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Brussels, 9 October 2025

CALL FOR EVIDENCE AND PUBLIC CONSULTATION – CO₂ STANDARDS FOR LIGHT-DUTY VEHICLES REVIEW

IRU contributions to the EC Call for Evidence and Public Consultation on the revision of the CO₂ standards for light-duty vehicles, open until 10 October 2025.

I. BACKGROUND

On 7 July 2025, the European Commission (EC) launched a [call for evidence for an impact assessment](#) on and a [joint public consultation](#) on the revision of the CO₂ emission performance standards for new cars and vans.

The consultations will feed into the proposal for a revision of the Regulation setting CO₂ emission performance standards for new cars and vans. It is likely that the EC will put forward a proposal before the end of 2025.

The deadline for submission of contributions to both the call for evidence and joint public consultation is **10 October 2025**.

II. ACTION FOR MEMBERS

The IRU Secretariat circulated draft contributions on 29 September, these have since been further improved following member's feedback. The final IRU contributions can be found in the Annexes below.

Members are welcome to use the IRU contribution or elements of it for their own contributions. The IRU Secretariat will formally submit the IRU contributions tomorrow, on Friday 10 October 2025.

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IRU CONTRIBUTION TO THE [CALL FOR EVIDENCE](#)

The International Road Transport Union (IRU), representing over 3.5 million mobility and logistics road transport operators worldwide, including 1 million in the EU, the majority being SMEs, welcomes the opportunity to contribute to the review of the CO₂ standards for new light-duty vehicles. IRU calls for a comprehensive review that is linked to a robust framework aimed at establishing the necessary enabling conditions for the uptake of zero-emission vehicles.

IRU is fully committed to supporting the commercial road transport sector's efforts to become carbon neutral by 2050. Achieving the EU's ambitious decarbonisation targets, while maintaining essential mobility and logistics services, requires a joint effort from governments and industry.

IRU recognises the review of the Regulation setting CO₂ emissions performance standards for light-duty vehicles (LDVs) as an important step to further decarbonise commercial road transport in the EU. The challenge is significant, especially for SMEs and micro-enterprises, but it can become an opportunity if an enabling framework is established at both EU and national levels.

To ensure that a comprehensive revision of the Regulation setting CO₂ standards for cars and vans further supports the decarbonisation of the commercial road passenger and goods transport sector, IRU has identified the following key challenges and recommendations:

1. Key challenges and evidence:

- **Enabling conditions are not yet in place:** The availability of affordable zero-emission vehicles, sufficient recharging and refuelling infrastructure in the right locations and adequate grid capacity remain major barriers. Over 70% of logistics operations are regional or local, requiring infrastructure beyond the Trans-European Transport network (TEN-T). Public charging points in urban areas, charging at or near drivers' homes, and depot charging remain scarce and energy costs remain high.
- **Grid capacity is a critical bottleneck:** Rapid electrification will require significant grid upgrades. Currently, grid access and permitting delays (up to 8 years in the Netherlands) have significant implications for the operational viability of commercial operators' investments in battery electric light-duty vehicles. Furthermore, with a projected increase in demand for electricity from all sectors, without urgent grid reinforcement, vehicle electrification targets are unattainable. While upcoming initiatives, such as the announced European Grid Package, are expected to contribute meaningfully, more is needed to fully unlock the potential of grid upgrades.
- **Technological and operational gaps persist:** Operators of specialised vehicles (e.g., wheelchair-accessible taxis) and certain light-commercial vehicles face technical and economic barriers in switching to zero-emission vehicles. Zero-emission specialised vehicles and certain light-commercial models are not widely available or still significantly more expensive than their ICE counterparts.
- **Market readiness lags behind ambition:** Despite a 100% reduction target for new LDVs by 2035, battery-electric registration rates are only 15.6% for cars and 9.5% for vans, highlighting a gap between regulatory ambition and market reality.
- **Regulatory coherence is needed:** Due to the extra weight of zero-emission technologies, zero-emission vehicles are usually heavier than their ICE counterparts. This increase in weight can have significant implications for zero-emission vehicles across a wide range of legislation. Any increase in mass above 3.5 tonnes could have the effect of subjecting certain zero-emission light-duty vehicles to different rules than their ICE counterparts. Double taxation should be avoided and coherence with other EU legislation promoting the decarbonisation of the energy and transport sectors, such as the Regulation setting CO₂ standards for new heavy-duty vehicles, the Alternative Fuels Infrastructure Regulation (AFIR), TEN-T, the Renewable Energy Directive

(RED), the Energy Taxation Directive (ETD), Eurovignette and type approval rules, should be ensured.

2. Recommendations:

- **Focus on enabling conditions:** Definitions and objectives of the CO₂ standards Regulation should also align with other relevant Union legal acts. An expansion of AFIR beyond the TEN-T core and comprehensive network and an EU harmonised framework binding Member States and electricity providers to upgrade the grid to necessary levels are required. IRU looks forward to the upcoming European Grids Package and calls for a renewed focus on public charging points in urban areas and depot charging. Furthermore, AFIR and the Energy Performance of Buildings Directive (EPBD) have the potential to support drivers access to recharging infrastructure at or near their homes. An effective right to plug would guarantee that drivers would have the opportunity to charge overnight at their own dedicated charger. This is crucial to support the deployment of a cost-effective and easy-to-use infrastructure for drivers.
- **Align emission reduction targets with enablers:** LDV emission reduction targets should carefully consider progress on enabling conditions, such as a wide range of affordable vehicle models suited to operational needs, grid capacity, the availability of recharging and refuelling infrastructure in the right locations, and the specificities of light-duty vehicles' mission profiles.
- **Ensure incentives for zero-emission vehicles:** EU rules should avoid creating unnecessary additional costs for commercial road transport operators due to the mere heavier weight of zero-emission powertrains by ensuring that such vehicles remain subject to light-duty vehicle rules. In addition, revenues from taxes, charges and duties paid by road transport operators, such as through Emission Trading System Directive, the ETD or Eurovignette, should be recycled to a much larger extent to support the road transport industry's decarbonisation efforts, especially for SMEs and micro-enterprises.
- **Conduct regular and concurrent reviews:** The regulation setting CO₂ standards for cars and vans, the Regulation setting CO₂ standards for heavy-duty vehicles, AFIR, and the Renewable Energy Directive should be reviewed concurrently every two to three years.
- **Adopt a technology-neutral approach:** A technology-neutral approach should be pursued not only focusing on the switch to new zero-emission vehicle technologies but also duly considering the use of high-quality carbon-neutral fuels in conventional ICE vehicles where this switch is not yet achievable.

