

Consultation on the review of Regulation (EU) 2019/631 setting CO2 emission performance standards for new passenger cars and light commercial vehicles and on the review of Directive 1999/94/EC ('Car Labelling Directive')

Fields marked with * are mandatory.

We are launching this consultation to collect the views of stakeholders and citizens with regard to the review of Regulation (EU) 2019/631 setting CO2 emission performance standards for new passenger cars and light commercial vehicles (vans) and the review of Directive 1999/94/EC relating to the availability of consumer information on fuel economy and CO2 emissions in respect of the marketing of new passenger cars.

Introduction

The automotive sector is of critical importance for the EU economy. It accounts for EUR 1 trillion in GDP and provides, directly and indirectly, about 13 million jobs. It is at the heart of the EU's competitiveness. This sector is facing a critical turning point, with rapid technological changes and increasing competition posing significant challenges.

In recent years, the European automotive sector has been contending with the uncertainties of rapid technological change, digitalisation, increasing competition and a changing geopolitical context. The [Competitiveness Compass](#) sets out a joint roadmap for decarbonisation and competitiveness. It highlights that the ambitious decarbonisation framework set out by the European Green Deal and the [European Climate Law](#) can drive competitiveness if objectives and policies are well aligned, as it gives certainty and predictability to companies and investors alike. Moreover, decarbonisation policies are a powerful driver of growth when they are well integrated with industrial, competition, economic, labour and social as well as trade policies. Following the Strategic Dialogue on the Future of the European Automotive Industry, the Commission adopted an [Industrial Action Plan for the European automotive sector](#) setting out concrete measures to help secure global competitiveness of the European automotive industry and maintain a strong European production and employment base through action in five key areas. Amongst the actions in the area of clean mobility, the Commission announced that it will accelerate work on the preparation of the foreseen review of Regulation

(EU) 2019/631 and that this review will be based on a fact-based analysis, taking into account all relevant technological developments, and the importance of an economically viable and socially fair transition towards zero-emission mobility.

The review of the CO2 standards for LDVs Regulation was mentioned in the [political guidelines for the next Commission 2024-2029](#) and in the [mission letter of Commissioner Hoekstra](#). As highlighted in the [Communication "A Competitiveness Compass for the EU"](#) and in the [Industrial action plan for the European automotive sector](#), in order to be globally competitive, the European automotive industry must urgently regain a leadership position in the transition towards smarter, cleaner, and more connected as well as affordable vehicles.

[Regulation \(EU\) 2019/631](#) (CO2 standards for light-duty vehicles (LDVs) Regulation) sets CO2 emissions performance requirements for new passenger cars and light commercial vehicles ('vans'), in order to contribute to achieving the Union's greenhouse gas emission reduction targets set in the [European Climate Law](#), to provide benefits to consumers and citizens from a wider deployment of zero-emission vehicles and to stimulate innovation in zero-emission technologies, thus strengthening the sustainable competitiveness and technological leadership of the automotive value chain and stimulating quality job creation and employment in the EU. It also contributes to reducing the EU's dependence on fossil fuel imports, which cause energy price volatility and higher supply costs, make the EU more vulnerable to external pressure and global market uncertainty, and have a significant impact on consumers' energy bills – in 2022, the EU's fossil-fuel energy import bill reached EUR 604 billion.

The CO2 standards for LDVs Regulation sets out targets for the annual average CO2 emissions of the new vehicles registered for each LDV manufacturer. These targets get progressively stricter every 5 years, up to a 100% emission reduction target from 2035. The CO2 standards for LDVs Regulation provides long-term certainty and predictability for investors along the value chain, while allowing sufficient lead time for a fair transition, which supports the EU automotive value chain's technological leadership, quality employment, and which also promotes the accessibility and affordability of zero-emission mobility solutions for all, including vulnerable groups.

The Regulation was amended by the European Parliament and the Council on 19 April 2023 as part of the Fit-for-55 package, strengthening the fleet-wide emission targets for 2030 and setting a 0 g/km target for both cars and vans from 2035 onwards.

