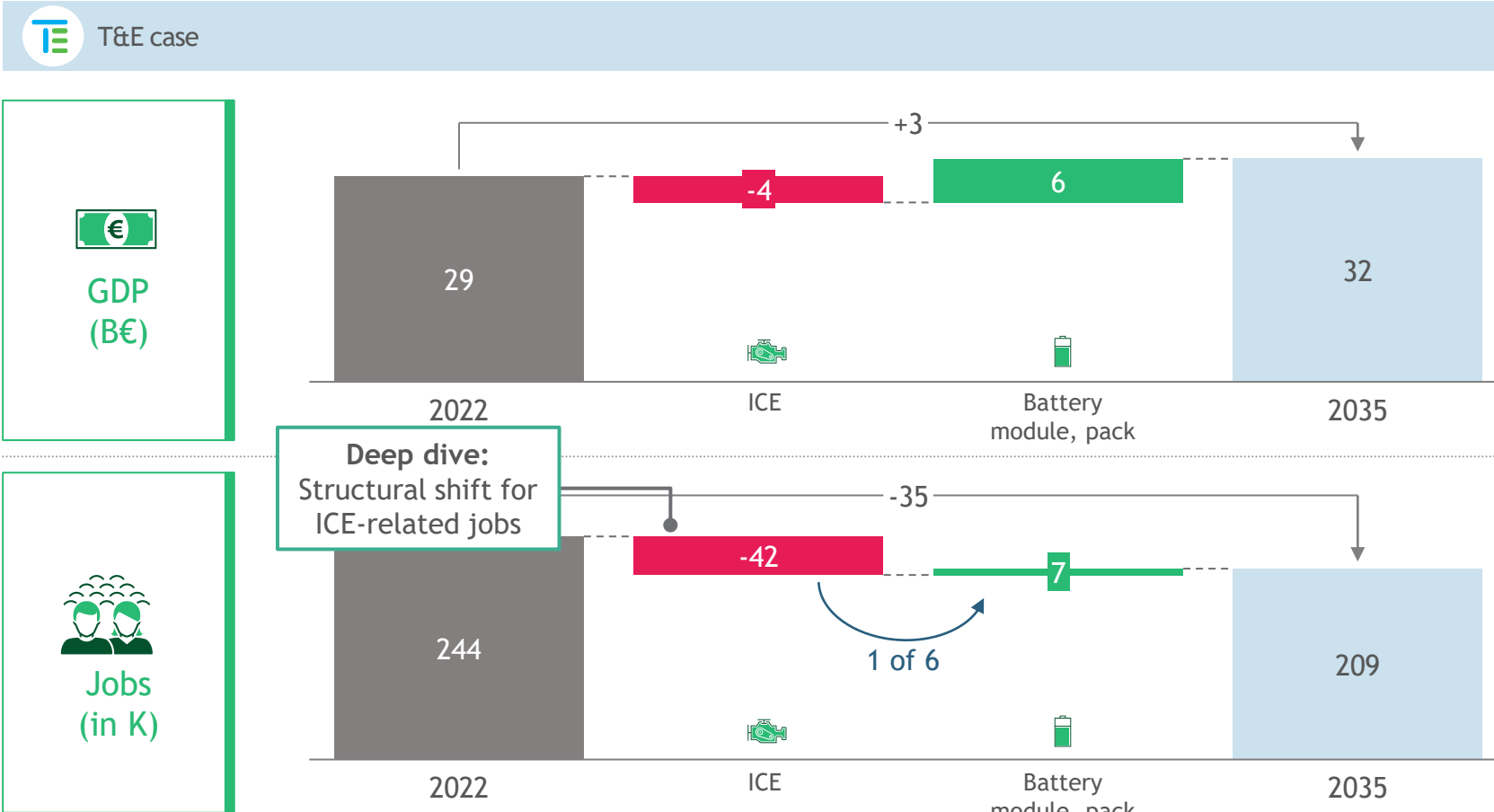


- ### Regulations
- ✓ **Net-Zero Industry Act:** Content requirements for batteries to enforce local production
  - ✓ **Critical Raw Mat. Act** proposed in March 2023 addresses shortages and supplier concentration
  - ✓ **Framework to secure sustainable supply of critical raw mat.,** supported by battery regulation's recycling and recovery requirements
  - ① **Taxes on import** of battery to increase attractiveness of local battery production
  - ② **Local sourcing requirements** for obtaining government contracts or licenses
- ### Incentives
- ✓ **New tech support:** Country-specific schemes in comb. with Temporary Crisis and Transition Framework and Green Deal Industrial Plan<sup>2</sup>
  - ③ Addl. tax incentives, subsidies, and grants to attract investment in battery infrastructure
  - ④ **Grants to R&D activities** for innovative raw material exploration and processing
  - ⑤ Support for accelerated build of **battery recycling infrastructure**

1. Battery mod. & pack covered by OEM, effects shown only for cell prod. & raw mat. at supplier 2. State aid valued at €837M granted to Spain for supporting battery prod. with loans & grants; Northvolt with support of ~ €500M in Germany 3. Assumptions for sensitivity demo  
Source: Expert interviews; BCG



# OEMs (1/2): While GDP grows, job losses from ICE phaseout cannot be replaced fully by new ZEV parts



**35K jobs**

Net job loss driven by phaseout of ICE and reduced labor need for battery module and pack

**1 in 6 jobs**

ICE employees require reskilling to secure shift to battery module and pack production in 2035

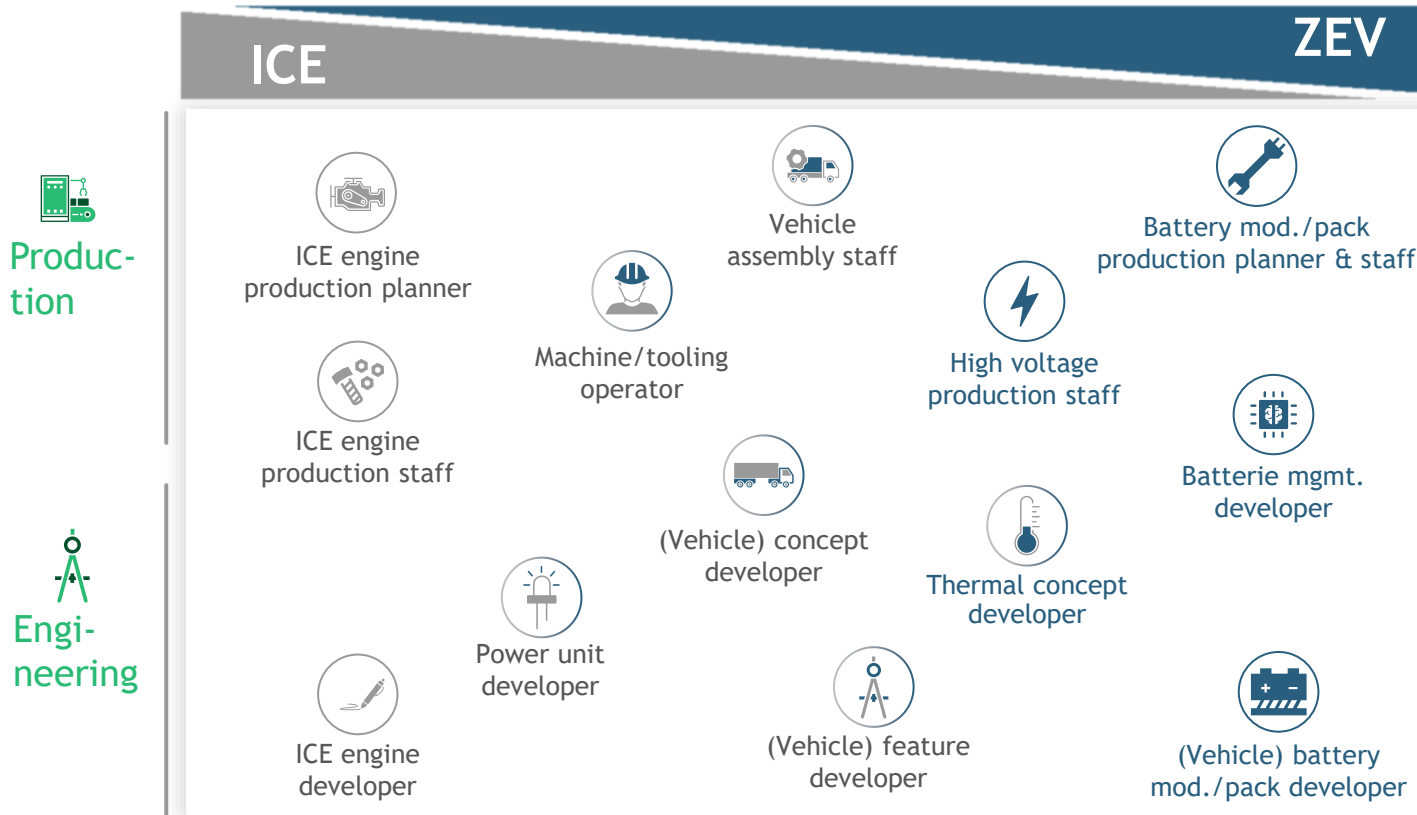
Note: 2035 figures based on ZEV adoption in T&E case; assuming no strategic changes to current OEM business model  
Source: BCG



# OEMs (2/2): Structural changes create need for reskilling labor force

2035: 35K employees in major job families affected

## Policies



- Incentives**
  - Green reskilling as part of Green Deal Industrial Plan—e.g., via Erasmus+ initiative (€1.1B), European Skills Agenda
  - Social investment and skills window (SISW)—support of supply and demand of skills (e.g., students, learners, and SMEs)
  - Recovery and resilience facility (RRF) support with grants and loans for development of skills to support green and digital transition
  - (National) location-based reskilling program supporting OEMs shift to ZEV and green production based on new job profiles