IRU stands ready to work with the European Commission to ensure that CO₂ standards for light-duty vehicles are aligned with key enablers, supporting both climate goals and the operational realities of the commercial road transport sector. Please find IRU's full position on the CO₂ Standards for light-duty vehicles [here](#).

IRU CONTRIBUTION TO THE [JOINT PUBLIC CONSULTATION](#)

Consultation on the review of Regulation (EU) 2019/631 setting CO2 emission performance standards for new passenger cars and light commercial vehicles and on the review of Directive 1999/94/EC ('Car Labelling Directive')

Fields marked with * are mandatory.

We are launching this consultation to collect the views of stakeholders and citizens with regard to the review of Regulation (EU) 2019/631 setting CO2 emission performance standards for new passenger cars and light commercial vehicles (vans) and the review of Directive 1999/94/EC relating to the availability of consumer information on fuel economy and CO2 emissions in respect of the marketing of new passenger cars.

Article I. Introduction

The automotive sector is of critical importance for the EU economy. It accounts for EUR 1 trillion in GDP and provides, directly and indirectly, about 13 million jobs. It is at the heart of the EU's competitiveness. This sector is facing a critical turning point, with rapid technological changes and increasing competition posing significant challenges.

In recent years, the European automotive sector has been contending with the uncertainties of rapid technological change, digitalisation, increasing competition and a changing geopolitical context. The [Competitiveness Compass](#) sets out a joint roadmap for decarbonisation and competitiveness. It highlights that the ambitious decarbonisation framework set out by the European Green Deal and the [European Climate Law](#) can drive competitiveness if objectives and policies are well aligned, as it gives certainty and predictability to companies and investors alike. Moreover, decarbonisation policies are a powerful driver of growth when they are well integrated with industrial, competition, economic, labour and social as well as trade policies. Following the Strategic Dialogue on the Future of the European Automotive Industry, the Commission adopted an [Industrial Action Plan for the European automotive sector](#) setting out concrete measures to help secure global competitiveness of the European automotive industry and maintain a strong European production and employment base through action in five key areas. Amongst the actions in the area of clean mobility, the Commission announced that it will accelerate work on the preparation of the foreseen review of Regulation (EU) 2019/631 and that this review will be based on a

fact-based analysis, taking into account all relevant technological developments, and the importance of an economically viable and socially fair transition towards zero-emission mobility.

The review of the CO2 standards for LDVs Regulation was mentioned in the [political guidelines for the next Commission 2024-2029](#) and in the [mission letter of Commissioner Hoekstra](#). As highlighted in the [Communication "A Competitiveness Compass for the EU"](#) and in the [Industrial action plan for the European automotive sector](#), in order to be globally competitive, the European automotive industry must urgently regain a leadership position in the transition towards smarter, cleaner, and more connected as well as affordable vehicles.

[Regulation \(EU\) 2019/631](#) (CO2 standards for light-duty vehicles (LDVs) Regulation) sets CO2 emissions performance requirements for new passenger cars and light commercial vehicles ('vans'), in order to contribute to achieving the Union's greenhouse gas emission reduction targets set in the [European Climate Law](#), to provide benefits to consumers and citizens from a wider deployment of zero-emission vehicles and to stimulate innovation in zero-emission technologies, thus strengthening the sustainable competitiveness and technological leadership of the automotive value chain and stimulating quality job creation and employment in the EU. It also contributes to reducing the EU's dependence on fossil fuel imports, which cause energy price volatility and higher supply costs, make the EU more vulnerable to external pressure and global market uncertainty, and have a significant impact on consumers' energy bills – in 2022, the EU's fossil-fuel energy import bill reached EUR 604 billion.

The CO2 standards for LDVs Regulation sets out targets for the annual average CO2 emissions of the new vehicles registered for each LDV manufacturer. These targets get progressively stricter every 5 years, up to a 100% emission reduction target from 2035. The CO2 standards for LDVs Regulation provides long-term certainty and predictability for investors along the value chain, while allowing sufficient lead time for a fair transition, which supports the EU automotive value chain's technological leadership, quality employment, and which also promotes the accessibility and affordability of zero-emission mobility solutions for all, including vulnerable groups.

The Regulation was amended by the European Parliament and the Council on 19 April 2023 as part of the Fitfor-55 package, strengthening the fleet-wide emission targets for 2030 and setting a 0 g/km target for both cars and vans from 2035 onwards.

Article 14a of Regulation (EU) 2019/631 tasks the Commission to biennially submit a **report** to the European Parliament and to the Council **on the progress towards zero-emission road mobility** (progress report), the first one by 31 December 2025.