Article 14a of Regulation (EU) 2019/631 tasks the Commission to biennially submit a **report** to the European Parliament and to the Council **on the progress towards zero-emission road mobility** (progress report), the first one by 31 December 2025.

Article 15 of the Regulation tasks the Commission to **review the effectiveness and impact of the Regulation**, building on the progress report. The Commission shall in particular assess progress made towards achieving the targets applying from 2035 onwards and the need to review those targets, taking into account the technological developments, including as regards plug-in hybrid technologies, and the importance

of an economically viable and socially fair transition towards zero-emission mobility. The Commission shall also assess the impacts of establishing minimum energy efficiency thresholds for new zero-emission cars and vans placed on the Union market.

In addition, Article 15(6) of Regulation (EU) 2019/631 states that the Commission shall review Directive 1999/94/EC (**'Car Labelling Directive'**) considering the need to provide consumers with accurate, robust and comparable information on the fuel and energy consumption, CO₂ emissions and air pollutant emissions of new passenger cars placed on the market, including under real-world conditions, as well as evaluate the options for introducing a fuel economy and CO₂ emissions label for new light commercial vehicles.

The Commission announced in the abovementioned Industrial Action Plan for the European automotive sector that it will review the Car Labelling Directive in 2026, following the [evaluation](#) that was published on 4 June 2025, to support consumers to make sustainable choices and help the objective of increasing the deployment of zero-emission vehicles.

This public consultation invites citizens and organisations to contribute their views to inform the **review of the CO₂ emission performance standards for new light-duty vehicles** (Regulation (EU) 2019/631) as well as the **review of the Car Labelling Directive** (Directive 1999/94/EC) by the Commission and the preparation of future legislative action in these policy areas.

Guidance on the questionnaire

The purpose of this open public consultation is to gather views to inform the evaluation and review of the CO₂ emission performance standards for new light-duty vehicles Regulation (EU) 2019/631 and the review of the Car Labelling Directive 1999/94/EC by the Commission. The questionnaire comprises four parts:

- 1) a first part, identifying the participant's profile;
- 2) a second part, focusing on retrospective questions relevant for the evaluation of certain elements of the CO₂ emission performance standards for new light-duty vehicles Regulation;
- 3) a third part, focusing on forward-looking questions relevant for the impact assessment of possible policy options to support the review of the CO₂ emission performance standards for new light-duty vehicles Regulation; and
- 4) a fourth part, focusing on forward-looking questions relevant for the impact assessment of possible policy options to support the review of the Car Labelling Directive.

You are invited to answer questions on the parts of the questionnaire and the questions therein which are relevant to you or to your organisation. Please note that you are not obliged to respond to all questions in the questionnaire.

At the end of the questionnaire, you are invited to provide additional comments or to upload additional information, position papers or policy briefs in support of your submission or that made on behalf of your organisation.

The results of the questionnaire as well, as well as any materials uploaded to support your submission, will be published online on the “Have your Say” platform. Please review the associated privacy statement for this consultant, which explains how your contribution and your personal data will be processed.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the register of interest representatives if you have not already done so. Registering commits you to complying with a Code of Conduct. If you do not wish to register, your contribution will be treated and published together with those received from individuals.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
-

Romanian

- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

CAROLINE

* Surname

ALMERAS

* Email (this won't be published)

caroline.almeras@ectri.org

* Organisation name

255 character(s) maximum

ECTRI - European Conference of Transport Research Institutes

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

54191854341-51

*Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
|---|--|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
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- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau

- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
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- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia

- Democratic Republic of the Congo
- Denmark
- Lesotho
- Liberia
- Saint Helena
- Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, ‘business association’, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Evaluation of the Regulation setting CO2 emission standards for new cars and vans

This section of the questionnaire focuses on those elements of the CO2 emission performance standards for new light-duty vehicles Regulation (Regulation (EU) 2019/631) for which sufficient evidence on their implementation will be available. The evaluation covers the period between 2015 and 2024.

