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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 27 March 2026: Call for comments

Following the WPE meeting on 27 March 2026, delegations are invited to send their comments and drafting suggestions on clusters 2 and 3 of the proposal, as set out in ST 17010/25 + ADD 1.

Contributions are to be submitted by **Friday, 17 April 2026 cob, via the consultation to be launched in the Delegates Portal.**

Delegations are invited to upload their contributions on Delegates portal, in the table **in Word format**. In order to download the Word version of the table, delegations have to choose option “download ZIP”, open the file and select Word document entitled “Table For Comments on Amendment of the CO2 emission standards for cars and vans Regulation” .

Delegations can only include text in the 2nd column ‘comments and drafting suggestions', while the structure of the table, including number of rows and columns should not be modified, in order to ensure compatibility of the comments.

For any technical issues, please contact the support team at delegates.support@consilium.europa.eu.

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.

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Guidelines to be followed

Please kindly provide your contributions in the table below.

Drafting suggestions: you may use '**track changes**'* or formatting (for example **bold-underline** for additions and ~~strike-through~~ for deletions, **where necessary, in a different colour**). *Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted.**

New provisions may only be added in any of the **'existing cells'.**

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments on … .docx**

Thank you for your cooperation!

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GENERAL COMMENTS	
RECITALS	
(5) Light commercial vehicles are purchased and used in a professional context. For some specific use cases there may be short-term barriers to the deployment of zero-emission vehicles in that segment. It is therefore appropriate to adjust the 2030 CO_2 emissions target for those vehicles to support continued manufacturers' ability to invest, in particular in the transition towards zero-emission vehicles.	
(6) Fostering the development and production of small electric cars made in the EU will ensure affordability and access to clean mobility for consumers and enhance the competitiveness and sustainability of the European automotive sector. It is therefore appropriate to incentivise development of small electric cars made in the EU by providing incentives in the form of	

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	CO_2 credits for manufacturers that place such vehicles on the Union market.	
(7)	While it is essential that the CO_2 emission targets continue to incentivise the transition towards zero-emission mobility and create certainty and predictability for such investments, a lack of regulatory flexibility may create difficulties for vehicle manufacturers where it limits their compliance options. It is therefore appropriate to support a technology-neutral approach by providing for regulatory flexibilities for non-zero-emission technologies.	
(8)	In order to provide additional flexibilities, during the period 2030 to 2032, manufacturers should ensure that the average specific emissions of CO_2 of their vehicles do not exceed an emissions target, calculated as the average of their annual specific emissions targets over the period. Compliance with the targets should be assessed at the end of the period for each individual manufacturer. The excess emission premiums should be calculated accordingly.	
(9)	The fleet-wide emissions reduction target as from 2035 is reduced from 100% to 90%, provided that the remaining emissions are compensated by the use of low-carbon steel credits or sustainable renewable fuel credits..	
(10)	The use of low-carbon steel credits and sustainable renewable fuel credits should be capped in order to preserve investments in the zero-emission value-chain. By allowing to compensate emissions up to 10% of the EU fleet-wide target of 2021 as from 2035, these credits, combined with the 90% emissions reduction target, support the overall climate neutrality objective.	
(12)	It is appropriate to allow for a recognition of emissions savings from sustainable renewable fuels in the CO_2 standards, to provide further flexibilities for manufacturers and support investments in the development	