Article 15 of the Regulation tasks the Commission to **review the effectiveness and impact of the Regulation**, building on the progress report. The Commission shall in particular assess progress made towards achieving the targets applying from 2035 onwards and the need to review those targets, taking into account the technological developments, including as regards plug-in hybrid technologies, and the importance of an economically viable and socially fair transition towards zero-emission mobility. The Commission shall also assess the impacts of establishing minimum energy efficiency thresholds for new zero-emission cars and vans placed on the Union market.

In addition, Article 15(6) of Regulation (EU) 2019/631 states that the Commission shall review Directive 1999/94/EC ('**Car Labelling Directive**') considering the need to provide consumers with accurate, robust and comparable information on the fuel and energy consumption, CO₂ emissions and air pollutant emissions of new passenger cars placed on the market, including under real-world conditions, as well as evaluate the options for introducing a fuel economy and CO₂ emissions label for new light commercial vehicles.

The Commission announced in the abovementioned Industrial Action Plan for the European automotive sector that it will review the Car Labelling Directive in 2026, following the [evaluation](#) that was published on 4 June 2025, to support consumers to make sustainable choices and help the objective of increasing the deployment of zero-emission vehicles.

This public consultation invites citizens and organisations to contribute their views to inform the **review of the CO₂ emission performance standards for new light-duty vehicles** (Regulation (EU) 2019/631) as well as the **review of the Car Labelling Directive** (Directive 1999/94/EC) by the Commission and the preparation of future legislative action in these policy areas.

Article II. Guidance on the questionnaire

The purpose of this open public consultation is to gather views to inform the evaluation and review of the CO₂ emission performance standards for new light-duty vehicles Regulation (EU) 2019/631 and the review of the Car Labelling Directive 1999/94/EC by the Commission. The questionnaire comprises four parts:

- 1) a first part, identifying the participant's profile;
- 2) a second part, focusing on retrospective questions relevant for the evaluation of certain elements of the CO₂ emission performance standards for new light-duty vehicles Regulation;
- 3) a third part, focusing on forward-looking questions relevant for the impact assessment of possible policy options to support the review of the CO₂ emission performance standards for new light-duty vehicles Regulation; and
- 4) a fourth part, focusing on forward-looking questions relevant for the impact assessment of possible policy options to support the review of the Car Labelling Directive.

You are invited to answer questions on the parts of the questionnaire and the questions therein which are relevant to you or to your organisation. Please note that you are not obliged to respond to all questions in the questionnaire.

At the end of the questionnaire, you are invited to provide additional comments or to upload additional information, position papers or policy briefs in support of your submission or that made on behalf of your organisation.

The results of the questionnaire as well, as well as any materials uploaded to support your submission, will be published online on the “Have your Say” platform. Please review the associated privacy statement for this consultant, which explains how your contribution and your personal data will be processed.

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.

Section 2.01 About you

*Language of my contribution

☒ English

*I am giving my contribution as

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

*First name

*Surname

*Email (this won't be published)

*Country of origin

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

Belgium

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

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

Article III. Evaluation of the Regulation setting CO₂ emission standards for new cars and vans

This section of the questionnaire focuses on those elements of the CO₂ emission performance standards for new light-duty vehicles Regulation (Regulation (EU) 2019/631) for which sufficient evidence on their implementation will be available. The evaluation covers the period between 2015 and 2024.

The evaluation criteria upon which the following questions are based are:

- Effectiveness (whether the EU action has reached its objectives),
- Efficiency (what are the costs and benefits),
- Relevance (whether it responds to stakeholders' needs),
- Coherence (how well it works with other actions), and
- EU added value (what are the benefits of acting at EU level).

Effectiveness considers how successful EU action has been in achieving or progressing towards its objectives.

1. In your view, how effective (on a scale of 1 – 5, with 5 meaning very effective and 1 not effective at all) has the Regulation been in achieving the following objectives in the period 2015-2024, in particular through the implementation of the 2020 targets and the modalities facilitating target compliance (eco-innovations, pooling, derogations, exemptions, supercredits, 2020 phase-in (cars))?

Objectives	1	2	3	4	5
Reducing CO2 emissions from passenger cars	☐	☐	☒	☐	☐
Reducing CO2 emissions from vans	☐	☐	☒	☐	☐
Increasing the supply of zero- and low-emission vehicles	☐	☐	☒	☐	☐

Please provide an explanation to support your response.

1000 character(s)
maximum

Average emissions from new passenger cars decreased by 27% between 2019 and 2022, and by 10% for new vans. The 2020 targets were largely met, though van progress has been slower due to limited electrification and fewer model options. While these CO₂ reductions are positive, enabling conditions must be strengthened to ensure ZLEVs are viable and attractive for commercial operators. All technologies with decarbonisation potential should be incentivised. The CO₂ standards Regulation has supported ZEV supply, but operators call for a broader range of affordable vehicles to meet diverse use-cases (e.g. wheelchair-accessible taxis, larger EVs, adapted e-vans). Though OEMs may meet 2025 targets, long-term compliance is uncertain. Uptake is highest in Member States with financial incentives, but these depend on political cycles and may not be sustainable. A stable framework and ramp-up of enabling conditions are needed for lasting market uptake.

Efficiency considers the resources used by an intervention for the given changes generated by the intervention.

2. How would you rate the efficiency of the Regulation in terms of reducing CO2 emissions from cars and vans? In your response, please consider the extent to which the regulatory costs involved in the implementation of the Regulation have been proportionate to its benefits.

- ☐ Very efficient
- ☒ Moderately efficient
- ☐ Slightly efficient
- ☐ Not efficient
- ☐ Do not know

3. Please indicate the extent to which the following elements of the Regulation made a significant contribution to achieving the identified objectives in a cost-effective manner (on a scale of 1 – 5, with 5 representing elements which made the greatest contribution and 1 the lowest)?

