European Commission Public consultation on the future of the European automotive industry (30 January – 13 February)

Organisation name

Climate Group is a global NGO.

EV100 and EV100+ bring over 130 international businesses committed to lead the transition to EVs in their own operations.

SteelZero bring together leading organisations to speed up the transition to a net zero steel industry.

To what extent do you agree that the themes as identified in the Concept paper for the Automotive Strategic Dialogue should figure in the EU industrial action plan for the automotive sector?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No opinion
*Innovation and leadership in future technologies and capabilities		x				
*Clean transition and decarbonisation	x					
*Competitiveness and resilience		x				
*Trade relations and "international		x				

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No opinion
level playing field"						
*Regulatory streamlining and process optimisation			x			

Question: Are there additional themes that should be added to the upcoming EU industrial action plan for the automotive sector? If so, please list them with a short explanation why. *3000 character(s) maximum*

Stimulate and support the demand for Electric Vehicle (EVs).

The EU should incentivise a fast transition to zero emission vehicles by supporting demand.

A legislative proposal on corporate fleet would be an excellent tool to enable the mobilisation of companies to transition their fleets at speed and scale and ensure all stakeholders in the system move forward along a coordinated timeline.

We call on the European Commission to develop zero emission corporate fleet targets for light, medium and heavy-duty vehicles, based on a thorough impact assessment. These targets shall be complemented by enabling conditions to allow businesses to fulfil the mandate, including sufficient supply of zero emission vehicles (ZEVs) and consistent deployment of charging infrastructures across the EU.

Question: Do you have any other comments or remarks as regards the EU industrial action plan for the automotive sector?

Keep the current regulatory framework and refrain from changes in adopted legislation

We are concerned about the recent political discussions putting once again in doubt the CO2 emission standards set in Regulation (EU) 2023/851.

EV100 and EV100+ members are strongly committed to the EU carbon neutrality goal by 2050 and have made massive investments to decarbonise their fleet. Those investments were based on clear, ambitious, yet feasible targets as well as a clear regulatory

framework. Any wavering in legislation would put those investments at risk, alongside the feasibility for the EU to reduce emissions from road transport and achieve its climate neutrality goals.

EU businesses need clarity and high ambition in legislation to support their longer-term plans to switch to electric vehicles. Reversing adopted legislation would set a dangerous precedent for EU policy making and undermine business trust in the political and policy making process.

Rather than reopening already agreed legislation, efforts should focus on reinforcing the enabling conditions for the transition to zero emission road transport, including increased supply of zero emission vehicles in the volumes and varieties required to meet demand, consistent deployment of charging infrastructures in the whole EU as well as incentives to ramp up the uptake of electric vehicles.

We urge EU policy makers to keep the already adopted CO2 emission targets by 2025, 2030 and 2035 so that companies can have access to a wide offer of electric vehicles and scale up the decarbonisation of their fleet.

Adopt a legislative proposal on corporate fleet

We believe that a corporate fleet mandate would be an excellent tool to support automakers in meeting their targets and drive EV uptake across the EU. We call on the Commission to propose a Regulation setting binding electrification target for light, medium and heavy-duty vehicles, applying to both fleet owners and operators.

A clear, well implemented corporate fleet mandate would enable the mobilisation of companies to transition their fleets at speed and scale and ensure all stakeholders in the system move forward along a coordinated timeline.

It would send an ever-clearer signal that the EU is a key market for zero emission vehicles, reduce emission from the road transport sector and boost the second-hand market for zero emission vehicles.

Keep biofuels and e-fuels out of road transport

We are also concerned about the inclusion of CO2-neutral fuels (such as e-fuels) into the post-2035 regulatory landscape. Any mechanism to account for biofuels and e-fuels would delay the production and the availability of zero tailpipe emission vehicles. The EU should instead focus on advancing progress towards the mass adoption of EVs.

Battery Electric Vehicles and Fuel Cell Electric Vehicles (FCEVs) are technology ready, supported by ambitious charging infrastructure targets set in the Alternative Fuel Infrastructure Regulation (AFIR). At the moment, these technologies are the only ones that guarantee zero tailpipe emissions and that would lead to considerable reduction of air pollution as well as the achievement of the EU climate goals.

Biofuels and e-fuels should be used in harder to abate sectors that cannot yet be electrified, such as industry, aviation and ocean shipping.

Question: Do you wish to upload also a position paper or additional evidence supporting your responses?