



European
Automobile
Manufacturers
Association

ACEA Position Paper Review of the CO₂ Regulation for cars and vans



March 2021

INTRODUCTION

The European Automobile Manufacturers' Association (ACEA) is committed to make mobility climate-neutral by 2050, in line with the objectives of the Paris Agreement. To achieve this target and enable a pathway to 2050, the automobile industry relies on innovation and technology as well as a Europe-wide regulatory framework that needs to be both appropriate and stable in the long term.

Decarbonised road transport will be based on green, renewable energy carriers. As an industry, we are driving the ramp-up of clean mobility by offering a wide range of attractive passenger cars and light commercial vehicles, technologies and services. For the coming years, electrified vehicles will play a crucial role. That is why the EU auto industry will invest more than €60 billion in these technologies over the next few years. In addition, we need European battery and hydrogen production facilities as well as appropriate charging and refuelling infrastructure in order to enable this steep ramp-up in clean mobility. In broad terms, these are the main prerequisites for reaching the European Union's climate goals for road transport.

To support and safeguard this transition towards electrification and decarbonisation, attractive and supportive framework conditions are essential. In particular, this includes the swift deployment of a pan-European network of charging and refuelling infrastructure, with binding national targets for member states, financed by the European Recovery Fund.

To become effective and meaningful, the necessary framework conditions must be put in place now and should follow a strategic plan. All stakeholders should commit to binding targets in their respective areas of responsibility to meet the overall climate targets – both the existing ones as well as more ambitious CO₂ targets for the future.

The underlying transformation will have a significant impact on the structure of Europe's automotive sector and its employment potential. Given that the auto industry is the backbone of prosperity in Europe, this impact on economic growth and employment must be carefully weighted. Europe's focus must be on investment, innovation and infrastructure.

Any decision to further tighten climate targets or emission performance standards should thus only be taken after a thorough impact assessment. All relevant technologies, and social and economic impacts, must be properly considered in order to allow the automotive industry to continue generating prosperity and employment in the future.

Clean mobility can only be achieved through a joint effort by industry, government and society. All stakeholders need to work together to create the right conditions needed to achieve the climate targets in Europe.

CONTEXT

The European automobile industry is fully committed to the 2050 climate neutrality targets, as endorsed by the member states and EU institutions to meet the COP21 objectives. In order to help address climate change, ACEA and its 15 members are also ready to contribute their fair share to reaching the overall -55% greenhouse gas (GHG) reduction target, as supported by the European Council in December 2020, and to contribute to the decarbonisation of the transport sector in a holistic way (read the ACEA position on implementation of the EU Green Deal¹ for more details).

ACEA members see the review of the CO₂ Regulation for cars and vans, foreseen for June 2021, as a step in the process of decarbonising road transport, but also want to stress the need to propose an ambitious, but realistic and achievable, roadmap for the European automotive sector. Indeed, the review should be based on technological openness, keeping doors open for different options to reach given targets. It should also be ensured that the European Commission takes a holistic approach towards the overall decarbonisation process, addressing all relevant pieces of legislative proposals in a coordinated and timely manner, mutually supporting each other.

The CO₂ Regulation only covers newly-registered vehicles in the EU. That is why the EU's overall strategy for the decarbonisation of road transport must be complemented by a package of measures addressing the current vehicle fleet and the decarbonisation of all energy carriers, as well as ensuring that mobility remains affordable for European society – across all vehicle segments, including vans. In order to support and even further speed up the overall decarbonisation of the transport sector, the Commission should incentivise the contribution that renewable and low-carbon fuels can make during the transition towards fully zero-emission mobility. It should also consider increasing the contribution of renewable and low-carbon fuels through those incentives and through an ambitious REDII reform.

¹ <https://www.acea.be/publications/article/paving-the-way-to-carbon-neutral-transport-10-point-plan-to-help-implement>

EXECUTIVE SUMMARY

ACEA members consider the review of the CO₂ Regulation as a step towards the faster decarbonisation of the transport sector, but such a step should also be appropriate. The Commission should present ambitious but achievable proposals that reflect the current economic situation in Europe, and that support the efforts taken by the automobile industry with an appropriate regulatory framework and financial support (such as fleet renewal schemes).

ACEA members would like to express their views in the following areas:

- The targets set by the Alternative Fuels Infrastructure Directive (AFID) are key to achieving the necessary decarbonisation of the fleet. More ambitious CO₂ targets for 2030 should thus be supported by and directly linked to newly-reviewed, more stringent and binding AFID targets. In other words, the 2030 CO₂ targets should be based on conditionality and directly linked to the AFID review (based on the outcome of the AFID review, the Commission can fix the appropriate targets for CO₂ and benchmarks).
- In addition, EU member states should implement a legal framework for the rapid rollout of private charging infrastructure at home and in workplaces.
- The 2030 CO₂ targets should be accompanied by suitable modalities that allow the targets to be met.
- The 2025 targets for cars and vans, as well as the benchmark levels, should remain unchanged.
- This review should be used as an opportunity to significantly improve the systems for CO₂ monitoring, eco-innovations and pooling provisions.
- The proposal should take into account the specificities of vans.
- Fixing targets beyond 2030 could provide long-term stability for the auto industry, but would require more in-depth discussions and depend on a number of enabling conditions that need to be delivered and fixed simultaneously within different pieces of legislation at the same moment. If such targets are set, a clear and strong revision clause must be introduced.

