

The Consumer Voice in Europe

Ref.: BEUC-X-2022-065/MGO/RLO/cm

Brussels, 17 June 2022

**Subject: BEUC's recommendations on CO2 emission performance standards for cars**

Dear Deputy Ambassador,

Next week you will discuss a Commission proposal of high importance for consumers' daily mobility: the new CO2 emission performance standards for cars (amending Regulation 2019/631). This text has the potential to make electric vehicles (EVs) affordable and convenient for all consumers, as they need to shift away from expensive fuel prices.

Today's skyrocketing fuel prices are heavily impacting consumers who need a car for their daily activities. Less affluent consumers, whose mobility expenditure represents a large share of their budget, are disproportionately hit. As this situation is likely to continue, consumers need access to credible alternatives to petrol and diesel cars.

Consumer organisations [demonstrated](#) that electric cars are already the best financial option over a car's lifetime for many consumers. The results of our studies – conducted at EU level and in 9 Member States – showed that middle- and lower-income consumers buying second-hand cars will save the most by switching to electric. At the time, we took a conservative approach regarding fuel prices; with current prices, the financial benefits of electric cars are even greater. That is despite electricity prices also increasing, and without considering that consumers can benefit from flexible tariffs or private renewable energy sources such as solar panels.

**To unlock the true savings potential of electric cars, it is necessary to accelerate the trend: the faster electric vehicles arrive on the second-hand market, the faster lower and middle-income consumers will have access to them and save money.** In this regard, the CO2 emission performance standards is the most efficient tool develop a wide EV offer across all car segments by pushing car makers to speed up the electrification of their fleet. This will also bring purchase prices down, making this Regulation a cost-efficient tool for Member currently supporting consumers buying electric vehicles due to a limited supply of EVs and a purchase price gap.

To confirm the advantage of electric cars over other powertrains, we also have recently published a [new research on batteries](#) of electric cars, showing they are sustainable, long lasting, and that even when their production is decarbonised, electric cars still bring considerable financial benefits to consumers.

.../...

Therefore, ahead of next week's discussion, we encourage you to support the following measures:

- **Confirm the 100% CO2 emissions reduction target for 2035** presented by the European Commission and confirmed by the European Parliament.
- **Remove mechanisms that slow down the reduction of CO2 emissions and the uptake of battery electric cars**, such as the so-called mass adjustment parameter, the zero and low emissions (ZLEV) benchmark and the use of eco-innovations. Additionally, support any measure aimed at accelerating the roll-out of second-hand electric cars, notably the electrification mandate for car fleets.
- **Oppose the introduction of an 'alternative fuels crediting mechanism'**. This loophole would only open the door to expensive e-fuels. These are inefficient and more expensive for consumers. Promoting them would delay investments in electric cars, directly hitting lower-income consumers. In our [Total Cost of Ownership study](#), we clearly showed that e-fuels will never financially compete with EVs.

We trust that you will take the consumer interest into account when discussing this proposal, and we stay available to discuss this with you and your team in more details.

Yours sincerely,

Monique Goyens  
Director General