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	of the sustainable renewable fuel value chain. Such fuels will continue to play a role in the decarbonisation of transport. In order to support innovative technologies, the current framework under Directive (EU) 2018/2001 includes binding targets for advanced biofuels in transport. Progress in its implementation is made albeit slow. A review of the Directive (EU) 2018/2001 is planned for end 2026 assessing the progress made and the need for an update of the future bioeconomy framework.	
(13)	The promotion of low-carbon steel is essential to achieve the Union's climate objectives while strengthening its industrial competitiveness and strategic autonomy. As the automotive sector is a key user of steel, it is appropriate to incentivise the use of low-carbon steel in vehicle production to create a lead-market. Hence, to compensate, after 2035, the CO_2 emissions of their new vehicles, which have not already been compensated by the use of sustainable renewable fuels, manufacturers should be able to use made in the EU low-carbon steel credits.	
(14)	To provide more certainty to light commercial vehicle manufacturers, a technical adjustment should be provided to the formula that adjusts the specific emissions target of a manufacturer depending on the average test mass of the EU fleet.	
(21)	In order to set up methodologies for determining the criteria for a car to be considered 'made in the EU', for steel to be considered low carbon and amend the Annex related to vehicle labelling, the power to adopt acts in accordance with Article 290 of the Treaty on the Functioning of the European Union should be delegated to the Commission to take into account technological and legislative developments, as well as developments relating to consumer information. It is of particular importance that the Commission carry out appropriate consultations during its preparatory work, including at expert level, and that those consultations be conducted in accordance with the principles laid down in the	

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Interinstitutional Agreement of 13 April 2016 on Better Law-Making. In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council receive all documents at the same time as Member States' experts, and their experts systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.	
(22) In order to ensure uniform conditions for the implementation of this Regulation, implementing powers should be conferred on the Commission in relation to establishing the detailed rules and procedures for the monitoring and reporting by manufacturers of all the necessary data for the calculation of the low-carbon steel credits and the operational details of the product database for the vehicle labelling. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council.	
ARTICLES	
Article 1 *Amendments to Regulation (EU) 2019/631*	
Regulation (EU) 2019/631 is amended as follows:	
(1) **Article 1** is amended as follows:	
(a) in paragraph 5, point (b) is replaced by the following:	
"(b) for the average emissions of the new light commercial vehicles fleet, an EU fleet-wide target equal to a 40% reduction of the target in 2021 determined in accordance with point 6.1.2 of Part B of Annex I.";	
(b) paragraph 5a is replaced by the following:	
"From 1 January 2035, the following EU fleet-wide targets shall apply:	

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(a) for the average emissions of the new passenger car fleet, an EU fleet-wide target equal to a 90% reduction of the target in 2021 determined in accordance with Part A, point 6.1.3, of Annex I;	
(b) for the average emissions of the new light commercial vehicles fleet, an EU fleet-wide target equal to a 90% reduction of the target in 2021 determined in accordance with Part B, point 6.1.3, of Annex I.”;	
(4) **Article 4** is amended as follows:	
(a) in paragraph 1 point (c), the following text is added:	
“In addition, starting from 2035, the manufacturer shall also ensure that its average specific emissions of CO_2 do not exceed the sum of its fuel credits as referred to in Article 5a, and its low-carbon steel credits as referred to in with Article 5b.”;	
(b) paragraph 1a is replaced by the following:	
“1a. By way of derogation from paragraph 1, for the periods comprising the calendar years 2025 to 2027 and the calendar years 2030 to 2032, a manufacturer, including when it is a member of a pool, shall ensure that its average specific emissions of CO_2 over these periods do not exceed its specific emissions target over these periods.	
Those average specific emissions of CO_2 shall be calculated as the average over the period concerned of the annual average specific emissions of CO_2 weighted according to the number of newly registered vehicles for the manufacturer in each calendar year.	
The specific emissions target shall be calculated as the average over the period concerned of the annual specific emissions targets determined in accordance with point 6.3 of Part A or Part B of Annex I or, where a manufacturer is granted a derogation under Article 10, in accordance with that derogation, weighted	

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according to the number of newly registered vehicles for the manufacturer in each calendar year.	
For each calendar year in which a manufacturer was included in a pool, the annual average specific emissions of CO_2 and the annual specific emissions target to be used for those calculations shall be the values for that pool.”;	
(5) **Article 5** is replaced by the following:	
“*Article 5* *Super credits for small zero-emission vehicles*	
1. Until 2034, for the purpose of calculating a manufacturer’s average specific emissions of CO_2, each new zero-emission vehicle of category M1 identified as small electric vehicle in line with point 2.4 of Part A of Annex I to Regulation (EU) 2018/858 and made in the EU shall be counted as 1.3 vehicles.	
2. For each calendar year, each Member State shall record and transmit to the Commission, as part of its obligations in line with Article 7, for each new zero-emission vehicle of category M1 whether or not it is identified as small electric vehicle in line with point 2.4 of Part A of Annex I to Regulation (EU) 2018/858 and it is made in the EU as well as the value of the parameters determining such compliance.	
3. The Commission is empowered to adopt delegated acts in accordance with Article 17 in order to supplement this Regulation by setting up a methodology for determining the criteria for a car to be considered ‘made in the EU ’.	
4. Paragraph 1 shall not apply to manufacturers that formed a pool, unless all the manufacturers included in the pool are part of the same group of connected manufacturers.”;	
(6) the following **Articles 5a** and **5b** are inserted:	