### General trends affecting ICE jobs

- (Early) retirement schemes
- Remote and flexible work
- Demographic shifts

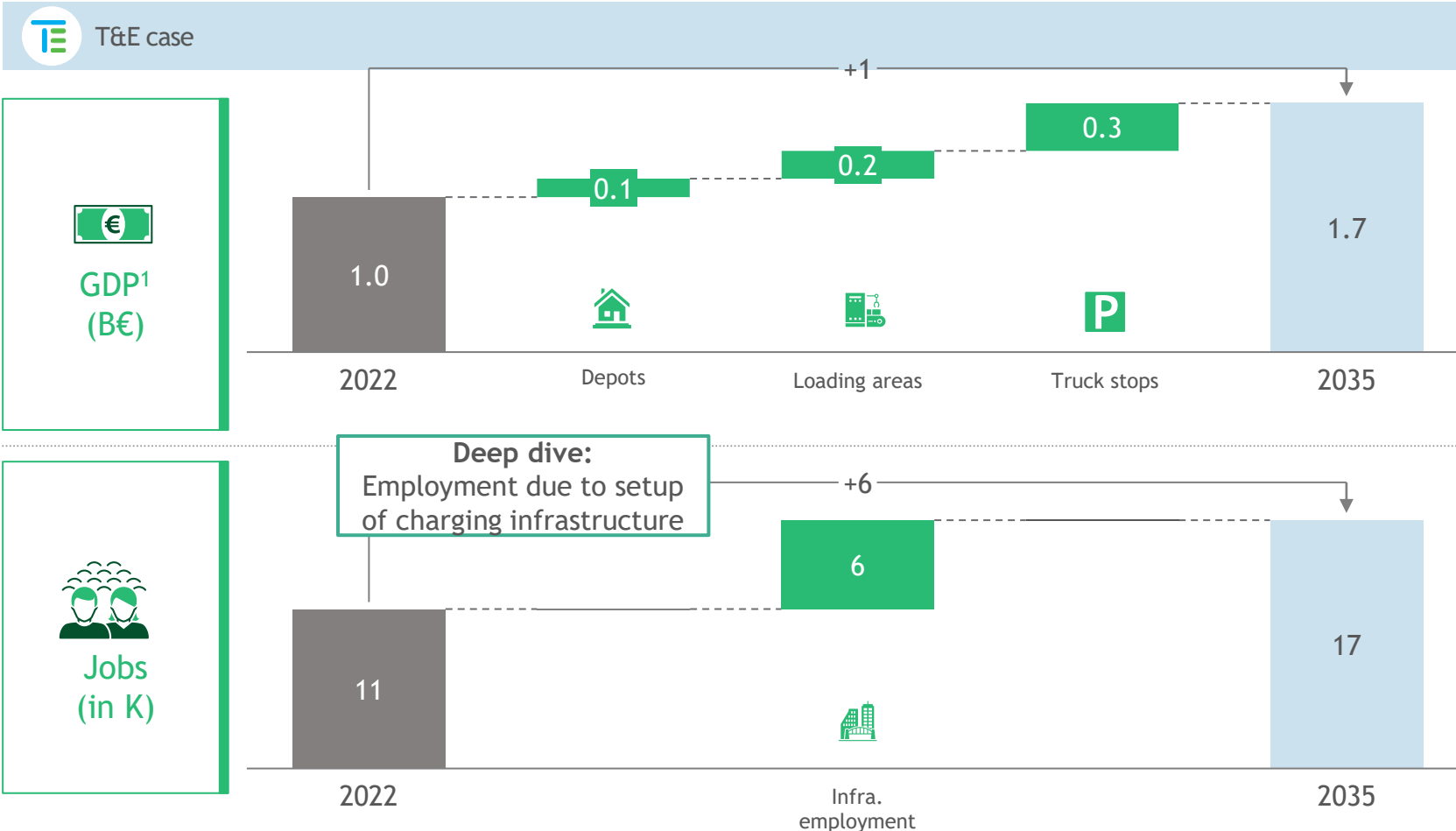
Note: Same applies to suppliers and utilities with significant changes in job demands and profiles taking place  
Source: BCG

Existing policies    Addl. policy levers to enable smooth job transition





# Infrastructure (1/2): Economic growth driven by buildup in charging infrastructure



**€600**  
M GDP

Additional GDP contribution from setup of charging infrastructure

**6K**  
jobs

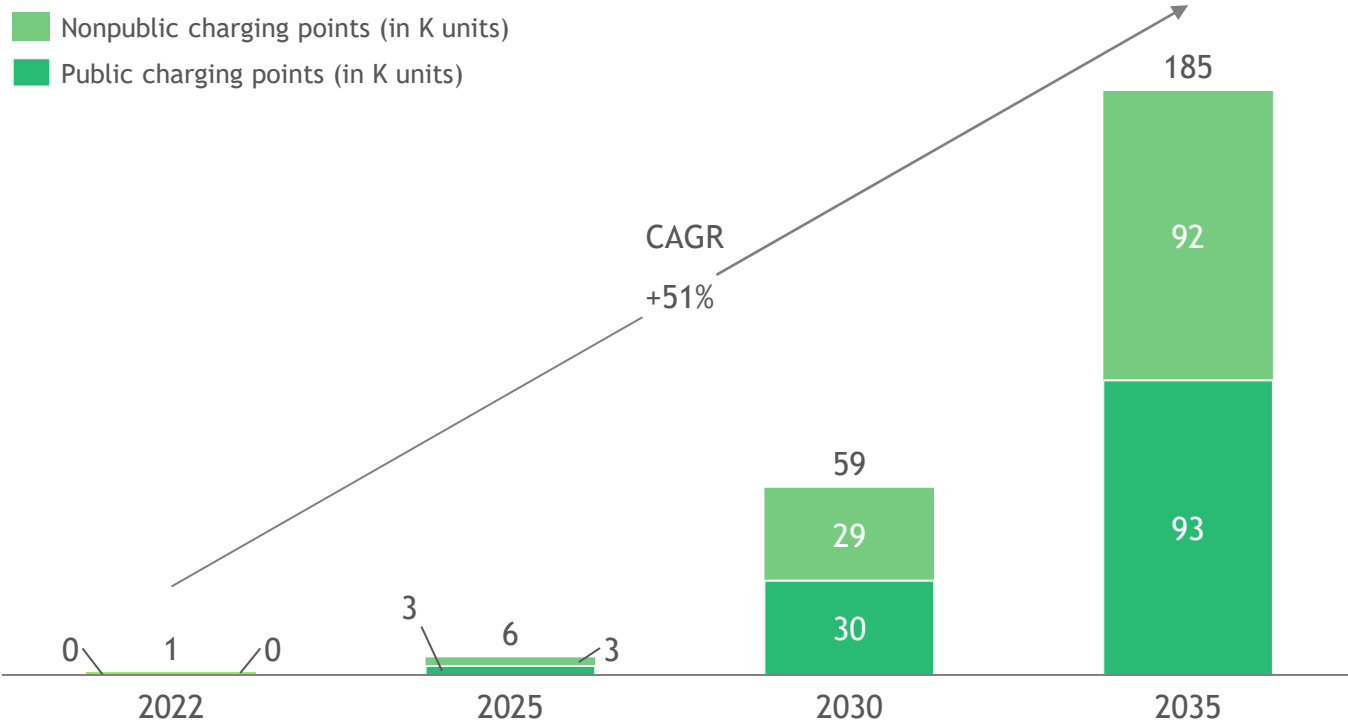
Employment contribution from infrastructure reliant on BEV adoption rates

1. Incl. connected and platform services, transport solutions, and resale, reuse, and recycling  
 Note: 2035 figures based on ZEV adoption in T&E scenario Source: BCG



# Infrastructure (2/2): Net ramp-up of charging infrastructure critical for capacity-driven road transport industry

## 2035: Fast growing number of charging points forecasted



1. Alternative fuel infrastructure regulation  
 Note: Assuming high-speed charger share of 70% for public charging points; CAGR = compound annual growth rate  
 Source: BCG



## Policies



### Regulations

- ✓ AFIR<sup>1</sup> requiring at least 3,600 kW MHDT charging pools to be installed every 60 km along TEN-T core network by 2030, supporting major buildup of charging infrastructure in Europe



### Incentives

- ! Subsidies and grants to support charging infrastructure providers and SMEs regarding setup of fleet charging options
- ! Support setup of electricity grid as fundamental basis of infrastructure rollout (including light vehicles)



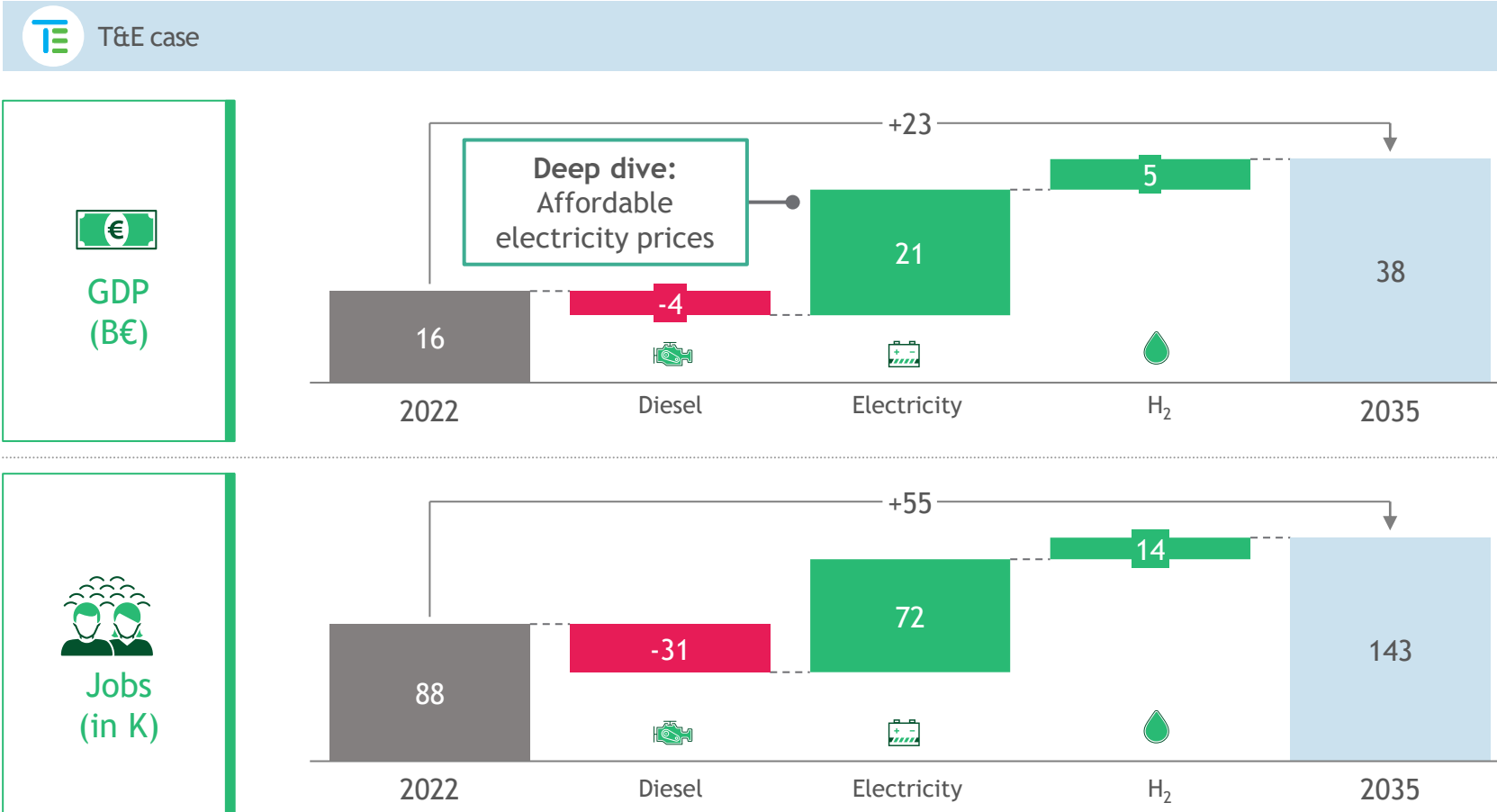
Existing policies



Addl. policy levers to enable deployment of charging infra.



