



CO2 TARGETS KEY RECOMMENDATIONS

- Leave 2025 target unchanged
- 2030 ambition level must be fully in sync with AFIR targets
- Too early to set long-term 2035 target; wait until 2028, together with strong review

Zero-emission vehicles & CO2 reduction targets
CO2 regulation for cars and vans

CO2 regulation and AFIR must be seen as one interlinked package

- CO2 targets have to be accompanied by equally ambitious mandatory targets for charging points and hydrogen stations in all 27 EU member states

Decarbonisation of the fleet already on the road
Renewable Energy Use Directive (RED) and Energy Taxation Directive (ETD)

Public infrastructure:

- Electric charging points
- Hydrogen refuelling stations

Alternative Fuels Infrastructure Regulation (AFIR)

All 5 pieces of the 'Fit for 55' puzzle are strongly interconnected
→ None should be seen as stand-alone

If one puzzle piece is missing, the whole puzzle falls apart!
→ Ambitious CO2 targets are not possible if the other 4 pieces are not equally ambitious

Incentives to make zero-emission mobility affordable for all
(Taxation policies, purchase incentives)

Charging points and refuelling stations at home and work
(Energy Performance of Buildings Directive)

AFIR KEY RECOMMENDATIONS

	COMMISSION PROPOSAL	NEEDED IN REALITY
Charging capacity per battery electric vehicle (BEV)	1kW	3kW
Charging capacity per plug-in hybrid electric vehicle (PHEV)	0.66kW	2kW
Total charging points	3.9 million	7 million



2019



Current CO2 targets for 2025 (-15% for cars and vans) and 2030 (-37.5% for cars; -31% for vans) were set under Regulation 2019/631 only two years ago

2020



The **auto industry's investment in electric cars is outpacing investment in infrastructure** by a long way:

- EU sales of electrically-chargeable cars grew more than six fold between 2017 and 2020
- The number of charging points only doubled over the same period (to 200,000)

2021



European Commission published proposal for review of Regulation 2019/631, as part of Fit for 55 package (just two years after Regulation was adopted)

2025



ACEA welcomes the proposal to **leave 2025 targets unchanged** – any change to this would not leave enough time to adapt due to vehicle development and production cycles

2030



A **-55% CO2 target for cars** (compared to 2021 baseline) is **very challenging**



It would **only be achievable with a massive ramp up of infrastructure** to reach a total of some **7 million chargers** (3kW / BEV and 2kW / PHEV)



Aiming only for **3.9 million chargers** (1kW / BEV and 0.66kW / PHEV), the current **AFIR proposal falls far short** of this ambition level. Its stringency must be increased!



The -50% target for vans is also extremely demanding, bordering on being unrealistic, especially in conjunction with other measures like the changed slope of the limit curve



An ambitious 2030 target will **speed up structural transformation** of the automotive value chain

- It will require careful management of the workforce and a 'Just Transition' plan to for reskilling



The existing derogation for small volume manufacturers in Regulation 2019/631 should be maintained as these vehicles only make up 0.2% of total fleet

2028



ACEA calls for a much stronger mid-term review, with a **clear safeguard that sufficient infrastructure will be in place** (linking to AFIR and EPBD)



2028 would be the **best time to set a long-term target**

2035



A 2035 target should be set as part of the 2028 review. It is **too early today to fix a 100% CO2 reduction target** – which essentially is a ban on the internal combustion engine – at a time when there are still too many open questions:

- How will infrastructure roll-out and consumer uptake develop in the next few years?
- What kind of game-changing technologies will hit the market between now and 2035?

2050



Motor vehicle manufacturers are **fully committed to bringing CO2 emissions down to zero**, supporting Europe's target of reaching climate neutrality by 2050