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Revision of the CO_2 emission standards for cars and vans

Fields marked with * are mandatory.

Introduction

The European Green Deal, adopted by the Commission in December 2019, has tackling climate change and reaching the objectives of the Paris Agreement and other environmental issues (including addressing air pollution) at its core. One of its central elements is the 2050 climate neutrality objective, which the Commission proposed in 2018 and the European Council and Parliament endorsed (see European Council conclusions of 12 December 2019; European Parliament resolution of 14 March 2019; European Parliament resolution of 28 November 2019). The Commission has proposed to enshrine climate neutrality into EU law. In order to set the EU on a sustainable path to achieve climate neutrality by 2050, the Commission has also proposed a net EU-wide, economy-wide greenhouse gas emissions reduction target by 2030 compared to 1990 of at least 55% in its Communication on stepping up Europe's 2030 climate ambition.

Building on the existing 2030 legislation and the Communication on stepping up the EU's 2030 climate ambition, the Commission will review and propose to revise, where necessary, the key relevant legislation by June 2021. This will include a coherent set of changes to the existing 2030 climate, energy and transport framework, notably related to the EU Emissions Trading System Directive, the Effort Sharing Regulation and the Land Use, Land Use Change and Forestry Regulation, CO_2 Emissions Performance Standards for Cars and Vans, the Alternative Fuels Infrastructure Directive, the Renewable Energy Directive and the Energy Efficiency Directive.

Each sector must contribute to reaching the EU's climate objectives. Transport is the only sector whose greenhouse gas emissions are higher than in 1990 and where emissions are growing. Road transport, which today accounts for a fifth of the EU's greenhouse gas emissions and increased its emissions by over a quarter since 1990, has a key role to play. As highlighted in the European Green Deal, in order to contribute to the overall climate neutrality objective for 2050, emissions of the transport sector need to be reduced by 90% by 2050 compared to 1990.

The impact assessment accompanying the Communication on stepping up the EU's 2030 climate ambition prepares the ground for adapting climate and energy policies to help decarbonise the European economy. This initiative will look at strengthening the CO_2 standards for cars and vans, to ensure a clear pathway onwards towards zero-emission mobility. The current legislation sets reduction targets of 15% for cars and vans to be achieved from 2025, and of 37.5% for cars and 31% for vans to be achieved from 2030, all compared to 2021. In addition the regulation contains a mechanism aimed to incentivise the deployment of

zero and low emission vehicles.

This public consultation invites citizens and organisations to contribute in order for the Commission to be properly informed by public opinion in preparation for future legislative action on the CO_2 standards for cars and vans. The results of the consultation will be summarised and published as well as be used to inform the Impact Assessment, accompanying the Commission proposal for revising the CO_2 standards for cars and vans Regulation...

There are additional parallel public consultations on the review of the LULUCF Regulation, the Effort Sharing Regulation and the EU ETS Directive.

Guidance on the questionnaire

This public consultation consists of some introductory questions related to your profile, followed by a questionnaire. **Please note that you are not obliged to respond to all questions in the questionnaire.**

The Commission already held an open public consultation on increasing the 2030 climate ambition, which was open for 12 weeks from 31 March to 23 June 2020. Many high-level questions related to the increased climate ambition were asked in the context of that consultation. The present questionnaire therefore focuses on more specialised and detailed questions on the revision of the Regulation setting CO_2 Emissions Performance Standards for Cars and Vans in order to achieve the revised target.

At the end of the questionnaire, you are invited to provide any additional comments and to upload additional information, position papers or policy briefs that express the position or views of yourself or your organisation.

The results of the questionnaire as well as the uploaded position papers and policy briefs will be published online. Please read the specific privacy statement attached to this consultation informing on how personal data and contributions will be dealt with.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the register of interest representatives if you have not already done so. Registering commits you to complying with a Code of Conduct. If you do not wish to register, your contribution will be treated and published together with those received from individuals.