	1	2	3	4	5
Provisions on pooling	☐	☐	☐	☐	☐
Provisions on eco-innovations	☐	☐	☐	☐	☐
Super-credits	☐	☐	☐	☐	☐
Exemption of manufacturers responsible for less than 1 000 cars or vans registered per year	☐	☐	☐	☐	☐
Small volume derogations (manufacturers responsible for less than 10 000 cars or 22 000 vans registered per year)	☐	☐	☐	☐	☐
Niche derogations (manufacturers responsible for less than 300 000 new cars per year registered)	☐	☐	☐	☐	☐
Monitoring and reporting of vehicle registration data for assessing target compliance	☐	☐	☐	☐	☐
Monitoring and reporting of real-world data	☐	☐	☐	☐	☐
Other (please specify)	☐	☐	☐	☐	☐

4. Which elements or provisions of the Regulation cause the highest administrative burden and/or could be simplified? Please provide suggestions for potential simplification measures. Do you have specific simplification suggestions for SMEs?

1000 character(s)
maximum

Relevance looks at the relationship between the needs and problems at the time of introducing the intervention and during its implementation, as well as the relationship between the current and future needs and problems in the EU and the objectives of the intervention.

5. To what extent do the needs/problems addressed by the Regulation (cost effective CO2 emission reductions in the road transport sector to support the EU climate targets) continue to require action at EU level?

- ☐ To a very large extent
- ☒ To a large extent
- ☐ To some extent
- ☐ To a small extent
- ☐ Not at all

☐ Do not know

Coherence means how well different interventions, EU/international policies or national/regional/local policy elements work together. At EU level, other policies with an interplay with the Regulation include the CO₂ emission performance standards for heavy-duty vehicles, the Car Labelling Directive, the Renewable Energy Directive, the Euro 7 Regulation, the Alternative Fuels Infrastructure Regulation (AFIR), the Emission Trading System Directive (ETS, including ETS2 covering road transport), the Air Quality and National Emission reduction Commitments Directives, the Batteries Regulation and the Clean Vehicles Directive.

6. To what extent do you find the Regulation coherent with other EU legislation and policies?

- ☐ To a very large extent
- ☐ To a large extent
- ☐ To some extent
- ☒ To a small extent
- ☐ Not at all
- ☐ Do not know

7. Please identify those policies for which you find that coherence could be improved and how this could be achieved.

1000 character(s)
maximum

EU-level action to address the needs addressed by the Regulation remains relevant, EU-level action is still needed to enable market uptake of alternatively fuelled vehicles. This includes improving enabling conditions (grid, infrastructure, affordability, vehicle availability) and ensuring financial and operational incentives across the EU. However, the Regulation lacks coherence with key EU policies like AFIR, RED, ETD, roadworthiness, type approval and grid planning. These are interdependent: infrastructure, energy, and taxation directly affect ZEV uptake. AFIR targets are not ambitious enough to support LDV CO₂ goals, especially in urban areas. Grid capacity is a major barrier. The ETD could better incentivise clean vehicles but remains stalled. Reviewing these frameworks in parallel is crucial. The Commission should assess enabling conditions when setting CO₂ targets. Operational incentives matter too, zero-emission vans, heavier due to batteries, should not be penalised by reclassification into higher regulatory categories (N1 into N2).

EU Added Value considers whether the results of implementing the Regulation could have been achieved without EU intervention, i.e. via actions by the Member States. Under the principle of subsidiarity (Article 5 of the Treaty on the European Union), and in areas of non-exclusive competence, the EU should only act when the objectives can be better achieved by Union action rather than action by the Member States.

8. In your opinion, what is the value added of having an instrument at the EU level aimed at reducing CO₂ emissions from new passenger cars and vans?

- ☐ Very high

- ☐ High
- ☒ Moderate
- ☐ Low
- ☐ Very low
- ☐ Do not know

Please provide an explanation to support your view, clarifying the specific elements of the Regulation for which you consider that action at the EU level does not add value.

200 character(s) maximum

EU-level targets add value, but Member State support is key for uptake (e.g. predictable subsidies, charging incentives tax/regulatory exemptions). EU level action can include guidance for Member States and ensuring a coherent decarbonisation framework that takes into account regional differences and needs.

Article IV. Review of the Regulation setting CO2 emission standards for new cars and vans

The review of the CO2 emission performance standards for new light-duty vehicles (Regulation (EU) 2019 /631) will explore a number of options compared to the baseline (i.e. continued application of the current Regulation) through an impact assessment, in particular regarding:

- the targets levels applying from 2035;
- additional flexibilities for target compliance;
- the role of sustainable renewable fuels;
- the excess emission premiums;
- monitoring and reporting;
- the energy efficiency of zero-emission vehicles.

This part of the questionnaire aims to gather stakeholders' views on these elements.

Section 4.01 Challenges to address

9. What are the needs that the Regulation should address (please rank the 5 most important needs, with 1 representing the most important and 5 the fifth most important).

	1	2	3	4	5
Need to reduce CO2 emissions from road transport in line with the climate neutrality objective	☒	☐	☐	☐	☐
Need for increased investments in innovative zero-emission technologies	☐	☐	☐	☒	☐
Need to strengthen the competitiveness and industrial leadership of the EU automotive industry	☐	☐	☐	☐	☐
Need for more affordable cars and vans	☒	☐	☐	☐	☐
Need to ensure a just transition to zero-emission mobility	☐	☐	☒	☐	☐
Need to stimulate employment in the automotive value chain and across the economy	☐	☐	☐	☐	☐
Need for improved air quality	☐	☐	☐	☐	☐
Need to reduce EU's energy consumption	☐	☐	☐	☐	☐
Need to reduce EU's fossil fuel import dependence	☐	☐	☐	☐	☐
Other (please specify)	☐	☒	☐	☐	☐

Other: Enabling conditions and incentives for the uptake of alternatively fuelled vehicles. Without coherence across linked EU rules, implementation will be fragmented and targets harder to achieve.

