eurelectric
powering people

European Commission proposal for a Regulation setting emission performance standards for new cars and vans

Eurelectric amendments

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

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

We stand for

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

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

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

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

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

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

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

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

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Electro-mobility WG

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Introduction

Europe is at a crucial moment in time, where in order to deliver on the Paris Agreement the transport sector has to drastically increase emission reduction efforts. Emissions from transport are both in absolute and in relative terms higher than in 1990.

Electrification is one major driver to reduce greenhouse gas emissions and energy consumption in road transport. Electrified transport will have to be integrated in the wider power system. If this is done well, electric vehicles can provide a valuable resource for the power system, while improving energy efficiency and air quality (and thus public health). With electrified transport, cities are also one step further on their journey to smart cities.

The power sector is ready to become a key enabler for the transport sector to reduce emissions drastically with the help of decarbonized electricity. We are committed to becoming carbon - neutral well before 2050. Regulatory frameworks which enable zero emission mobility to develop are needed now to drive this transition.

CO2 standards for cars and vans have proven to be very effective since their introduction in 2008 in lowering emissions from passenger cars. According to the European Commission CO2 standards have been the cause for 65% to 85% of the emission reductions achieved since 2010 concerning passenger cars. These standards also delivered emission reductions at much lower costs than initially assumed – manufacturers achieved the standards for 2015 with less than 20% of the initially estimated costs for cars and for less than 12% of the expected costs for vans.

The amendments presented below are tackling the key shortcomings of the Commission's proposal and seek to move Europe toward a trajectory in which the transport sector can successfully play it's part in achieving the EU's ambitions for the Paris Agreement.

Amendment Proposals

Amendment 1

Text proposed by Commission	*Amendment proposal by Eurelectric*
Article 1 – Subject matter and objectives	
[…]	[…]
4. From 1 January 2025 the following EU fleet-wide targets shall apply:	4. From 1 January 2025 the following EU fleet-wide targets shall apply:
(a) for the average emissions of the new passenger car fleet, an EU fleet-wide target equal to a 15% reduction of the average of the specific emissions targets in 2021 determined in accordance with point 6.1.1 of Part A of Annex I;	(a) for the average emissions of the new passenger car fleet, an EU fleet-wide target equal to ***at least 25%*** reduction of the average of the specific emissions targets in 2021 determined in accordance with point 6.1.1 of Part A of Annex I;
(b) for the average emissions of the new light commercial vehicles fleet, an EU fleetwide target equal to a 15% reduction of the average of the specific emissions targets in 2021 determined in accordance with point 6.1.1 of Part B of Annex I;	(b) for the average emissions of the new light commercial vehicles fleet, an EU fleetwide target equal to ***at least 25%*** reduction of the average of the specific emissions targets in 2021 determined in accordance with point 6.1.1 of Part B of Annex I;
5. From 1 January 2030 the following targets shall apply:	5. From 1 January 2030 the following targets shall apply:
(a) for the average emissions of the new passenger car fleet, an EU fleet-wide target equal to a 30% reduction compared to the average of the specific emissions targets in 2021 determined in accordance with point 6.1.2 of Part A of Annex I;	(a) for the average emissions of the new passenger car fleet, an EU fleet-wide target equal to ***at least 50%*** reduction compared to the average of the specific emissions targets in 2021 determined in accordance with point 6.1.2 of Part A of Annex I;
(b) for the average emissions of the new light commercial vehicles fleet, an EU fleetwide target equal to a 30% reduction of the average of the specific emissions targets in 2021 determined in accordance with point 6.1.2 of Part B of Annex I.	(b) for the average emissions of the new light commercial vehicles fleet, an EU fleetwide target equal to ***at least 50%*** reduction of the average of the specific emissions targets in 2021 determined in accordance with point 6.1.2 of Part B of Annex I.

