Council of the European Union
General Secretariat

Interinstitutional files:
2025/0420 (COD)

Brussels, 20 January 2026

WK 863/2026 INIT

LIMITE

CLIMA
ENV
TRANS
MI
CODEC

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

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 13 January 2026: Comments from delegations

Following the call for comments on the above set out in WK 492/26 of 14 January 2026, delegations will find attached comments from BE, CZ, DK, EE, ES, IT, NL and FI.

BELGIUM

Written comments and questions from Belgium on the CO2 standards for cars and vans proposal presented during the Working Party Environment of 13 January 2026

1. The impact assessment examined various policy options with respect to CO_2 emission targets, flexibilities, financial support via use of fines and vehicle labelling. Based on this assessment, a preferred combination of options was selected. However, 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. For example:

    a. The preferred option for the targets was to maintain the 100% target for 2035, but it has now been set at 90% from 2035 onwards (with no end date);

    b. The preferred option for fuels was to allow VEEF on sustainable renewable fuels (SRF) from 2035, but now the Commission has included a system whereby manufacturers receive credits for the use of SRF, even including for the use of biofuels;

    c. None of the options considered for off-vehicle charging hybrid electric vehicles (OVC-HEV) have been retained;

    d. The Commission has introduced an additional multi-annual compliance assessment for the period 2030-2032, whereas this option was disregarded in the impact assessment;

    e. The preferred option of allocating received fines to the Social Climate fund has not been retained (nor the other option of allocating fines to the Innovation Fund). The amounts of the fines remain revenue for the EU general budget.

2. The impact of the considered options and proposed amendments on air quality has not been evaluated. The impact assessment does not include any quantification or other information on the extent to which the Commission 's proposal may affect the achievement of the revised 2030 air quality targets (in particular for NOX in cities), nor on the extent to which the proposal is coherent with the achievement of the EU zero pollution vision for 2050 (reducing pollution to levels that are no longer considered harmful to health and natural ecosystems) and the new WHO AQ guidelines. In particular, the reduced target for vans for 2030, the use of super credits for small e-cars without any cap until 2034 and the reduced targets for cars and vans for 2035 could have a negative impact on air quality, particularly in cities (e.g. urban distribution by vans). According to ICCT's analysis of the proposal the share of

electric vehicles by 2050 could drop to somewhere between 80% and 90%, still leaving a high share of combustion engines (emitting NOX and other pollutants). How does the Commission reconcile its proposal to revise the CO_2 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, given that the Euro 7 NO_X limits for petrol and diesel vehicles have not been tightened further compared to the Euro 6 NO_X limits and that vehicles running on SRF and therefore emitting NO_X will still be permitted after 2050.

3. The new fleet composition in the baseline (see table 2 of the impact assessment report SWD(2025) 1058 final, page 38) includes a 60% share of ZEV for cars and a 50% share of ZEV for vans. This baseline corresponds to achieving the current CO2-reduction targets of respectively -55% CO2 for new cars and -50% for new vans. Why do these 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 (see table 4 of the impact assessment report SWD(2021) 631 final, page 35)? The ZEV shares for 2030 corresponding to a CO2 reduction target of -55% for cars and -50% for vans in this previous impact assessment report were 41% and 35,4% respectively, significantly lower than what is now assumed.

4. To stimulate sales of affordable small electric cars manufactured in the EU, super credits with a multiplication factor of 1.3 are awarded for the calculation of the manufacturer's average specific CO2 emissions. Has the Commission considered other mechanisms to stimulate sales of small electric cars? The disadvantage of the super-credit-system is that it lowers the applicable CO2-reduction target from the sale of one small e-car, whereas, for example, a benchmark mechanism requires a certain threshold to be reached first. 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)? The proposed super-credit system for small e-cars would allow manufacturers to sell more or higher polluting combustion engine vehicles, resulting in higher average emissions when considering the unadjusted (actual) CO_2 emissions. In practice, this could significantly undermine the applicable CO2 reduction targets by several percentage points.