Section 4.02 Market barriers and supporting measures

10. In your view, what are the main barriers for the further market uptake of zero-emission vehicles? (please rank the top 3 most important barriers, with 1 being the most important, 2 the second most, up to 5 for the fifth most important).

	1	2	3	4	5
Limited affordability due to high purchase price of zero-emission vehicles	☒	☐	☐	☐	☐
Limited availability of recharging and refuelling infrastructure	☐	☒	☐	☐	☐
Barriers and delays in the installation of charging points	☐	☐	☒	☐	☐
Long recharging times	☐	☐	☐	☐	☐
Fossil fuels subsidies, hampering the consumers choice for zero-emission vehicles	☐	☐	☐	☐	☐
High price of electricity (recharging)	☐	☐	☐	☒	☐
High taxation on electricity compared to gasoline and diesel	☐	☐	☐	☐	☐
Limited choice of zero-emission vehicle models	☐	☐	☐	☐	☐
Consumer anxiety on lack of autonomy, due to perceived limited range	☐	☐	☐	☐	☐
Lack of adequate information or misinformation, limiting consumer awareness	☐	☐	☐	☐	☐
Other (please specify)	☐	☐	☐	☐	☒

Other: Unstable residual values and limited second-hand markets for ZEVs hinder affordability and uptake, especially in new markets, reinforcing the cycle of low resale value and weak demand.

11. In your view, which additional measures should be introduced to make zero-emission cars and vans more attractive for consumers and businesses? (please rank the top 5 most important measures, with 1 being the most important, 2 the second most, up to 5 being the fifth most important).

	1	2	3	4	5
EU co-ordinated incentive schemes for zero-emission vehicle purchase	☒	☐	☐	☐	☐
Member States social leasing schemes targeting lower-income users	☐	☐	☐	☐	☐
Fiscal regime favourable to zero-emission vehicles (registration tax, circulation tax)	☐	☒	☐	☐	☐
Favourable taxation of electricity compared to fossil fuels	☐	☐	☐	☐	☐
Measures to lower the cost of vehicle batteries	☐	☐	☐	☐	☐
Measures to accelerate the uptake of zero-emission vehicles in corporate fleets	☐	☐	☐	☐	☐
Measures to facilitate/accelerate the deployment of public recharging and refuelling infrastructure	☐	☐	☒	☐	☐
Measures to facilitate/accelerate the deployment of private recharging infrastructure	☐	☐	☐	☒	☐
Measures to accelerate the deployment of (ultra-) fast charging infrastructure	☐	☐	☐	☐	☐
Measures to improve the transparency of recharging costs	☐	☐	☐	☐	☐
Measures to lower the cost of recharging (electricity price)	☐	☐	☐	☐	☒
Measures to facilitate flexible charging, e.g. smart and bi-directional charging including use of batteries for storage purposes	☐	☐	☐	☐	☐
Enforcement of the right to plug for citizens	☐	☐	☐	☐	☐
Other (please specify)	☐	☐	☐	☐	☐

Please explain your reply

1000 character(s)

maximum

To accelerate ZEV uptake, the EU and Member States should implement coherent policies combining financial incentives (purchase subsidies, tax relief), investment in public charging infrastructure (especially in urban and rural areas) and in grid upgrades. Operational incentives, such as revising the ensuring zero-emission vans are not subject to rules for heavy-duty vehicles, will make ZEVs more attractive for businesses. The European Grids Package should be adopted to modernise grid infrastructure and support renewables. Expanding alternative fuels infrastructure beyond TEN-T networks is essential for full coverage. Furthermore, enforcement of the right to plug for citizens is also important. It will be crucial for professional drivers who wish or must charge their vehicles at home,

Section 4.03 Automotive value chain

12. In your view, which additional measures should be set up to ensure a socially acceptable and just transition towards zero-emission mobility, taking into account the necessary industrial transformation throughout the whole automotive value chain in particular in those regions particularly dependent on automotive jobs, as well as the need for accessible and affordable zero-emission mobility solutions and infrastructures?

1000
maximum character(s)

Affordability, accessibility, and usability of zero-emission vehicles must be ensured for companies of all sizes. Measures should address both the pre-purchase phase (investment costs) and the use phase (operational costs), to make the transition viable for SMEs and larger operators alike. Supporting regions dependent on automotive jobs requires targeted funding, reskilling programmes, and investment in accessible, affordable infrastructure, ensuring that zero-emission mobility solutions are available and practical everywhere.

13. In your view, which additional measures are needed to promote a resilient and sustainable automotive value chain in Europe? (please rank the top 3 most important measures, with 1 being the most important, 2 the second most, up to 5 for the fifth most important).