Justification

Eurelectric is concerned that the ambition level proposed by the Commission is insufficient to drive decarbonisation of road transport at the necessary speed. In order to reach the goal of 60% EU transport sector emission reductions in 2050 (compared to 1990 levels), cars and vans will have to be completely decarbonised by 2050.

Eurelectric advocates for an increase of the annual emission reduction rate. In the current Regulation, the average emission reduction rate for cars is 5%, and for vans 5.5%. To reflect the needed ambition increase the reduction rate should be at least 7% for the period between 2021 and 2030.

Amendment 2

Text proposed by Commission	*Amendment proposal by Eurelectric*
Article 3 - Definitions	
[...]	[...]
(m) 'zero- and low-emission vehicle' means a passenger car or a light commercial vehicle with tailpipe emissions from zero up to 50 g CO2/km, as determined in accordance with Regulation (EU) 2017/1151.	(m) 'zero- and low-emission vehicle' means a passenger car or a light commercial vehicle with tailpipe emissions from zero up to ***25 gCO_2/km for passenger cars and from zero up to 40 g CO_2/km for light commercial vehicles***, as determined in accordance with Regulation (EU) 2017/1151.

Justification

The revision for the Clean Vehicles Directive sets much lower thresholds for clean vehicles (40 g CO_2/km for vans and 25 g CO_2/km for cars). The definition provided in this article for ZLEV should be aligned to the threshold proposed in the Clean Vehicles Directive.

Amendment 3

Text proposed by Commission	*Amendment proposal by Eurelectric*
	(new) Article 4a – ZLEV mandate
	The manufacturer shall ensure that a minimum 15% share of its annual sales is of zero and low-emission vehicles by 2025 and a minimum 30% share of its annual sales is of zero and low-emission vehicles by 2030.
	The Commission shall adopt implementing acts in accordance with this regulation in order to design flexible mandate that differentiates between zero and low-emission vehicles and allows trading among manufacturers. Moreover, it shall determine penalties to be applied to manufacturers failing to meet minimum shares.

Justification

It is not properly justified why the introduction of a mandatory quota for ZLEV has been discarded. The proposed regulation grants a premium (in terms of higher emission target) to those manufacturers outperforming a 15%/30% benchmark ZLEV sales share in 2025/2030, but it does not foresee a penalty for those manufacturers who underperform the benchmark. This results in an ineffective provision. In fact, according to the EC's Impact Assessment, the EC proposal would lead to a much lower EU ZLEV sales share than the benchmark in both reference years (20% share of ZLEV cars in 2030 while the incentive starts at 30%), which shows the inconsistence of the proposal.

A mandatory quota therefore should not be discarded but rather introduced in line with the incentive proposed.

Taking into consideration the difficulties to decarbonise both the shipping and aviation sectors, to achieve 60% GHG emission reduction in the transport sector overall as stated by the EU in 2011, we believe that road transport needs to be fully decarbonised by 2050. This means that all new cars and vans will need to be zero emissions by 2035/40.

Amendment 4

Text proposed by Commission	*Amendment proposal by Eurelectric*
Article 11 – Eco-innovation	
1. Upon application by a supplier or a manufacturer, CO2 savings achieved through the use of innovative technologies or a combination of innovative technologies (‘innovative technology packages’) shall be considered.	1. Upon application by a supplier or a manufacturer, CO2 savings achieved through the use of innovative technologies or a combination of innovative technologies (‘innovative technology packages’) shall be considered.
Such technologies shall be taken into consideration only if the methodology used to assess them is capable of producing verifiable, repeatable and comparable results.	Such technologies shall be taken into consideration only if the methodology used to assess them is capable of producing verifiable, repeatable and comparable results.
The total contribution of those technologies to reducing the average specific emissions of a manufacturer may be up to 7 g CO2/km.	The total contribution of those technologies to reducing the average specific emissions of a manufacturer may be up to 7 *g CO2/km*.
The Commission may adjust the cap with effect from 2025 onwards. Those adjustments shall be performed by means of delegated acts in accordance with Article 16.	***~~The Commission may adjust the cap with effect from 2025 onwards. Those adjustments shall be performed by means of delegated acts in accordance with Article 16.~~*** ***The eco-innovations contribution will end by 1 January 2025, when a new real-driving test shall apply, unless they get verified by means of this new test.***
[...]	[...]

