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REQUEST FOR CONTRIBUTION

From: To:	General Secretariat of the Council Working Party on the Environment
N° Cion doc.:	ST 17010/25 INIT + ADD 1-6
Subject:	CO2 in cars: Follow-up of the WPE meeting on 26 January 2026: Call for comments and Commission presentation

As announced by the Presidency at the abovementioned WPE meeting, delegations are invited to send their further written comments and questions to the proposal and the Impact Assessment **by Monday 2 February 2026 cob** to the Presidency ([redacted] and the Commission ([redacted]) with copy to the General Secretariat ([redacted], environment@consilium.europa.eu).

Delegations will also find attached the Commission presentations given at the abovementioned WPE meeting.

Delegations are reminded that Regulation (EC) No 1049/2001 of 30 May 2001 regarding public access to European Parliament, Council and Commission documents applies to all written comments, in whatever form provided.

CO_2 emission standards for cars and vans and vehicle labelling Q&A

Council – WPE 26/1/2026

European Commission

2030 targets – multi-annual

- Why does the Commission rely solely on multiannual averaging for the years 2030–2032 as the flexibility mechanism for meeting the 2030 CO_2 target for passenger car, despite the Impact Assessment acknowledging alternative flexibility options? (CZ)

➢ Also small EV super-credits and change in vans target for 2030

- Why was averaging limited to a three-year period (2030–2032), despite the particularly steep tightening of targets in those years and the lack of flexibility for 2028–2029. Why were longer or rolling averaging options not retained? (CZ)
- Penalties spread over multiple years (2025-2027 and 2030-2032) soften the curve for manufacturers, but the trajectory for the final years continues to project a sharp reduction, especially considering that targets for the next two or three years will not be met (IT)
- Are there plans to further modify the trajectory of CO2 emission limits? (IT)

➢ Need to ensure balanced approach: gradual transition to zero-emission vehicles

2030 targets - vans

- The share of battery-electric vans in the new sales of vans in the Netherlands was approximately 90% in the Netherlands. This shows clear demand for battery-electric vehicles. Could the Commission give an indication of how many battery-electric vans less there will be available for purchase in 2030 as a result of lowering the emission target in that year from 50% to 40% and what this means for the expected development of the purchasing price of battery-electric vans? (NL)

  - *The share of ZEV vans in 2030 declines from 50% (baseline) to 41% (policy scenarios)*
  - *This is shown in Chapter 6.2.1 and in Annex 8 (section 4.1) of the impact assessment*

Small ZEV

- Could the Commission specify which criteria were used to define 4.2 meters as the length parameter for the new M1 category? (IT, NL) Why not surface area (NL)
  We ask the COM to explain why the length dimension of 4.20 meters is appropriate for the definition of small, affordable electric cars in order to stimulate the market for low-cost electric vehicles in the lower volume segment. It does not seem to reflect the everyday needs of families with several children. We ask the COM to provide further details on the choice of length. (DE)
- The introduction of the new vehicle category through the Automotive Omnibus in combination with the super credits aims at ensuring the availability of small electric cars. What will the Commission do to ensure that cars in this category will not just be “small” but also “affordable” as mentioned by the Commission president in her State of the Union? (NL)

➢ See SWD accompanying the Omnibus Proposal

- What is the share of small electric cars in the current sale of EVs in Europe? (DK)

Small ZEV

- As for the super credits for small zero-emission vehicles, could the Commission explain in detail why the coefficient has been set at the level of 1.3 and not higher? Is it motivating enough for the manufacturers? (CZ) We ask the COM to explain the chosen level of supercredits and why no cap is planned. (DE)
  - IA looked at a range of values
  - M1E definition is intended to trigger other incentives for small EVs, esp. at MS level.
- How will the proposed supercredits be implemented with minimal bureaucracy? (DE)
- Has the Commission considered other mechanisms to stimulate sales of small electric cars? (BE)
  - Super-credits is the only option considered in IA
- Why did the Commission decide not to apply a cap for the super-credits, contrary to what was proposed in the impact assessment report (p. 21)? (BE)
  - Because impact in terms of ZEV share is limited (only small ZEV eligible) and reversing the trend towards larger vehicles brings broader positive effects (resource efficiency, energy savings, etc)

