

Amendment: 2030: further target adjustment of -35%

Article 1	
<i>Text proposed by the Commission</i>	<i>ACEA Amendment</i>
<i>Article 1 para 5 point (b)</i> “(b) for the average emissions of the new light commercial vehicles fleet, an EU fleet-wide target equal to a 40% reduction of the target in 2021 determined in accordance with point 6.1.2 of Part B of Annex I.”;	<i>Article 1 para 5 point (b)</i> “(b) for the average emissions of the new light commercial vehicles fleet, an EU fleet-wide target equal to a 35 % reduction of the target in 2021 determined in accordance with point 6.1.2 of Part B of Annex I.”;
Justification: The current market uptake of low- and zero emission vehicles is far from expectations and market situation. Especially small SMEs suffer from lack of infrastructure and high electricity prices for charging electrified vans. Current framework conditions do not reflect specificities of the vans market (focus on maximum use – often 24/7, maximum payload and lowest total costs of ownership). This is reflected in purchase behaviour of the businesses.	

Amendment: 2 averaging periods (2025-29, 2030-34)

Recital 8, Article 4	
<i>Text proposed by the Commission</i>	<i>ACEA Amendment</i>
<i>Recital 8</i> (8) In order to provide additional flexibilities, during the period 2030 to 2032, manufacturers should ensure that the average specific emissions of CO₂ of their vehicles do not exceed an emissions target, calculated as the average of their annual specific emissions targets over the period. Compliance with the targets should be assessed at the end of the period for each individual manufacturer. The excess emission premiums should be calculated accordingly. <i>Article 4 para 1a</i> “1a. By way of derogation from paragraph 1, for the periods comprising the calendar years 2025 to 2027 and the calendar years 2030 to 2032, a manufacturer, including when it is a member of a pool, shall ensure that its average specific emissions of CO₂ over these periods do not exceed its specific emissions target over these periods.	<i>Recital 8</i> (8) In order to provide additional flexibilities, during the period 2028 to 2032, manufacturers should ensure that the average specific emissions of CO₂ of their M category vehicles do not exceed an emissions target, calculated as the average of their annual specific emissions targets over the period. Compliance with the targets should be assessed at the end of the period for each individual manufacturer. The excess emission premiums should be calculated accordingly. <i>In order to provide additional flexibilities, during the period 2025 to 2029 and during the period 2030 to 2034, manufacturers should ensure that the average specific emissions of CO₂ of their N category vehicles do not exceed an emissions target, calculated as the average of their annual specific emissions targets over the period. Compliance with the targets should be assessed at the end of the period for each individual manufacturer. The excess emission premiums should be calculated accordingly.</i> <i>Article 4 para 1a</i> “1a. By way of derogation from paragraph 1, for the periods comprising the calendar years 2025 to 2027 and the calendar years 2028 to 2032, a manufacturer, including when it is a member of a pool, shall ensure that its average specific emissions of CO₂ over that period do not exceed its specific emissions target over that periods. <i>Those average specific emissions of CO₂ shall be calculated as the average over the three and five-year period of the annual average specific emissions of CO₂ weighted according to the number of newly registered vehicles for the M category manufacturer in each calendar year. The specific emissions target shall be calculated in accordance with point 6.3 of Part A of Annex I or, where a manufacturer is granted a derogation under Article 10, in accordance with that derogation, weighted according to the number of newly registered vehicles for the manufacturer in each calendar year.</i> <i>By way of derogation from paragraph 1, for the five-year period comprising the calendar years 2025 to 2029 and for the five-year period comprising the calendar years 2030 to 2034, a manufacturer, including when it is a member of a pool, shall ensure that its average specific emissions of CO₂ over that period do not exceed its specific emissions target over that period. Those average specific emissions of CO₂ shall be calculated as the average over the five-year period of the annual average specific emissions of CO₂ weighted according to the number of newly registered vehicles for the</i>

	<i>N vehicle manufacturer in each calendar year. The specific emissions target shall be calculated in accordance with point 6.3 of Part B of Annex I or, where a manufacturer is granted a derogation under Article 10, in accordance with that derogation, weighted according to the number of newly registered vehicles for the manufacturer in each calendar year.</i>
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Justification: Averaging is an already established and appropriate mechanism to reflect market developments at this critical stage of e-mobility ramp-up, which continues to lag behind expectations. Both private consumers and businesses still face significant barriers, including insufficient charging infrastructure and high electricity prices in several EU Member States.

