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Brussels, 25 October 2017

Subject: Need to introduce more ambitious provisions in the mobility package

Dear First Vice-President Timmermans,

In 2016, you attended a Roundtable debate at BEUC offices on the financial benefits for consumers thanks to the EU Ecodesign and Energy Labelling policies.

Through a similar [research](#) we investigated the total costs of ownership of cars. The research demonstrates that electric vehicles will be at parity with petrol and diesel cars in the early 2020s and will become the cheapest option shortly after. BEUC is therefore convinced that access to clean, low carbon, fuel efficient cars will allow consumers to save money and better protect both the environment and their health. However, electric vehicles will not be brought to market by themselves. An integrated EU approach is needed to support their uptake through setting ambitious post 2020 CO₂ targets with tough vehicle testing requirements in place. Adequate infrastructure for alternatively powered cars needs to be installed and consumers need to be better informed about the cars they are buying.

The EU has a great chance to decarbonize transport and improve citizens' health through an ambitious mobility package which is expected to be published on 8 November. However, the proposal needs to be much more ambitious for passenger cars than what is under discussion right now.

We count on your support to improve the proposal on lowering CO₂ emissions from passenger cars before its publication, and ask to:

- Cut CO₂ emissions by 40% by 2030 – introducing interim targets for 2025;
- Provide for binding market shares of e-vehicles;
- Develop a real world test on CO₂ emissions to apply during type approval.

Please see our more detailed proposals in annex to this letter.

Yours sincerely,

Monique Goyens
BEUC Director General

Annex

1. Cutting CO2 emissions of at least 40% by 2030

A [BEUC study](#) showed that low carbon cars will bring numerous benefits to consumers such as lower costs for fuel during the use phase and lower local air pollution in particular in cities. BEUC had investigated the total costs of ownership of owning different car models.

It could be demonstrated that electric vehicles will be at parity with petrol and diesel cars in the early 2020s and will become the cheapest option shortly after. Second and third hand owners will also benefit considerably from more fuel efficient cars.

In order to bring the optimum level of cost savings to consumers, we assume that the EU must adopt emission limit values of at least 75g CO₂/km for 2025 and 50g CO₂/km for 2030 (WLTP). We understand that **this would require a reduction of 40%-45% by 2030 compared to the year 2020.**

We understand that the reduction level which is under discussion within the Commission at the moment is much lower and that setting a target for 2025 *and* 2030 is not yet certain.

We call on you to make sure that the level of ambition will be raised and that binding targets will be set for both, 2025 and 2030 equivalent to at least 75g CO₂/km for 2025 and 50g CO₂/km for 2030 (WLTP).

2. Making a certain share of electric vehicles binding

To achieve the necessary emission reductions, the EU should foresee a quota for electric vehicles that will have to be put on the market by 2030. Only a mandate for electric vehicles will make sure that consumers will have sufficient choice between different models of electric vehicles.

A new, yet unpublished study by BEUC shows that very often electric car models which are in theory available on the market are not available in all EU countries. When they are available in one country, they are not shown to consumers in all show rooms. Moreover, when models are available in showrooms, interested consumers have to take into account long waiting times until the vehicles can be delivered due to lack of manufacturing capacity.

In addition, not enough charging points are available and the lack of infrastructure is a major obstacle for consumers to switch to electric vehicles. The Commission urgently needs to address this lack of charging points.

We calculated based on our research that 15% of new electric vehicles sales would need to be full electric or plug-in hybrid cars by 2025 and 40% by 2030.

3. Call for developing a real world test on CO2 emissions

We understand that the Commission is planning to introduce mandatory on-board fuel meters. While we are not against these meters, we call nonetheless for the development of a real world driving test for CO₂ emissions which should be binding during the type approval phase. Such a test will be crucial to ensure compliance with emission limit values.