Made in the EU

- How does the Commission intend to ensure legal certainty and predictability for manufacturers regarding super-credits limited to “M1E made in the EU” (small zero-emission passenger cars manufactured in the European Union), given that eligibility criteria will only be defined in a future delegated act, and how will the Commission ensure alignment with ongoing industrial and automotive policy discussions, the reality of global supply chains, and Member State involvement in defining these criteria? (CZ)
- How will “Made in Europe” be practically implemented for both small European cars and European low-carbon steel? (IT) How will the consistency with Industrial Accelerator Act in terms of “made in EU” condition be ensured? (for low-carbon steel) (CZ)
- In what way will supplier supply chains be protected? (IT)
- Small cars: Does the Commission envision that ‘made in the EU’-requirements can be done in compliance with WTO-rules and/or EU’s bilateral trade agreements? (DK) Is there a risk that the regulation on “small vehicles” (Art. 5) could be interpreted as protectionist under WTO law? (DE)

2035 targets

- What percentage of non-battery electric vehicles does the Commission expect in new vehicle registrations after 2035? (CZ)
  - See IA Chapter 6.2.1 and Annex 8 (section 4.1): TL_90 scenario

Vans targets

- How does the Commission justify maintaining a –90 % CO_2 target for light commercial vehicles (LCVs, category N1) in 2035, given the acknowledged challenges in zero-emission vehicle market ramp-up for this segment and the decision to reduce the 2030 target from –50 % to –40 %? (CZ)
- How does the Commission assess whether the proposed flexibilities for LCVs sufficiently reflect their specific duty cycles and customer constraints? (CZ)

➢ Balance between acknowledging short-term challenges for vans and maintaining strong signal for ZEV in 2035

Role of plug-in hybrid vehicles

- How does the Commission justify maintaining the current Utility Factor (the regulatory parameter reflecting the assumed share of electric driving for plug-in hybrid vehicles), given that its combined effect with other regulatory initiatives may cause many PHEVs to exceed 50 g CO_2/km and therefore lose their status as low-emission vehicles, thereby preventing PHEVs from contributing to long-term compliance and effectively transforming the framework into an almost exclusive zero-emission vehicle quota? (CZ)
- The Impact Assessment explicitly presents advanced PHEVs and extended-range electric vehicles (EREVs) as a driver of competitiveness for EU manufacturers. How does the Commission reconcile this assessment with the compliance pathways set out in the proposal? (CZ)

➢ Utility factor reflects real-world emission gap of PHEV

➢ Proposal opens also to PHEV/EREV post-2035

Role of plug-in hybrid vehicles

- The Commission's proposal allows the sale of plug-in hybrid vehicles (PHEVs) after 2034. In this context it will be even more important that PHEVs' type-approval CO_2 emission values will be fully aligned with the real-world driving emissions (correctly reflecting the use of the combustion engine). By when will the necessary corrections been agreed to achieve this full alignment? As technologies evolve, it will also be necessary to continuously assess the possible (growing) divergence between WLTP and real-world values (BE)
- We consider it is essential to amend utility factors to reflect reality. Regulation 2023/443 required a review by 31 December 2024, and the Commission's 2024 study on real fuel consumption concludes that real emissions for plug-in hybrids are 3.5 times higher than the WLTP method. Does the Commission intend to comply with the mandate and update utility factors based on real data? (ES)

➢ UF applicable from 2027 is established in WLTP Regulation: reflects current reality of PHEV use

Role of plug-in hybrid vehicles

- Does the Commission plan to include restrictions on the use of PHEV and REEV, such as requiring a minimum electric range, to reduce their environmental impact? How will this aspect, mentioned in the Impact Assessment, be incorporated into a legislative proposal? What solutions does the Commission foresee to increase the use of the electric mode of PHEVs? (ES)
- We ask the COM to explain why no regulations are planned for “off-vehicle charging hybrid electric vehicles” (externally chargeable hybrid electric vehicles) that meet certain criteria, e.g., an electric range of at least 150 km and other supplementary criteria. (DE)

➢ Proposal opens to PHEV post-2035 without additional PHEV-specific restrictions

Emission calculation / LCA

- Does the European Commission plan to revise the emission calculation method? (IT)
- Why was the choice made not to move to an LCA (Life Cycle Assessment) calculation method, despite requests from many countries? Why the Commission has not explored the alternative Life Cycle Assessment (LCA) analysis and approach to the CO2 emissions reduction from passengers cars and light duty vehicles ? (IT)