Justification

Eurelectric is advocating for real-driving testing of CO2 emissions. If this is done, eco-innovations are not needed anymore.

Amendment 5

Text proposed by Commission	*Amendment proposal by Eurelectric*
Article 12 – Real world CO_2 emissions and energy consumption	
1. The Commission shall monitor and assess the real world representativeness of the CO_2 emission and energy consumption values determined in accordance with Regulation (EU) 2017/1151. It shall ensure that the public is informed of how that representativeness evolves over time.	1. The Commission shall monitor and assess the real world representativeness of the CO_2 emission and energy consumption values determined in accordance with Regulation (EU) 2017/1151. It shall ensure that the public is informed of how that representativeness evolves over time.
2. For that purpose, the Commission shall ensure the availability, from manufacturers or national authorities, as the case may be, of robust non-personal data on real world CO_2 emissions and energy consumption of passenger cars and light commercial vehicles.	2. For that purpose, the Commission shall ensure the availability, from manufacturers or national authorities, as the case may be, of robust non-personal data on real world CO_2 emissions and energy consumption of passenger cars and light commercial vehicles.
	3. The Commission should work on introducing a new real-driving emissions test cycle able to reflect real use conditions and to avoid any kind of laboratory uncertainties. The Commission should have it at hand at the latest for the next round of CO2 standards.
3. The Commission may adopt the measures referred to in this Article by means of implementing acts	~~*3.*~~ ***4.*** The Commission may adopt the measures referred to in this Article by means of implementing acts

Justification

Without a transition to Real Driving Emission test, in the light of previous non-compliance by the automotive industry (e.g. Dieselgate), a high uncertainty would remain on actual results that can be achieved by the sector as a whole.

Amendment 6

Text proposed by Commission	*Amendment proposal by Eurelectric*
Article 14 – Review and report	
[…]	[…]
2. The Commission shall take into account the assessments performed pursuant to Article 12 and may, where appropriate, review the procedures for measuring CO_2 emissions as set out under Regulation (EC) No 715/2007. The Commission shall, in particular, make appropriate proposals to adapt those procedures to reflect adequately the real world CO2 emissions of cars and light commercial vehicles.	2. The Commission shall take into account the assessments performed pursuant to Article 12 and may, ***accordingly,*** review the procedures for measuring CO_2 emissions as set out under Regulation (EC) No 715/2007. The Commission ***may***, in particular, ***adopt the measures to adapt*** those procedures to reflect adequately the real world CO2 emissions of cars and light commercial vehicles ***by means of implementing acts.***

Justification

The Commissions should already define what measures it takes when the gap widens beyond a defined limit.