# Utilities (1/2): GDP and jobs created by new energy needs; main driver electricity due to high value share in Europe



**€4**  
B GDP

Diesel GDP loss due to shrinking diesel fleet and lower consumption

**€21**  
B GDP

GDP contribution by electricity, driven by high value add in Europe

Note: 2035 figures based on ZEV adoption in T&E case  
Source: BCG



# Utilities (2/2): Contribution from electricity consumption reliant on affordable energy prices and value add versus diesel

## 2035: Sensitivity of TCO to energy prices

		2035 diesel prices		
		Lower prices	Current prices	Higher prices (e.g., penalties)
2035 electricity prices	Lower prices (e.g., incentives)	No change in TCO advantage	High/medium TCO advantage	High TCO advantage
	Current prices	Medium/low TCO advantage	No change in TCO advantage	High/medium TCO advantage
	Higher prices	No TCO advantage	Medium/low TCO advantage	No change in TCO advantage

■ Low TCO advantage    ■ High TCO advantage

## Policies



### Regulations

- ✓ **Net Zero Industry Act:** Strengthen manufacturing capacity of net-zero technologies, overcoming barriers to scaling up
- ✓ **REPowerEU Plan:** Decarbonizing the industry by accelerating the switch to electrification and providing affordable energy



### Incentives

- ✓ **Partial toll reductions:** Subsidies for BEVs, e.g., no road tolls in scale-up phase
- ! **Green subsidies:** No/lower cost for access to grid of renewable electricity
- ! **Wholesale prices:** Access to large scale electricity prices for smaller fleets

- ✓ Existing policies
- ! Addl. policy levers to enable smooth job transition

# EU already with substantial mechanisms in place to support shift to ZEV





			Not exhaustive			
 Regulations R	<input type="radio"/> CO <sub>2</sub> reduction targets	CO <sub>2</sub> emissions reduction targets of 15% by 2025 and 30% by 2030 <sup>1</sup> ; case for stricter targets awaiting final approval	<input type="radio"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>
	<input type="radio"/> Manufacturing ecosystem	Net Zero Industry Act to strengthening net-zero technology products, setting enabling conditions for batteries and energy with 40% domestic production benchmark by 2030	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
	<input type="radio"/> Battery supply	Critical Raw Materials Act addresses shortages for critical and strategic raw materials sets a 40% target for the local processing of these materials by 2030	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>
	<input type="radio"/> Infrastructure	Alternative Fuels Infrastructure Regulation with complete TEN-T network coverage to be achieved by '30 with MHDT charging pools at least 3,600 kW to be installed every 60 km	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input type="radio"/>
	<input type="radio"/> Energy	REPowerEU Plan diversifies EU energy supply by investing in renewables and securing affordable energy supplies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
 Incentives I	<input type="radio"/> Purchase subsidies	National level subsidies (e.g., Germany and Austria up to 80% of price delta to ICE truck; NL 45%)	<input type="radio"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>
	<input type="radio"/> Road tolls	Partial toll reductions on natl. level (e.g., Germany €0/km until 2023, afterward reduced until 2040)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
	<input type="radio"/> CO <sub>2</sub> pricing	CO <sub>2</sub> price on transport fuels increasing diesel prices and thus relative TCO adv. of ZEVs	<input type="radio"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>
	<input type="radio"/> Tech funding	New tech support via e.g., NextGen EU (€800B), Horizon Europe R&D program (€40B)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="radio"/> Skills funding	Green reskilling as part of Green Deal Industrial Plan—e.g., via Erasmus+ initiative (€1.1B), European Skills Agenda; social investment and skills window (SISW)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Common incentive along the value chain

1. Relative to 2019 level; stricter CO<sub>2</sub> standards revised for MHDTs based on EU commission case (Feb. 2023) of 45% by '30 & 65% by '35, applicable to trucks (> 5 t), city buses, long-distance buses (> 7.5 t), trailers; final approval still pending; additional targets set on national level

Source: BCG

# Agenda

-  **Current state** of the European truck industry 1
-  **Shift to ZEV** and underlying key drivers 2
-  **Impact** of ZEV shift on European economy until 2035 3
-  **Supporting** the shift to zero emissions 4
-  **Outlook:** Emerging competition from new non-European ZEV players 5

# Global trend toward ZEV challenges traditional market structures, offering new players opportunities to enter into the European truck industry



**Technology shift is enabler for market disruption**

Shifts in technology and business model open up opportunities for new players in the market, incl. non-European truck manufacturers



**Exports are starting point for new players, moving toward localization**

Depending on home-market cost structure, localization becomes crucial for long-term dominance for non-European players, but requires minimum volume of ~ 5-10K vehicles p.a.



**Three scenarios for the rise of non-European players foreseen**

Overall impact of non-European ZEV players on GDP and employment depends upon the concrete scenario, esp. number of entrants, localization degree, etc.



# ZEV shift is accelerating fast, impacting traditional MHDT OEMs

## Market trends

Core MHDT market is tougher, growth shifts to Asia, rules of the game being redefined



MHDT market maturing, limited growth in Europe



Temporary volume shocks due to COVID and semiconductors



New valuations emphasize the transition

## Technological development

Rapid tech development forces large investments and redefinition of industrial operations



New powertrain technologies accelerating



Digital solutions gaining speed



Autonomous vehicles maturing

## External forces

Sustainability and environment top of the agenda, through both push and pull forces, accelerating the shift



Push from regulations and standards



Geopolitical implications



Sustainability and climate pull from customers

## Value drivers and business models

Profit pools shift toward new business models, where the right to win is not as given for traditional OEMs



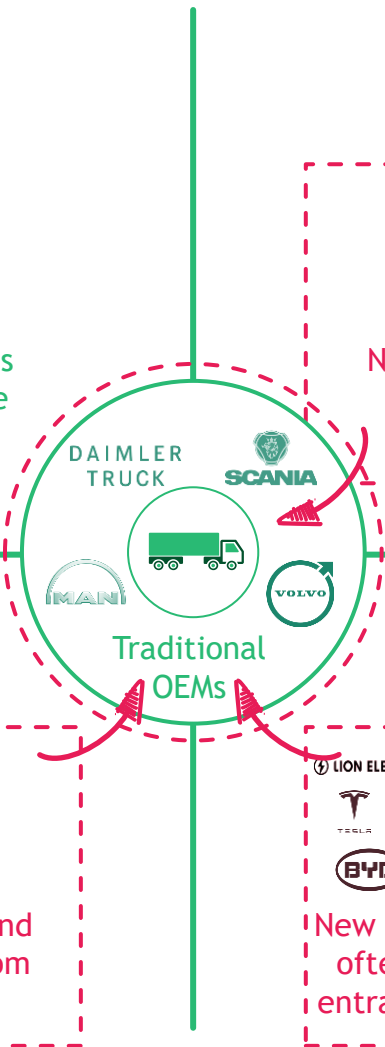
New ZEV competition—often driven by new entrants from US & CN



Value pools are shifting toward new technologies



Customer landscape is changing







# New ZEV competition expected mainly from new market entrants

Not exhaustive

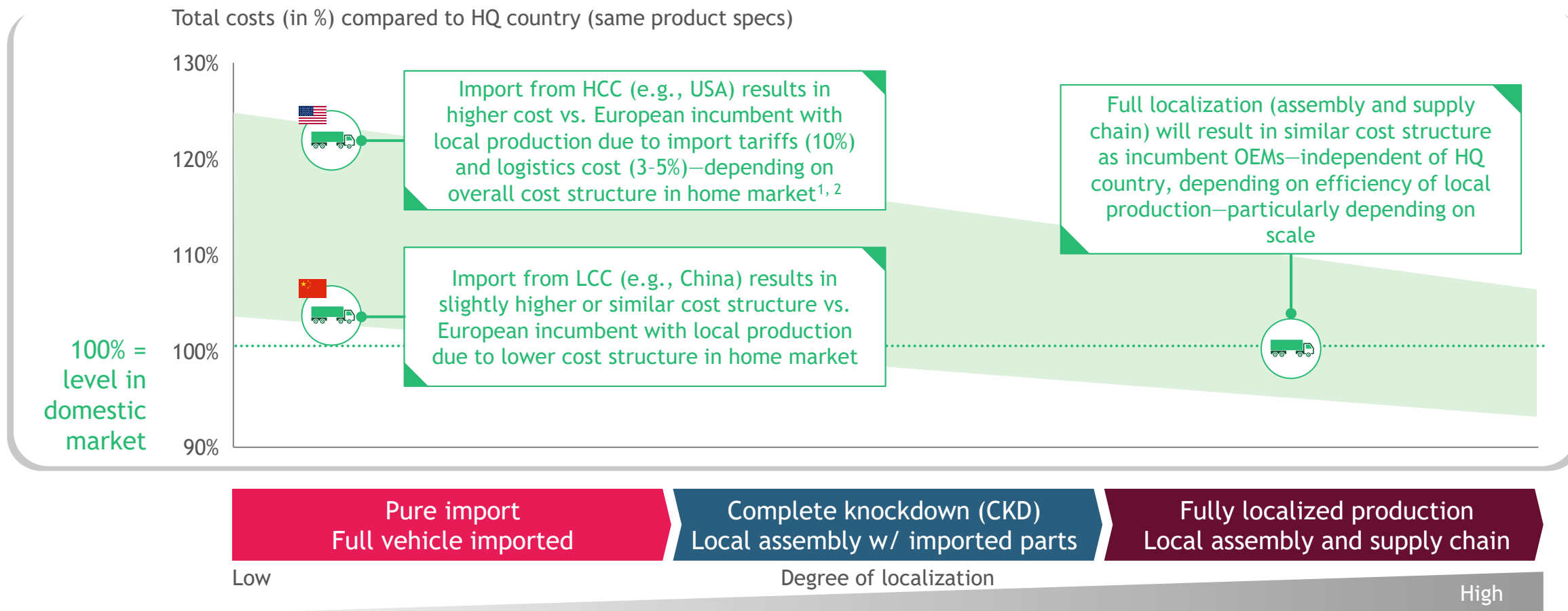
## Potential candidates for entry into European MHDT market

Company	HQ	xEV portfolio	Highlights of what is known	Year established
			<ul style="list-style-type: none"> <li>Preorders from UK, Netherlands, and Norway, no delivery date disclosed</li> </ul>	2003
			<ul style="list-style-type: none"> <li>Developed electric and hydrogen truck eligible for European market, recently sold European stake to IVECO</li> </ul>	2015
			<ul style="list-style-type: none"> <li>Main BEV presence currently in the US</li> </ul>	2015
			<ul style="list-style-type: none"> <li>Main BEV presence currently in the US</li> </ul>	2020
			<ul style="list-style-type: none"> <li>Currently in production but only available to North American market as of yet</li> </ul>	2008
			<ul style="list-style-type: none"> <li>Presented MHDT designed to enter European market at IAA in 2022</li> </ul>	2003 <sup>1</sup>
			<ul style="list-style-type: none"> <li>Developed native NEV-truck aiming for US and Chinese markets</li> </ul>	2002
			<ul style="list-style-type: none"> <li>Hyundai expands its hydrogen fueled truck fleet in Europe</li> </ul>	1967 <sup>2</sup>
...	...	...	...	...
... New European Players				
			<ul style="list-style-type: none"> <li>Teva started in UK, recently expanding into mainland Europe</li> </ul>	2012
			<ul style="list-style-type: none"> <li>Production partnership with Steyr, supplying Schenker with ~ 1,500 trucks</li> </ul>	2017
			<ul style="list-style-type: none"> <li>Partnered with Scania to deliver 110 trucks primarily for Swedish market</li> </ul>	2016
			<ul style="list-style-type: none"> <li>Partnerships with NEUMAN &amp; ESSER in Germany, and Ballard Power Systems in Canada</li> </ul>	2019
...	...	...	...	...