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- (•) Business association
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- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Susanna

* Surname

PFLÜGER

* Email (this won't be published)

pfluger@european-biogas.eu

* Organisation name

255 character(s) maximum

European Biogas Association

* Organisation size

- (•) Micro (1 to 9 employees)
- ( ) Small (10 to 49 employees)
- ( ) Medium (50 to 249 employees)
- ( ) Large (250 or more)

Transparency register number

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Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

- ( ) Afghanistan
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- Falkland Islands
- Faroe Islands
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- South Africa
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- South Korea
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- Sudan
- Suriname
- Svalbard and Jan Mayen
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- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
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- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
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- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
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- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay

- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
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- Denmark
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- Kazakhstan
- Kenya
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* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- **Anonymous**
  Only your contribution, country of origin and the respondent type profile that you selected will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.
- **Public**
  Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☑ I agree with the personal data protection provisions

Questions

A free text section is available at the end of some of the questions to enable you to provide additional clarifications or observations.

1. Objective

As highlighted in the European Green Deal, transport is the only sector whose greenhouse gas emissions are higher than in 1990 and where emissions are growing. Road transport accounts for around 20% of transport greenhouse gas emissions today. Road transport is also a key contributor to air pollution, especially in cities. In order to contribute to the overall climate neutrality objective for 2050, greenhouse gas emissions of the transport sector need to be reduced by 90% by 2050 compared to 1990. Transport also has to contribute to the overall emission reduction of at least 55% by 2030 as set out in the Commission Communication on stepping up the EU's 2030 climate ambition. CO_2 standards drive innovations in low and zero emission automotive technologies, which are of key importance for Europe's future industrial leadership. They make more low and zero emission vehicles and models available to consumers, which could have a positive impact on the price for such vehicles. Therefore, the Commission is working to revise the CO_2 standards for cars and vans set out in Regulation (EU) 2019/631, together with other relevant legislative measures to deliver on the increased climate ambition.

In your view, how important are the following objectives for the future cars and vans CO_2 legislation?

On a scale from 1-5, with 5 representing the highest importance and 1 no importance

	1	2	3	4	5
Reducing CO_2 emissions from cars and vans to implement the overall emissions reduction target of at least 55% by 2030 and the climate neutrality objective by 2050	○	○	○	○	◉
Promoting the market uptake of zero-emission vehicles and boosting their supply so that they become more affordable	◉	○	○	○	○
Strengthening the competitiveness , industrial leadership, innovation and stimulate employment in the EU automotive value chain	○	○	○	◉	○
Reducing total costs of ownership for consumers	○	○	○	○	◉
Contributing to reducing air pollution	◉	○	○	○	○
Reducing EU's energy consumption and import dependence	○	○	○	◉	○

2. Future CO_2 emissions targets for cars and vans

Regulation (EU) 2019/631 currently sets the following new vehicle fleet average CO_2 targets compared to 2021 levels: 15% reduction for both new cars and vans from 2025 on and 37.5% and 31% reduction for new cars and vans respectively from 2030 onwards. However, in light of the proposed increased ambition of the EU's greenhouse gas emission targets for 2030 and the objective of achieving climate neutrality by 2050, the Commission will revisit and strengthen the CO_2 emission standards for cars and vans for 2030 as underlined in the Communication on stepping up the EU's 2030 climate ambition.

This section contains questions related to the future CO_2 emission target levels for cars and vans.

Target Levels

In your view, how important are the following actions related to the future CO_2 emission target levels for cars and vans to be presented in June 2021?

Scale from 1 to 5 where 5 is highest importance and 1 no importance

	1	2	3	4	5
Strengthening the 2025 CO_2 emission targets for cars	○	○	○	○	○
Strengthening the 2025 CO_2 emission targets for vans	○	○	○	○	○
Strengthening the 2030 CO_2 emission targets for cars	○	○	○	○	○
Strengthening the 2030 CO_2 emission targets for vans	○	○	○	○	○
Setting stricter CO_2 emission targets for new cars and vans for 2035	○	○	○	○	○
Setting stricter CO_2 emission targets for new cars and vans for 2040	○	○	○	○	○

The proposal for a European Climate Law, in line with the European Green Deal, set the objective of achieving climate neutrality by 2050. The Communication on stepping up the EU's 2030 climate ambition highlights that to achieve climate neutrality and ensure that sectors with emissions that are more difficult to abate have access to sufficient quantities of renewable and low carbon fuels, conventional cars will need to gradually be displaced by zero emissions vehicles.

