

# Revision of the CO<sub>2</sub> emission standards for cars and vans

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Eurelectric response paper to Commission consultation

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

## We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

**investing** in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

**transforming** the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

**accelerating** the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

**embedding** sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

**innovating** to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2021/12.105/5

# Revision of the CO<sub>2</sub> emission standards for cars and vans

Fields marked with \* are mandatory.

## Introduction

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The [European Green Deal](#), adopted by the Commission in December 2019, has tackling climate change and reaching the objectives of the Paris Agreement and other environmental issues (including addressing air pollution) at its core. One of its central elements is the 2050 climate neutrality objective, which [the Commission proposed in 2018](#) and the European Council and Parliament endorsed (see [European Council conclusions of 12 December 2019](#); [European Parliament resolution of 14 March 2019](#); [European Parliament resolution of 28 November 2019](#)). The Commission [has proposed](#) to enshrine climate neutrality into EU law. In order to set the EU on a sustainable path to achieve climate neutrality by 2050, the Commission has also proposed a net EU-wide, economy-wide greenhouse gas emissions reduction target by 2030 compared to 1990 of at least 55% in its [Communication on stepping up Europe's 2030 climate ambition](#).

Building on the existing 2030 legislation and the Communication on stepping up the EU's 2030 climate ambition, the Commission will review and propose to revise, where necessary, the key relevant legislation by June 2021. This will include a coherent set of changes to the existing 2030 climate, energy and transport framework, notably related to the EU Emissions Trading System Directive, the Effort Sharing Regulation and the Land Use, Land Use Change and Forestry Regulation, CO<sub>2</sub> Emissions Performance Standards for Cars and Vans, the Alternative Fuels Infrastructure Directive, the Renewable Energy Directive and the Energy Efficiency Directive.

Each sector must contribute to reaching the EU's climate objectives. Transport is the only sector whose greenhouse gas emissions are higher than in 1990 and where emissions are growing. Road transport, which today accounts for a fifth of the EU's greenhouse gas emissions and increased its emissions by over a quarter since 1990, has a key role to play. As highlighted in the European Green Deal, in order to contribute to the overall climate neutrality objective for 2050, emissions of the transport sector need to be reduced by 90% by 2050 compared to 1990.

The impact assessment accompanying the Communication on stepping up the EU's 2030 climate ambition prepares the ground for adapting climate and energy policies to help decarbonise the European economy. This initiative will look at strengthening the CO<sub>2</sub> standards for cars and vans, to ensure a clear pathway onwards towards zero-emission mobility. [The current legislation](#) sets reduction targets of 15% for cars and vans to be achieved from 2025, and of 37.5% for cars and 31% for vans to be achieved from 2030, all compared to 2021. In addition the regulation contains a mechanism aimed to incentivise the deployment of

zero and low emission vehicles.

This public consultation invites citizens and organisations to contribute in order for the Commission to be properly informed by public opinion in preparation for future legislative action on the CO<sub>2</sub> standards for cars and vans. The results of the consultation will be summarised and published as well as be used to inform the Impact Assessment, accompanying the Commission proposal for revising the CO<sub>2</sub> standards for cars and vans Regulation...

There are additional parallel public consultations on the review of the LULUCF Regulation, the Effort Sharing Regulation and the EU ETS Directive.

## Guidance on the questionnaire

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This public consultation consists of some introductory questions related to your profile, followed by a questionnaire. **Please note that you are not obliged to respond to all questions in the questionnaire.**

The Commission already held an open public consultation on increasing the 2030 climate ambition, which was open for 12 weeks from 31 March to 23 June 2020. Many high-level questions related to the increased climate ambition were asked in the context of that [consultation](#). The present questionnaire therefore focuses on more specialised and detailed questions on the revision of the Regulation setting CO<sub>2</sub> Emissions Performance Standards for Cars and Vans in order to achieve the revised target.

At the end of the questionnaire, you are invited to provide any additional comments and to upload additional information, position papers or policy briefs that express the position or views of yourself or your organisation.

The results of the questionnaire as well as the uploaded position papers and policy briefs will be published online. Please read the specific privacy statement attached to this consultation informing on how personal data and contributions will be dealt with.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the register of interest representatives if you have not already done so. Registering commits you to complying with a Code of Conduct. If you do not wish to register, your contribution will be treated and published together with those received from individuals.

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English

- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

Petar

\* Surname

Georgiev

\* Email (this won't be published)

pgeorgiev@eurelectric.org

\* Organisation name

*255 character(s) maximum*

Eurelectric

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

\* Country of origin

Please add your country of origin, or that of your organisation.