➢ Methodology is still under development

Technology neutrality

- Most of the preferred options are not included in the Commission's final proposal to revise CO_2 emission standards for passenger cars and vans. Why is that? The Commission does not provide any justification or explanation for making other choices (targets, VEEF, PHEV, multi-annual, fines revenue) (BE)
- How does the Commission reconcile the proposal with the results of its own Impact Assessment, which indicate that scenarios including sustainable renewable fuels, eligible fuel vehicles and plug-in hybrid electric vehicles (PHEVs) lead to lower or neutral average costs per vehicle for manufacturers, while the proposal caps fuel-based flexibilities, excludes vehicles running exclusively on carbon-neutral fuels (CNF-only vehicles) from fleet compliance, and—through the tightening of the Utility Factor—effectively removes PHEVs from long-term compliance pathways? (CZ)
- How does the Commission define technology neutrality, if compliance options other than battery electric vehicles and hydrogen-powered vehicles are effectively excluded from long-term fleet compliance, despite having been analysed in the Impact Assessment? (CZ) How will it be ensured that the regulation remains technology-neutral? (DE)

➢ Manufacturer costs are only one out of many indicators on which options are assessed

➢ Flexibility options in the IA all come with a cap

➢ PHEV are not removed as a long-term compliance option (next to ICEV, HEV)

Role of vehicles running only on certain fuels

- Why does the proposal not explicitly integrate vehicles running exclusively on carbon-neutral fuels (CNF-only vehicles, i.e. vehicles powered solely by fuels with net-zero greenhouse gas emissions) into the CO_2 fleet compliance framework, despite such vehicles being analysed in the Impact Assessment? (CZ)
- If the Commission relies on a separate delegated act for CNF-only vehicles (vehicles operating exclusively on carbon-neutral fuels), why has this act not been reintroduced or rescheduled, given its relevance for the compliance pathways already assessed in the Impact Assessment? (CZ)
- How will the Commission intend to follow through the commitment on the long-awaited definition of carbon-neutral fuels? (IT)
- To what extent was Recital 11 (Regulation (EU) 2023/851) taken into account in the considerations leading to the proposed amendment? Does the COM intend to implement the recital? We ask the COM to explain why no regulations are planned for “e-fuels only vehicles” (DE)

Renewable fuels and green steel credits

- What is the rationale for allowing manufacturers to collect credits for either "low carbon" steel or renewable fuels, but not both (Art. 5b(2))? (AT)
  - *Manufacturers can use both credits*
- Of the remaining 10% of the emissions post 2035, why is the cap set at 3% in relation to low carbon steel credits with 7%? (FI) Why was the ratio 3/7% chosen for renewable fuels/green steel? (CZ)
- Why does the proposal allow renewable fuels eligible under the Renewable Energy Directive and green steel credits to contribute to compliance only from 2035, despite the Impact Assessment highlighting their positive effects on value creation and reduced dependency on technology imports? Why was the flexibility not introduced already for the 2030 targets in order to create incentive for earlier development? (CZ)

Renewable fuels and green steel credits

- Why is “new cars” defined differently in the annex 7.1 and 7.2? (DK)
  - Steel credits → specific to manufacturers → manufacturers’ cars/vans
  - Fuel credits → same for all → all cars/vans
- Could the Commission confirm again that fully utilizing the proposed credits for low-carbon steel and sustainable renewable fuels cannot lead to an specific emission reduction target for vehicle manufacturers that is lower than 90% in 2035? Could it confirm that if vehicle manufacturers do not fully utilize the flexibilities for either low-carbon steel and/or clean renewable fuels, that this would consequently mean that those vehicle manufacturers need to realize higher emission reduction than the target of 90%? (NL)
  - Confirmed, OEMs must achieve at least 90% reduction compared to 2021 fleet-wide target

Role of fuels

- The quantity of eligible biofuels used in road transport is to be retrieved from the Union Database (UDB). This database does not record the use of biofuels in the individual modes of transport (road, air, ship, etc.). The question therefore arises: how should the allocation to sustainable renewable fuels from road transport be determined? (AT)
  - *UDB records also the sector, as shown here: https://wikis.ec.europa.eu/spaces/UDBBIS/pages/102630809/User+Guides+Demo+Video+s?preview=/102630809/208734354/Placed%20on%20Market%20Transactions%20-%20User%20Guide%20v1.1.docx*
- Does the manufacturers need to do something to earn the renewable fuels credits or will they be allocated to the manufacturer? (DK)
  - *No action needed: fuel credits are calculated by the Commission and allocated to manufacturers (CCF)*