In this context, the three- year averaging should be modified for vans and complemented for passenger cars, taking into account the differing market dynamics between these segments. For vans— particularly in light of the Commission’s proposed adjustment of the target—a five-year averaging period aligned with the agreed target phases (2025–2029 and 2030–2034) would be more suitable.

This would allow for the necessary flexibility in compliance calculations, allowing for market fluctuations and a more realistic reflection of deployment trends.

By contrast, for passenger cars, where the target has not been modified, a five-year averaging period covering 2028–2032 should be introduced. This would support the achievement of the -55% target without requiring any revision to the target itself.

Amendment: 2035: target adjustment (-80%, unconditioned)

Article 1 and 8 - definitions	
<i>Text proposed by the Commission</i>	<i>ACEA Amendment</i>
<i>Recital 9</i> (9) The fleet-wide emissions reduction target as from 2035 is reduced from 100% to 90%, <i>provided that the remaining emissions are compensated by the use of low-carbon steel credits or sustainable renewable fuel credits.</i> <i>Recital 10</i> (10) The use of low-carbon <i>steel</i> credits and sustainable renewable fuel credits should be capped in order to preserve investments in the zero-emission value-chain. By allowing to compensate emissions up to 10% of the <i>EU fleet-wide target of 2021</i> as from <i>2035</i>, these credits, <i>combined with the 90% emissions reduction target</i>, support the overall climate neutrality objective. <i>Article 1</i> (b) paragraph 5a is replaced by the following: “From 1 January 2035, the following EU fleet-wide targets shall apply: (a) for the average emissions of the new passenger car fleet, an EU fleet-wide target equal to a 90% reduction of the target in 2021 determined in accordance with Part A, point 6.1.3, of Annex I; (b) for the average emissions of the new light commercial vehicles fleet, an EU fleet-wide target equal to a <i>90%</i> reduction of the target in 2021 determined in accordance with Part B, point 6.1.3, of Annex I.”; <i>Article 8 (2)</i> The excess emissions premium under paragraph 1 shall be calculated using the following formula: (Excess emissions × EUR 95) × number of newly registered vehicles. <i>Article 8 (5)</i> (b) the following paragraph (5) is added:	<i>Recital 9</i> (9) The fleet-wide emissions reduction target as from 2035 is reduced from 100% to 90% <i>for passenger cars and 80% for vans.</i> <i>Recital 10</i> (10) The use of low-carbon <i>materials</i> credits and sustainable renewable fuel credits should be capped in order to preserve investments in the zero-emission value-chain. By allowing to compensate <i>additional</i> emissions up to 10% <i>or 20% for a manufacturer that has been granted a derogation under Article 10</i>, of the <i>OEM2021 specific</i> target as from <i>date of the application of the review</i> these credits, support the overall climate neutrality objective. <i>Article 1</i> (b) paragraph 5a is replaced by the following: “From 1 January 2035, the following EU fleet-wide targets shall apply: (a) for the average emissions of the new passenger car fleet, an EU fleet-wide target equal to a 90% reduction of the target in 2021 determined in accordance with Part A, point 6.1.3, of Annex I; (b) for the average emissions of the new light commercial vehicles fleet, an EU fleet-wide target equal to a <i>80%</i> reduction of the target in 2021 determined in accordance with Part B, point 6.1.3, of Annex I.”; <i>Article 8 (2)</i> The excess emissions premium under paragraph 1 shall be calculated using the following formula: (Excess emissions – <i>(fuel credits + low-carbon materials credits)</i>) × EUR 95} × number of newly registered vehicles. <i>Article 8 (5)</i> (b) the following paragraph (5) is added: “By way of derogation from paragraphs 1 and 2, for each calendar year starting from 2035, the Commission shall impose