- |                                      |  |                                     |  |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan    | <input type="radio"/> Djibouti           | <input type="radio"/> Libya         | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands  | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania        | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria        | <input type="radio"/> Ecuador            | <input type="radio"/> Luxembourg    | <input type="radio"/> Samoa                            |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt              | <input type="radio"/> Macau         | <input type="radio"/> San Marino                       |
| <input type="radio"/> Andorra        | <input type="radio"/> El Salvador        | <input type="radio"/> Madagascar    | <input type="radio"/> São Tomé and Príncipe            |

- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria

- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
  
- Burkina Faso
- Burundi
  
- Cambodia
  
- Cameroon
  
- Canada
- Cape Verde
- Cayman Islands
  
- Central African Republic
- Chad
- Chile
- China
  
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
  
- Colombia
  
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
  
- Guyana
  
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
  
- Hungary
  
- Iceland
  
- India
- Indonesia
- Iran
  
- Iraq
  
- Ireland
- Isle of Man
- Israel
  
- Italy
  
- Jamaica
- Japan
  
- Jersey
  
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
  
- Niger
  
- Nigeria
- Niue
  
- Norfolk Island
- Northern Mariana Islands
- North Korea
  
- North Macedonia
- Norway
- Oman
- Pakistan
  
- Palau
  
- Palestine
- Panama
- Papua New Guinea
- Paraguay
  
- Peru
- Philippines
  
- Pitcairn Islands
  
- Taiwan
- Tajikistan
- Tanzania
- Thailand
  
- The Gambia
  
- Timor-Leste
- Togo
  
- Tokelau
- Tonga
  
- Trinidad and Tobago
- Tunisia
  
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
  
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay

- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

\* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only your contribution, country of origin and the respondent type profile that you selected will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

**Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

## Questions

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**A free text section is available at the end of some of the questions to enable you to provide additional clarifications or observations.**

## 1. Objective

As highlighted in the European Green Deal, transport is the only sector whose greenhouse gas emissions are higher than in 1990 and where emissions are growing. Road transport accounts for around 20% of transport greenhouse gas emissions today. Road transport is also a key contributor to air pollution, especially in cities. In order to contribute to the overall climate neutrality objective for 2050, greenhouse gas emissions of the transport sector need to be reduced by 90% by 2050 compared to 1990. Transport also has to contribute to the overall emission reduction of at least 55% by 2030 as set out in the Commission Communication on stepping up the EU's 2030 climate ambition. CO<sub>2</sub> standards drive innovations in low and zero emission automotive technologies, which are of key importance for Europe's future industrial leadership. They make more low and zero emission vehicles and models available to consumers, which could have a positive impact on the price for such vehicles. Therefore, the Commission is working to revise the CO<sub>2</sub> standards for cars and vans set out in Regulation (EU) 2019/631, together with other relevant legislative measures to deliver on the increased climate ambition.

**In your view, how important are the following objectives for the future cars and vans CO<sub>2</sub> legislation?**

On a scale from 1-5, with 5 representing the highest importance and 1 no importance

	1	2	3	4	5
Reducing CO <sub>2</sub> emissions from cars and vans to implement the overall emissions reduction target of at least 55% by 2030 and the climate neutrality objective by 2050	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting the market uptake of zero-emission vehicles and boosting their supply so that they become more affordable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Strengthening the competitiveness , industrial leadership, innovation and stimulate employment in the EU automotive value chain	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reducing total costs of ownership for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Contributing to reducing air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reducing EU's energy consumption and import dependence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

## 2. Future CO<sub>2</sub> emissions targets for cars and vans

Regulation (EU) 2019/631 currently sets the following new vehicle fleet average CO<sub>2</sub> targets compared to 2021 levels: 15% reduction for both new cars and vans from 2025 on and 37.5% and 31% reduction for new cars and vans respectively from 2030 onwards. However, in light of the proposed increased ambition of the EU's greenhouse gas emission targets for 2030 and the objective of achieving climate neutrality by 2050, the Commission will revisit and strengthen the CO<sub>2</sub> emission standards for cars and vans for 2030 as underlined in the Communication on stepping up the EU's 2030 climate ambition.

This section contains questions related to the future CO<sub>2</sub> emission target levels for cars and vans.

### Target Levels

In your view, how important are the following actions related to the future CO<sub>2</sub> emission target levels for cars and vans to be presented in June 2021?