1. BYD founded in 1995 as battery manufacturer, entered automobile business in 2003 2. Announced H2 MHDT offering for Europe in 2020  
Source: Press releases



# Exports are typically starting point for new players, moving toward localization



1. Under IRA subsidies, US likely to be in lower range of scenario 2. Tesla Semi likely to fall under 16% tariff being categorized as road tractor

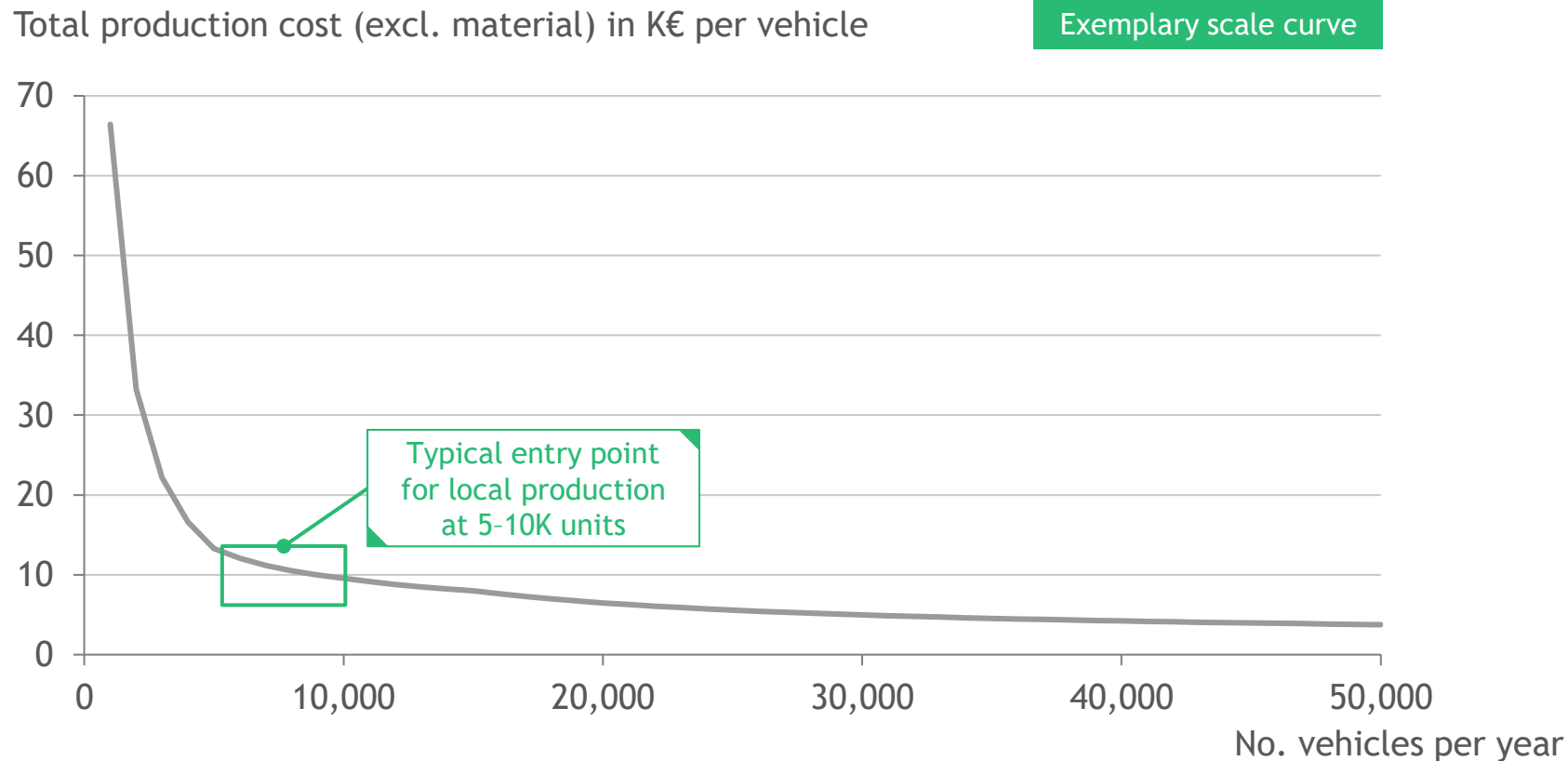
Note: HCC = high-cost country, LCC = low-cost country

Source: BCG



# Localization requires minimum volume of 5-10K units p.a. to reach efficient production levels

## Typical scale curve for MHDT production



Production cost significantly declines per vehicle until 5-10K units per year

If respective volume is in sight, players typically shift to local assembly (CKD) and start to localize supply chain



# Reasons and barriers for entering the European market



## Key reasons to enter European market

**Supply shortage:** European incumbents do not fulfill high ZEV demand, attracting new players to fill the gap

**Technological advantage:** New players entering with advanced offering (e.g., range, performance) outperforming incumbents

**Supply chain advantage:** New players may have access to potential scarce resources than incumbent OEMs

**Cost advantage:** Potentially lower cost structure besides tariffs and logistics cost of new players

**Potential lead market:** Current regulation could make Europe front-runner for BEV truck market (versus USA)



## Key barriers to European market entry

**Development effort:** Homologation and product adaptations needed to fulfill European needs

**Low-margin market:** Overall low margins realized in recent years in Europe

**Trade barriers:** Tariffs (also if lowered) may make imports (temporarily required to establish brand) less attractive

**Service/aftermarket network:** Need to offer dense network of workshops and spare part supply

**Sales network and customer relations:** Long-standing customer relations<sup>1</sup> limit market potential for new players

**Investments at risk:** High investments needed to establish market presence but limited guarantee to succeed

1. Brand stickiness in MHDT market lower than in light vehicle market due to focus on TCO  
Source: BCG



# Three scenarios considered for non-European player market entry

	0	I	II	III
	Defend	Fully localized production	Local assembly with partial local sourcing	Import-based competition
Assumption	Baseline scenario, assuming no new competition	Two players establish in market and transition to fully localized production from import-only model. Peak import to be expected around 2030. Long-term only limited vehicle import to Europe	Two players established in market and transition toward local production with CKD model. Long-term only little whole vehicle import to Europe	No entrant can achieve sufficient market share to establish local production: Also in medium- to long-term only imports at relatively low levels
Mkt shr. '35 <sup>1</sup>		-11% (thereof 1% vehicle import)	~ 8% (thereof 1% vehicle import)	~ 3% (all vehicle import)
Localization approach		After achieving sufficient market share (2-3%), start to localize assembly and supply chain to achieve similar cost structure as incumbents, targeting full localization	After achieving sufficient market share (2-3%), start to localize assembly and partially also supply chain (50% of incumbent OEM levels). Limited further growth prevents from full localization	No localization, full import
		▼	▼	▼
GDP (B€)		Peak (2028) -1.6      2035 -0.4	Peak (2029) -1.8      2035 -1.4	Peak (2035) -1.2      2035 -1.2
Jobs (K)		-11.3      -1.6	-12.3      -7.4	-7.6      -7.6

1. Assuming upper range in following analyses for more prominent results 2. In high adoption case versus 2022  
Source: BCG



# Underlying foundations and assumptions for market entry scenarios



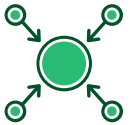
GDP and employment effect of scenarios calculated against base scenario, i.e., no competition from abroad



Underlying base is the current BCG market perspective (see chapter 1), which showcases a median trajectory between the two regulatory scenarios (Base case and T&E case)



Start of local assembly derived from truck production scale curve (see section 5B) and transition period toward full local assembly assumed to take 5-7 years



Number of entrants estimated based on today's potential entrants and competitive dynamics in European truck market (saturated, low-margin, BEV technology already available, etc.)



Focus of GDP and employment calculations is on OEMs and suppliers. ZEV infrastructure and MHDT-related utilities assumed stable with/without new entrants

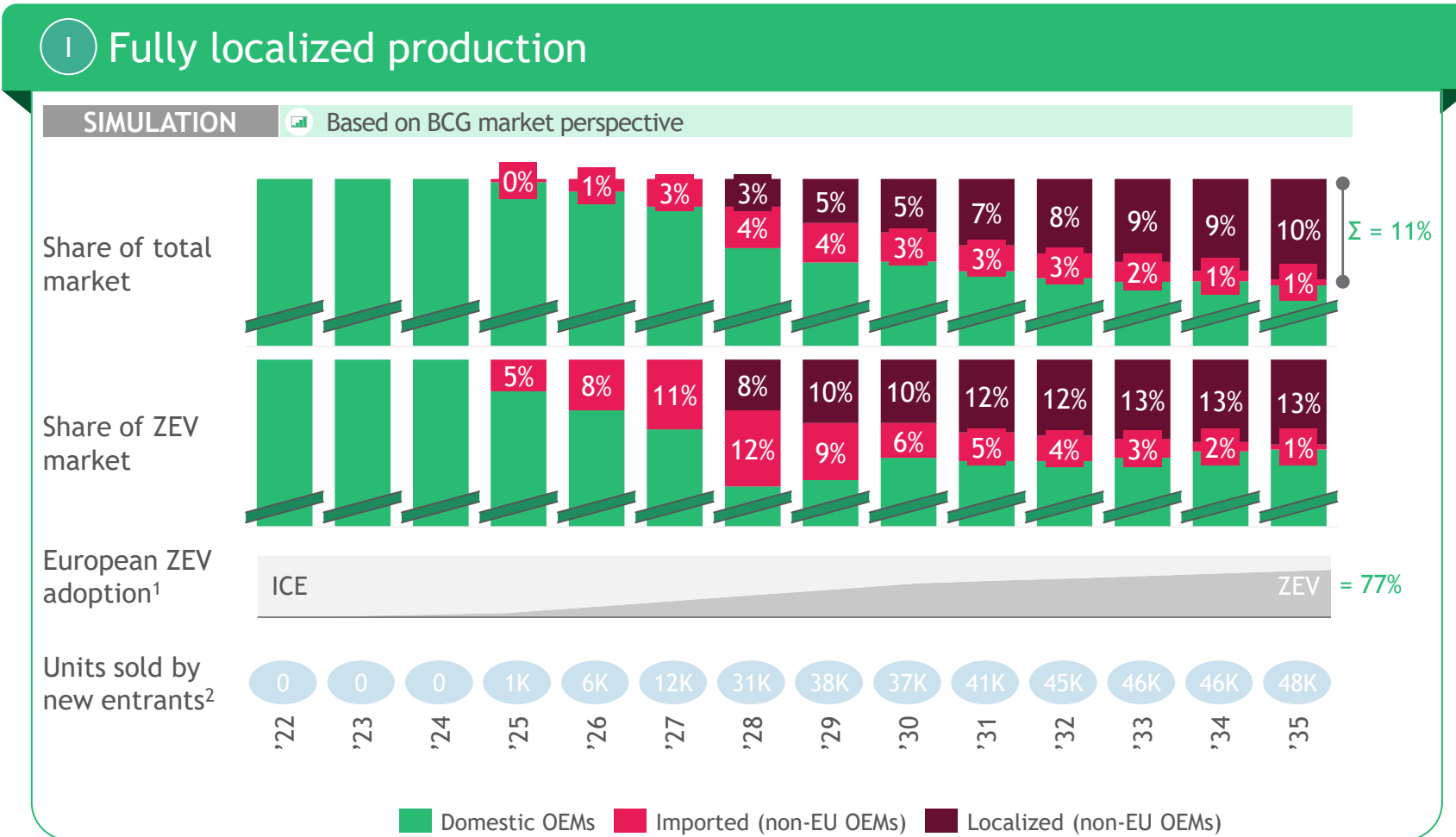


# Fully localized production (1/2): New player market share of 11% in 2035, assuming two fully localized new entrants

Few new players enter market with import model first

Two players can establish in market and transition to fully localized production when volume of ~ 5K units p.a. is in reach