The evaluation criteria upon which the following questions are based are:

- Effectiveness (whether the EU action has reached its objectives),
- Efficiency (what are the costs and benefits),
- Relevance (whether it responds to stakeholders' needs),
- Coherence (how well it works with other actions), and
- EU added value (what are the benefits of acting at EU level).

Effectiveness considers how successful EU action has been in achieving or progressing towards its objectives.

1. In your view, how effective (on a scale of 1 – 5, with 5 meaning very effective and 1 not effective at all) has the Regulation been in achieving the following objectives in the period 2015-2024, in particular through the implementation of the 2020 targets and the modalities facilitating target compliance (eco-innovations, pooling, derogations, exemptions, super-credits, 2020 phase-in (cars))?

Objectives	1	2	3	4	5
Reducing CO2 emissions from passenger cars	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing CO2 emissions from vans	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing the supply of zero- and low-emission vehicles	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide an explanation to support your response.

1000 character(s) maximum

The effectiveness of the Regulation is limited due to the loopholes it offers to manufacturers (e.g. use of eco-innovation savings) and to the fact that the reductions achieved are due primarily to the increase in PHEVs (often overestimating their CO2 reduction on real road driving), which compensate the scan progress in the emissions of ICE vehicles. More so, as the Regulation has been unable to curb the manufacturers' (and market's) push for higher emitting SUVs and cross-over vehicles.

Efficiency considers the resources used by an intervention for the given changes generated by the intervention.

2. How would you rate the efficiency of the Regulation in terms of reducing CO2 emissions from cars and vans? In your response, please consider the extent to which the regulatory costs involved in the implementation of the Regulation have been proportionate to its benefits.

- Very efficient
- Moderately efficient
- Slightly efficient
- Not efficient
- Do not know

3. Please indicate the extent to which the following elements of the Regulation made a significant contribution to achieving the identified objectives in a cost-effective manner (on a scale of 1 – 5, with 5 representing elements which made the greatest contribution and 1 the lowest)?

	1	2	3	4	5
Provisions on pooling	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on eco-innovations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Super-credits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exemption of manufacturers responsible for less than 1 000 cars or vans registered per year	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Small volume derogations (manufacturers responsible for less than 10 000 cars or 22 000 vans registered per year)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Niche derogations (manufacturers responsible for less than 300 000 new cars per year registered)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring and reporting of vehicle registration data for assessing target compliance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Monitoring and reporting of real-world data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Which elements or provisions of the Regulation cause the highest administrative burden and/or could be simplified? Please provide suggestions for potential simplification measures. Do you have specific simplification suggestions for SMEs?

1000 character(s) maximum

Relevance looks at the relationship between the needs and problems at the time of introducing the intervention and during its implementation, as well as the relationship between the current and future needs and problems in the EU and the objectives of the intervention.

5. To what extent do the needs/problems addressed by the Regulation (cost-effective CO2 emission reductions in the road transport sector to support the EU climate targets) continue to require action at EU level?

- To a very large extent
- To a large extent
- To some extent
- To a small extent
- Not at all
- Do not know

Coherence means how well different interventions, EU/international policies or national/regional/local policy elements work together. At EU level, other policies with an interplay with the Regulation include the CO2 emission performance standards for heavy-duty vehicles, the Car Labelling Directive, the Renewable Energy Directive, the Euro 7 Regulation, the Alternative Fuels Infrastructure Regulation (AFIR), the Emission Trading System Directive (ETS, including ETS2 covering road transport), the Air Quality and National Emission reduction Commitments Directives, the Batteries Regulation and the Clean Vehicles Directive.

6. To what extent do you find the Regulation coherent with other EU legislation and policies?

- To a very large extent
- To a large extent
- To some extent
- To a small extent
- Not at all
- Do not know

7. Please identify those policies for which you find that coherence could be improved and how this could be achieved.

1000 character(s) maximum

The Regulation could be closer aligned with the Emission Commitments Directives, the Clean Vehicles Directive and with the EU objectives regarding GHG emissions from road transport and the expansion of full-electric vehicles (e.g. Sustainable and Smart Mobility Strategy, COM(2020)789).

