

The Consumer Voice in Europe

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28 September 2021

Subject: BEUC's recommendations on CO2 performance standards for cars and vans for 2025 and beyond.

Dear Deputy Ambassador,

I am contacting you on behalf of BEUC, the European Consumer Organisation, ahead of the Environment Council of October 6th. On the agenda will be a debate on the revision of Regulation (EU) 2019/631 setting CO2 emission performance standards for new passenger cars and for new light commercial vehicles.

Stricter EU CO2 emissions standards are crucial to enable all consumers to have access to more affordable, zero-emission cars. In a recent study conducted at EU level and in 9 EU Member States, BEUC showed that, from a 'total cost of ownership' perspective (meaning several years of use), electric cars [are already an affordable option](#) for many consumers. We also revealed that electric cars are the most 'equitable' engine on the market. That is because second- and third-hand owners – who bear less of the car's depreciation and benefit from low maintenance costs – will make savings for each electric car sold today. Based on this study, BEUC shared its [recommendations](#) for a consumer-friendly legislation on cars' CO2 emissions.

Based on these recommendations, we have just published our [assessment](#) of the Commission proposal, along with a brief explanation of what should be amended by the Council and the European Parliament. While BEUC supports the 100% CO2 emissions reduction target for cars and vans by 2035, several elements need to be improved to ensure a rapid rollout of affordable zero-emission vehicles.

First, **we need to introduce an interim CO2 emissions reduction target between 2025 and 2030**, for instance by anticipating the currently applicable 2030 37,5% reduction target to 2027. This is to avoid the market stagnation observed between 2015 and 2019 which led to a limited supply of electric vehicles for consumers. As of 2025, electric vehicles will become the cheapest option for almost all consumers in Europe. This would be the right moment to accelerate the trend towards electrification, notably to ensure that electric cars reach the second- and third-hand users (the vast majority of middle- and low-income households) which would see the greatest benefits of these vehicles.

Second, BEUC calls for the promotion of only zero-emission vehicles for a transitional period. The current proposal gives a disproportionate advantage to plug-in hybrid vehicles (PHEVs). BEUC showed that these PHEVs pose financial risks to consumers, notably in the second- and third-hand market. **BEUC suggests modifying the benchmark to only favour Zero-Emission Vehicles (ZEVs) for the period up to 2027.**

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Third, **the so-called “mass adjustment parameter” needs to be removed** as it encourages the production of heavier cars, to the detriment of consumers’ wallets, health, and safety. With the move towards electrification, there is no need to keep such incentive as all car manufacturers are expected to reach important CO2 emissions reduction.

Fourthly, **we need to make use of new rules on real-world fuel consumption data.** BEUC has been calling for several years to move away from the laboratory testing methods to rely on on-road measurements. Since January 2021, all cars must be equipped with devices monitoring their fuel consumption. The enormous set of data soon available to the European Commission should be used as a compliance tool towards car manufacturers. This should be reflected in the CO2 standards Regulation via an assessment of the effectiveness of the Regulation in 2025 and a potential revision to ensure CO2 emissions reduction on the road.

Finally, **BEUC stresses the importance of keeping any fuels crediting system out of the proposal on CO2 standards.** The Commission’s own analysis is in line with BEUC’s study on the cost of electric vehicles, showing that promoting so-called e-fuels in cars would be detrimental to consumers, along with poor energy efficiency standards. The foreseen publication of an EU-wide methodology that allows car makers to report on the full life-cycle CO2 emissions of cars will confirm the potential of electric vehicles in a net-zero production scenario for cars in the future.

We trust you will take these recommendations into account in your deliberations and stand at your disposal should you have any question.

Yours sincerely,

Monique Goyens
Director General