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"Article 5a *Role of sustainable renewable fuels*	
1. Starting from 2035, the Commission shall calculate, for each manufacturer, fuel credits based on the greenhouse gas emission savings achieved by the use of the fuels referred to in paragraph 2, as determined in accordance with point 7 of Parts A and B of Annex I, to compensate emissions from new passenger cars and new light commercial vehicles registered in the calendar year. These fuel credits shall be calculated taking into account the quantity of such fuels placed on the Union market for road transport and their greenhouse gas emissions intensity, as calculated according to Article 29a and 31 of Directive (EU) 2018/2001 and as reported in the Union Database established pursuant to Article 31a of that Directive, the share of road transport fuel used in passenger cars and light commercial vehicles, the average lifetime mileage of the vehicles, and the number of vehicles registered.	
2. The eligible fuels shall be renewable fuels of non-biological origin (RFNBOs) as defined in Article 2(36) of Directive (EU) 2018/2001 and fulfilling the criteria set out in Article 29a of that Directive, biofuels, as defined in Article 2(33) of that Directive, and biogas, as defined in Article 2(28) of that Directive, both produced from feedstock listed in Annex IX to that Directive and fulfilling the criteria set out in Article 29 of that Directive.	
3. The credits from all fuels referred to in paragraph 2 shall not reduce the average specific emissions of CO_2 of a manufacturer by more than 3% of the EU fleet-wide $target_{2021}$ as set out in point 6.0 of Annex I Parts A and B.	
The credits from the quantities of biofuels and biogas produced from feedstock listed in Part B of Annex IX to Directive (EU) 2018/2001 shall not reduce the average specific emissions of CO_2 of a manufacturer by more than 1% of the EU fleet-wide $target_{2021}$ as set out in point 6.0 of Annex I Parts A and B.	

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4. Paragraph 1 shall not apply to manufacturers that formed a pool, unless all the manufacturers included in the pool are part of the same group of connected manufacturers.	
Article 5b *Role of low-carbon steel*	
1. Starting from 2035, a manufacturer shall obtain credits for low-carbon steel made in the EU ('low-carbon steel credits') to compensate emissions from new passenger cars and new light commercial vehicles registered in the calendar year.	
2. Paragraph 1 shall not apply for those vehicles whose contribution to the average emissions is covered by Article 5a.	
3. Low-carbon steel credits shall be calculated taking into account the quantity and the CO_2 emissions intensity, calculated according to the methodology as set out in accordance with paragraph 6, of the low-carbon steel made in the EU used in the manufacturer's new passenger cars or new light commercial vehicles registered in the Union in the calendar year, the number of vehicles registered in the calendar year, and the lifetime mileage of the vehicles, in accordance with point 7 of Parts A and B of Annex I.	
4. Low-carbon steel credits shall not decrease the average specific emissions of CO_2 of a manufacturer by more than 7% of the EU fleet-wide $target_{2021}$ as set out in point 6.0 of Annex I Parts A and B.	
5. The Commission shall specify, by means of implementing acts, the detailed rules and procedures for the monitoring and reporting by manufacturers of all the necessary data for the calculation of the low-carbon steel credits. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2).	
6. The Commission is empowered to adopt delegated acts in accordance with Article 17 in order to supplement this Regulation by setting up a methodology for	