EU Added Value considers whether the results of implementing the Regulation could have been achieved without EU intervention, i.e. via actions by the Member States. Under the principle of subsidiarity (Article 5 of the Treaty on the European Union), and in areas of non-exclusive competence, the EU should only act when the objectives can be better achieved by Union action rather than action by the Member States.

8. In your opinion, what is the value added of having an instrument at the EU level aimed at reducing CO2 emissions from new passenger cars and vans?

- Very high
- High
- Moderate
- Low
- Very low
- Do not know

Please provide an explanation to support your view, clarifying the specific elements of the Regulation for which you consider that action at the EU level does not add value.

200 character(s) maximum

The road vehicle market, especially for cars and vans, is highly integrated in the EU. It makes sense for manufacturers, dealers and consumers to address this through EU legislation.

Review of the Regulation setting CO2 emission standards for new cars and vans

The review of the CO2 emission performance standards for new light-duty vehicles (Regulation (EU) 2019 /631) will explore a number of options compared to the baseline (i.e. continued application of the current Regulation) through an impact assessment, in particular regarding:

- the targets levels applying from 2035;
- additional flexibilities for target compliance;
- the role of sustainable renewable fuels;
- the excess emission premiums;
- monitoring and reporting;
- the energy efficiency of zero-emission vehicles.

This part of the questionnaire aims to gather stakeholders' views on these elements.

Challenges to address

9. What are the needs that the Regulation should address (please rank the 5 most important needs, with 1 representing the most important and 5 the fifth most important).

	1	2	3	4	5
Need to reduce CO2 emissions from road transport in line with the climate neutrality objective	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Need for increased investments in innovative zero-emission technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Need to strengthen the competitiveness and industrial leadership of the EU automotive industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Need for more affordable cars and vans	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Need to ensure a just transition to zero-emission mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Need to stimulate employment in the automotive value chain and across the economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Need for improved air quality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Need to reduce EU's energy consumption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Need to reduce EU's fossil fuel import dependence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Market barriers and supporting measures

10. In your view, what are the main barriers for the further market uptake of zero-emission vehicles? (please rank the top 3 most important barriers, with 1 being the most important, 2 the second most, up to 5 for the fifth most important).

	1	2	3	4	5
Limited affordability due to high purchase price of zero-emission vehicles	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited availability of recharging and refuelling infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Barriers and delays in the installation of charging points	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Long recharging times	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuels subsidies, hampering the consumers choice for zero-emission vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
High price of electricity (recharging)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
High taxation on electricity compared to gasoline and diesel	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited choice of zero-emission vehicle models	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumer anxiety on lack of autonomy, due to perceived limited range	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of adequate information or misinformation, limiting consumer awareness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can use the space below in case you selected "other"

200 character(s) maximum

Supply-side barrier: Business strategies of most European manufacturers still focusing on ICE vehicles or PHEV instead of fully embracing full BEVs.

11. In your view, which additional measures should be introduced to make zero-emission cars and vans more attractive for consumers and businesses? (please rank the top 5 most important measures, with 1 being the most important, 2 the second most, up to 5 being the fifth most important).

	1	2	3	4	5
EU co-ordinated incentive schemes for zero-emission vehicle purchase	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States social leasing schemes targeting lower-income users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fiscal regime favourable to zero-emission vehicles (registration tax, circulation tax)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Favourable taxation of electricity compared to fossil fuels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to lower the cost of vehicle batteries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to accelerate the uptake of zero-emission vehicles in corporate fleets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to facilitate/accelerate the deployment of public recharging and refuelling infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Measures to facilitate/accelerate the deployment of private recharging infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to accelerate the deployment of (ultra-) fast charging infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to improve the transparency of recharging costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to lower the cost of recharging (electricity price)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to facilitate flexible charging, e.g. smart and bi-directional charging including use of batteries for storage purposes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enforcement of the right to plug for citizens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your reply

1000 character(s) maximum

EU-coordinated schemes would provide a more stable framework to consumers (even if flexible enough to adapt to the huge differences in electrification among EU countries); ICE and BEV vehicle prices should converge, through lower battery/manufacturing costs, incentives/disincentives or a mix of both. Also, the ambiguous role of PHEV (using mainly the ICE rather than the battery and hardly contribution to GHG emission mitigation) needs to be clarified by regulations and properly informing consumers (marketing...).