Role of fuels

- Please clarify the methodology for calculating fuel credits in accordance with Annex I, Section 7.2, and their allocation to manufacturers. The calculation can be understood to mean that fuel credits are based on parameters that relate to the entire EU-wide new registration fleet, regardless of the type of drive system. The calculation is not manufacturer-specific. How are the fuel credits then converted to manufacturers? (DE)
- In the formula for fuel credits, why is the emission reduction from sustainable renewable fuels used by all passenger cars in the fleet allocated to new passenger cars? Why is it not calculated only according to the share of new cars? (FI)

$$Q_{fuel} * GHGsavings * \frac{fuelsharecars}{newcars * mileage}$$

newcars	is the number of new passenger cars registered

- Could the Commission clarify how the parameter ‘fuelsharecars’ is derived in practice, in particular how data from the EU GHG inventory under the Governance Regulation are used to determine the share of road-transport fuels attributable to passenger cars? (EE)
  - ➢ *Common reporting Table (CRT) report all the necessary information (table 1.A.3).*

Role of fuels

- As the 3% credits for renewable sustainable fuels are not additional to the targets indicated in RED III, how will these credits be financed? If they benefit manufacturers, could the additional cost of using sustainable fuels be financed from manufacturers? (ES)
- How will the inclusion of renewable fuels in the CO2-standards drive more investment in the production of renewable fuels? (DK)
- Does the Commission assess the investment signal created by a fuel compensation cap of 3 % high enough, given the capital-intensive nature and long depreciation periods of renewable fuel production? (CZ)
  - *The impact assessment takes this into account (see macro-economic impacts, chapter 6.3.1.4 + section 4.4 of Annex 8)*
- The proposed **10% flexibility** from an industrial perspective does not guarantee investment in biofuels, as these are capped at 1% and can only be offset from 2035 onwards (IT, CZ)
  - *Cap on Annex IX Part B is consistent with RED*

Role of fuels

- Fuel credits are expressed as CO2 equivalents (and cover well-to-wheel emissions, if we interpret correctly), whereas elsewhere in the regulation the scope covers CO2 only (and tank-to-wheel emissions only). How are these differences taken into account? (FI)
- How does the proposal make sure that the emissions savings from renewable fuels is not double counted (both in this regulation and in ETS2)? (DK)
- How will the Commission ensure that the new sale of internal combustion engine in 2035 that it proposes to allow will be suited for flexible fuel use? Will it take additional measures to ensure usage of sustainable renewable fuels, if it plans to compensate all vehicle manufacturers with the availability of such sustainable renewable fuels regardless of whether these are used? (NL)
- Are the planned three percentage points that can be offset by fuels already offset by the RED III requirements for the existing fleet, or are additional sustainable fuels needed in transport? (DE)

Role of fuels

- Could the Commission give an indication of the availability of the sustainable renewable fuels mentioned in the proposal in 2035 and what whether this means that in 2035 all vehicle manufacturers will in fact get the full 3% sustainable renewable fuel credits? (NL)
  How does this relate to the availability of the resources for the renewable fuels in hard to abate sector such as maritime shipping and aviation? (ES) What is the estimated capacity for 2035? (DE)
  - *See IA, chapter 6.2.2.2 + Annex 8 (chapter 4.5 and 6)*
- As Europe has a high dependency on raw materials for biofuels, how the Commission envisage to address the sustainability of the use of these fuels? Does the Commission analyse the impacts on raw materials dependence for the European Union? Does the Commission analyse the impacts on water use, land use and biodiversity impacts for the increase of the use of biofuels? (ES)
  - *Eligible fuels will need to meet the RED GHG and sustainability criteria*
- Has the Commission assessed what the potential increase in emissions and other associated impacts would be resulting from the use of biofuels or biogas derived from Part B of the Directive, considering their deforestation and indirect land-use change (ILUC) risks? (ES)
  - *Part B biofuels do not have ILUC risks as they are waste-derived*