“By way of derogation from paragraphs 1 and 2, for each calendar year starting from 2035, the Commission shall impose an excess emissions premium on a manufacturer or pool manager, as appropriate, where a manufacturer's average specific emissions of CO₂ exceed its specific emissions target or its average specific emissions of CO₂ exceed the sum of its fuel credits as referred to in Article 5a, and its low-carbon steel credits as referred to in Article 5b. The excess emissions premium shall be calculated using the following formula: (average specific emissions of CO₂ – (fuel credits + low-carbon steel credits)) × EUR 95) × number of newly registered vehicles. In the above calculation the sum of fuel credits and low-carbon steel credits cannot exceed 10% of the EU2021 target”;	an excess emissions premium on a manufacturer or pool manager, as appropriate, where a manufacturer's average specific emissions of CO₂ exceed its specific emissions target or its average specific emissions of CO₂ exceed the sum of its fuel credits as referred to in Article 5a, and its low-carbon materials credits as referred to in Article 5b. The excess emissions premium shall be calculated using the following formula: (average specific emissions of CO₂ – <i>specific emission target as defined in Article 1 para 5b or Article 10</i> – (fuel credits + low-carbon materials credits)) × EUR 95) × number of newly registered vehicles. In the above calculation the sum of fuel credits and low-carbon materials credits cannot exceed 10% <i>or 20% for a manufacturer that has been granted a derogation under Article 10(1), of the OEM2021 specific target</i>”; <i>In case the outcome of the excess emission premium calculation formula becomes negative, the excess emissions premium is set to zero.</i>
Justification: A 100% target is unachievable under the current economic conditions and foreseeable market developments. Numerous forecasts predict significantly lower BEV uptake through 2035, particularly in the van segment. Market adoption to date has been limited mainly by insufficient charging infrastructure and high electricity prices for public charging, both of which significantly increase the total cost of ownership. This is especially critical for SMEs and has a direct impact on their businesses. The contribution of steel should be expanded to other advanced materials (e.g. aluminium) in order to create incentives for a broader range of lead markets and to stimulate competition among material providers. For alternative credit cap for small volume manufacturers which have been granted a derogation under Article 10(1), refer to justification of Recitals 10 and Article 8 (5) for passenger cars.	

Amendment: Further 10% compensation by green materials + fuels

Article 15 – role of low-carbon materials	
<i>Text proposed by the Commission</i>	<i>Amendment proposal</i>
<i>Annex III – Part I & Part II</i> (b) the ratio between the total ex-works price of vehicle components - excluding the vehicle battery - originating in the Union and the total ex-works price of all vehicle components – excluding the battery – is equal to or greater than 70%; <i>Article 4 para 1 (c)</i> (c) for each calendar year, starting from 2025, the specific emissions targets determined in accordance with point 6.3 of Part A or B of Annex I, or, where a manufacturer is granted a derogation under Article 10, in accordance with that derogation. <i>“In addition, starting from 2035, the manufacturer shall also ensure that its average specific emissions of CO2 do not exceed the sum of its fuel credits as referred to in Article 5a, and its low-carbon steel credits as referred to in with Article 5b.”;</i> <i>Article 5b</i> <i>1. Starting from 2035</i>, a manufacturer shall obtain credits for low-carbon <i>steel</i> made in the EU (‘low-carbon <i>steel credits</i>’) to compensate emissions from new passenger cars and new light commercial vehicles registered in the calendar year. <i>2. Paragraph 1 shall not apply for those vehicles whose contribution to the average emissions is covered by Article 5a.</i> 3. Low-carbon <i>steel</i> credits shall be calculated taking into account the quantity and the CO2 emissions intensity, calculated according to the methodology as set out in accordance with paragraph 6, of the low-carbon <i>steel</i> made in the EU used in the manufacturer’s new passenger cars or new light commercial vehicles registered in the Union in the calendar year, the number of vehicles registered in the calendar year, and the lifetime mileage of the vehicles, in accordance with point 7 of Parts A and B of Annex I.	<i>Annex III – Part I & Part II</i> (b) 70% of the total ex-works price of a vehicle – excluding the vehicle battery – must originate from within the Union. <i>Article 4 para 1 (c)</i> (c) for each calendar year, starting from 2025, the specific emissions targets determined in accordance with point 6.3 of Part A or B of Annex I, or, where a manufacturer is granted a derogation under Article 10, in accordance with that derogation. <i>Article 5b</i> <i>1. As of date of application</i>, a manufacturer shall obtain credits for low-carbon <i>materials</i> (‘low-carbon <i>materials</i>’) to compensate emissions from new passenger cars and new light commercial vehicles registered in the calendar year. <i>2. Deleted</i> 3. Low-carbon <i>materials</i> credits shall be calculated taking into account the quantity and the CO2 emissions intensity, calculated according to the methodology as set out in accordance with paragraph 6, <i>including consideration of the made in EU to prioritise</i>, of the low-carbon <i>materials</i> used <i>in the production of</i> the manufacturer’s new passenger cars or new light commercial vehicles registered in the Union in the calendar year, the number of vehicles registered in the calendar year, and the lifetime mileage of the vehicles, in accordance with point 7 of Parts A and B of Annex I.