Automotive value chain

12. In your view, which additional measures should be set up to ensure a socially acceptable and just transition towards zero-emission mobility, taking into account the necessary industrial transformation throughout the whole automotive value chain in particular in those regions particularly dependent on automotive jobs, as well as the need for accessible and affordable zero-emission mobility solutions and infrastructures?

1000 character(s) maximum

Most European manufacturers still need to fully embrace this transition. More social, political and regulatory pressure on them is needed; otherwise, they will continue lagging behind and focusing on extending the lifetime of ICE technologies. To drive demand, that pressure should drive and support development & deployment of attractive, affordable and widely available mobility and transport solutions based on zero-emission technologies.

13. In your view, which additional measures are needed to promote a resilient and sustainable automotive value chain in Europe? (please rank the

top 3 most important measures, with 1 being the most important, 2 the second most, up to 5 for the fifth most important).

	1	2	3	4	5
Measure to incentivise investments into an EU battery value chain	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementation of the Battery Booster package announced in the Industrial plan for the European Automotive sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to boost circularity of the supply chain of electric vehicles (please specify which actions)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to support European production in recognition of its environmental standards (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Measures to further promote the use of sustainable renewable fuels in internal combustion engine vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stable long term industrial strategy for the value chain	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Stronger Research and Innovation investments in the European Automotive sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to support the development of a skilled workforce in the European automotive sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging cooperation, including international standards (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other measures (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can use the space below to provide additional information, if relevant

200 character(s) maximum

The long term stability strategy needs to include concrete plans and actions for European independence in securing critical materials and components. Software should not be ignored.

Please explain your reply

1000 character(s) maximum

The automotive value chain in Europe remains strongly focused on ICE technologies and disruptive change is urgently need; the skilled workforce is probably there, but investors are reluctant and leadership in frontier know- how needs to be rebuilt.

2035 CO2 emissions targets for cars and vans

Regulation (EU) 2019/631 sets targets for the average CO2 emissions of the fleet of new vehicles registered in a given calendar year, which gradually become stricter over time. For both cars and vans, the target becomes 0 g/km (100% emission reduction) from 2035 onwards. Article 15 of the Regulation tasks the Commission to review the effectiveness and impact of the Regulation and in particular assess progress made under the Regulation towards achieving the 2035 targets.

This section contains questions related to the 2035 CO2 emission target level for cars and vans.

14. In your view, should the EU keep targets on 2035 CO2 emission level for cars and vans unchanged?

- Yes
- No

15. Do you have any additional comments on the 2035 targets? If so, they can be added below

1000 character(s) maximum

Existing flexibilities to meet the 2030 and 2035 targets should be revised, as the current ones could strongly weaken the final de-carbonisation results expected by the Regulation and by the overarching EU climate Law.

Additional flexibilities for target compliance

Regulation (EU) 2019/631 provides for a number of flexibilities, aimed to facilitate manufacturers' compliance with their targets, such as the option to pool with other manufacturers, eco-innovation credits and a bonus for having a high share of zero- and low-emission vehicles in their fleet.

The manufacturer-specific emission targets apply annually, meaning that the average CO2 emissions of all vehicles registered in a given calendar year for which a manufacturer is responsible shall not exceed that manufacturer's target for that year. Manufacturers exceeding their specific emissions target pay an excess emission premium of €95 per g/km for each new vehicle registered.

16. Please indicate to what extent you agree with the following statements as regards flexibilities for target compliance from 2030 (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement). Not all statements need to be rated.