5. The Effort Sharing Regulation sets a national target for each EU Member State for reducing greenhouse gas emissions by 2030 in domestic transport, buildings, agriculture, small industry and waste. The revised ESR of 2023 has set new national targets to achieve an EU collective 40% reduction in emissions compared to 2005 in the sectors covered by the ESR. The ESR also includes annual emission limits per Member State for the years 2021 to 2030. The Commission's proposal to weaken the CO_2 targets for both passenger cars and vans, including the introduction of additional flexibility, will delay the uptake of zero-emission vehicles and allow manufacturers to postpone their efforts to reduce CO_2 emissions, leading to additional CO_2 emissions, including in the period up to 2030 (e.g. due to a lower reduction target for vans and the introduction of a super-credit system for small e-cars). The lower CO_2 emission

reductions by manufacturers of passenger cars and vans in the years up to 2030 will have to be offset by other (national) measures in the transport sector or in other ESR sectors, such as buildings or agriculture. There is little time to develop and implement compensatory measures quickly in order to remain on track with the annual emission limits on the path to the ESR reduction target for 2030. Has the Commission taken into account in any way the risk that the 40 % ESR target for 2030 will not be achieved? Has the Commission foreseen any measures to compensate for this, so that member states are able to comply with their ESR targets? It should also be noted that the proposed offsetting of CO_2 emissions through credits for low carbon fuels and steel will only start in 2035 and at the expense of car manufacturers' contributions to the future ESR target since the steel industry is covered by the ETS and SRFs are already counted in the RED.

6. 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..

7. E-fuel credits will be calculated based on the amount of e-fuels placed on the market for road transport in a given year. As a result, vehicle manufacturers will be rewarded for the efforts of fuel suppliers (see impact assessment Annex 8) in the context of compliance within the RED without having to bear the cost for it which means the 3% offset is not really compensating for the lowering of the 2035 target.

8. What will be the combined impact of the proposed flexibilities on the competitive advantage of first movers? What is the Commission's assessment of the impact on the competitiveness of European car makers in general?

9. 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 CO2 emissions depending on how the plug-in hybrid is used?

CZECH REPUBLIC

Written comments and questions by the Czech Republic on the Proposal amending Regulation (EU) 2019/631 as regards CO2 emission performance standards for new light duty vehicles and vehicle labelling and repealing Directive 1999/94/EC, 19. 1. 2026

1. 2030 - Flexibility for Passenger Cars

- 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?
- 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?
- 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?
- 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?

2. Technology neutrality - Plug-in hybrid electric vehicles, Utility Factor and CNF-only vehicles

- 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?
- 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?

- 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?
- 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?
- 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?
- 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?

3. 2035 – Renewable fuels and green steel credits

- 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?
- 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? Why is there a limit of 1% for the biofuels from Part B of Annex IX?
- When does the Commission expect to adopt the delegated act defining green steel made in Europe (steel produced with significantly reduced greenhouse gas emissions), and how does it ensure sufficient availability and affordability of such steel by 2035? Why was the ration 3/7% chosen for renewable fuels/green steel? How will the consistency with Industrial Accelerator Act in terms of "made in EU" condition be ensured?
- In this context, what percentage of non-battery electric vehicles does the Commission expect in new vehicle registrations after 2035?

4. Light Commercial Vehicles

- 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 %?
- How does the Commission assess whether the proposed flexibilities for LCVs sufficiently reflect their specific duty cycles and customer constraints?