Leaving limited window of opportunity for additional competition through import (only 1% market share long-term)



1. Underlying ZEV adoption in new-vehicle sales 2. Units sold for upper market-share range in each scenario  
Source: IHS Automotive; BCG

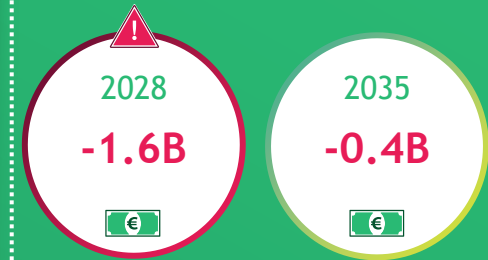
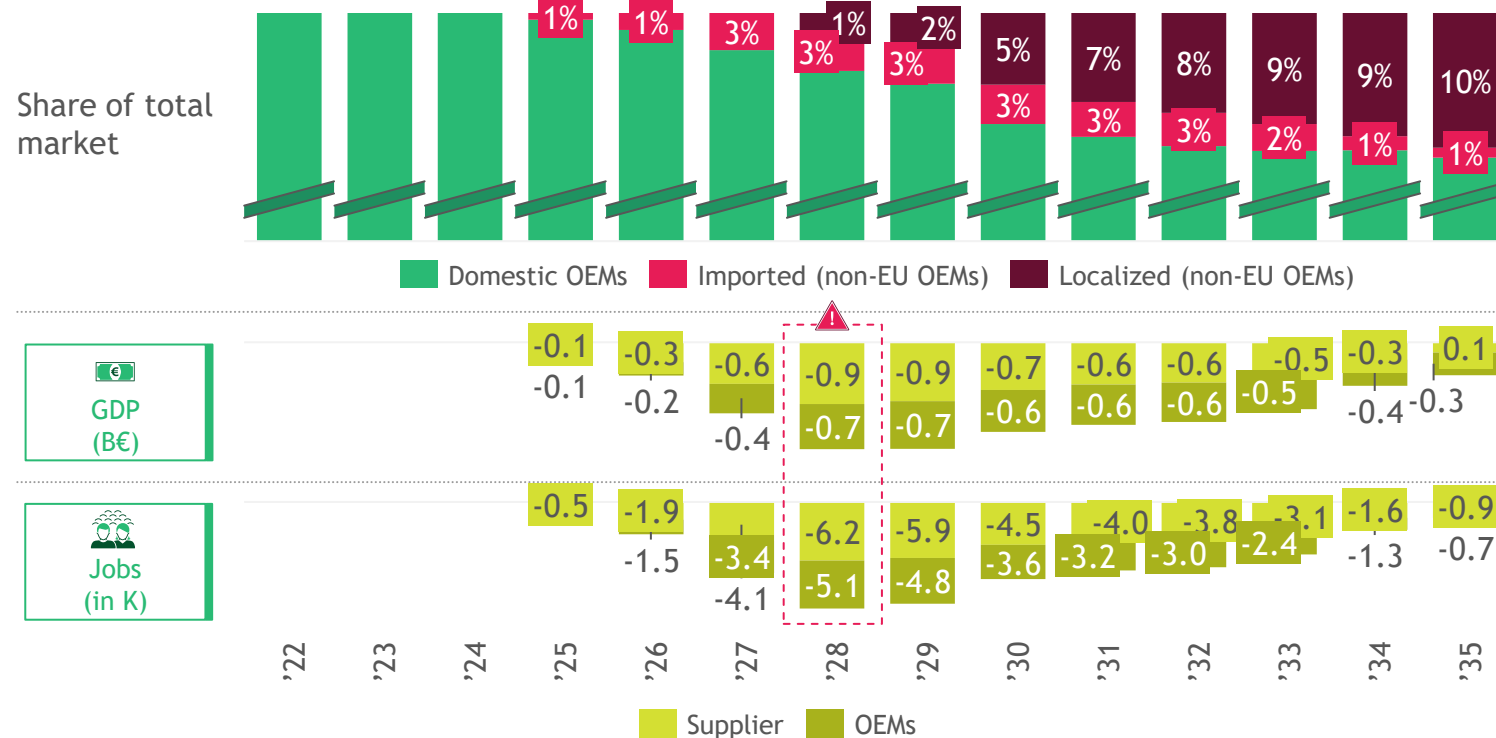


# Fully localized production (2/2): Intermediate dip in GDP and employment during “import peak” with recovery after

## 1 Fully localized production

SIMULATION

Based on BCG market perspective



GDP decrease during import peak temporary up to 1.6B



Employment losses throughout import phase up to 11.3K



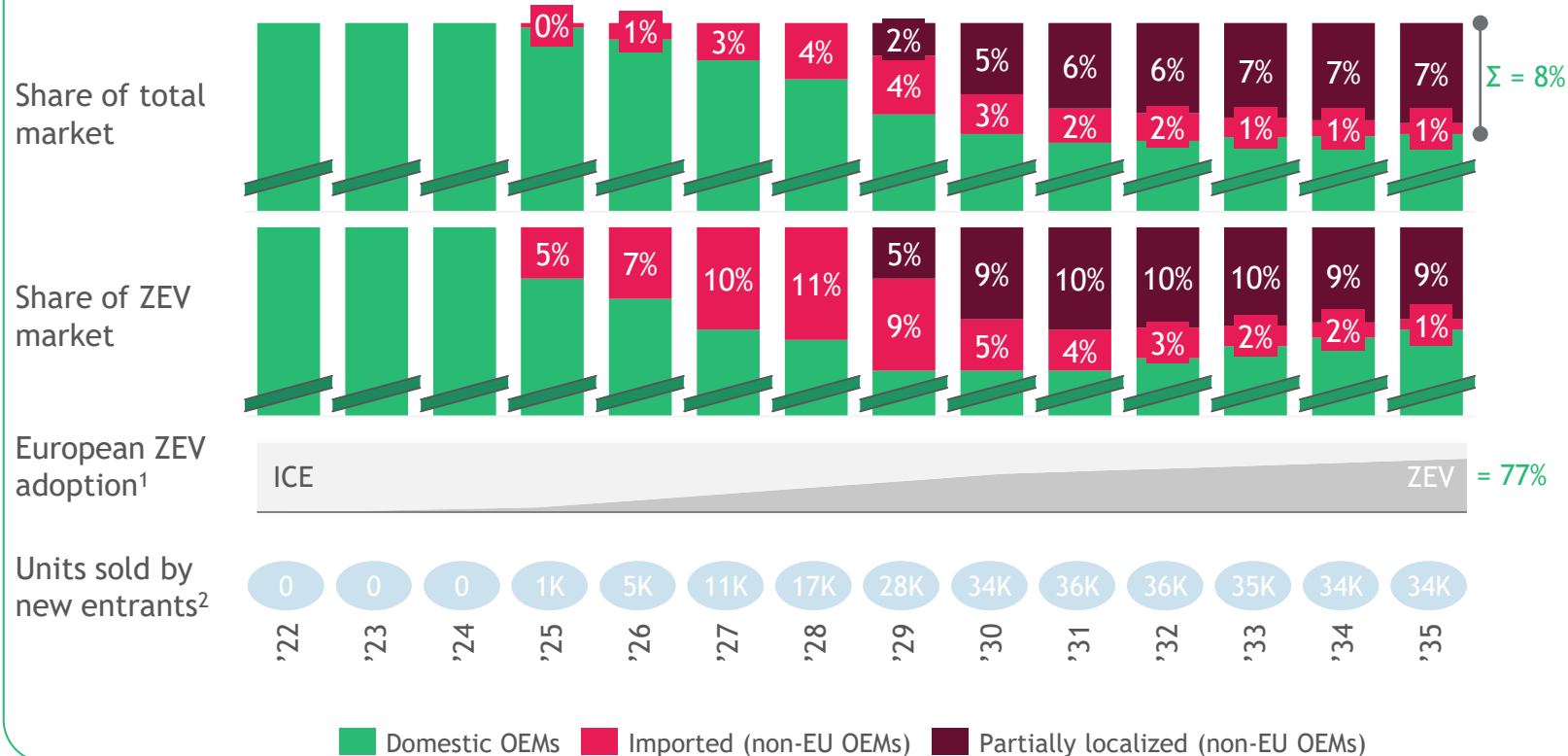


# Local assembly w. partial local sourcing (1/2): New player market share of 7% expected in 2035, w. partial localization

## II Local assembly with partial local sourcing

SIMULATION

Based on BCG market perspective



Few new players enter market with import model first

Two players can get established in market and partially transition toward local production, however they don't fully localize. Localization of supply chain reaches 50% of incumbent's level

Vehicle import very low in long term, as new players and incumbents leave little room

1. Underlying ZEV-adoption in new-vehicle sales 2. Units sold for upper market-share range in each scenario Source: IHS Automotive; BCG

