

# Comment from Picnic Technologies

Posted by the **National Highway Traffic Safety Administration** on Nov 1, 2021

Picnic Technologies, the operator of the mass-market grocery home delivery service that uses the Picnic G6, would like to submit the following considerations as the agency reviews the merits of this petition:

## 1. Economic effects

- Our mass-market solution has broad coverage and adoption ((over 150 cities in the Netherlands, Germany and France and over 30% household penetration in our most mature markets)
- Our model enables customers of all socio-economic backgrounds, in all communities to have daily access to free delivery of fresh groceries at regular grocery store prices

## 2. Environmental effects

- Our system utilizes an ultra-efficient “milkman” route with a 100% electric last mile delivery fleet
- Our vehicles save an estimated 11-13k lbs. of carbon emissions per Picnic G6 vehicle per year relative to comparable diesel alternatives
- In addition to grocery delivery, our service also brings back parcel returns for our customers, which doubles the emissions savings potential of our service

## 3. Vehicle usage

- Picnic currently operates a fleet of over 1,500 Goupil vehicles in the Netherlands, Germany and France; Picnic’s partnership with Goupil Industries dates back to 2015, when Picnic started its operations
- Our vehicles operate at low speeds averaging under 12 mph, with the largest portion of the driving occurring at speeds of less than 5 mph; the average trip length is less than 10 miles
- The drivers of our vehicles are all trained by Picnic and our vehicles are equipped with continuous safety feedback and monitoring applications
- Our pilot contemplates a coverage area of a cca. 2.5 mile radius, with the gradual introduction of up to 100 Picnic G6 vehicles over the 2 year exemption period
- The exemption requested is necessary as no suitable EV alternative exists on the US market

## 4. Support for our service

•State and local agencies in Maryland, Virginia and the District of Columbia have recognized the potential for our service to systemically address the problem of food deserts as well as dramatically reduce congestion and pollution in their communities. Given the high incidence rate of driving trips to the grocery store that it replaces, it has also been recognized that Picnic presents one of the highest potential solutions to reach the 2030 Greenhouse Gas Pollution Reduction Target set by President Biden.

•In September 2021 it was announced that Picnic raised \$ 700 million in equity to further expand its service. The Bill & Melinda Gates Foundation Trust led this financing round and supports Picnic's sustainable business model.

Thank you for your consideration,

Cristina Berta Jones  
on behalf of  
Picnic Technologies