In your view, in order to contribute to the climate neutrality by 2050 objective, by when should CO_2 standards become so strict that all new cars/vans are zero-emission vehicles ?

	by 2035	by 2040	after 2040	The CO_2 standards should not become so strict that all new vehicles are zero-emission
For cars…	○	○	○	◉
For vans…	○	○	○	◉

Do you have any additional comments on the levels of the future targets? If so, they can be added below:

1000 character(s) maximum

If the definition for a zero carbon vehicle remains the same (based on tailpipe only), we do not support the idea of all new vehicles being zero-carbon. We would support it if the emissions were calculated based on a well-to-wheel approach or, even better, an LCA approach including emissions related to vehicle manufacturing & recycling + the fuels. An LCA approach of mobility in fact shows that zero-emision vehicles do not exist. As shown by many studies (IFPEN, JEC), when considering an LCA approach, several sustainable mobility solutions are possible, including electric mobility with renewable electricity, hydrogen and 2nd generation biofuel such as biomethane. Tail-pipe CO2 measurement approach exclude de facto efficient biofuel sustainable mobility solutions, which is not good neither for the environment, nor to answer the great variety of European requirement, nor for EU resilience to unforeseen events.

Timing of the targets

In the current Regulation, the same fleet targets apply for five years before becoming stricter. Other options could be considered to ensure an effective emission reduction trajectory.

Please indicate to what extent you agree with the following statements:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
The same targets should remain applicable for 5 years before being strengthened, as in the current legislative framework	○	○	◉	○	○
The targets should be strengthened every year.	◉	○	○	○	○
In case targets become stricter more frequently, additional flexibility should be provided as regards annual compliance. For instance with banking and/or borrowing, so that overachievement in a given year can be carried over to subsequent years and/or underachievement in a given year can be compensated by overachievement in subsequent years.	○	○	◉	○	○

3. Incentivising zero- and low-emission vehicles

The following questions relate to specific elements aimed to enhance the uptake of zero- and low-emission vehicles (ZLEV) such as plug-in hybrid vehicles, battery electric vehicles and fuel cell electric vehicles.

In addition to the binding CO_2 emission targets for manufacturers, Regulation (EU) 2019/631 contains a mechanism to incentivise the deployment of ZLEV, which are defined as vehicles with tailpipe CO_2 emissions between 0 and 50 g/km. A “one-way” crediting system is introduced from 2025 on. This means that the specific CO_2 emission target of a manufacturer will be relaxed if its share of ZLEV, expressed as a percentage of its total number of vehicles registered in a given year, exceeds the benchmarks set out in the Regulation. Exceeding the benchmark level by one percentage point will decrease the manufacturer’s CO_2 target (in g CO_2/km) by one percent, and this target relaxation is capped at a maximum of 5%. Manufacturers who do not meet the ZLEV benchmark face no consequences.

For calculating the share of ZLEV in a manufacturer’s fleet to be compared against the benchmark levels, an accounting rule applies, which gives a greater weight to ZLEV with lower emissions. In addition, during

the period 2025 to 2030 and for cars only, a multiplier of 1.85 is applied for counting ZLEV registered in those Member States which had the lowest ZLEV share in 2017.

In order for the CO_2 emission targets legislation for cars and vans to contribute to the 2030 -55% target and the 2050 climate neutrality objective, it has to provide a strong incentive for the deployment of ZLEV. With this respect, different alternative options could be envisaged to incentivize ZLEV, as described below.

In your views, what are the main barriers for market uptake of zero-emission vehicles?

- [x] Price of zero-emission vehicles
- [ ] Price-quality ratio of key components like batteries
- [ ] Availability of recharging/refuelling infrastructure
- [x] Limited range
- [ ] Availability of vehicles models
- [x] Other...