4. Low-carbon **steel** credits shall not decrease the average specific emissions of CO₂ of a manufacturer by more than 7% of the **EU fleet-wide** target 2021 as set out in **point 6.0** of Annex I Parts A and B.

5. The Commission shall specify, by means of implementing acts, the detailed rules and procedures for the monitoring and reporting by manufacturers of all the necessary data for the calculation of the low-carbon steel credits. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2).

6. The Commission is empowered to adopt delegated acts in accordance with Article 17 in order to supplement this Regulation by setting up a methodology for determining the characteristics of the low carbon **steel** and the CO₂ emissions intensity of the **steel** and of **the** baseline **steel** as a reference point for the calculation for the low-carbon **steel** credits.

7. Paragraph 1 shall not apply to manufacturers that formed a pool, unless all the manufacturers included in the pool are part of the same group of connected manufacturers.”;

4. Low-carbon **materials** credits shall not decrease the average specific emissions of CO₂ of a manufacturer by more than 5% of the **OEM 2021 specific** target as set out in **points 4 and 5** of Annex I Parts A and B. **The share of the renewable fuels and advanced materials to be revisited during the Regulation review in 2029, also reflecting potential RED review parameters.**

Low carbon materials credits shall not decrease the average specific emissions of CO₂ of a manufacturer which has been granted a derogation under Article 10(1) by more than 10% of the OEM2021 specific target as set out in points 4 and 5 of Annex I Part A and B.

5. The Commission shall specify **by end 2027 at the latest**, by means of implementing acts, the detailed rules and procedures for the monitoring and reporting by manufacturers of all the necessary data for the calculation of the low-carbon **materials** credits, **including their definition and made in EU provisions to prioritise**. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2).

6. The Commission is empowered to adopt delegated acts in accordance with Article 17 in order to supplement this Regulation by setting up a methodology for determining the characteristics of the low carbon **materials** and the CO₂ emissions intensity of the **material** and of **their** baseline as a reference point for the calculation for the low-carbon **materials** credits.

7. Deleted

Justification: The proposal should not only focus on the use of low-carbon steel only, but should instead be extended to other materials, such as aluminium for example. This would increase competition between different materials, ultimately lowering prices of those advanced materials and speeding-up decarbonisation in more lead markets, with benefits for final consumers. The contribution of the advanced materials should be part of the compliance immediately (by end 2027 at the latest) to speed-up decarbonisation of that part of the supply chain. The contribution of advanced materials should be comparable to the contribution of the renewable fuels to drive demand for decarbonised products and fuels at the same time.

In order to stimulate development of alternative materials (especially steel and aluminium, but others to be further defined by the Commission), the cap should be set at a level of 5%. The total contribution of the two compensation mechanisms shall not

exceed 10%. The share of the renewable fuels and advanced materials ought to be revisited during the Regulation review in 2029 and also reflecting the foreseen RED review.

With respect to Article 4 para 1 (c), the OEMs could exceed the target but will then need to pay excess premium.

For the reasoning behind the alternative credit cap for small volume manufacturers which have been granted a derogation under Article 10(1), refer to justification of Recital 10 and Article 8 (5) for passenger cars.