	1	2	3	4	5
There is no need for additional flexibilities for target compliance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
For the period 2030-2032, compliance with the targets should be assessed for the three years combined so that overachievement in a given year can be carried over to subsequent years and/or underachievement in a given year can be compensated by overachievement in subsequent years.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For the period 2030-2034, compliance with the targets should be assessed for the five years combined.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other additional flexibilities should be introduced (please specify) <i>Please note that fuels, eco-innovations, pooling, derogations are covered in the next sections.</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Existing flexibilities should be reduced (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If needed, please specify

1000 character(s) maximum

Article 11 (eco-innovations) should be revised or even cancelled after 2030, as the quick transition to zero-emission vehicles is the EU target and these vehicles are already available; similarly, flexibilities regarding "low-emission vehicles" should be reduced, or even eliminated.

17. Please indicate to what extent you agree with the following statements as regards the role of plug-in hybrid and range extender electric vehicles in the CO2 emission standards for cars and vans (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement). Not all statements need to be rated

	1	2	3	4	5
They are not delivering sufficient environmental benefits, therefore they should play a limited role in the transition towards zero-emission mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

They are transitional technologies that can help the transition towards zero-emission mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
They are technologies whose usefulness to decarbonise road transport should be recognised also in the longer term	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can use the space below in case of additional views on the role of plug-in hybrid and range extender electric vehicles in the CO2 emission standards for cars and vans

1000 character(s) maximum

Fuels

Regulation (EU) 2019/631 sets responsibilities for vehicle manufacturers, requiring them to ensure that the vehicles they put on the EU market achieve a certain CO2 performance and improve it over time. The deployment of sustainable renewable fuels in transport is incentivised through other EU policies that focus on fuels suppliers, such as the Renewable Energy Directive, the ReFuelEU Aviation Regulation, the FuelEU maritime Regulation, and the emissions trading system (ETS2).

The role of fuels in the context of the Regulation has been the subject of debate over the past years and has been referred to by the Commission in several policy documents, most recently in the Competitiveness Compass Communication.

18. In your view, should sustainable renewable fuels have a role in the CO2 emission standards for cars and vans?

- No
- Yes

Please specify:

a) Which fuels should have such a role:

- Only climate-neutral fuels, whose net-emissions are zero
- Only renewable fuels of non-biological origin
-

Advanced biofuels and renewable fuels of non-biological origin

- Also other fuels in addition to the ones above – please specify which ones

Please explain your reply

1000 character(s) maximum

So-called sustainable renewable fuels should be addressed independently; otherwise, this opens one additional loophole to water down the CO2 emission targets, and will slow down the transition to a full-electric car and van fleet.

b) What should be the design of the mechanism to define the role of such fuels

1000 character(s) maximum

c) Regarding the impacts of sustainable renewable fuels playing a role in the CO2 emission standards for cars and vans, please indicate to what extent you agree with the following statements (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated)

	1	2	3	4	5
It will provide for a more technology neutral approach	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will come at the expense of the availability of those fuels for other sectors /transport modes which face steeper challenges to decarbonize (e.g. aviation/ maritime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
This will be incompatible with EU efforts to reduce energy consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
It will no longer ensure clear and distinct responsibilities and accountability for vehicles manufacturers and fuels suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
It could weaken the long-term certainty needed for investments in zero-emission technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
It will result in continued air pollutant emissions, thus affecting negatively public health and the ecosystem	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

You can use the space below in case of additional views on the role of sustainable renewable fuels in the CO2 emission standards for cars and vans

1000 character(s) maximum

Excess emissions premiums

Under Regulation (EU) 2019/631, a manufacturer whose average specific emissions of CO₂ exceed its emission target has to pay an excess emission premium, for each of its vehicles registered in the calendar year concerned, of 95 EUR per g/km target exceedance. The amounts of these premiums are considered as revenue for the general budget of the Union, without a specific destination for the spending of the recovered money.