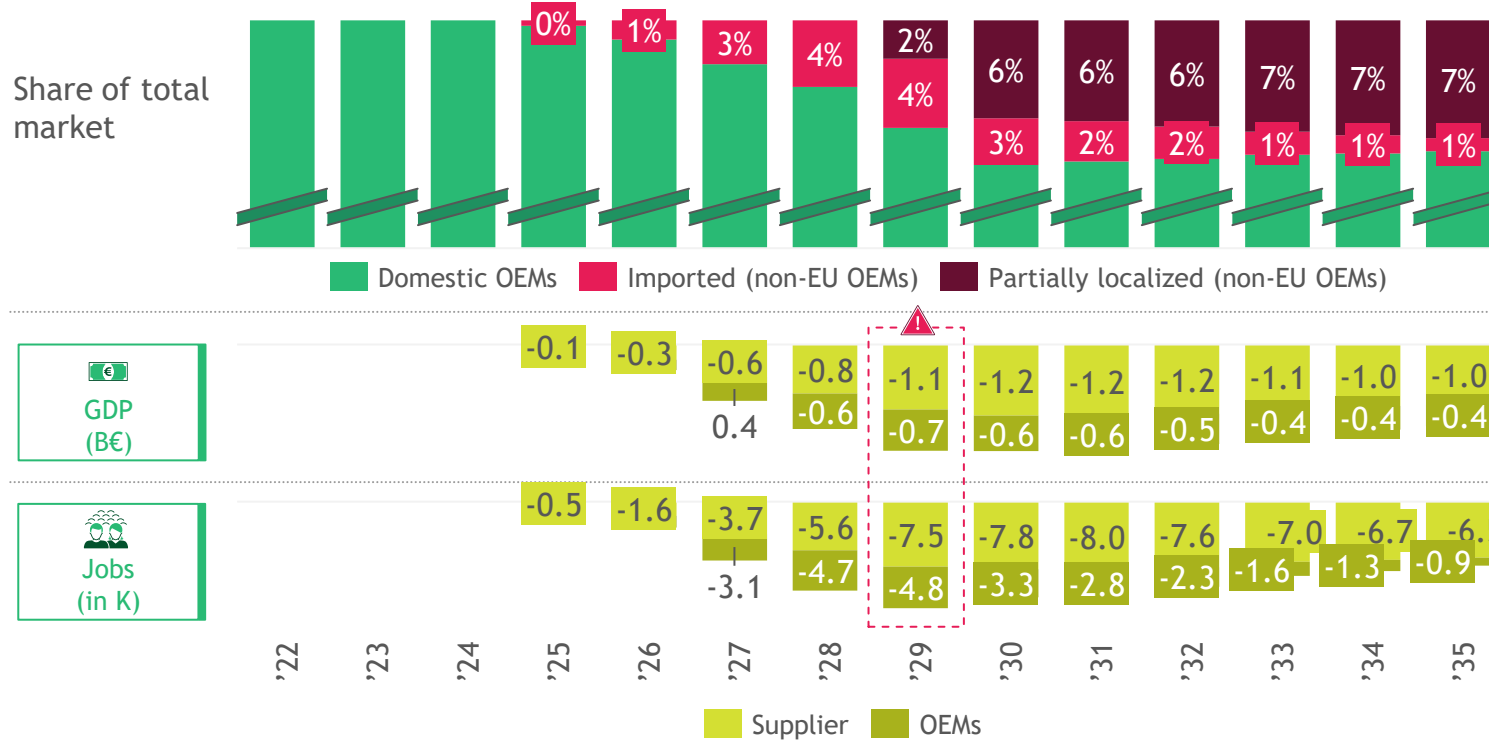


# Local assembly w. partial local sourcing (2/2): Substantial decline in GDP and jobs if supply chain is not localized

## II Local assembly with partial local sourcing

SIMULATION

Based on BCG market perspective



**2029**  
-1.8B  
€

**2035**  
-1.4B  
€

GDP decrease during import peak in 2030 temporary up to 1.8B

**2029**  
-12.3K  
👤

**2035**  
-7.4K  
👤

Employment losses throughout import phase up to 12.3K

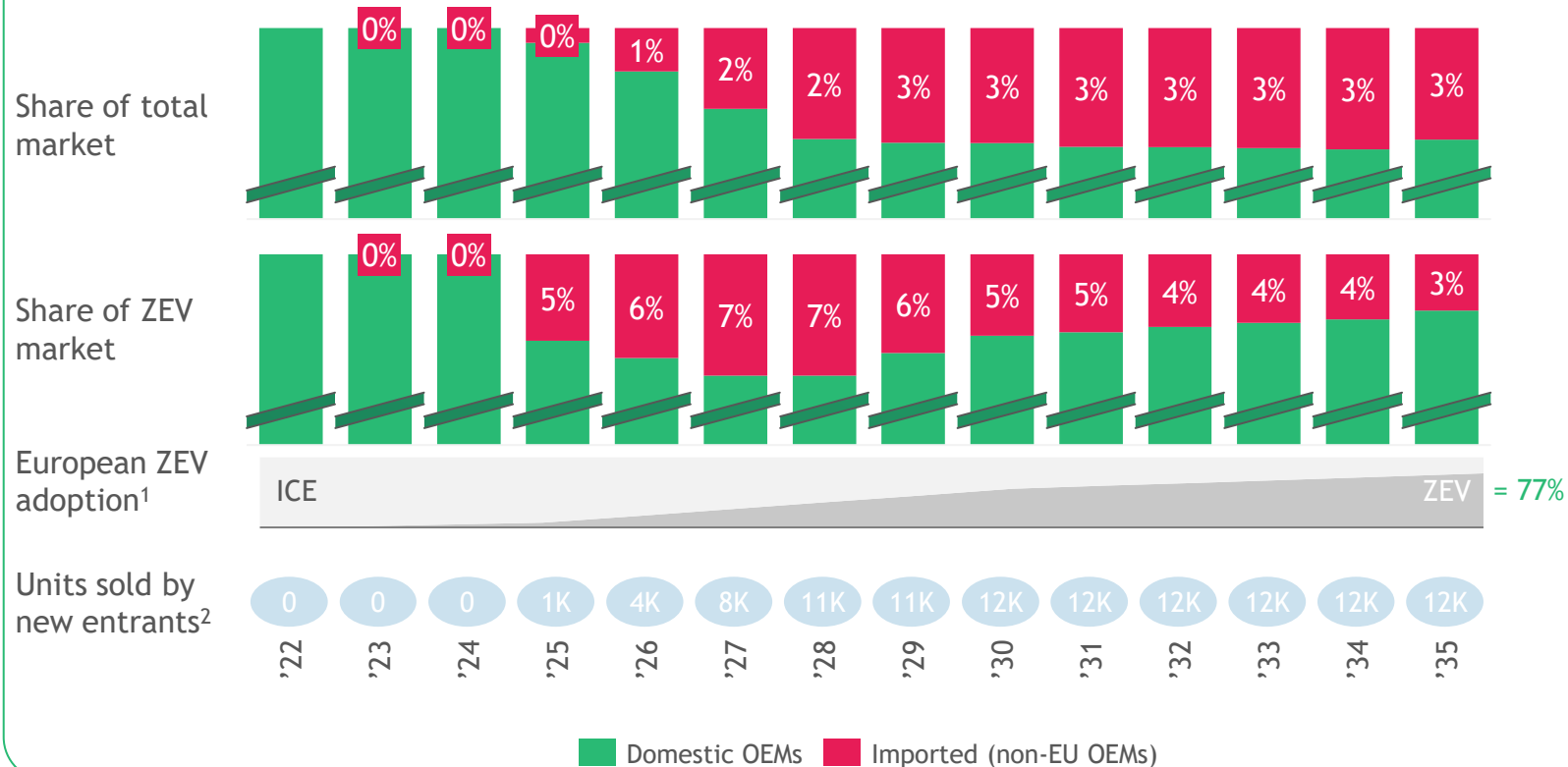


# Import-based competition (1/2): New player market share of 3% expected in 2035, with pure import business model

## III Import-based competition

SIMULATION

Based on BCG market perspective



Few players try to enter market but no player achieves sufficient volume for local production

Limited import of ~ 3% of the European truck market expected

1. Underlying ZEV adoption in new-vehicle sales 2. Units sold for upper market-share range in each scenario  
Source: IHS Automotive; BCG