Please specify:

1000 character(s) maximum

Open questions related to raw materials required for batteries (possibly dependence on third countries), no transparency related to the sustainability of batteries.
The definition of a zero-emission vehicle must change: vehicles with true emissions savings over the life-cycle of fuel and vehicle must be promoted. This would enable also lower-income people to acquire a zero-emission vehicle like a gas car fueled with biomethane.

For the period up to 2030

Please indicate to what extent you agree with the following statements on the incentive system for cars and vans:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
In addition to the CO_2 targets, a mechanism incentivising zero- and low-emission vehicles should be maintained	○	○	○	◉	○

Please indicate to what extent you agree with the following statements on the incentive system for cars and vans:

Vehicles eligible for the incentive system:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
Only zero emission vehicles	◉	○	○	○	○

All vehicles with emission below 50 g CO_2 /km (as in the current Regulation)	◉	○	○	○	○
Only vehicles with emissions below a lower threshold than 50 g CO_2/km	◉	○	○	○	○
Other options...	○	○	○	○	◉

Please specify:

1000 character(s) maximum

Only vehicles below a lower threshold than 50G/CO2/km based on the emissions over the life-cycle.
The aim of the Regulation is to reduce CO2 emission of mobility, therefore all solution enabling to reach this goal should be incentivised. Europe is large, and so are the variety of mobility needs of its inhabitants. A wider range of solution will help acceptance and a faster and smoother transition to a real CO2 neutral mobility.

Incentive type:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
The one-way crediting system should be maintained in its current form	○	○	○	○	○
The one-way crediting system should be replaced with an obligation for each manufacturer to register a certain share of ZLEV (i.e. mandate)	○	○	○	○	○
Other options...	○	○	○	○	◉

Please specify:

1000 character(s) maximum

Incentive shall be given to all vehicles having low CO2 emissions on a well-to-wheel approach, electric vehicles using green electricity and vehicles using renewable gas as well as hybrid vehicles using a combination of both. To ensure the use of renewable energy, solutions similar to the one proposed by Frontier Economics could be used.

Link with the CO_2 target:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
The ZLEV benchmark/mandate levels should be adapted to the new targets. In particular, the benchmark levels should increase when targets levels are increased	○	○	○	○	○

For the period after 2030

Please indicate to what extent you agree with the following statements on the incentive system for cars and vans:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
In addition to the CO_2 targets, a mechanism incentivising zero- and low-emission vehicles continues to be needed, even if CO_2 targets become stricter	○	○	○	◉	○

Please indicate to what extent you agree with the following statements on the incentive system for cars and vans:

Vehicles eligible for the incentive system:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
Only zero emission vehicles	◉	○	○	○	○
All vehicles with emission below 50 g CO_2 /km (as in the current Regulation)	◉	○	○	○	○
Only vehicles with emissions below a lower threshold than 50 g CO_2/km	◉	○	○	○	○
Other options...	○	○	○	○	◉

Please specify:

1000 character(s) maximum

Only vehicles below a lower threshold than 50G/CO2/km based on the emissions over the life-cycle.

Incentive type:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
The one-way crediting system should be maintained in its current form	◉	○	○	○	○
The one-way crediting system should be replaced with an obligation for each manufacturer to register a certain share of ZLEV (i.e. mandate)	◉	○	○	○	○
Other options...	○	○	○	○	◉

Please specify:

1000 character(s) maximum

Incentive shall be given to all vehicles having low CO2 emissions on a well-to-wheel approach

Link with the CO_2 target:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
The ZLEV benchmark/mandate level should be adapted to the new targets	○	○	○	○	○

Do you have any additional comment on the ZLEV incentive system? If so, they can be added below:

1000 character(s) maximum

4. Contribution of renewable and low carbon fuels

Under Regulation (EU) 2019/631, compliance of a manufacturer with its specific emission target is assessed against the average CO_2 emissions of its fleet as measured under the WLTP.

Other EU policies incentivise the deployment of renewable and low carbon fuels in transport, as detailed in the Communication on stepping up the EU's 2030 climate ambition. They include for instance the Renewable Energy Directive, the Energy Taxation Directive, to be revised in June 2021, the upcoming specific initiatives promoting sustainable aviation and maritime fuels, a possible expanded emissions trading system.