19. In your view, which should be the specific destination for revenues derived from the excess emission premiums?

- They should continue to be considered as revenue for the general budget of the Union
- They should be redirected to be used to support the zero-emission transport transition
- They should be redirected to be used to support the companies and/or regions most affected by job losses and/or restructuring along the value chain
- Other (please specify)

You can use the space below in case of additional views on the excess emission premiums

1000 character(s) maximum

Monitoring

20. In your view, how could the monitoring and reporting requirements (annual reporting of vehicle registration data) for Member States and manufacturers be simplified? (scale from 1 to 5, where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated)

	1	2	3	4	5
No changes are needed to the monitoring system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The number of parameters to be reported should be limited	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The monitoring process should be based on the electronic Certificate of Conformity (eCoC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should only report the vehicle identification numbers (VINs) and manufacturers should report all relevant eCOC data for their vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should only report the vehicle identification numbers (VINs) and type-approval authorities should report all relevant eCOC data for their vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission/EEA should have direct access to the relevant vehicle registration data in the Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please explain)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your reply:

1000 character(s) maximum

21. In your view, how could the real-world data monitoring and reporting requirements (for manufacturers and Member States) be changed in order to simplify them? (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated)

	1	2	3	4	5
No changes are needed to the real-world data monitoring system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The number of parameters to be reported should be limited	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Only the Member States should report data (collected during periodical technical inspections), not manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Only manufacturers should report data (using the same means as currently), not the Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacturers should be obliged to report data directly from the vehicles (over-the-air transmission)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Manufacturers should be obliged to report data directly from the vehicles (over-the-air transmission) and the Member States should no longer report real-world data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please explain)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain you reply

1000 character(s) maximum

Energy efficiency of zero-emission vehicles

According to Article 15 of the Regulation, the Commission shall assess the impacts of establishing minimum energy efficiency thresholds for new zero-emission cars and vans placed on the Union market.

22. In your view, should the Commission propose to regulate the energy efficiency of zero-emission cars and vans at EU level? (scale from 1 to 5, where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated)

	1	2	3	4	5
No, there is no need to do so	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No, but information on energy efficiency should be integrated into the vehicle label	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Yes, and this should be done in the form of a limit imposing a minimum energy efficiency per vehicle	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Yes, and this should take the form of a target value for the fleet-wide average energy efficiency (which could vary amongst manufacturers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your reply

1000 character(s) maximum

Other provisions

Manufacturers of new cars and vans have to meet specific emission reduction targets, which are based on the fleet-wide targets, taking into account the average mass of the vehicles registered in the year concerned.

Regulation (EU) 2019/631 includes flexibilities allowing a more cost-effective implementation, such as the possibility for pooling, credits for the uptake of eco-innovations, an exemption for very small manufacturers, and a derogation possibility for small volume manufacturers.

23. In your opinion, do any of the following provisions need to be changed?

	Yes	Neutral	No
Provisions on eco-innovations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on pooling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Exemption for manufacturers responsible for less than 1 000 new vehicles registered in the EU per year	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Small Volume derogations (manufacturers responsible for less than 10 000 new cars or 22 000 new vans registered in the EU per year)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If YES, please explain how the provisions should be changed:

1000 character(s) maximum

Credits on eco-innovations, rather than sales on low-emission or zero emission vehicles- explain most of the last years progress towards the CO2 emission targets. The actual merits of such innovations and their delivery in the real-world remains uncertain, at best. As Europe moves to a zero target for new cars and vans, such creative accounting should be eliminated. Follow-up of the provisions' effectiveness in contributing towards targets should be made periodically and be the foundation of revisions/updates if not heading in the right direction.

Any additional comments

24. If you have any comments or supplementary information to add to your replies to the above questions, please insert this here:

1000 character(s) maximum

Review of the Car Labelling Directive

The review of the Car Labelling Directive (Directive 1999/94/EC) will explore a number of options compared to the baseline (i.e. continued application of the current Directive) through an impact assessment, in particular on:

- the harmonisation of the label
- the design characteristics and information elements to be included in the label
- the use of information channels and digital tools
- the scope of the legislation (types of vehicles covered)

This part of the questionnaire aims to gather stakeholders' views on these elements.