Amendment: Further 10% compensation by green materials + fuels

Article 5a –Role of sustainable renewable fuels	
<i>Text proposed by the Commission</i>	<i>ACEA Amendment</i>
<i>Article 5a</i> 1. Starting from 2035, the Commission shall calculate, for each manufacturer, fuel credits based on the greenhouse gas emission savings achieved by the use of the fuels referred to in paragraph 2, as determined in accordance with point 7 of Parts A and B of Annex I, to compensate emissions from new passenger cars and new light commercial vehicles registered in the calendar year. These fuel credits shall be calculated taking into account the quantity of such fuels placed on the Union market for road transport and their greenhouse gas emissions intensity, as calculated according to Article 29a and 31 of Directive (EU) 2018/2001 and as reported in the Union Database established pursuant to Article 31a of that Directive, the share of road transport fuel used in passenger cars and light commercial vehicles, the average lifetime mileage of the vehicles, and the number of vehicles registered. 2. The eligible fuels shall be renewable fuels of non-biological origin (RFNBOs) as defined in Article 2(36) of Directive (EU) 2018/2001 and fulfilling the criteria set out in Article 29a of that Directive, biofuels, as defined in Article 2(33) of that Directive, and biogas, as defined in Article 2(28) of that Directive, both produced from feedstock listed in Annex IX to that Directive and fulfilling the criteria set out in Article 29 of that Directive. 3. The credits from all fuels referred to in paragraph 2 shall not reduce the average specific emissions of CO₂ of a manufacturer by more than 3% of the EU fleet-wide target 2021 as set out in point 6.0 of Annex I Parts A and B. The credits from the quantities of biofuels and biogas produced from The credits from the quantities of biofuels and biogas produced from feedstock listed in Part B of Annex IX to Directive (EU) 2018/2001 shall not reduce the average specific emissions of CO₂ of a manufacturer by more than 1% of the EU fleet-wide target²⁰²¹ as set out in point 6.0 of Annex I Parts A and B.	<i>Article 5a</i> 1. As from the date of application of this Regulation, the Commission shall calculate, for each manufacturer, fuel credits based on the greenhouse gas emission savings achieved by the use of the fuels referred to in paragraph 2, as determined in accordance with point 7 of Parts A and B of Annex I, to compensate emissions from new passenger cars and new light commercial vehicles registered in the calendar year. These fuel credits shall be calculated taking into account the quantity of such fuels placed on the Union market for road transport and their greenhouse gas emissions intensity, as calculated according to Article 29, 29a and 31 of Directive (EU) 2018/2001 and as reported in the Union Database established pursuant to Article 31a of that Directive, the share of road transport fuel used in passenger cars and light commercial vehicles, the average lifetime mileage of the vehicles, and the number of vehicles registered. 2. The eligible fuels shall be verifiable RED-compliant sustainable fuels of non-biological origin (RFNBOs) as defined in Article 2(36) of Directive (EU) 2018/2001 and recycled carbon fuels (RCF) as defined in Article 2(35) of that Directive and fulfilling the criteria set out in Article 29a of that Directive, biofuels, as defined in Article 2(33) of that Directive, and biogas, as defined in Article 2(28) of that Directive, both produced from feedstock listed in Annex IX to that Directive and fulfilling the criteria set out in Article 29 of that Directive. In all cases, eligible fuels shall meet required EU fuel quality standards. 3. The credits from all fuels referred to in paragraph 2 shall not reduce the average specific emissions of CO₂ of a manufacturer by more than 5% of OEM2021 specific target as set out in points 4 and 5 of Annex I Parts A and B. The share of the renewable fuels and advanced materials to be revisited during the Regulation review in 2029, also reflecting potential RED review parameters. The credits from all fuels referred to in paragraph 2 shall not reduce the average specific emissions of CO₂ of a manufacturer which has been granted a derogation under Article 10(1) by more than 10% of OEM2021 specific target in 2021 as set out in points 4 and 5 of Annex I Parts A and B.

4. Paragraph 1 shall not apply to manufacturers that formed a pool, unless all the manufacturers included in the pool are part of the same group of connected manufacturers.	<i>4. Deleted</i>
Justification: The fuel credit mechanism proposed by EU Commission of a defined CO2 compensation via the use of CO2 neutral fuels is generally supported but should be adjusted in its details: It makes sense to use the fuel compensation proposed by the EU Commission before 2035 in order to allow the CO2 effect of the market fuel that already exists today to take effect for compliance with the upcoming 2030 target. It is important to also mention that all these eligible fuels should be covered by minimum quality standards to ensure broad compatibility of use in road vehicles. In order to stimulate development of alternative fuels, the cap should be increased to 5% in order to make the compensation mechanism workable and use full amount of credits either from fuels or advanced materials. The total contribution of the two compensation mechanisms shall not exceed 10%. The share of the renewable fuels and advanced materials can and should be revisited during the Regulation review in 2029 and also reflecting the foreseen RED review. With respect to Article 4 para 1 (c), the OEMs could exceed the target but will then need to pay excess premium. For the reasoning behind the alternative credit cap for small volume manufacturers which have been granted a derogation under Article 10(1), refer to justification of Recital 10 and Article 8 (5) for passenger cars.	