Please indicate to what extent you agree with the following statements:

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
A mechanism should be introduced in the CO_2 emission standards for cars and vans so that compliance assessment for each manufacturer takes into account the contribution of renewable and low carbon fuels.	○	○	○	○	◉
The policies to decarbonize fuels and reduce emissions from cars and vans must remain in separate legal instruments	◉	○	○	○	○

If a system to account for renewable and low carbon fuels is introduced when assessing compliance, please indicate to what extent you agree with the following statements:

1. **With regards to the effects:**

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
Such system will ensure a holistic approach to road transport decarbonisation	○	○	○	○	◉
More renewable and low-carbon fuels will be made available for road transport	○	○	○	○	◉

More renewable and low-carbon fuels in road transport will come at the expense of the availability of those fuels for other sectors/transport modes which face steeper challenges to decarbonize (e.g. aviation/ maritime)	○	◉	○	○	○
This will be incompatible with EU efforts to increase efficiency and reduce energy consumption	◉	○	○	○	○
Such system will no longer ensure clear and distinct responsibilities and accountability for vehicles manufacturers and fuels suppliers	◉	○	○	○	○
This could weaken the signal for innovations that are needed to make vehicles on the road zero-emission in time for the EU's 2050 climate neutrality	◉	○	○	○	○
The CO_2 emission standards for cars and vans should be tightened more rapidly in order to maintain the overall level of ambition	◉	○	○	○	○
Air pollution co-benefits would not be achieved in the same degree	◉	○	○	○	○

2. **With regards to the design of the mechanism**

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
Only renewable and low-carbon fuels actually used in cars and vans in a particular year should be taken into account to assess compliance with CO_2 emission standards for these types of vehicles	○	○	○	○	◉
To avoid double counting, renewable and low-carbon fuels should be counted either towards the targets set in fuels related legislation or to assess compliance under the CO_2 emission standards for cars and vans	◉	○	○	○	○
Renewable and low-carbon fuels should be counted according to their actual greenhouse gas emission savings over the whole lifecycle	○	◉	○	○	○
All renewable and low-carbon fuels (such as sustainable biogas, biomethane and biofuels, renewable and low-carbon hydrogen or synthetic fuels) should be taken into account, as long as they meet the minimum sustainability criteria set under the Renewable Energy Directive	○	○	○	○	◉
Only the renewable and low-carbon fuels with the highest greenhouse gas emission savings should be taken into account	○	○	◉	○	○

Do you have any additional comments, views, information on the possible introduction of a system to account for renewable and low carbon fuels when assessing compliance with the vehicle CO_2 standard? If so, they can be added below:

1000 character(s) maximum

In order to ensure true emissions savings, emissions over the entire life-cycle should be taken into account instead of tailpipe. The linkages between fuel and vehicle legislation must be better understood; if fuel with negative emissions (biomethane) is supported by the RED, its use in gas vehicles must be equally supported in the vehicle legislation (CO2 standards). Finally, all renewable options that are available as of today (biomethane) should be supported stronger in order to start immediate decarbonisation of the sector. Most European electricity is not renewable and therefore not zero-carbon.

5. Allocation of the excess emissions premiums

Under Regulation (EU) 2019/631, manufacturers whose average specific emissions of CO_2 exceed their specific targets should pay excess emission premiums, whose amounts is considered as revenue for the general budget of the Union, without a specific destination for the spending of the recovered money.

In your view, how should these excess emission premiums be allocated?

- [ ] They should continue to be considered as revenue for the general budget of the Union
- [ ] They should be allocated to a new or existing specific fund or a relevant programme, with the objective to ensure a just transition towards a climate-neutral economy, in particular to support re-skilling, up-skilling and other skills training and reallocation of workers in the automotive sector
- [x] Other...