Scale from 1 to 5 where 5 is highest importance and 1 no importance

	1	2	3	4	5
Strengthening the 2025 CO <sub>2</sub> emission targets for cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Strengthening the 2025 CO <sub>2</sub> emission targets for vans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Strengthening the 2030 CO <sub>2</sub> emission targets for cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Strengthening the 2030 CO <sub>2</sub> emission targets for vans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Setting stricter CO <sub>2</sub> emission targets for new cars and vans for 2035	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Setting stricter CO <sub>2</sub> emission targets for new cars and vans for 2040	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

The proposal for a European Climate Law, in line with the European Green Deal, set the objective of achieving climate neutrality by 2050. The Communication on stepping up the EU's 2030 climate ambition highlights that to achieve climate neutrality and ensure that sectors with emissions that are more difficult to abate have access to sufficient quantities of renewable and low carbon fuels, conventional cars will need to gradually be displaced by zero emissions vehicles.

In your view, in order to contribute to the climate neutrality by 2050 objective, by when should CO<sub>2</sub> standards become so strict that all new cars/vans are zero-emission vehicles ?

	by 2035	by 2040	after 2040	The CO <sub>2</sub> standards should not become so strict that all new vehicles are zero-emission
For cars...	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For vans...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have any additional comments on the levels of the future targets? If so, they can be added below:

*1000 character(s) maximum*

Electric mobility is nearing an exponential growth and stringent CO<sub>2</sub> standards, especially for the cars segment, are needed to deliver successful and fast roll-out of electric vehicles. An ambitious policy would make sense from the perspective of rapidly decreasing technology costs, environmental benefits and international competition. It would also make sense to invest EU funds in future-proof zero-emission mobility solutions.

## Timing of the targets

In the current Regulation, the same fleet targets apply for five years before becoming stricter. Other options could be considered to ensure an effective emission reduction trajectory.

Please indicate to what extent you agree with the following statements:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
The same targets should remain applicable for 5 years before being strengthened, as in the current legislative framework	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The targets should be strengthened every year.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
In case targets become stricter more frequently, additional flexibility should be provided as regards annual compliance. For instance with banking and/or borrowing, so that overachievement in a given year can be carried over to subsequent years and/or underachievement in a given year can be compensated by overachievement in subsequent years.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## 3. Incentivising zero- and low-emission vehicles

The following questions relate to specific elements aimed to enhance the uptake of zero- and low-emission vehicles (ZLEV) such as plug-in hybrid vehicles, battery electric vehicles and fuel cell electric vehicles.

In addition to the binding CO<sub>2</sub> emission targets for manufacturers, Regulation (EU) 2019/631 contains a mechanism to incentivise the deployment of ZLEV, which are defined as vehicles with tailpipe CO<sub>2</sub> emissions between 0 and 50 g/km. A “one-way” crediting system is introduced from 2025 on. This means that the specific CO<sub>2</sub> emission target of a manufacturer will be relaxed if its share of ZLEV, expressed as a percentage of its total number of vehicles registered in a given year, exceeds the benchmarks set out in the Regulation. Exceeding the benchmark level by one percentage point will decrease the manufacturer’s CO<sub>2</sub> target (in g CO<sub>2</sub>/km) by one percent, and this target relaxation is capped at a maximum of 5%.

Manufacturers who do not meet the ZLEV benchmark face no consequences.

For calculating the share of ZLEV in a manufacturer’s fleet to be compared against the benchmark levels, an accounting rule applies, which gives a greater weight to ZLEV with lower emissions. In addition, during the period 2025 to 2030 and for cars only, a multiplier of 1.85 is applied for counting ZLEV registered in those Member States which had the lowest ZLEV share in 2017.

In order for the CO<sub>2</sub> emission targets legislation for cars and vans to contribute to the 2030 -55% target and the 2050 climate neutrality objective, it has to provide a strong incentive for the deployment of ZLEV. With this respect, different alternative options could be envisaged to incentivize ZLEV, as described below.

In your views, what are the main barriers for market uptake of zero-emission vehicles?

- Price of zero-emission vehicles
- Price-quality ratio of key components like batteries
- Availability of recharging/refuelling infrastructure
- Limited range
- Availability of vehicles models
- Other...