	1	2	3	4	5
Measure to incentivise investments into an EU battery value chain	☐	☐	☐	☐	☐
Implementation of the Battery Booster package announced in the Industrial plan for the European Automotive sector	☐	☐	☐	☐	☐
Measures to boost circularity of the supply chain of electric vehicles (please specify which actions)	☐	☐	☐	☒	☐
Measures to support European production in recognition of its environmental standards (please specify)	☐	☐	☐	☐	☐
Measures to further promote the use of sustainable renewable fuels in internal combustion engine vehicles	☐	☒	☐	☐	☐
Stable long term industrial strategy for the value chain	☒	☐	☐	☐	☐
Stronger Research and Innovation investments in the European Automotive sector	☐	☐	☒	☐	☐
Measures to support the development of a skilled workforce in the European automotive sector	☐	☐	☐	☐	☐
Encouraging cooperation, including international standards (please specify)	☐	☐	☐	☐	☐

Other measures (please specify)

☐	☐	☐	☐	☐
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You can use the space below to provide additional information, if relevant

200 character(s) maximum

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Please explain your reply

1000 character(s)
maximum

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Section 4.042035 CO2 emissions targets for cars and vans

Regulation (EU) 2019/631 sets targets for the average CO2 emissions of the fleet of new vehicles registered in a given calendar year, which gradually become stricter over time. For both cars and vans, the target becomes 0 g/km (100% emission reduction) from 2035 onwards. Article 15 of the Regulation tasks the Commission to review the effectiveness and impact of the Regulation and in particular assess progress made under the Regulation towards achieving the 2035 targets.

This section contains questions related to the 2035 CO2 emission target level for cars and vans.

14. In your view, should the EU keep targets on 2035 CO2 emission level for cars and vans unchanged?

- ☒ Yes
☐ No

15. Do you have any additional comments on the 2035 targets? If so, they can be added below

1000 character(s)
maximum

The 2035 targets for CO₂ standards for LDVs should be maintained, but their effectiveness depends on enabling conditions. Ambitious emission reduction targets must be matched by progress on affordable vehicle availability, grid capacity, and widespread recharging/refuelling infrastructure. EU rules should avoid penalising zero-emission vehicles due to heavier powertrains and ensure that revenues from road transport are reinvested to support decarbonisation, especially for SMEs. Regular, concurrent reviews of related regulations and a technology-neutral approach are essential to ensure a fair and effective transition.

Section 4.05 Additional flexibilities for target compliance

Regulation (EU) 2019/631 provides for a number of flexibilities, aimed to facilitate manufacturers' compliance with their targets, such as the option to pool with other manufacturers, eco-innovation credits and a bonus for having a high share of zero and low-emission vehicles in their fleet.

The manufacturer-specific emission targets apply annually, meaning that the average CO₂ emissions of all vehicles registered in a given calendar year for which a manufacturer is responsible shall not exceed that manufacturer's target for that year. Manufacturers exceeding their specific emissions target pay an excess emission premium of €95 per g/km for each new vehicle registered.

16. Please indicate to what extent you agree with the following statements as regards flexibilities for target compliance from 2030 (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
There is no need for additional flexibilities for target compliance	☐	☐	☐	☐	☐
For the period 2030-2032, compliance with the targets should be assessed for the three years combined 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.	☐	☐	☐	☐	☐
For the period 2030-2034, compliance with the targets should be assessed for the five years combined.	☐	☐	☐	☐	☐
Other additional flexibilities should be introduced (please specify) <i>Please note that fuels, eco-innovations, pooling, derogations are covered in the next sections.</i>	☐	☐	☒	☐	☐
Existing flexibilities should be reduced (please specify)	☐	☐	☐	☐	☐

Other additional flexibilities: **To achieve CO₂ reduction targets flexibilities are needed to avoid penalties. Existing flexibilities are not sufficient, had they been, the recently adopted targeted amendment would not have been necessary.**

17. Please indicate to what extent you agree with the following statements as regards the role of plug-in hybrid and range extender electric vehicles in the CO₂ emission 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
They are not delivering sufficient environmental benefits, therefore they should play a limited role in the transition towards zero-emission mobility	☒	☐	☐	☐	☐
They are transitional technologies that can help the transition towards zero-emission mobility	☐	☐	☐	☐	☒
They are technologies whose usefulness to decarbonise road transport should be recognised also in the longer term	☐	☐	☐	☒	☐

You can use the space below in case of additional views on the role of plug-in hybrid and range extender electric vehicles in the CO2 emission standards for cars and vans *1000 character(s) maximum*

Plug-in Hybrid Electric Vehicles (PHEVs) and Range-Extended Electric Vehicles (REEVs) should play a role in the transition to zero-emission light-duty transport. We do not agree that they deliver insufficient environmental benefits. These technologies offer CO₂ reductions in areas where battery electric vehicles (BEVs) are not yet viable due to infrastructure gaps or operational constraints. PHEVs and REEVs are especially relevant for urban logistics and LCVs, where flexibility and access to charging infrastructure vary. Their long-term usefulness should be recognised, provided driving behaviour maximises electric use and enabling conditions, such as infrastructure and electricity costs, are addressed. A market for PHEVs should be maintained, and their role as transitional technologies in the decarbonisation pathway should be recognised.

Section 4.06 Fuels

Regulation (EU) 2019/631 sets responsibilities for vehicle manufacturers, requiring them to ensure that the vehicles they put on the EU market achieve a certain CO₂ performance and improve it over time. The deployment of sustainable renewable fuels in transport is incentivised through other EU policies that focus on fuels suppliers, such as the Renewable Energy Directive, the ReFuelEU Aviation Regulation, the FuelEU maritime Regulation, and the emissions trading system (ETS2).

The role of fuels in the context of the Regulation has been the subject of debate over the past years and has been referred to by the Commission in several policy documents, most recently in the Competitiveness Compass Communication.