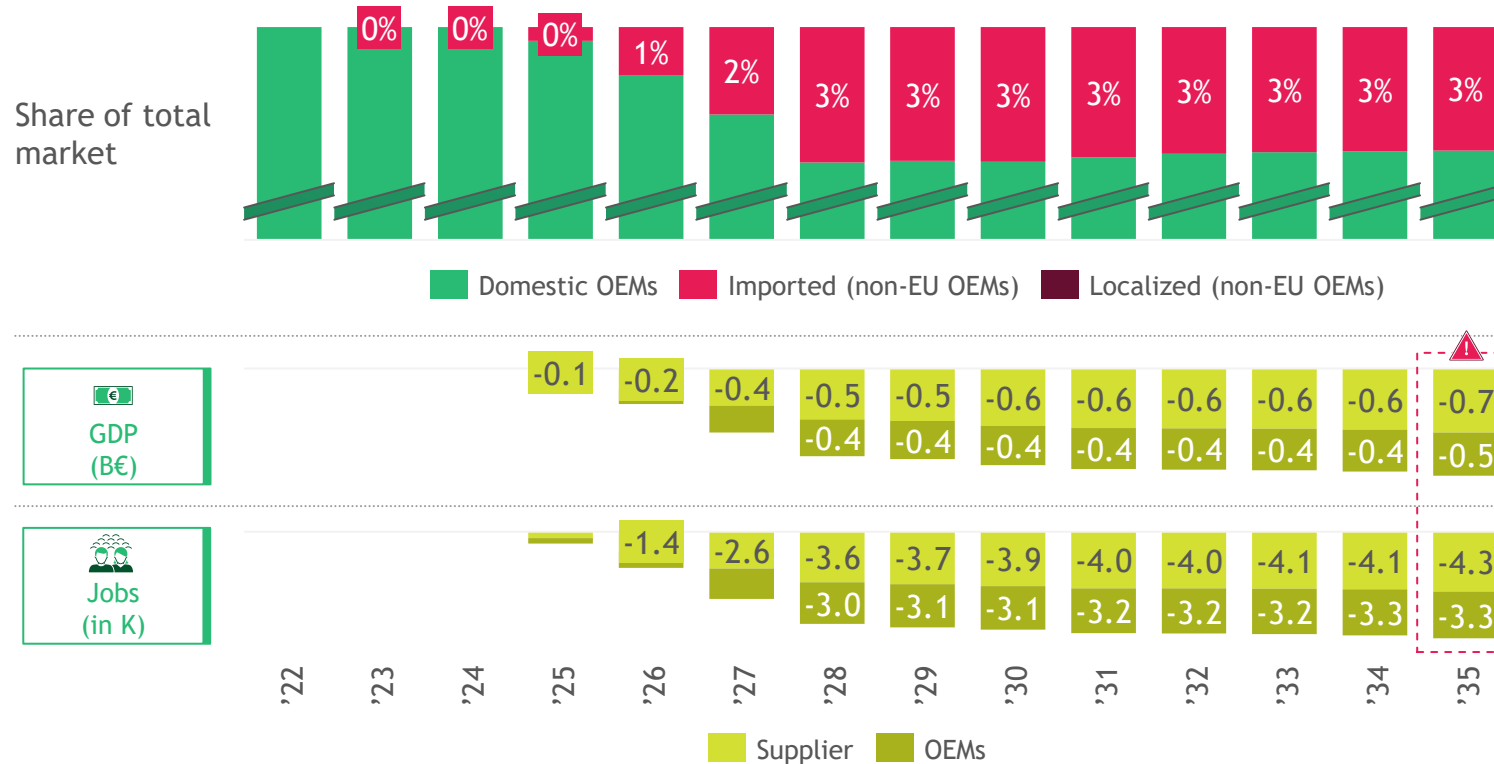


# Import-based competition (2/2): GDP and employment loss grows with ZEV adoption

## III Import-based competition

SIMULATION

Based on BCG market perspective



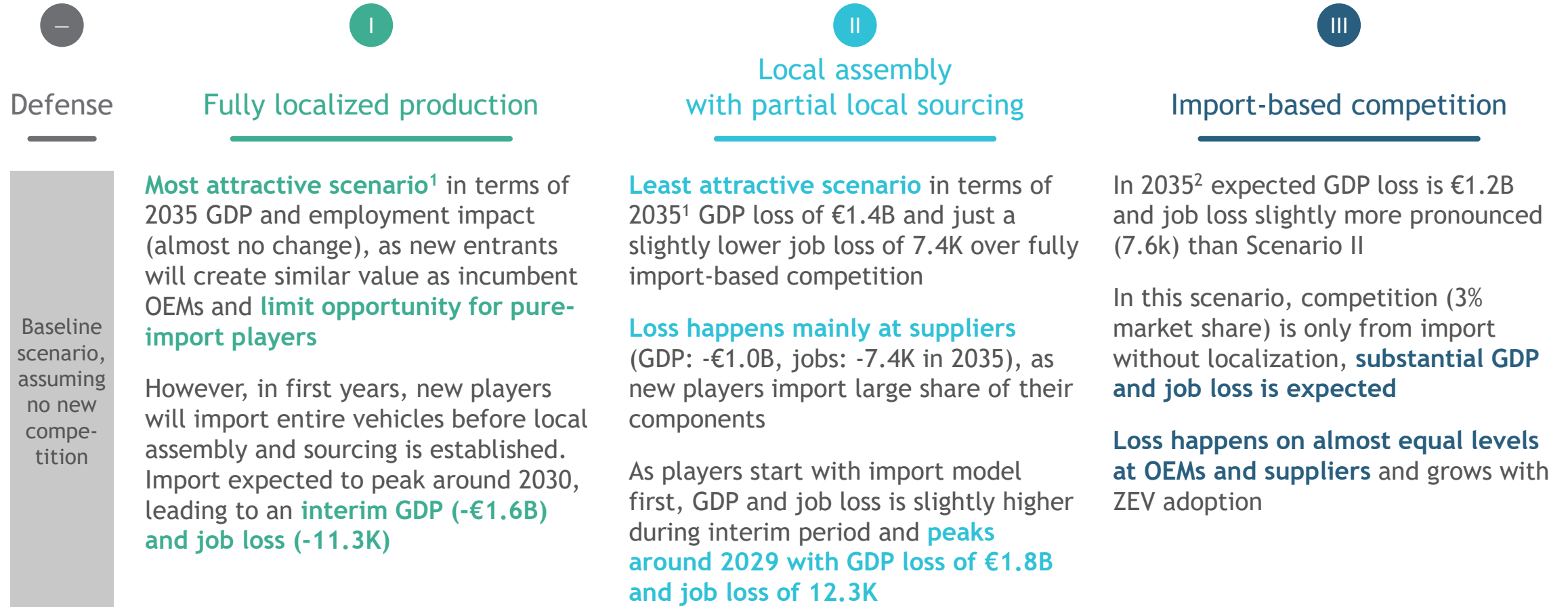
2035  
-1.2B  
€

2035  
-7.6K  
Jobs

Impact increases over time with higher ZEV adoption

1. Total value for OEMs and suppliers; loss incurred from share of imported vehicles only  
Source: IHS Automotive; BCG

# Summary: Highest risk for GDP and employment loss in steady state from new entrants with local assembly and partial local sourcing (scenario II)



1. Under the assumption that new competition cannot be avoided (baseline scenario) 2. Peak effect at end of investigated horizon—to slightly grow afterward with increasing ZEV adoption  
Source: BCG



# Potential levers to influence rise of non-European MHDT competition (extract)

Lever	Potential impact on new non-European market entrants
Standards	Emission targets Imposing minimum emission standards for MHDT players. Depending on the exact design the lever can incentivize or deter new entrants
	Increased technical requirements With requirements to invest largely to meet local demands, import (III) and semi-localization (II) scenarios can become less likely
	...
Tariffs / Local content	Higher tariffs on vehicles Local production is incentivized by making imports less attractive. Import-only becomes less likely, and new entrants may shorten import phase and ramp-up local production more quickly
	Higher tariffs on components Entire-vehicle import not affected by lever, but CKD production (II) becomes less likely, and players may shorten time for localization of supply chain
	Local content requirements Depending on specifics of regulation, import (III) can be fully suppressed and full localization (I) can be made more attractive
	...
Subsidies	Subsidies for development May speed up ZEV shift in Europe, thus limiting a supply gap, which can make a market entry for new players less attractive
	Subsidies, e.g., for local production Supports semi/full localization in Europe
	Customer incentives to push demand Supports demand for ZEV, which increases adoption and might drive a supply gap, thus attracting new players
	...



## Conclusion: All scenarios for non-European market entry have a negative impact on OEMs and suppliers, though ZEV transition outweighs losses along full value chain

In all scenarios with new entrants, GDP and jobs are lower than in base scenario without new competitors. In worst scenario (II) GDP is -€1.4B and jobs -7.4K lower in a steady state for full ZEV adoption in 2035 versus baseline scenario assuming no competition

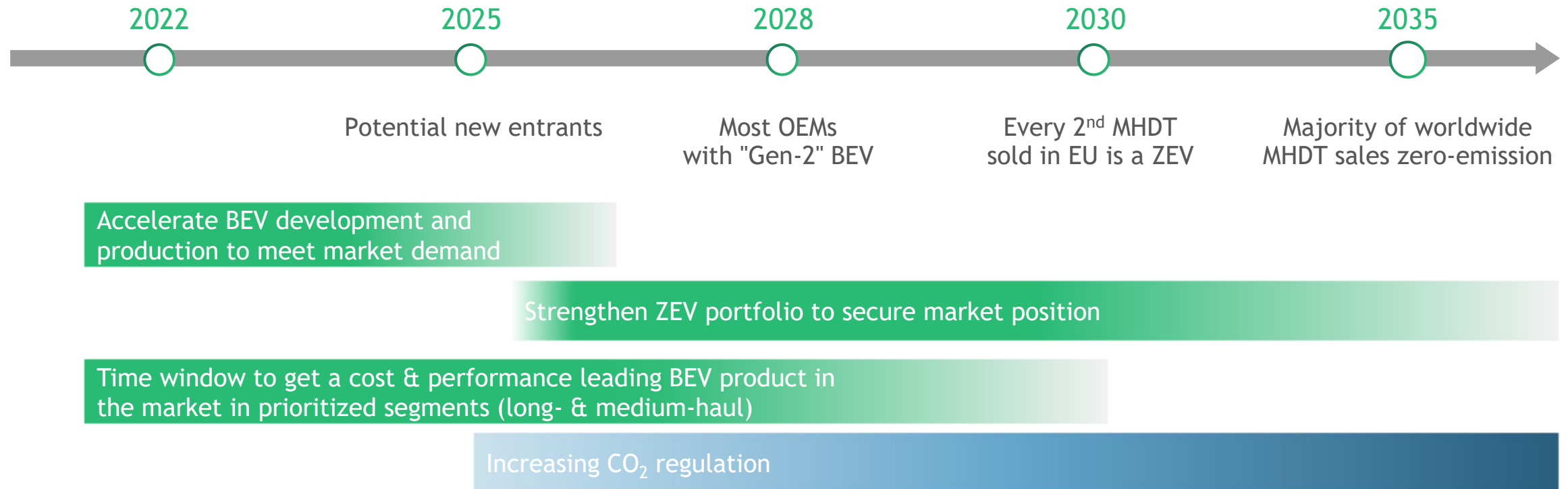
If new players cannot be avoided, long-term a scenario with full localization (I) could be most advantageous in terms of GDP and jobs. However, new entrants will start with import model first that leads to an interim peak loss in employment and GDP around 2030 relative to baseline scenario

Policymakers can influence likelihood of scenarios with protective measures (e.g., MHTD CO<sub>2</sub> standards, import tariffs, local content requirements) or subsidies for local players

Considering the full value chain, overall positive GDP (+€16B in the lower base and +€32B in the higher T&E case) and job (+16K/+30K) development can be achieved. This positive effect from the transition to ZEV is reduced in all scenarios, but not at risk, with non-European players entering the market



# Outlook: Roadmap for European MHDT OEMs to secure ZEV leadership as ZEV volumes significantly increase and new players enter the market





# Please reach out to the authors for further details



**Dr.-Ing. Peter Wiedenhoff**  
Managing Director and Partner  
Munich

Wiedenhoff.Peter@bcg.com



**Dr.-Ing. Kristian Kuhlmann**  
Managing Director and Partner  
Frankfurt

Kuhlmann.Kristian@bcg.com



**Andreas Girisch**  
Partner  
Munich

Girisch.Andreas@bcg.com



**Florian Gorzitzke**  
Principal  
Munich

Gorzitzke.Florian@bcg.com



**Dawid Golebiewski**  
Lead Knowledge Analyst  
Munich

Golebiewski.Dawid@bcg.com

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# Appendix

# EU with broadest set of policies amongst peers promoting shift to ZEV




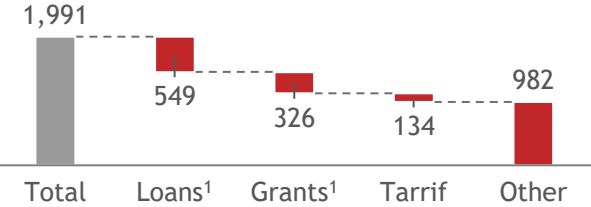
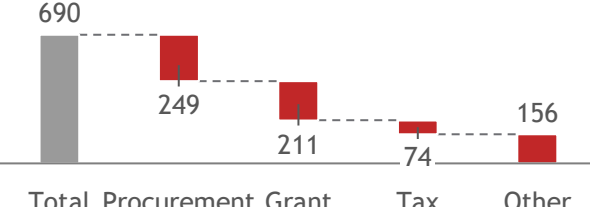
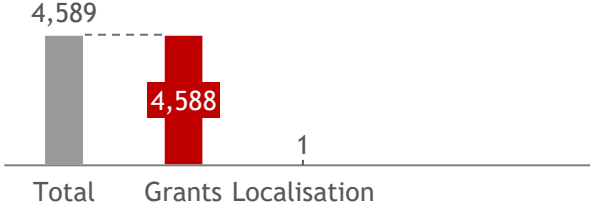