Please specify:

*1000 character(s) maximum*

Another main obstacle is the low production numbers of EVs

For the period up to 2030

Please indicate to what extent you agree with the following statements on the incentive system for cars and vans:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
In addition to the CO <sub>2</sub> targets, a mechanism incentivising zero- and low-emission vehicles should be maintained	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please indicate to what extent you agree with the following statements on the incentive system for cars and vans:

### Vehicles eligible for the incentive system:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
Only zero emission vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
All vehicles with emission below 50 g CO <sub>2</sub> /km (as in the current Regulation)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Only vehicles with emissions below a lower threshold than 50 g CO <sub>2</sub> /km	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other options...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Incentive type:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
The one-way crediting system should be maintained in its current form	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The one-way crediting system should be replaced with an obligation for each manufacturer to register a certain share of ZLEV (i.e. mandate)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other options...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## Please specify:

1000 character(s) maximum

We support having an obligation on the minimum share of ZEV alongside the possibility to trade the remainder, when there is one.

## Link with the CO<sub>2</sub> target:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
The ZLEV benchmark/mandate levels should be adapted to the new targets. In particular, the benchmark levels should increase when targets levels are increased	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

For the period after 2030

Please indicate to what extent you agree with the following statements on the incentive system for cars and vans:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
In addition to the CO <sub>2</sub> targets, a mechanism incentivising zero- and low-emission vehicles continues to be needed, even if CO <sub>2</sub> targets become stricter	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please indicate to what extent you agree with the following statements on the incentive system for cars and vans:

## Vehicles eligible for the incentive system:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
Only zero emission vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

All vehicles with emission below 50 g CO <sub>2</sub> /km (as in the current Regulation)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Only vehicles with emissions below a lower threshold than 50 g CO <sub>2</sub> /km	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other options...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

### Incentive type:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
The one-way crediting system should be maintained in its current form	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The one-way crediting system should be replaced with an obligation for each manufacturer to register a certain share of ZLEV (i.e. mandate)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other options...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

### Link with the CO<sub>2</sub> target:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
The ZLEV benchmark/mandate level should be adapted to the new targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Do you have any additional comment on the ZLEV incentive system? If so, they can be added below:

*1000 character(s) maximum*

## 4. Contribution of renewable and low carbon fuels

Under Regulation (EU) 2019/631, compliance of a manufacturer with its specific emission target is assessed against the average CO<sub>2</sub> emissions of its fleet as measured under the WLTP.

Other EU policies incentivise the deployment of renewable and low carbon fuels in transport, as detailed in the Communication on stepping up the EU's 2030 climate ambition. They include for instance the Renewable Energy Directive, the Energy Taxation Directive, to be revised in June 2021, the upcoming specific initiatives promoting sustainable aviation and maritime fuels, a possible expanded emissions trading system.

Please indicate to what extent you agree with the following statements:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
	<input type="radio"/>				

A mechanism should be introduced in the CO <sub>2</sub> emission standards for cars and vans so that compliance assessment for each manufacturer takes into account the contribution of renewable and low carbon fuels.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The policies to decarbonize fuels and reduce emissions from cars and vans must remain in separate legal instruments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If a system to account for renewable and low carbon fuels is introduced when assessing compliance, please indicate to what extent you agree with the following statements:

### 1. With regards to the effects:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
Such system will ensure a holistic approach to road transport decarbonisation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
More renewable and low-carbon fuels will be made available for road transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
More renewable and low-carbon fuels in road transport will come at the expense of the availability of those fuels for other sectors/transport modes which face steeper challenges to decarbonize (e.g. aviation/ maritime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
This will be incompatible with EU efforts to increase efficiency and reduce energy consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Such system will no longer ensure clear and distinct responsibilities and accountability for vehicles manufacturers and fuels suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
This could weaken the signal for innovations that are needed to make vehicles on the road zero-emission in time for the EU's 2050 climate neutrality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The CO <sub>2</sub> emission standards for cars and vans should be tightened more rapidly in order to maintain the overall level of ambition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Air pollution co-benefits would not be achieved in the same degree	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

### 2. With regards to the design of the mechanism

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
Only renewable and low-carbon fuels actually used in cars and vans in a particular year should be taken into account to assess compliance with CO <sub>2</sub> emission standards for these types of vehicles	<input type="radio"/>				
To avoid double counting, renewable and low-carbon fuels should be counted either towards the targets set in fuels related legislation or to assess compliance under the CO <sub>2</sub> emission standards for cars and vans	<input type="radio"/>				

Renewable and low-carbon fuels should be counted according to their actual greenhouse gas emission savings over the whole lifecycle	<input type="radio"/>				
All renewable and low-carbon fuels (such as sustainable biogas, biomethane and biofuels, renewable and low-carbon hydrogen or synthetic fuels) should be taken into account, as long as they meet the minimum sustainability criteria set under the Renewable Energy Directive	<input type="radio"/>				
Only the renewable and low-carbon fuels with the highest greenhouse gas emission savings should be taken into account	<input type="radio"/>				

Do you have any additional comments, views, information on the possible introduction of a system to account for renewable and low carbon fuels when assessing compliance with the vehicle CO<sub>2</sub> standard? If so, they can be added below:

*1000 character(s) maximum*

We only support zero-emission vehicles based on decarbonised electricity and decarbonised hydrogen, regarding the latter it should only be considered as a solution for the heavy transport segment and when direct electrification is not feasible. The emission factor of the average energy mix should be taken into account given that it is impossible to acknowledge in advance how the car will be recharged or refuelled. Otherwise, the car manufactures will be responsible for the uses, and this would be complicated or even legally impossible.