18. In your view, should sustainable renewable fuels have a role in the CO₂ emission standards for cars and vans?

- ☐ No
☒ Yes

Please

specify:

a) Which fuels should have such a role:

- ☐ Only climate-neutral fuels, whose net-emissions are zero
- ☐ Only renewable fuels of non-biological origin
- ☐ Advanced biofuels and renewable fuels of non-biological origin
- ☒ Also other fuels in addition to the ones above – please specify which ones

Please explain your reply

1000 character(s)
maximum

A technology-neutral approach should consider the role of high-quality renewable fuels in decarbonising ICE vehicles when full electrification is not yet feasible. Renewable and synthetic fuels that meet the sustainability and minimum GHG saving criteria under the Renewable Energy Directive (RED) should be included in the scope of the CO₂ standards for cars and vans. Recognising RED-compliant fuels complements battery-electric and hydrogen vehicles, accelerating the phase-out of fossil fuels without undermining climate targets and aligns the Regulation with RED and ETS2.

b) What should be the design of the mechanism to define the role of such fuels

1000 character(s)
maximum

c) Regarding the impacts of sustainable renewable fuels playing a role in the CO₂ emission standards for cars and vans, 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
It will provide for a more technology neutral approach	☐	☐	☐	☐	☒
It 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)	☒	☐	☐	☐	☐
This will be incompatible with EU efforts to reduce energy consumption	☒	☐	☐	☐	☐
It will no longer ensure clear and distinct responsibilities and accountability for vehicles manufacturers and fuels suppliers	☒	☐	☐	☐	☐
It could weaken the long-term certainty needed for investments in zero-emission technologies	☒	☐	☐	☐	☐
It will result in continued air pollutant emissions, thus affecting negatively public health and the ecosystem	☒	☐	☐	☐	☐

You can use the space below in case of additional views on the role of sustainable renewable fuels in the CO₂ emission standards for cars and vans

1000 character(s)
maximum

Section 4.07 Excess emissions premiums

Under Regulation (EU) 2019/631, a manufacturer whose average specific emissions of CO₂ exceed its emission target has to pay an excess emission premium, for each of its vehicles registered in the calendar year concerned, of 95 EUR per g/km target exceedance. The amounts of these premiums are considered as revenue for the general budget of the Union, without a specific destination for the spending of the recovered money.

19. In your view, which should be the specific destination for revenues derived from the excess emission premiums?

- ☐ They should continue to be considered as revenue for the general budget of the Union
- ☐ They should be redirected to be used to support the zero-emission transport transition
- ☐ They should be redirected to be used to support the companies and/or regions most affected by job losses and/or restructuring along the value chain
- ☒ Other (please specify)

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

1000 character(s)
maximum

Revenues derived from excess emission premiums should be reinvested exclusively in the road transport sector. This ensures a fair and transparent use of funds and avoids cross-subsidisation between transport modes. Allocating these revenues to road infrastructure, cleaner vehicle technologies, and emission reduction initiatives directly benefits the sector.

Monitoring

20. In your view, how could the monitoring and reporting requirements (annual reporting of vehicle registration data) for Member States and manufacturers be simplified? (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
No changes are needed to the monitoring system	☐	☐	☐	☐	☐
The number of parameters to be reported should be limited	☐	☐	☐	☐	☐
The monitoring process should be based on the electronic Certificate of Conformity (eCoC)	☐	☐	☐	☐	☐
Member States should only report the vehicle identification numbers (VINs) and manufacturers should report all relevant eCOC data for their vehicles	☐	☐	☐	☐	☐
Member States should only report the vehicle identification numbers (VINs) and type-approval authorities should report all relevant eCOC data for their vehicles	☐	☐	☐	☐	☐
The Commission/EEA should have direct access to the relevant vehicle registration data in the Member States	☐	☐	☐	☐	☐
Other (please explain)	☐	☐	☐	☐	☐

Please explain your reply:

1000 character(s)
maximum

21. In your view, how could the real-world data monitoring and reporting requirements (for manufacturers and Member States) be changed in order to simplify them? (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
No changes are needed to the real-world data monitoring system	☐	☐	☐	☐	☐
The number of parameters to be reported should be limited	☐	☐	☐	☐	☒
Only the Member States should report data (collected during periodical technical inspections), not manufacturers	☐	☐	☐	☒	☐
Only manufacturers should report data (using the same means as currently), not the Member States	☐	☐	☐	☐	☐
Manufacturers should be obliged to report data directly from the vehicles (over-the-air transmission)	☐	☐	☐	☐	☐

Manufacturers should be obliged to report data directly from the vehicles (over-the-air transmission) and the Member States should no longer report real-world data	☐	☐	☐	☐	☐
Other (please explain)	☐	☐	☐	☐	☐

Please explain your reply

1000 character(s)
maximum

Access to in-vehicle data related to CO₂ should only be allowed upon request to authorised inspectors for periodic and roadside inspections under standardised and safe conditions. Continuous on-board monitoring implies challenges in terms of technical, safety, security and privacy requirements.

Section 4.08 Energy efficiency of zero-emission vehicles

According to Article 15 of the Regulation, the Commission shall assess the impacts of establishing minimum energy efficiency thresholds for new zero-emission cars and vans placed on the Union market.

22. In your view, should the Commission propose to regulate the energy efficiency of zero-emission cars and vans at EU level? (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
No, there is no need to do so	☐	☐	☐	☐	☐
No, but information on energy efficiency should be integrated into the vehicle label	☐	☐	☐	☐	☐
Yes, and this should be done in the form of a limit imposing a minimum energy efficiency per vehicle	☐	☐	☐	☐	☐
Yes, and this should take the form of a target value for the fleet-wide average energy efficiency (which could vary amongst manufacturers)	☐	☐	☐	☐	☐
Other (please specify)	☐	☐	☐	☐	☐

Please explain your reply

1000 character(s)
maximum

Section 4.09 Other provisions

Manufacturers of new cars and vans have to meet specific emission reduction targets, which are based on the fleet-wide targets, taking into account the average mass of the vehicles registered in the year concerned.