Role of fuels

- Could the Commission better illustrate the actual role biofuels will play in the transition and how European excellence in this sector will be preserved, including the enhancement of chemical transition pathways currently underway in Europe and encouraged by the Commission in the European Chemical Plan? (IT)
  - *See the 2040 Climate Target Communication and accompanying SWD, the Sustainable Transport Investment Plan, and the bioeconomy strategy*
    - *Bioenergy: priority to sectors where the potential for electrification is limited, such as air or maritime transport, and for the decarbonisation of the existing fleet of road vehiles*
    - *Electrification is the main pathway for new vehicles*
- How did the Commission analyse the role of biofuels and the potential technological developments from now until 2035 and beyond (such as Mobile Carbon Capture)? (IT)
- In what way has the Commission analysed the climate effects stemming from a wider use of biofuels in terms of immediate emission savings, of impacts on biodiversity, and of enhancing the development of the European agricultural sector? (IT)
  - *See Impact Assessment supporting the proposal for 2040 Climate Target*

Title / definition

- The title of the proposed regulation uses the term "new light duty vehicles." However, this term is currently not defined in either Regulation 2019/631 or the referenced Regulation 2018/858. (AT)

  - *“light duty vehicles” is used in previous regulations: Regulation (EC) No 443/2009 and Regulation (EU) No 510/2011 and is well-established concept in the EU transport and environmental legislation*

Pooling

- What is the reasoning behind not letting pools use the credits from renewable fuels and low carbon steel? (DK)
- Why is pooling not possible within the framework of the flexibilities (super credits for small zero-emission vehicles, fuel credits, steel credits)? What are the arguments for and against such a regulation? (DE)
  - *The provision only refers to so-called "open" pools, i.e. pools formed by including non-connected undertakings*

Low-carbon steel credits

- How will the definition of "green steel" in the CO_2 Standards Regulation relate to the definitions in the Industrial Accelerator Act and the Ecodesign for Sustainable Products Regulation (ESPR) (IT)?
- When does the Commission expect to adopt the delegated act defining green steel made in Europe (steel produced with significantly reduced greenhouse gas emissions), (…)? (CZ)
- How does the proposal make sure that the emissions savings from low carbon steel is not double counted (both in this regulation and in the ETS1)? (DK)
- Is the steel used by suppliers also included in the calculation of steel credits? Why is the compensation limited to steel and not extended to other green materials, such as aluminum? (DE)
- How will the proposed credits be implemented with minimal bureaucracy? (DE)
- Are the total CO_2 emissions saved by OEMs or suppliers through green steel produced in the EU credited regardless of the vehicle's destination (export)? (DE)

Low-carbon steel credits

- Could the Commission give an indication of how much low-carbon steel is currently used by vehicle producers and the expected availability of low-carbon steel in 2035? Does it have an indication of the expected usage of this flexibility? Has the Commission done research into the plans of the steel industry to scale-up the production of low-carbon steel and, if so, what are the findings? (NL)
- How will it be ensured that there is a sufficient supply of European low-carbon steel to meet manufacturers' production capacity? (IT) (…) How does *the Commission* ensure sufficient availability and affordability of such steel by 2035? (CZ)
- How high are the estimated capacities for green steel in the EU in 2035? (DE)
  - *Objective is to create a lead market*
- How high are the additional costs for offsetting with green steel? (DE)
  - *Please see the Impact Assessment, see chapter 6.2.3*

Scope N ZEV (IVA, NSS)

- The Commission has proposed to clarify Article 2 paragraph 1 point (b) of the regulation on the scope of application to also include zero-emission light trucks in the CO2 emissions targets. However, a question has arisen regarding this point of the proposal and section 4.7 (Individual vehicle approvals (IVA) and national small series (NSS)) of the Guidelines for reporting countries _reporting year_2026 on CO2 monitoring regarding IVA and NSS approvals. As the Guidelines state in section 4.7 as set out below, it remains unclear how IVA and NSS approved zero-emission N2 vehicles are taken into account when calculating manufacturers' CO2 emissions targets.
  - *IVA and NSS fall within the scope of Regulation (EU) 2019/631 but are not taken into account for calculating the average emissions of CO2 and the specific CO2 emissions targets of the manufacturers concerne*d.
- In this context, would it be justified to clarify in Article 2 on the scope of the Regulation that zero-emission N-category vehicles should be taken into account in the calculation regardless of the vehicle approval procedure? (FI)