Regarding the harmonisation of the label

The implementation of the current Directive varies across Member States. The label remains relevant, but the lack of harmonisation leads to higher costs for industry.

25. Please indicate to what extent you agree with the following statements regarding the harmonisation of the label (scale from 1 to 5 where 5 is highest agreement and 1 is no agreement).

	1	2	3	4	5
The label design should be the same in all Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The information included in the label should be the same in all Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
There should be a possibility for a Member State to require manufacturers to include additional information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There should be a possibility for a vehicle manufacturer to voluntarily display additional information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Regarding the information elements to be included in the label

The current Directive requires that the car label displays the fuel consumption and CO2 emissions values. The evaluation shows that buyers of zero-emission vehicles are not well served by the current Directive.

26. In your view, how important is it to display on the label the following information for zero-emission vehicles? (scale from 1 to 5, where 5 is very important and 1 is not important at all).

Information elements for zero-emission vehicles	1	2	3	4	5
Energy consumption (for instance in kWh/100 km or kg H2/100 km)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Electric range (in km)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Charging time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Battery capacity (in kWh)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

In addition to fuel consumption values, CO2 emissions values and specific information for zero-emissions vehicles, more information elements could be added to the label, although simplicity is important for the label to be effective.

27. In your view, which are the most important additional information elements that should be displayed on the label for potential buyers of a vehicle? (please choose and rank the 5 most important measures, with 1 representing the most important, 2 the second most, and so on, up to 5 being the fifth most important).

	1	2	3	4	5
Vehicle weight	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Real-world fuel or energy consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Life-cycle CO2 emissions (all CO2 emissions from the production, use and end-of-life stages of the vehicle and from the production of the fuel or electricity used)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Carbon footprint of key materials used in the vehicle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Information on local content (e.g. percentage of the added value of the vehicle coming from the EU)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the operational costs (fuel/energy costs) of the vehicle	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Total Cost of Ownership of the vehicle (sum of purchase price and operational costs)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on incentives and taxes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Air pollutant emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expected battery durability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

You can use the space below in case of additional views on the label.

1000 character(s) maximum

Regarding the use of information channels and digital tools

The Car Labelling Directive requires a paper version of the label, poster and guide to be made available. However, consumers increasingly rely on digital platforms for information on new vehicles.

28. Please indicate to what extent you agree with the following statements regarding the use of information channels and digital tools (scale from 1 to 5, where 5 is highest agreement and 1 is no agreement - not all statements need to be rated)

About the label	1	2	3	4	5
The label should be shown at the point of sale	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The label should be accessible online (also outside the point of sale)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The label should include a weblink to other relevant information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

About the guide	1	2	3	4	5
A guide with information on all available vehicle models should be available to allow comparing brands and models	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The guide should be accessible online (outside the point of sale) and include search and compare functions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Regarding the scope (types of vehicles covered)

29. In your view, how important is it to extend the scope of the car labelling requirements from those currently covered (new passenger cars)? (scale from 1 to 5, where 5 is most important and 1 is least important.)?

	1	2	3	4	5
No need to extend the scope (cover only new passenger cars)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cover all second-hand passenger cars	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cover second-hand passenger cars sold through a dealership including certified occasions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Cover new light commercial vehicles (vans)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cover all second-hand vans	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cover second-hand vans sold through a dealership including certified occasions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

You can use the space below in case of any additional views.

1000 character(s) maximum

Final Remarks

Should you wish to provide additional information (for example a position paper), or raise specific points not covered by the questionnaire, you may upload an additional document here.

Please note that any uploaded material will be published alongside your response to the questionnaire which is the essential input to this public consultation.

The document is an optional complement and serves as additional background reading to better understand your position.

Please upload your file(s)

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

a5ed1f5f-9350-45af-8da3-375429b74e72/2025-10-10_ECTRI_reply-Rev-CO2-emission-standards_EC-CfE.pdf

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