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

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

	Yes	Neutral	No
Provisions on eco-innovations	☐	☐	☐
Provisions on pooling	☐	☐	☐
Exemption for manufacturers responsible for less than 1 000 new vehicles registered in the EU per year	☐	☐	☐
Small Volume derogations (manufacturers responsible for less than 10 000 new cars or 22 000 new vans registered in the EU per year)	☐	☐	☐
Other (please specify)	☐	☐	☐

Any additional comments

24. If you have any comments or supplementary information to add to your replies to the above questions, please insert this here:

1000 character(s)
maximum

Article V. Review of the Car Labelling Directive

The review of the Car Labelling Directive (Directive 1999/94/EC) will explore a number of options compared to the baseline (i.e. continued application of the current Directive) through an impact assessment, in particular on:

-
- the harmonisation of the label the design characteristics and information elements to be included in the label

-
- the use of information channels and digital tools the scope of the legislation (types of vehicles covered)

This part of the questionnaire aims to gather stakeholders' views on these elements.

Section 5.01 Regarding the harmonisation of the label

The implementation of the current Directive varies across Member States. The label remains relevant, but the lack of harmonisation leads to higher costs for industry.

25. Please indicate to what extent you agree with the following statements regarding the harmonisation of the label (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement).

	1	2	3	4	5
The label design should be the same in all Member States	☐	☐	☐	☐	☐
The information included in the label should be the same in all Member States	☐	☐	☐	☐	☐
There should be a possibility for a Member State to require manufacturers to include additional information	☐	☐	☐	☐	☐
There should be a possibility for a vehicle manufacturer to voluntarily display additional information	☐	☐	☐	☐	☐

Section 5.02 Regarding the information elements to be included in the label

The current Directive requires that the car label displays the fuel consumption and CO₂ emissions values. The evaluation shows that buyers of zero-emission vehicles are not well served by the current Directive.

26. In your view, how important is it to display on the label the following information for zero-emission vehicles? (scale from 1 to 5, where 5 is very important and 1 is not important at all).

Information elements for zero-emission vehicles	1	2	3	4	5
Energy consumption (for instance in kWh/100 km or kg H ₂ /100 km)	☐	☐	☐	☐	☐
Electric range (in km)	☐	☐	☐	☐	☐

Charging time	☐	☐	☐	☐	☐
Battery capacity (in kWh)	☐	☐	☐	☐	☐

In addition to fuel consumption values, CO2 emissions values and specific information for zero-emissions vehicles, more information elements could be added to the label, although simplicity is important for the label to be effective.

27. In your view, which are the most important additional information elements that should be displayed on the label for potential buyers of a vehicle? (please choose and rank the 5 most important measures, with 1 representing the most important, 2 the second most, and so on, up to 5 being the fifth most important).

	1	2	3	4	5
Vehicle weight	☐	☐	☐	☐	☐
Real-world fuel or energy consumption	☐	☐	☐	☐	☐
Life-cycle CO2 emissions (all CO2 emissions from the production, use and end-of-life stages of the vehicle and from the production of the fuel or electricity used)	☐	☐	☐	☐	☐
Carbon footprint of key materials used in the vehicle	☐	☐	☐	☐	☐
Information on local content (e.g. percentage of the added value of the vehicle coming from the EU)	☐	☐	☐	☐	☐
Information on the operational costs (fuel/energy costs) of the vehicle	☐	☐	☐	☐	☐
Total Cost of Ownership of the vehicle (sum of purchase price and operational costs)	☐	☐	☐	☐	☐
Information on incentives and taxes	☐	☐	☐	☐	☐
Air pollutant emissions	☐	☐	☐	☐	☐
Expected battery durability	☐	☐	☐	☐	☐

You can use the space below in case of additional views on the label.

1000 character(s)
maximum

Section 5.03 Regarding the use of information channels and digital tools

The Car Labelling Directive requires a paper version of the label, poster and guide to be made available. However, consumers increasingly rely on digital platforms for information on new vehicles.

28. Please indicate to what extent you agree with the following statements regarding the use of information channels and digital tools (scale from 1 to 5, where 5 is highest agreement and 1 is no agreement - not all statements need to be rated)

About the label	1	2	3	4	5
The label should be shown at the point of sale	☐	☐	☐	☐	☐
The label should be accessible online (also outside the point of sale)	☐	☐	☐	☐	☐
The label should include a weblink to other relevant information	☐	☐	☐	☐	☐

About the guide	1	2	3	4	5
A guide with information on all available vehicle models should be available to allow comparing brands and models	☐	☐	☐	☐	☐
The guide should be accessible online (outside the point of sale) and include search and compare functions	☐	☐	☐	☐	☐

Section 5.04 Regarding the scope (types of vehicles covered)

29. In your view, how important is it to extend the scope of the car labelling requirements from those currently covered (new passenger cars)? (scale from 1 to 5, where 5 is most important and 1 is least important.)?

	1	2	3	4	5
No need to extend the scope (cover only new passenger cars)	☐	☐	☐	☐	☐
Cover all second-hand passenger cars	☐	☐	☐	☐	☐
Cover second-hand passenger cars sold through a dealership including certified occasions	☐	☐	☐	☐	☐

Cover new light commercial vehicles (vans)	☐	☐	☐	☐	☐
Cover all second-hand vans	☐	☐	☐	☐	☐
Cover second-hand vans sold through a dealership including certified occasions	☐	☐	☐	☐	☐

You can use the space below in case of any additional views.

1000 character(s)
maximum

Section 5.05Final Remarks

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

Please note that any uploaded material 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(s)

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

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