Excess emissions

- If excess emission premiums are allocated to the Social Climate Fund, how is the continuation of this financing envisaged after 2032, given that the Fund is currently scheduled to conclude in December 2032? (EE)
- We ask the COM to explain why potential penalties for exceeding emissions limits are allocated to the EU Climate Social Fund (KSF) and thus not used to invest in the Europe-wide development of charging infrastructure. (DE)
  - ➢ Proposal does not change allocation of fine revenues (general budget of EU)

Review

- We ask the COM to explain why the next regular review of the regulation is to take place in 2035 and then every five years thereafter (DE)

Vehicle labelling

- At present, it is not clear to us how consumers would meaningfully benefit from vehicle information, if it is on a vehicle model / engine family level? (FI)
- Has the Commission considered showing comparable versions of the same model through the QR-code? (NL)
  - ➢ Different role of label (individual vehicle), product database (model) and vehicle configurator (impact of features)

Vehicle labelling

- How often would the thresholds A–G or other information/criteria of the vehicle label be updated? (FI)
- How does the EC view an alternative approach with a higher distinguishing power with regard to the efficiency classes? (NL)
  - Aligned with energy label (A-G)
- Has the EC considered including more elaborate information regarding energy efficiency and the usage of a coloured arrow for the label? (NL)
- Why does the COM not provide for an assessment of the electricity consumption of electric vehicles within the framework of the label, unlike for common household appliances, even though these are expected to contribute significantly to the EU's total electricity consumption? (DE)
  - Electric energy consumption values are now added on the label

Vehicle labelling

- In the review of the labelling, it seems that results on emissions would be based on WLTP data. Has the Commission considered to update WLTP data to approximate them to real data in the case of PHEV and REEV vehicles to reflect this in the labelling? (ES)
- The sustainability of a (plug-in) hybrid car depends on the way it is used. Will the new car label include separate figures for electric range and CO_2 emissions depending on how the plug-in hybrid is used? (BE)
  - ➢ Label info is COC based. For PHEV: also CD electric consumption and CS fuel consumption.
- Questions regarding made-in-EU information (FI):
  - Would the made-in-EU information on the vehicle label come from vehicle's CoC? How should this requirement be considered in OEM's configurators? Which EU-legislation would set the criteria (IAA or delegated regulation)? Which EU-legislation would set the EU-type approval methods and requirements if the information would be part of CoC? It is not clear to us, how this requirement would be enforced by Member States in future – would the made-in-EU requirement be part of vehicle market surveillance?
  - "Made in EU" is optional, methodology to be established via Delegated Act (Art. 15a(7)).

Vehicle labelling

- Could the Commission clarify how ‘commercial activity’ is defined for the purpose of vehicle labelling requirements, particularly in distinguishing professional sellers — whether natural or legal persons — from private individuals making occasional second-hand vehicle sales? (EE)

➢ See Commission ‘Blue Guide’ on the implementation of EU product rules 2022

- Could the Commission elaborate on how the battery state of health check is envisaged in practice, including how accessible this information is intended to be for second-hand zero-emission vehicle dealers who would be responsible for informing the potential buyer? (EE)

➢ See Euro 7: requires in-vehicle display of SOH

- Should the distributor perform a health check itself to obtain the battery state of health? (NL)

➢ No

Vehicle labelling

- Member states have 12 months to notify rules about penalties and enforcement. When does the rest of the article 15a and 15b have to implemented? Member states need time to implement new rules and/or change and repeal legislation that implement directive 1999/94 (DK)

➢ Entry into force + 12 months

- How will member states' market surveillance authorities enforce article 15a 4. which only relates to the Commission's product database? (DK)
- Who will ensure that the data in the planned product database is relevant, up-to-date, and accurate, and how will this be guaranteed? How does the European Commission assess the administrative burden for the companies concerned? (DE)

➢ Manufacturers are responsible: based on type approval and production data.