DENMARK

Questions regarding the
Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) 2019/631 as regards CO2 emission performance standards for new light duty vehicles and vehicle labelling and repealing Directive 1999/94/EC

- Renewable fuels: How will the inclusion of renewable fuels in the CO2-standards drive more investment in the production of renewable fuels?
- Renewable fuels: Do the manufacturers need to do something to earn the renewable fuels credits or will they be allocated to the manufacturer?
- Renewable fuels: How does the proposal ensure that the emissions savings from renewable fuels are not double counted (both in this regulation and in ETS2)?
- Renewable fuels: Why is "newcars" defined differently in the annex 7.1 and 7.2?
- Low Carbon steel: How does the proposal ensure that the emissions savings from low carbon steel are not double counted (both in this regulation and in the ETS1)?
- Renewable fuels and low carbon steel: What is the reasoning behind not letting pools use the credits from renewable fuels and low carbon steel?
- 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?
- Small cars: What is the share of small electric cars in the current sale of EVs in Europe?
- 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.
- Vehicle labelling: How will Member States' market surveillance authorities enforce article 15a 4. which only relates to the Commission's product database?
- Vehicle labelling: What is considered 'undue delay' with regards 15a 4.?

_____

ESTONIA

Questions regarding the CO2 standards amendment

- *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?*
- *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?*
- *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?*
- *Has the Commission also considered potential effects on the second-hand electric vehicle market and the second-hand market distributional impacts across Member States?*
- *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?*

SPAIN

Amendment of light-duty vehicles Regulation

Questions to the Commission on the proposed Regulation:

1. 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?

2. 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?

3. Based on the impact assessment results, the regulation amendment proposal poses two risks:

    - Non-compliance with the 2030 climate targets regarding transport decarbonisation.

    - Non-compliance with energy efficiency targets.

    Both objectives represent a major challenge for the EU, and according to the evaluation of European NECPs, there are risks of non-compliance. Therefore, reducing these objectives only worsens this outlook, considering that the transport sector is the largest emitter of greenhouse gases in the UE. Has the Commission made an assessment on how will this impact in the 2030 climate and energy efficiency targets?

4. Has the commission carried out an analysis of the impact on compliance with the ESR objectives?
5. 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? 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?

6. 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?

7. 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?

8. 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?

9. In the consolidated version shared by the Commission, article 5.a, paragraph 3 established a limitation of 1% to reduce the average specific emissions of CO2 of a manufacturer for Part B of Annex IX to Directive (EU) 2018/2001. 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?

Questions regarding the Impact Assessment:

1. The Regulatory Scrutiny Board report requests a review of the IA. When does the Commission plan to expand the impact analysis report?

2. 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?

3. The IA states that ICE efficiency is much lower than BEV efficiency. Has the Commission calculated the impact of the increase in ICE on the EU energy efficiency target?

4. Has the COM accounted or studied the potential availability of raw materials for fuel production, considering that their demand is expected to increase due to their use not only in aviation and maritime transport but now also in road transport? Has the Commission considered allocating the available resources to these hard-to-abate sectors instead of road transport? 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?

ITALY

Proposal for a Regulation amending Regulation (EU) 2019/631 as regards CO2 emission performance standards for new light-duty vehicles

Preliminary remarks by IT and questions for the European Commission

Critical Issues:

1. The Commission's proposals remain within a framework that *de facto* does not embrace the principle of **technological neutrality**, as also referenced in the European Climate Law amendment for the target 2040.
2. The 2035 target remains unchanged, and there is no mention of revising the emission calculation methodology.
3. 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.
4. The opening for renewable fuels linked solely to **PHEVs** (Plug-in Hybrid Electric Vehicles) is necessary but insufficient in its proposed form. These fuels must be permitted for all types of engines, ensuring that all vehicles sold can contribute immediately to achieving targets through compensated quotas.
5. The focus on **commercial vehicles** is necessary but must be accompanied, in this case as well, by a more incisive technologically neutral strategy.
6. It is maintained that all currently existing technologies, as well as those that may become available in the future, should be permitted in the decarbonization process and in the calculation toward shared objectives.
7. **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.
8. Regarding the new category of **small European electric cars (M1)**, a length of 4.2 meters is not considered appropriate for a "small" vehicle; rather, it describes a medium-sized car or a small-to-medium SUV. Furthermore, this length includes vehicles currently in production, specifically favoring certain manufacturers. The spirit of the initiative was to promote a city car of 3.7–3.8 meters, ideally powered by a "multi-energy" approach rather than exclusively electric.
9. The transition significantly impacts the evolution of the **refining sector**, which provides essential inputs to other industries. **Investment certainty** for transforming existing plants into biorefineries is vital to guarantee sufficient output for all road transport needs (not just heavy-duty) and for the strategic independence of key sectors like chemicals.
10. There is a need to follow the same approach of bringing forward the review of the regulation—with a technologically neutral and non-punitive vision (according to current targets)—also for the **heavy-duty vehicle** sector, which