Amendment 7

Text proposed by Commission	*Amendment proposal by Eurelectric*
Point 6.3 of Part A of Annex I	
The specific emissions target from 2025 onwards	The specific emissions target from 2025 onwards
Specific emissions target = specific emissions reference target . ZLEV factor	Specific emissions target = specific emissions reference target ***~~. ZLEV factor~~***
Where,	Where,
Specific emissions reference target is the specific emissions reference target of CO2 determined in accordance with point 6.2.2 for the period 2025 to 2029 and 6.2.2 for 2030 onwards	Specific emissions reference target is the specific emissions reference target of CO2 determined in accordance with point 6.2.2 for the period 2025 to 2029 and 6.2.2 for 2030 onwards
ZLEV factor is (1+y-x), unless tis sum is larger than 1.05 or lower than 1.0 in which case the ZLEV factor shall be set to 1.05 or 1.0 as the case may be	***~~ZLEV factor is (1+y-x), unless tis sum is larger than 1.05 or lower than 1.0 in which case the ZLEV factor shall be set to 1.05 or 1.0 as the case may be~~***
Where,	***~~Where,~~***
y is the share of zero- and low-emission vehicles in the manufacturer’s fleet of newly registered passenger cars calculated as the total number of zero- and low-emission vehicles, where each of them is counted as $ZLEV_{specific}$ in accordance with the formula below, divided by the total number of passenger cars registered in the relevant calendar year	***~~y is the share of zero- and low-emission vehicles in the manufacturer’s fleet of newly registered passenger cars calculated as the total number of zero- and low-emission vehicles, where each of them is counted as ZLEV_{specific} in accordance with the formula below, divided by the total number of passenger cars registered in the relevant calendar year~~***
$ZLEV_{specific} = 1 - (\frac{specific\ emissions}{50})$	$\cancel{\boldsymbol{ZLEV_{specific} = 1 - (\frac{specific\ emissions}{50})}}$
x is 15% in the years 2025 to 2029 and 30% in 2030 onwards.	***~~x is 15% in the years 2025 to 2029 and 30% in 2030 onwards.~~***

Justification

As of 2025, the proposed Regulation sets a specific emission target which is based on the share of low and zero-emission vehicles sales of each manufacturer. This means that if the manufacturer's sales percentage of zero-emission vehicles is over 15% in 2025 and 30% in 2030 it will earn a bonus in emission standards of a maximum of 5%, i.e. the vehicles produced by the manufacturer will be able to emit even more.

Consequently, we believe that the emission target on manufacturers should be kept removing the ZLEV factor. Instead a mandatory sales quota on manufacturers for zero-emission vehicles (ZEV) should be established.

Amendment 8

Text proposed by Commission	*Amendment proposal by Eurelectric*

Point 6.3 of Part B of Annex I

Specific emissions targets from 2025 onwards	Specific emissions targets from 2025 onwards
6.3.1 From 2025 to 2029	6.3.1 From 2025 to 2029
The specific emissions target = (specific emissions reference target – ($Ø_{targets}$ – EU fleet-wide $target_{2025}$)) . ZLEV factor	The specific emissions target = (specific emissions reference target – ($Ø_{targets}$ – EU fleet-wide $target_{2025}$))~~***. ZLEV factor***~~
Where,	Where,
Specific emissions reference target is the specific emissions reference target for the manufacturer determined in accordance with 6.2.1	Specific emissions reference target is the specific emissions reference target for the manufacturer determined in accordance with 6.2.1
$Ø_{targets}$ is the average, weighted on the number of newly registered light commercial vehicles of each individual manufacturer, of all the specific emissions reference targets determined in accordance with point 6.2.1	$Ø_{targets}$ is the average, weighted on the number of newly registered light commercial vehicles of each individual manufacturer, of all the specific emissions reference targets determined in accordance with point 6.2.1
ZLEV factor is (1+y-x), unless tis sum is larger than 1.05 or lower than 1.0 in which case the ZLEV factor shall be set to 1.05 or 1.0 as the case may be	~~***ZLEV factor is (1+y-x), unless tis sum is larger than 1.05 or lower than 1.0 in which case the ZLEV factor shall be set to 1.05 or 1.0 as the case may be***~~
Where,	~~***Where,***~~
y is the share of zero- and low-emission vehicles in the manufacturer's fleet of newly registered light commercial vehicles calculated as the total number of zero- and low-emission vehicles, where each of them is counted as $ZLEV_{specific}$ in accordance with the formula below, divided by the total number of light commercial vehicles	~~***y is the share of zero- and low-emission vehicles in the manufacturer's fleet of newly registered light commercial vehicles calculated as the total number of zero- and low-emission vehicles, where each of them is counted as ZLEV_{specific} in accordance with the formula below, divided by the total number of light commercial***~~

registered in the relevant calendar year	~~vehicles registered in the relevant calendar year~~
$ZLEV_{specific} = 1 - (\frac{specific\ emissions}{50})$	$\cancel{\boldsymbol{ZLEV_{specific} = 1 - (\frac{specific\ emissions}{50})}}$
x is 15%.	~~***x is 15%.***~~