Amendment: VEEF – Vehicles running Exclusively on Eligible Fuels (RED Definition)

Article 3 + new recital 12 (new)	
<i>Text proposed by the Commission</i>	<i>ACEA Amendment</i>
<i>Recital 12</i> It is appropriate to allow for a recognition of emissions savings from sustainable renewable fuels in the CO₂ standards, to provide further flexibilities for manufacturers and support investments in the development of the sustainable renewable fuel value chain. Such fuels will continue to play a role in the decarbonisation of transport. In order to support innovative technologies, the current framework under Directive (EU) 2018/2001 includes binding targets for advanced biofuels in transport. Progress in its implementation is made albeit slow. A review of the Directive (EU) 2018/2001 is planned for end 2026 assessing the progress made and the need for an update of the future bioeconomy framework. <i>Article 3</i> (3) Article 3 is amended as follows: ... (b) the following points (n) to (r) are added: “(n) ‘zero-emission vehicle’ means a passenger car or a light commercial vehicle with tailpipe emissions of 0 g CO₂/km, as determined in accordance with the applicable EU type-approval procedure; (o) ‘vehicle label’ means a graphic diagram in printed or electronic form that complies with the requirements set out in this Regulation; (p) ‘point of sale’ means a location where vehicles are displayed or offered for sale or lease to potential customers, including trade fairs where vehicles are presented to the public; (q) ‘promotional material’ means any form of information in printed or electronic form, offline or online, used for sale or lease of vehicles or in the marketing, advertising or promotion of vehicles offered for sale or lease to the general public or a potential customer;	<i>Recital 12</i> It is appropriate to allow for a recognition of emissions savings from sustainable renewable fuels in the CO₂ standards, to provide further flexibilities for manufacturers and support investments in the development of the sustainable renewable fuel value chain. Such fuels will continue to play a role in the decarbonisation of transport. In order to support innovative technologies, the current framework under Directive (EU) 2018/2001 includes binding targets for advanced biofuels in transport. Progress in its implementation is made albeit slow. A review of the Directive (EU) 2018/2001 is planned for end 2026 assessing the progress made and the need for an update of the future bioeconomy framework. <i>During this review, the European Commission shall consider more ambitious renewable fuel targets for transport, and specifically for road transport, as well as a suitable fuel accounting system, to enable sufficient fuel allocation and flexibility for the deployment of VEEF vehicles (Vehicles Exclusively running on Eligible Fuels) and refuelling infrastructure.</i> <i>Article 3 (n); Article 3 (s) - new</i> (3) Article 3 is amended as follows: ... (b) the following points (n) to (s) are added: “(n) ‘zero-emission vehicle’ means a passenger car or a light commercial vehicle with tailpipe emissions of 0 g CO₂/km, as determined in accordance with the applicable EU type-approval procedure; <i>including VEEF, in accordance with Article 4(4) with an assigned WLTP value of 0 g CO₂/km</i> (o) ‘vehicle label’ means a graphic diagram in printed or electronic form that complies with the requirements set out in this Regulation; (p) ‘point of sale’ means a location where vehicles are displayed or offered for sale or lease to potential customers, including trade fairs where vehicles are presented to the public; (q) ‘promotional material’ means any form of information in printed or electronic form, offline or online, used for sale or lease of vehicles or in the marketing, advertising or promotion of vehicles offered for sale or lease to the general public or a potential customer; (r) ‘vehicle model’ means a group of vehicles belonging to the same type, variant and version as specified in Part B of Annex I to Regulation (EU) 2018/858.”;