Please specify:

1000 character(s) maximum

These premiums should be allocated to amplify the transition to a climate neutral mobility via :
- funding just transition avoiding energy poverty
- supporting the European R&D for CO2 efficiency in mobility (LCA based).
- financing the development of renewable energy production in the EU

You can use the space below in case of additional views on the allocation of the excess emission premiums:

1000 character(s) maximum

6. Other elements of the regulatory approach

Regulation (EU) 2019/631 includes a monitoring and reporting system and flexibilities allowing a more cost-effective implementation, such as the possibility for pooling, credits for the uptake of eco-innovations, an exemption for very small manufacturers, and a derogation possibility for small volume manufacturers.

In your opinion, do any of the following provisions need to be changed?

	Yes	No	Neutral
Monitoring and reporting provisions	○	○	○
Ecoinnovation	○	○	○
Pooling	○	○	○
Exemption for manufacturers registering less than 1,000 vehicles per year	○	○	○
Small Volume derogations	○	○	○

In your opinion, Are there other aspects of the Regulation that need to be addressed? If so, which ones?

1000 character(s) maximum

7. Impacts

Do you agree with the following statements on the likely impacts of strengthened CO_2 standards for cars and vans?

Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
The EU automotive industry will increase investments in zero- emission technologies	◉	○	○	○	○
The competitiveness of the EU automotive industry on the global market will be increased	◉	○	○	○	○
Lower income social groups will benefit from an economic perspective thanks to lower cost of ownership of a car (for example reduced upfront cost of EVs, reduced energy/fuel costs)	◉	○	○	○	○
Macroeconomic benefits can be expected, on both GDP and jobs	◉	○	○	○	○
Job losses in the automotive value chain can be expected as a result of decreasing production of conventional powertrains	○	○	○	○	◉
New skills and qualifications for workers in the automotive value chain will be needed	○	○	◉	○	○
Co-benefits in terms of better air quality, especially in urban areas, can be expected	○	○	◉	○	○
Co-benefits in terms of energy dependency can be expected	◉	○	○	○	○

Which other impacts are relevant in your opinion?

1000 character(s) maximum

An electric mobility oriented strategy will favour development of electric mobility but, as between 1/3rd and a half of the value of an EV is within its battery which is not European expertise and which comes with high social and environmental impact in third countries, it is hard to be sure that this will improve GDP and employment in Europe. There is a high risk to swap dependency, from petrol producers to battery manufacturers.
Having a form of an alternative sustainable mobility, like biofuel mobility, reduces that risk.
Without a life cycle analysis, it is hard to assess the environmental gains or losses as a whole. Indeed, air pollution is likely to be reduced where the electric car is used, but this have to be balance with emissions due to batteries production and recycling, even if it is a foreign country, it still the same planet.
Having several alternative mobility solution, can only be an advantage for citizens: more choices, more competition, more resilience..

What additional measures should be set up to ensure a socially acceptable and just transition towards zero-emission mobility, taking into account its social effects throughout the whole automotive value chain in particular in those regions particularly dependent on automotive jobs?

1000 character(s) maximum

If renewable fuels were finally accepted to contribute towards the targets in the CO2 standards regulation, also lower-income citizens could contribute to the emissions reduction in the transport sector, even in the short-term, by driving for example a NGV, produced entirely in Europe and fueled by local renewable gas.

8. Any additional comments

If you have any comments or supplementary information to add to your replies to the above questions:

1000 character(s) maximum

Tail-pipe CO2 measurement is not sufficient to assess climate impact of mobility. In the short term, provisions must be taken to recognise renewable biofuel (as per RED 2) as ZLEV and get the related incentivation. In the longer run, legislation must evolve to integrate an LCA approach in the CO2 standards, combining obligations for the manufacturers (European and foreign) and fuel producers (European and foreign).
Biomethane is a very climate-friendly fuel contributing to a circular economy by making best use of organic waste and residues by generating a low-carbon renewable fuel out of local feedstock while circulating nutrients back to the soil via digestate, the second product of biogas production that is an organic fertiliser. Biomethane thus reduces emissions by replacing fossil energy as well as fossil fertilisers. Such factors should be reflected when climate impact of mobility is assessed.

Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

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