Justification

As of 2025, the proposed Regulation sets a specific emission target which is based on the share of low and zero-emission vehicles sales of each manufacturer. This means that if the manufacturer’s sales percentage of zero-emission vehicles is over 15% in 2025 and 30% in 2030 it will earn a bonus in emission standards of a maximum of 5%, i.e. the vehicles produced by the manufacturer will be able to emit even more.

Consequently, we believe that the emission target on manufacturers should be kept removing the ZLEV factor. Instead a mandatory sales quota on manufacturers for zero-emission vehicles (ZEV) should be established.

Amendment 9

Text proposed by Commission	*Amendment proposal by Eurelectric*
Point 6.3 of Part B of Annex I	
6.3.2 From 2030 onwards	6.3.2 From 2030 onwards
The specific emissions target = (specific emissions reference target – ($Ø_{targets}$ – EU fleet-wide $target_{2030}$)) . ZLEV factor	The specific emissions target = (specific emissions reference target – ($Ø_{targets}$ – EU fleet-wide $target_{2030}$))~~ . *ZLEV factor*~~
Where,	Where,
Specific emissions reference target is the specific emissions reference target for the manufacturer determined in accordance with 6.2.2	Specific emissions reference target is the specific emissions reference target for the manufacturer determined in accordance with 6.2.2
$Ø_{targets}$ is the average, weighted on the number of newly registered light commercial vehicles of each individual manufacturer, of all the specific emissions reference targets determined in accordance with point 6.2.2	$Ø_{targets}$ is the average, weighted on the number of newly registered light commercial vehicles of each individual manufacturer, of all the specific emissions reference targets determined in accordance with point 6.2.2
ZLEV factor is (1+y-x), unless tis sum is larger than 1.05 or lower than 1.0 in which case the ZLEV factor shall be set to 1.05 or 1.0 as the case may be	~~*ZLEV factor is (1+y-x), unless tis sum is larger than 1.05 or lower than 1.0 in which case the ZLEV factor shall be set to 1.05 or 1.0 as the case may be*~~
Where,	~~*Where,*~~
y is the share of zero- and low-emission vehicles in the manufacturer's fleet of newly registered light commercial vehicles calculated as the total number of zero- and low-emission vehicles, where each of them is counted as $ZLEV_{specific}$ in accordance with the formula below, divided by the total number of light commercial vehicles registered in the relevant calendar year	~~*y is the share of zero- and low-emission vehicles in the manufacturer's fleet of newly registered light commercial vehicles calculated as the total number of zero- and low-emission vehicles, where each of them is counted as* $ZLEV_{specific}$ *in accordance with the formula below, divided by the total number of light commercial vehicles registered in the relevant calendar year*~~

$$ZLEV_{specific} = 1 - (\frac{specific\ emissions}{50})$$

x is 30%.

$$\cancel{\boldsymbol{ZLEV_{specific} = 1 - (\frac{specific\ emissions}{50})}}$$

~~***x is 30%.***~~

Justification

As of 2025, the proposed Regulation sets a specific emission target which is based on the share of low and zero-emission vehicles sales of each manufacturer. This means that if the manufacturer's sales percentage of zero-emission vehicles is over 15% in 2025 and 30% in 2030 it will earn a bonus in emission standards of a maximum of 5%, i.e. the vehicles produced by the manufacturer will be able to emit even more.

Consequently, Eurelectric believes that the emission target on manufacturers should be kept removing the ZLEV factor. Instead a mandatory sales quota on manufacturers for zero-emission vehicles (ZEV) should be established.

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

Economic Development

Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability

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