(r) ‘vehicle model’ means a group of vehicles belonging to the same type, variant and version as specified in Part B of Annex I to Regulation (EU) 2018/858.”;	(s) ‘Eligible fuels’ (EF) means all fuels that comply with the feedstock, production and sustainability criteria set out in the Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources and its delegated and implementing acts, including future amendments and revisions.”
Justification: VEEF (also known as CNF – vehicles running exclusively on renewable fuels) should benefit from a zero-emission rating at the combustion phase, in line with the zero-rating principle already applied to those RED-compliant fuels under the EU Emissions Trading System Directive (EU ETS, Directive (EU) 2023/959). In addition, CNFs, as proposed, are fully consistent with the “zero-rated fuels” defined in Article 3(23d) of the Monitoring and Reporting Regulation (EU) 2018/2066, as amended by Regulation (EU) 2024/2493, which includes all biofuels, bioliquids, biomass fuels, synthetic low-carbon fuels, RFNBOs, and RCFs. Thus, vehicles exclusively using VEEF shall be considered “zero-emission vehicles (ZEVs)” with net tailpipe emissions equal to 0 g CO₂/km and be counted as such for the OEMs’ fleet average. All RED-compliant renewable fuels should fall within the pathways under a VEEF classification. In parallel, the coming revision of the RED must set out a more progressive and economically sustainable pathway for minimum GHG reduction targets for road transport fuels for 2030 and beyond.	

Amendment: VEEF vehicle category implementation

Article 4, new paragraph (4)	
Text proposed by the Commission	ACEA Amendment
	<i>Article 4, new paragraph (4)</i> <i>(4) The specific CO₂ emissions of VEEF, as defined in Article 3(s), shall be 0 g/km for the purpose of this Regulation.</i> <i>[x months] after the adoption of this regulation and in accordance with Articles 14 and 15 of Regulation (EU) 2024/1257 on type-approval of motor vehicles and engines and of systems, components and separate technical units intended for such vehicles, with respect to their emissions and battery durability (Euro 7), the European Commission shall adopt an implementing act to introduce the requirements for the EU type-approval of light-duty VEEF. The type-approval of light-duty vehicles shall be permitted as from the entry into force of the implementing act.</i> <i>The implementing act referred to in this paragraph shall lay down the following:</i> <i>A. A practical methodology to enable the type-approval of light-duty VEEF regarding their exclusive use of eligible fuels.</i> <i>B. A pragmatic and flexible and safe inducement system to avoid the possibility for continuous mis-fuelling by the vehicle user.</i> <i>C. Requirements to address situations when light-duty VEEF would travel outside the EU and in cross-border transport.</i> <i>Accordingly, [x months] after the adoption of this regulation, the European Commission shall integrate VEEF in the Certificate of Conformity through an implementing act that will amend Regulation (EU) 2020/683.</i>

	<i>[x months] after the adoption of this regulation, when deemed necessary for the compatibility of state-of-the-art fuel monitoring systems with refuelling points, the European Commission shall be empowered to adopt implementing or delegated acts as defined in Article 20 of Regulation (EU) 2023/1804, and to request European standardization organizations to prepare any necessary European technical standards.</i> <i>In consideration that EF would replace the use of current fuels in road vehicles, the European Commission shall address any need to amend Directive 98/70/EC to ensure maximum compatibility of EF with new vehicles and the existing EU fleet, to the greatest extent possible. In that respect the European Commission may instruct CEN to amend existing fuel quality standards or prepare new standards.</i>
Justification: It shall be ensured that the EU Commission receives all necessary mandates to develop a complete regulatory framework for VEEF vehicles that works in practice, including: vehicle type approval under Euro 7, CoC updates for the type-approval framework regulation, and infrastructure requirements under AFIR, in order to secure future-proof digital solutions with vehicle x infrastructure communication.	

Amendment: Super-credits for all BEV of 1,2

Article 5 - Super credits for small zero-emission vehicles	
<i>Text proposed by the Commission</i>	<i>ACEA Amendment</i>
1. Until 2034, for the purpose of calculating a manufacturer's average specific emissions of CO ₂ , each new zero-emission vehicle of category M1 identified as small electric vehicle in line with point 2.4 of Part A of Annex I to Regulation (EU) 2018/858 <i>and made in the EU</i> shall be counted as 1.3 vehicles.	1.a. Until 2034, for the purpose of calculating a manufacturer's average specific emissions of CO ₂ , each new zero-emission vehicle of category M1 identified as small electric vehicle in line with point 2.4 of Part A of Annex I to Regulation (EU) 2018/858 shall be counted as <i>1.3 vehicles</i> . <i>1.b. Until 2034, for the purpose of calculating a manufacturer's average specific emissions of CO₂, each new zero-emission vehicle of category N1 shall be counted as 1.2 vehicles.</i>
<u>Justification:</u> Electrification of light commercial vehicles (LCVs) presents considerably greater challenges than passenger cars, mainly due to their functional purpose (transporting goods rather than leisure), operational patterns (often running continuously), and intensive driving requirements necessitating rapid charging solutions. A super-credit system offers the benefit of reducing compliance costs, which can then be reinvested to further reduce vehicle costs for end customers.	