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determining the characteristics of the low carbon steel and the CO_2 emissions intensity of the steel and of the baseline steel as a reference point for the calculation for the low-carbon steel credits.	
7. Paragraph 1 shall not apply to manufacturers that formed a pool, unless all the manufacturers included in the pool are part of the same group of connected manufacturers.”;	
(7) in **Article 6**, paragraph 2, last sentence is replaced by the following:	
“By way of derogation from the first subparagraph, an agreement to form a pool covering the calendar year 2025 or 2026 may be entered into up to 31 December 2027, an agreement to form a pool covering the calendar year 2030 or 2031 may be entered into up to 31 December 2032.’	
(9) **Article 8** is amended as follows:	
(a) in paragraph 1, the second subparagraph is replaced by the following:	
“By way of derogation from the first subparagraph, with respect to the calendar years 2025 to 2027, and 2030 to 2032, the Commission shall impose an excess emissions premium on any manufacturer whose average specific emissions of CO_2 over the period exceed its specific emissions target over that period.”;	
(b) the following paragraph (5) is added:	
“By way of derogation from paragraphs 1 and 2, for each calendar year starting from 2035, the Commission shall impose an excess emissions premium on a manufacturer or pool manager, as appropriate, where a manufacturer's average specific emissions of CO_2 exceed its specific emissions target or its average specific emissions of CO_2 exceed the sum of its fuel credits as referred to in Article 5a, and its low-carbon steel credits as referred to in Article 5b.	
The excess emissions premium shall be calculated using the following formula:	

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(average specific emissions of CO_2 – (fuel credits + low-carbon steel credits)) × EUR 95) × number of newly registered vehicles.		
In the above calculation the sum of fuel credits and low-carbon steel credits cannot exceed 10% of the EU_{2021} target”;		
ANNEX		
Annex I is amended as follows:		
(a) in Part A, the following point 7 is added:		
“7. Fuel credits and low carbon steel credits.		
7.1. Low carbon steel credits		
Low-carbon steel credits = $GHGsavings_{low\text{-}carbon\ steel}$ [$kgCO_2$/t steel] * quantity of low carbon steel made in the EU used in passenger cars by the manufacturer in the calendar year [t] / (newcars * mileage) Taking into account all the rules defined in Article 5b		
where:		
$GHGsavings_{low\text{-}carbon\ steel}$	is the CO_2 emission intensity of the baseline steel – average CO_2 emission intensity of the low-carbon steel made in the EU used by a manufacturer in passenger cars [kg CO_2 / t steel] in the calendar year	
newcars	is the number of new passenger cars registered, the manufacturer is responsible for, in the calendar year	
mileage	is the average lifetime mileage of passenger cars, which is set at 240 000 [km]	

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7.2. Fuel credits		
fuel credits	is the sum for all of the eligible fuels referred to in Article 5a(2) of: $$Q_{fuel} * GHGsavings * \frac{fuelsharecars}{newcars * mileage}$$ Taking into account all the rules defined in Article 5a	
where:		
Qfuel	is, for each fuel, the energy quantity put on the Union market for the road transport sector, as reported in the Union Database established pursuant to Article 31a of Directive (EU) 2018/2001 [MJ]	
GHGsavings	is, for each fuel, the difference between the fossil fuel comparator and the greenhouse gas emission intensity of the fuel as reported in the Union Database established pursuant to Article 31a of Directive (EU) 2018/2001 [g CO_2e/MJ]	
fossil fuel comparator	is as defined in point 19 of Part C of Annex 5 to Directive (EU) 2018/2001 for biofuels, in point 19 of Part B of Annex 6 to that Directive for biogas, and in point 2 of part A of the Annex to Commission Delegated Regulation (EU) 2023/1185 for renewable fuels of non-biological origin	
fuelsharecars	is the total quantity of fuels used by passenger cars, as a proportion of the total quantity of fuels used in road transport in the Union, as published in the Union greenhouse-gas inventory, in accordance with Article 26 of Regulation (EU) 2018/1999 of the European	