is currently much further behind in the transition process compared to cars and light commercial vehicles.

Questions for the European Commission:

1. Does the European Commission plan to **revise the emission calculation method**?
2. Why was the choice made not to move to an **LCA (Life Cycle Assessment)** calculation method, despite requests from many countries?
3. 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?
4. How will it be ensured that there is a **sufficient supply of European low-carbon steel** to meet manufacturers' production capacity?
5. How will the Commission intend to follow through the commitment on the long-awaited definition of **carbon-neutral fuels**?
6. 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 ?
7. 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)**?
8. In what way has the Commission analysed the climate effects stemmig 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**?
9. How will **"Made in Europe"** be practically implemented for both small European cars and European low-carbon steel?
10. In what way will supplier supply chains be protected?
11. How will the definition of "green steel" in the CO2 Standards Regulation relate to the definitions in the Industrial Accelerator Act and the Ecodesign for Sustainable Products Regulation (ESPR)?
12. Are there plans to **further modify the trajectory** of CO2 emission limits?
13. Could the Commission specify which criteria were used to define **4.2 meters** as the length parameter for the new M1 category?
14. Is the European Commission considering **bringing forward the review of Regulation 2019/1242** on heavy-duty vehicles?

NETHERLANDS

Initial written comments on revision CO2-emission standards for cars and vans - WPE
Since the Netherlands is still developing its final position, a scrutiny reservation remains. Attached are also preliminary comments and questions related to the proposal and impact assessment for the vehicle label.

1. Emission reduction target for 2035 for cars and vans

- 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? 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? 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?
- 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?
- 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%?

2. Emission reduction target for vans in 2030

- 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 batter-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?

3. Super credits for small electric cars

- 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?

- What have been the considerations of the Commission to base the vehicle category on length (<4.2m) rather than surface area (including both length and width)?

4. Impact assessment

- The combination of measures from Impact Assessment do not match the combination of measures in the proposal from the Commission. Does the Commission have sufficient insights in the combined effects of the proposed measures?
- 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%?

FINLAND

Written questions by Finland on the Commission proposal on CO2 standards for light-duty vehicles and vehicle labelling

Finland is still scrutinising the proposal and at this point our comments are preliminary. We would also welcome further clarification on certain points in order to fully understand the implications.

General

- How does the proposal effect Member states achieving their national targets in the effort sharing sector in 2030?

Fuel 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%?
- 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?
- 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?

Scope

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.

The most important point from the Guidelines (4.7):
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 concerned.

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?

Vehicle labelling

We have no official position on Vehicle labelling yet, but as a first reaction we are pleased that the Commission has presented a proposal on the new car- labelling rules, as the current directive is out of date. Here are our current main questions regarding the proposal:

Question regarding vehicle model data:

- 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?

Explanation: We have concerns regarding the usefulness of the proposed vehicle-model-based data and the product database, as the range of emissions or consumption values would be considerably broad on vehicle model or engine family level. Instead, we welcome Article 15a(2) and the inclusion of OEMs' configurators in the scope. From a technical point-of-view, we consider that OEMs are the parties who possess the necessary consumption and emission data for new vehicles. Member States can provide data on registered vehicles, but not on vehicles that are marketed as new.

Questions regarding made-in-EU information:

- 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?

Question regarding the label:

- How often would the thresholds A–G or other information/criteria of the vehicle label be updated?