For more details, please read the Eurelectric paper on RFNBOs in the context of REDII: [https://cdn.eurelectric.org/media/5182/eurelectric\\_reaction\\_paper\\_on\\_rfnbos-2021-030-0013-01-e-h-B5F7EAF8.pdf](https://cdn.eurelectric.org/media/5182/eurelectric_reaction_paper_on_rfnbos-2021-030-0013-01-e-h-B5F7EAF8.pdf)

## 5. Allocation of the excess emissions premiums

Under Regulation (EU) 2019/631, manufacturers whose average specific emissions of CO<sub>2</sub> exceed their specific targets should pay excess emission premiums, whose amounts is considered as revenue for the general budget of the Union, without a specific destination for the spending of the recovered money.

In your view, how should these excess emission premiums be allocated?

- They should continue to be considered as revenue for the general budget of the Union
- They should be allocated to a new or existing specific fund or a relevant programme, with the objective to ensure a just transition towards a climate-neutral economy, in particular to support re-skilling, up-skilling and other skills training and reallocation of workers in the automotive sector
- Other...

Please specify:

*1000 character(s) maximum*

They should be allocated to specific fund or programme supporting zero-emission mobility to ensure the decarbonisation of transport in Europe and the shift towards zero-emission mobility.

You can use the space below in case of additional views on the allocation of the excess emission premiums:

*1000 character(s) maximum*

## 6. Other elements of the regulatory approach

Regulation (EU) 2019/631 includes a monitoring and reporting system and flexibilities allowing a more cost-effective implementation, such as the possibility for pooling, credits for the uptake of eco-innovations, an exemption for very small manufacturers, and a derogation possibility for small volume manufacturers.

In your opinion, do any of the following provisions need to be changed?

	Yes	No	Neutral
Monitoring and reporting provisions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ecoinnovation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pooling	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Exemption for manufacturers registering less than 1,000 vehicles per year	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Small Volume derogations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

In your opinion, Are there other aspects of the Regulation that need to be addressed? If so, which ones?

*1000 character(s) maximum*

## 7. Impacts

Do you agree with the following statements on the likely impacts of strengthened CO<sub>2</sub> standards for cars and vans?

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
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The EU automotive industry will increase investments in zero- emission technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The competitiveness of the EU automotive industry on the global market will be increased	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lower income social groups will benefit from an economic perspective thanks to lower cost of ownership of a car (for example reduced upfront cost of EVs, reduced energy/fuel costs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Macroeconomic benefits can be expected, on both GDP and jobs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Job losses in the automotive value chain can be expected as a result of decreasing production of conventional powertrains	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
New skills and qualifications for workers in the automotive value chain will be needed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Co-benefits in terms of better air quality, especially in urban areas, can be expected	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Co-benefits in terms of energy dependency can be expected	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Which other impacts are relevant in your opinion?

*1000 character(s) maximum*

What additional measures should be set up to ensure a socially acceptable and just transition towards zero-emission mobility, taking into account its social effects throughout the whole automotive value chain in particular in those regions particularly dependent on automotive jobs?

*1000 character(s) maximum*

## 8. Any additional comments

If you have any comments or supplementary information to add to your replies to the above questions:

*1000 character(s) maximum*

Our sector sees the CO2 standards are the most efficient tool to decarbonise the transport sector and the strengthening of their ambition and mechanisms should be the favoured option compared to the extension of the EU ETS system to road transport. The extension would add a burden to the energy bills of consumers while not reducing significantly the GHG emissions.

In addition, our industry believes that specific legislation or incentive could be introduced at EU level with regards to electrifying private fleets across various use-cases (as described in the latest Eurelectric report: EVision - [www.evision.eurelectric.org](http://www.evision.eurelectric.org)). Electric fleets can be the catalyst for e-mobility and bolster the effectiveness of the vehicle emission standards.

Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

**Please upload your file**

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

## **Contact**

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Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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