	EU	USA	China	
Regulations	CO <sub>2</sub> red. targets	✓ CO <sub>2</sub> emissions reduction targets of 15% by '25 and 30% by '30 <sup>1</sup> ; Case for stricter targets waiting for final approval	✓ CO <sub>2</sub> reduction targets for various HD CVs, reducing CO <sub>2</sub> emissions by in '27 (depending on vehicle category/weight)	? No specific ZEV policies beyond '23 but announced commitments
	ZEV sales targets	✓ 11 European countries signed the MOU: 30% MHTDs ZEV sales by '30 and 100% by 40 <sup>2</sup>	✓ Also signed MOU: 30% MHTDs ZEV sales by '30 and 100% by 40 <sup>2</sup> ; addl. natl.-level funds (e.g., CA Air Resources Board bans sale of diesel trucks by '36)	✓ ZEV credit targets for manufacturers as % of their annual sales, Program extended to '23 (18% in '23, 16% in '22, 14% in '21)
R&D support and grants	Tech funding	✓ New tech support via, e.g., NextGen EU (€250B), Horizon Europe R&D program (€40B)	✓ IRA invests \$1B to replace MHTDs with ZEVs; new tech support via, e.g., battery supply chain fund (\$7B); addl. natl. funds (e.g., NY \$500K for ZEV infrastructure)	✓ Four-year pilot program announced—select cities receive support for R&D and demonstration of fuel cell EVs
	Skills funding	✓ Green reskilling as part of Green Deal Industrial Plan—e.g., via Erasmus+ initiative (€1.1B), European Skills Agenda	✓ Green reskilling as part of IRA funding for infrastructure, workforce training/planning & maintenance/charging; funds available through FY '31	✗ Potential reskilling incentives are being discussed
Economic incentives	Purchase subsidies	✓ National level subsidies; (e.g., Germany and Austria up to 80% of price delta to ICE truck; NL 45%)	✓ Tax credits via \$430B policy bill for new BEVs (i.e., up to \$7.5K for L-& MDVs & up to \$40K for MHTDs); addl. state-level subsidies	? Subsidies for NEVs (phased out in '22); purchase tax exemption until '23 (10% of purchase tax); now subsidies shifted from national to regional level
	Road tolls	✓ Partial toll reductions on natl. level (e.g., Germany €0/km until '23, afterward reduced until '40)	✗ No current subsidies for road tolls for HD CVs	✗ No current subsidies for road tolls for HD CVs
	CO <sub>2</sub> pricing	✓ CO <sub>2</sub> price on transport fuels increasing diesel prices and thus relative TCO adv. of ZEVs	✗ Current tax doesn't include the CO <sub>2</sub> charge and potential charge of \$35 per mt of CO <sub>2</sub> will cause a decline of 2% of emissions associated with HD CVs	✗ Current tax doesn't include CO <sub>2</sub> charge
Usage incentives	✓ Infra-structure	✓ Process of infrastructure deployment to start in 2025 and cover all TEN-T roads by 2030	✓ State support to fund the ZEV corridors with EV charging and H <sub>2</sub> refuelling across 23 states	✗ Not announced, needs \$14T-17T in additional green infrastructure investments

✓ Existing policies    ? Under discussion    ✗ Nonexisting

1. Relative to 2019 level; stricter CO<sub>2</sub> standards revised for MHTDs based on EU Commission case (Feb. 2023) of 45% by '30 & 65% by '35, applicable to trucks (> 5 t), city buses, long-distance buses (> 7.5 t), trailers; final approval still pending; additional targets set on national level 2. Nonbinding memorandum of understanding (MOU); Source: BCG

# Import tariffs and broad range localization incentives support localized market structure but low tariffs in Europe for ZEV open up market to imports

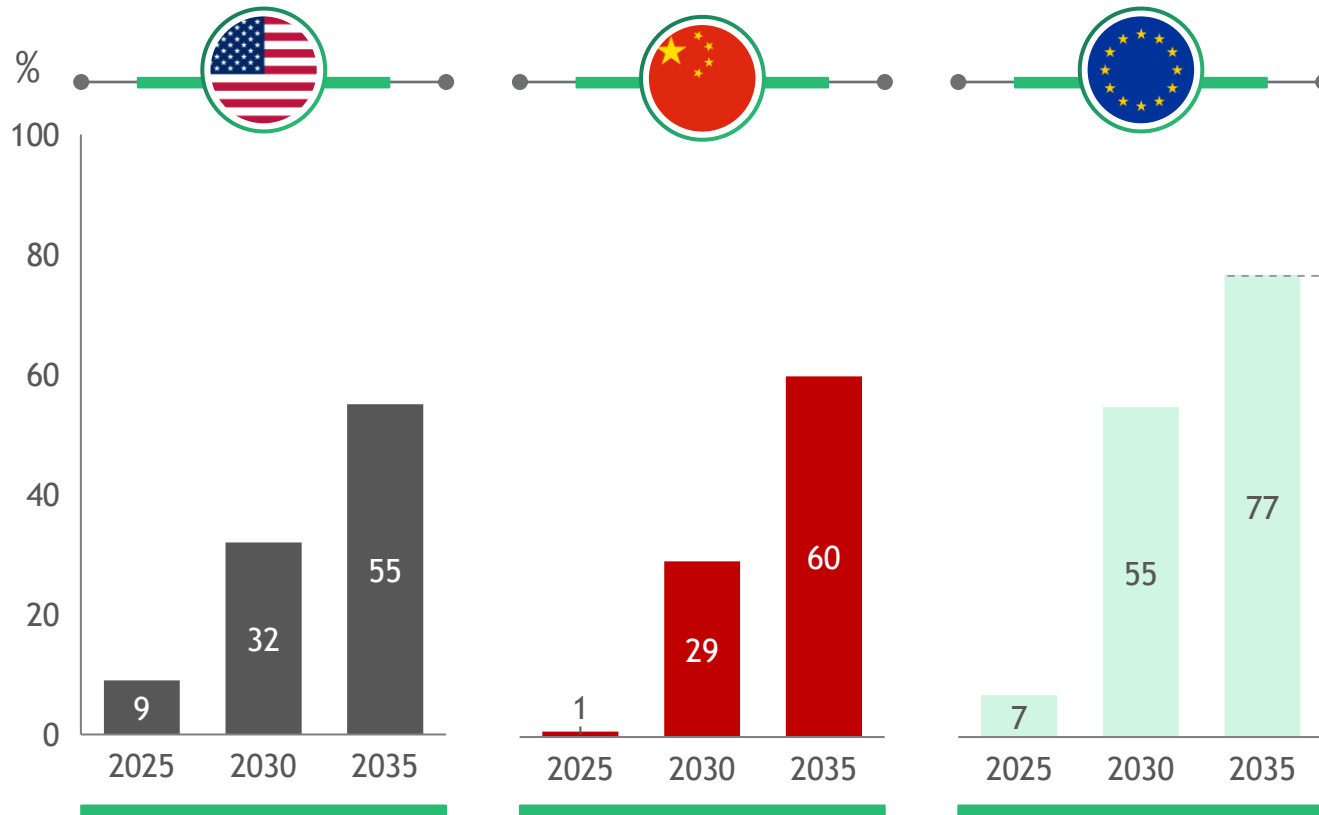
				
Import tariffs <sup>1</sup>	Truck >5t (GVW) 16% - 22% ICE ad valorem 10% ZEV av for BEV and other propulsion <sup>2</sup>	4% - 25% ad valorem No special tariffs for other propulsion	9% - 15% ad valorem No special tariffs for other propulsion	
	Light vehicles 10% ad valorem	2.5% ad valorem	15% ad valorem	
Non-tariff	Number of harmful measures put in force since '21 (#) 			
	Local content /Procurement	International Procurement Instrument threatens to exclude bidders from countries disadvantaging EU-companies in public tenders	NAFTA requires 75% North American content to apply for tariff waiver; Buy America requires 40% local-content in public tenders	Public procurement strong lever due to high share of state-owned companies
	Sourcing restrictions	Requirement to source battery raw materials from eco-certified suppliers	40% of battery raw materials from 'US or FTA-partners and not from 'foreign entities of concern'	Currently no sourcing restrictions in place in China
	Subsidies for local production	EU pledged to mobilise € 1tr, to support transition to net-zero over the next decade	IRA is a \$ 400bn, fund to support clean energy industries	China 2025 provides \$ 500bn, to support domestic manufacturing in strategic sectors affecting automotive

1 Maximum ad valorem (AV) duty (MFN) for 8701xx and 8704xx; 2 Tesla Semi despite likely to be applicable to 16% duty since categorized as road tractor  
 Note: Loans and grants considered harmful since only benefitting local producers; ad valorem = payment, rate, or tax calculated according to the price of a product or service, rather than at a fixed rate  
 Source: World Bank; Global Trade Alert; BCG

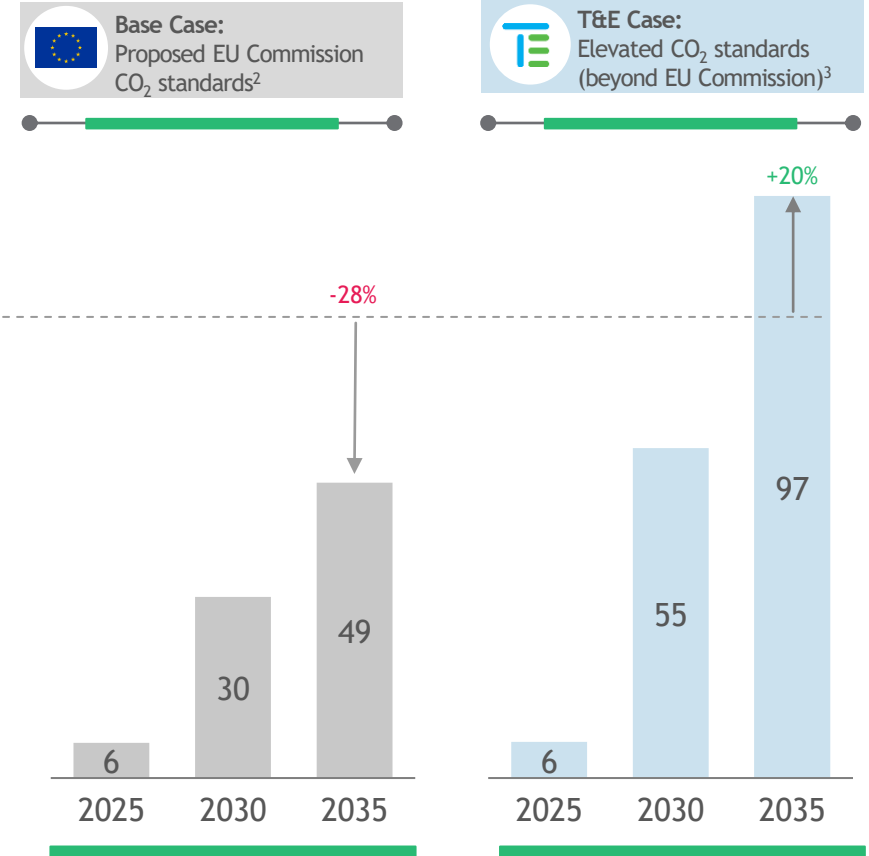


# Proposed EU commission standards are below projected ZEV adoption 2035 across geographies, whereas progressive T&E case is above

## ZEV adoption forecast<sup>1</sup> based on BCG market perspective



## ZEV adoption<sup>1</sup> under currently proposed regulatory cases



1. Entails both BEV and H2 HDVs 2. Not covering unregulated MHDT segments (e.g., vocational, non-certified) 3. Incl. unregulated MHDT (under EU Commission)  
 Note: EU Commission proposed new CO<sub>2</sub> standards for new ZEV sales in Feb