



CLIMATE GROUP
EV100

**Maintaining ambition
and regulatory
certainty for a
zero-emission future**

EV100 position paper on the
revision of EU Regulation on CO₂
standards for cars and vans

| April 2026

Our position

Climate Group EV100, representing over 120 major businesses committed to decarbonising their fleets, expresses concern over the European Commission's proposal to retreat from the 2035 zero-emission target for cars and vans.

We call on EU policymakers to reaffirm and uphold the 100% CO2 reduction target by 2035. This is to protect the significant investments EV100 members have already made towards their commitment to purchase or procure only zero-emission cars by 2030 and vans by 2035.

A clear 2035 phase-out of combustion engines is not just an environmental necessity but a strategic choice for Europe's energy security and industrial resilience. A shift to energy-efficient electric mobility lowers operating costs for businesses and reduces reliance on volatile imported fossil fuels.



1 Maintain clear and stable targets towards zero-emission road transport

Replacing the 2035 zero-emission requirement with a 90% reduction target sends a mixed signal to investors and risks locking Europe into higher-cost, lower-volume EV production.

For companies to continue investing at scale and with confidence in the decarbonisation of their fleets, a clear path towards 100% zero-emission vehicles is essential.

Moreover, the introduction of the flexibility allowing manufacturers to average compliance of the 2030 CO2 target over the 2030–

2032 period risks delaying investments into the transition to zero-emission vehicles. This, combined with the retreat from a 100% zero-emission target for 2035, will divert essential investment from proven, efficient technologies like Battery Electric Vehicles (BEVs) and undermine the clarity of Europe's transition to zero-emission road transport.

2 Prioritise efficiency and the proven technology of BEVs

To secure Europe's clean transport future, policymakers must champion Battery Electric Vehicles (BEVs) as the most efficient and proven technology for zero tailpipe emissions.

Using e-fuels and biofuels for road transport is an inefficient use of scarce resources which are better used for hard-to-abate sectors such as aviation and maritime transport, where electrification is less viable. Furthermore, we advise against continued reliance on Plug-in Hybrids (PHEVs), as their real-world emissions exceed

laboratory results, rendering them an unsuitable solution.

Therefore, we urge policymakers to reject any "fuel credit" mechanisms that would allow combustion engine vehicles to remain on the market indefinitely and compromise the clarity of the zero-emission transition.



3 Ensure integrity in green steel credits

Scaling up green steel production is critical for the automotive industry to address embodied emissions in vehicle materials and move forwards on a clean transition. However, "low-carbon steel credits" should not

undermine the ambition of this Regulation and need to ensure that the integration of green steel in vehicles is produced without fossil fuels and rely on green hydrogen and renewable electricity.

4 Uphold the 2030 van standard: Securing supply for fleet decarbonisation

The proposal to weaken the 2030 CO₂ reduction target for vans from 50% to 40% is a step backward. EV100 members have already committed to

only purchase or procure zero-emission vans from 2035 at the latest and require a strong manufacturer supply to meet these goals.

5 Enable the ecosystem

While supply-side CO2 targets remain the core regulatory engine of the transition to EVs, their success can be accelerated by supportive measures.

- **Infrastructure:**

Continue the rollout of a reliable charging network, ensuring the consistent implementation of the Alternative Fuel Infrastructure Regulation (AFIR) across all Member States, alongside widespread deployment of smart charging and integration of renewable energy.

- **Grid & Planning Reform:**

Prioritise strategic investment in resilient electricity grids and streamline infrastructure planning processes to ensure EV charging demand is met.

- **Fiscal Policy:**

Robust incentives for EV adoption at national level, including favourable taxation policies, addressed exclusively to zero-emission vehicles.



6 Vehicle labelling & transparency

The introduction of harmonised EU-wide car labelling rules represents a significant step towards transparency and consumer confidence in the EV market and ensures buyers have access to consistent, reliable data.

Crucially, the introduction of the "A" rating reserved exclusively for

zero-emission vehicles will clearly distinguish truly clean transport options.

A central EU product database will provide consumers with instant, harmonised information, including CO2 emissions, battery state of health and battery state of health, and electric range.

- **Demand-side Regulation:**

An ambitious and well-designed Regulation setting zero-emission vehicle targets for corporate fleets to provide investment certainty and send clear demand signals to manufacturers to meet CO2 standards.



Supporters





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EV100 is a global network of over 120 companies committed to decarbonising their entire fleet by only purchasing and/or procuring zero-emission (BEVs and FCEVs) cars and vans (up to 7.5 tonnes) by 2030, medium-duty vehicles (between 7.5 and 20 tonnes) by 2035, and heavy-duty vehicles (above 20 tonnes) by 2040.