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	Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action (the 'Governance Regulation')	
newcars	is the number of new passenger cars registered	
mileage	is the average lifetime mileage of passenger cars, which is set at 240 000 [km]	
For the parameters Qfuel, GHGsavings, fuelsharecars and newcars, the data to be used are those for the calendar year two years prior to the target year or, where that data is not available, for the most recent calendar year for which data is available. "		
(b) in Part B, point 6.3.1., row "$ø_{targets}$" is replaced by the following:		
"		
$ø_{targets}$	is the average, weighted on the number of new light commercial vehicles of each individual manufacturer registered in 2024, of all the specific emissions reference targets determined in accordance with point 6.2.1 but for which TM and TM0 are calculated on the basis of the test mass of the vehicles registered in 2024;	
"		
(c) in Part B, point 6.3.2., row "$ø_{targets}$" is replaced by the following:		
"		
$ø_{targets}$	is the average, weighted on the number of new light commercial vehicles of each individual manufacturer registered in 2028, of all the specific emissions	

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	reference targets determined in accordance with point 6.2.2 but for which TM and TM0 are calculated on the basis of the test mass of the vehicles registered in 2028 ;	
“		
(d) in Part B, point 6.3.3., row “$ø_{targets}$” is replaced by the following:		
“		
$ø_{targets}$	is the average, weighted on the number of new light commercial vehicles of each individual manufacturer registered in 2033, of all the specific emissions reference targets determined in accordance with point 6.2.3 but for which TM and TM0 are calculated on the basis of the test mass of the vehicles registered in 2033;	
“		
(e) in Part B, the following point 7 is added:		
“7. Fuel credits and low carbon steel credits.		
7.1. Low carbon steel credits		
Low-carbon steel credits = $GHGsavings_{low\text{-}carbon\ steel}$ [$kgCO_2$/t steel] * quantity of low carbon steel made in the EU used in light commercial vehicles by the manufacturer in the calendar year [t] / (newvans * mileage) Taking into account all the rules defined in Article 5b		
where:		

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$GHGsavings_{low\text{-}carbon\ steel}$	is the CO_2 emission intensity of the baseline steel – average CO_2 emission intensity of the low-carbon steel made in the EU used by a manufacturer in light commercial vehicles [kg CO_2 / t steel] in the calendar year	
newvans	is the number of new light commercial vehicles registered, the manufacturer is responsible for, in the calendar year	
mileage	is the average lifetime mileage of light commercial vehicles, which is set at 300 000 [km]	
7.2. Fuel credits		
fuel credits	is the sum, for all of the eligible fuels referred to in Article 5a(2), of: $$Q_{fuel} * GHGsavings * \frac{fuelsharevans}{newvans * mileage}$$ Taking into account all the rules defined in Article 5a	
where:		
Qfuel	is, for each fuel, the energy quantity put on the Union market for the road transport sector, as reported in the Union Database established pursuant to Article 31a of Directive (EU) 2018/2001 [MJ]	
GHGsavings	is, for each fuel, the difference between the fossil fuel comparator and the greenhouse gas emission intensity of the fuel as reported in the Union Database established pursuant to Article 31a of Directive (EU) 2018/2001 [g CO_2e/MJ]	

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fossil fuel comparator	is as defined in point 19 of Part C of Annex 5 to Directive (EU) 2018/2001 for biofuels, in point 19 of Part B of Annex 6 to that Directive for biogas, and in point 2 of part A of the Annex to Commission Delegated Regulation (EU) 2023/1185 for renewable fuels of non-biological origin	
fuelsharevans	is the total quantity of fuels used by light commercial vehicles, as a proportion of the total quantity of fuels used in road transport in the Union as published in the Union greenhouse-gas inventory, in accordance with Article 26 of Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action (the 'Governance Regulation')	
newvans	is the number of new light commercial vehicles registered	
mileage	is the average lifetime mileage of light commercial vehicles, which is set at 300 000 [km]	
For the parameters Qfuel, GHGsavings, fuelsharevans and newvans, the data to be used are those for the calendar year two years prior to the target year or, where that data is not available, for the most recent calendar year for which data is available. "		
Annex II is amended as follows:		
(a) in Part A (1a), the following points (22) and (23) are added:		
"(22) Length"		

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	"(23) 'Made in the EU';"		
(b)	in the table in Part B, Section 2A, the following rows (22) and (23) are added:		
"			
(22)	Length	5	
(23)	Made in the EU		
"			

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