Phi Factor Correction 2025 onwards (COM Proposal)

(b) in Part B, point 6.3.1., row “ $\emptyset_{\text{targets}}$ ” is replaced by the following:

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$\emptyset_{\text{targets}}$	is the average, weighted on the number of new light commercial vehicles of each individual manufacturer registered in 2024, of all the specific emissions reference targets determined in accordance with point 6.2.1 but for which TM and TM0 are calculated on the basis of the test mass of the vehicles registered in 2024;
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(c) in Part B, point 6.3.2., row “ $\emptyset_{\text{targets}}$ ” is replaced by the following:

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$\emptyset_{\text{targets}}$	is the average, weighted on the number of new light commercial vehicles of each individual manufacturer registered in 2028, of all the specific emissions reference targets determined in accordance with point 6.2.2 but for which TM and TM0 are calculated on the basis of the test mass of the vehicles registered in 2028 ;
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(d) in Part B, point 6.3.2., row “ $\emptyset_{\text{targets}}$ ” is replaced by the following:

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$\emptyset_{\text{targets}}$	is the average, weighted on the number of new light commercial vehicles of each individual manufacturer registered in 2033, of all the specific emissions reference targets determined in accordance with point 6.2.3 but for which TM and TM0 are calculated on the basis of the test mass of the vehicles registered in 2033;
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Amendment: Simplify inclusion of electrified N2 vehicles up to 4.25t GVW

Article 5 –	
<i>Text proposed by the Commission</i>	<i>ACEA Amendment</i>
<i>Article 2 para 1, point (b)</i> category N 1 as defined in Article 4(1), point (b)(i), of Regulation (EU) 2018/858 and falling within the scope of Regulation (EC) No 715/2007 ('light commercial vehicles'), which are registered in the Union for the first time and which have not previously been registered outside the Union ('new light commercial vehicles'); <i>in the case of zero-emission vehicles of category N they shall, from 1 January 2025, for the purposes of this Regulation and without prejudice to Regulation (EU) 2018/858 and Regulation (EC) No 715/2007, be counted as light commercial vehicles falling within the scope of this Regulation if the reference mass minus the mass of the energy storage system does not exceed 2840 kg.</i>	<i>Article 2 para 1, point (b)</i> category N 1 as defined in Article 4(1), point (b)(i), of Regulation (EU) 2018/858 and falling within the scope of Regulation (EC) No 715/2007 or Regulation (EU) 2024/1257 ('light commercial vehicles'), which are registered in the Union for the first time and which have not previously been registered outside the Union ('new light commercial vehicles'); <i>In case of zero-emission vehicles and OVC-HEV of category N with a maximum technically permissible laden mass not exceeding 4,25 tonnes shall, from 1 January 2025, for the purposes of this Regulation and without prejudice to Regulation (EU) 2018/858, Regulation (EC) No 715/2007 and Regulation (EU) 2024/1257 be counted as light commercial vehicles falling within the scope of this Regulation.</i>
Justification: The scope of the Regulation should reflect the ongoing electrification of the vehicle fleet and the growing vehicle mass associated with electric powertrains, while remaining consistent with other relevant legislative acts, such as those governing driving licences. In addition, the forthcoming Euro 7 legislation will no longer include a reference mass definition, and the CO₂ Regulation should therefore be prepared to accommodate this change. Replacing the reference mass criteria with the maximum technically permissible laden mass will simplify the monitoring process and reduce administrative burden for manufacturers, while in practice maintaining the current vehicles scope. The definition should be aligned with the existing averaging mechanism, and a clear explanatory procedural note on the application of this mechanism should be issued by the Commission as soon as possible.	