- What is considered 'undue delay' with regards 15a 4.? (DK)
- Has the European Commission taken into account the case of decentralized administrative structures with several competent authorities at national level with regard to the obligations to designate a market surveillance authority for the new passenger car label? (DE)

➢ Based on established market surveillance Regulation (EU) 2019/1020

Vehicle labelling

- For used cars, the CoC can be made available by the manufacturer up to ten years after the vehicle's production date […]. How to deal with this complication? (NL)
- Which costs were used in the impact assessment for applying a label to a car? How would the Efficiency and Proportionality – the added value – of the car labelling proposal be assessed if these higher costs for applying labels to cars were assumed? (NL)

➢ See IA Annex 4 (section 3) – p. 57

- What prompted the European Commission to comply with consumer organizations' demands to extend the labelling requirement to used vehicles? Why was the option covering the widest range of used vehicles preferred? We fear that such an extension will place an excessive burden on (re)sellers and lead to unpredictable liability risks. (DE)

➢ IA: benefit of reaching more vehicle buyers outweighs the additional costs

Impacts on other targets

- How will the Commission compensate for the 14% increase in emissions (estimated by external studies) resulting from higher sales of ICE and PHEV? How does the Commission plan to offset this increase compared to the approved scenario, which is consistent with the 2030 emissions reduction target? (ES)
- Regarding the introduction of biofuels, an increase in emissions of 23% by 2050 is also estimated by external studies. How will this increase be compensated? (ES)
  - *The IA shows, for the TL_90 scenario (the scenario closer to the proposal), an increase in cumulative emissions (2030-2050) of 3%.*

Impacts on other targets

- Has the Commission made an assessment on how will this impact in the 2030 climate and energy efficiency targets? (ES) What impact is expected on the achievement of climate targets? What is the climate impact of the proposed amendment and what impact will it have on the ramp-up of electric mobility? If applicable, also in combination with the other proposals in the Automotive Package. (DE)
- With the relaxation of the 2030 and 2035 targets, is it possible to meet the transport decarbonisation objectives set out in RED III? How is the review of this directive, expected in 2026, envisaged? (ES)
- How does the proposal affect Member states achieving their national targets in the effort sharing sector in 2030? (FI, ES, BE)
  - *Very small changes proposed for 2030, so the impacts on CO_2 emissions and on the energy system are small and the targets are not at risk*

Impact Assessment

- The impact of the considered options and proposed amendments on air quality has not been evaluated. How does the Commission reconcile its proposal to revise the CO2 standards for cars and vans with its zero pollution vision for 2050? In this context, is the Commission considering a further revision of the Euro standards? (BE)
  - ➢ See Impact Assessment, notably chapter 4.3 of Annex 8
- Why do the estimated shares of ZEV for new sold cars and vans differ so strongly from the ZEV shares estimated for the impact assessment of the previous revision in 2023? (BE)
- Does the Commission have sufficient insights in the combined effects of the proposed measures? (NL)

Impact Assessment

- What effects are expected on value creation and employment in the European automotive sector – in the short and long term? (DE)
  - Please see Impact Assessment Chapter 6.3.1.4 and Annex 8 (chapter 4.4)
- How does the impact assessment take into account the demands on electricity grids resulting from an increasing number of electric vehicles? (DE)
- What effects will the new regulations have on the development and production of technologies such as PHEVs, range extenders, and highly efficient combustion engines? (DE)
  - See IA Chapter 6.2.1 and Annex 8 (section 4.1): TL_90 scenario (closest to proposal)

Impact Assessment

- Has the Commission also considered potential effects on the second-hand electric vehicle market and the second-hand market distributional impacts across Member States? (EE)
- What is the expected impact on first-movers and investment certainty in the automotive value chain of lowering the emission reduction target for 2035 from 100 to 90%? (BE, NL)
- What is the Commission's assessment of the impact on the competitiveness of European car makers in general? (BE) What impact will the change from a 100% target to a 90% target have on the automotive industry and suppliers? What do the amended regulations mean for the international competitiveness of the European automotive industry? (DE)
  - *See IA, Chapter 6.3.1.3 and Annex 5 (competitiveness check)*

Impact Assessment

- We request that a more detailed assessment of the consequences of the specific COM proposal be submitted. (DE)
- The Regulatory Scrutiny Board report requests a review of the IA. When does the Commission plan to expand the impact analysis report? (ES)
  - *The published report is final and takes into account the comment of the Regulatory Scrutiny Board*
- What is the increase in emissions in 2030, 2035 and 2040 in the COMBI_1 and COMBI_2 scenarios compared to the baseline? Only the evaluation for 2050 is included. How much would BEV or ZEV penetration also decrease in those years? (ES)
  - *See Chapter 4.1 of Annex 8*

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