ACEA members are ready to work constructively and actively with the Commission, and all other relevant stakeholders, in order to reach consensus on a reasonable outcome that further enhances the global competitiveness of the European automotive sector and helps to tackle environmental challenges.

KEY ELEMENTS OF THE REVIEW

1. 2025 ambition level

The proposed review of the CO₂ Regulation for cars and vans is foreseen for June 2021, which implies that inter-institutional agreement could be reached sometime in late 2022 or even later. Considering the long technological development and production cycles of the auto industry, it is simply not possible to change any technical parameters of vehicles this late if those vehicles have to be ready for the market in 2025. In principle, vehicles entering the market now will also be sold in 2025 and their production facilities are installed years in advance, especially those for major components like batteries. For this reason, the **2025 ambition level must remain the same** as that fixed in the current CO₂ Regulation. This is necessary with a view to respecting the principles of better regulation and guaranteeing the reliability and robustness of the system.

2. 2030 ambition level

The auto industry is firmly committed to reach climate neutrality by 2050 and in general supports the objectives of the European Green Deal. However, the CO₂ ambition level for 2030 must reflect the environment in which our industry operates, especially with respect to the:

- Significant drop in sales in 2020 and similar results expected for 2021 due to the COVID-19 pandemic, which has limited the investment possibilities of automobile manufacturers and also harmed consumer confidence and purchasing power.
- Missing public and private charging and refuelling infrastructure for electrified vehicles (50% share of electrically-chargeable vehicles by 2030 would require around 60 million private and public charging points to be available) as well as the required 1,000 public hydrogen refuelling stations.

In this context, ACEA considers the current targets already to be very challenging. Nevertheless, ACEA is open to the further development of the current regulation, as all of its members are equally committed to sustainably reaching a carbon-neutral transport sector by the middle of the century. Nevertheless, **any CO₂ reduction beyond the current targets must be directly and through legislation linked to key enabling conditions** that must be met (the so-called 'conditionality principle'):

- A strong and ambitious AFID review in line with the agreed ACEA position (especially with regard to mandatory targets for member states and the Directive becoming a Regulation)²

² ACEA's position on the AFID review is summarised in the paper available at:

https://www.acea.be/uploads/publications/ACEA_Position_Paper-Review_of_Alternative_Fuels_Infrastructure_Directive.pdf, as well as in the joint letter with Transport & Environment and BEUC to the Commission from 11 February 2021: <https://www.acea.be/press-releases/article/eu-should-target-1m-ev-public-chargers-by-2024-say-carmakers-environmentali>.

must deliver a sharp increase in the number of publicly-available charging points.

- EU citizens should have the 'right to charge', both at public and private locations. A review of the Energy Performance of Buildings Directive (EPBD) should set clear and binding targets for the installation of charging equipment at private parking lots, as private charging represents the vast majority of charging sessions. Moreover, charging at work and at home must be easy and unbureaucratic for both employers and employees (installation, operation, funding, etc). These prerequisites must be part of the conditionality principle and should be accompanied by comprehensive incentive schemes in all EU member states.
- Fleet renewal schemes have to be continued to support the uptake of low- and zero-emission vehicles.
- A stronger 2030 target should be associated with flexibilities to reach it and to support new technologies and innovation.
- The eco-innovations process has to be simplified, making an evolution towards a pre-defined list of technologies with pre-defined CO₂ savings.
- Changes in the way CO₂ emissions are determined as part of the type-approval process must be reflected in the actual targets, and should not be used as a 'back door' to increase stringency – for instance through modifications in the test procedures, requirements for Conformity of Production (COP) or In-Service Conformity (ISC), or tightening utility factors for plug-in hybrid electric vehicles.
- All energy carriers should be decarbonised through the relevant energy-related legislative acts.
- Measures should be taken at national and EU level to support the up- and re-skilling of the automotive workforce in order to mitigate the negative consequences of the transition.
- Potential fines for non-compliance with CO₂ targets ought to be ring-fenced for supporting the transition of the industry towards zero-emission mobility, and especially for charging and refuelling infrastructure.
- EU state aid rules should be revised to allow for restructuring and financing the further development of the sector across the EU.

3. Conditionality in connection with the AFID review

The review of the CO₂ Regulation must go hand-in-hand with an equally (if not more) ambitious review of the Alternative Fuels Infrastructure Directive (AFID). As stressed in the recent joint letter from ACEA, Transport & Environment (T&E) and the European Consumer Organisation (BEUC), we need political commitment from the Commission to deliver one million charging points in 2025, three million charging points by 2030, as well as a minimum of 1,000 hydrogen refuelling stations. From ACEA's perspective, it should be reiterated that these numbers are necessary to reach the

current ambition level of the CO₂ targets.

Therefore, **any target level above the current levels must be accompanied by a conditionality mechanism**. If the Commission wants to go beyond the current CO₂ targets it should consequently present a more ambitious AFID proposal, equal to the proposed CO₂ reduction target. Moreover, the **AFID review must be also concluded before the CO₂ review**. After all, the number of charging points and refuelling stations member states agree to deploy determines what an achievable CO₂ ambition level would be.

Strong and binding enforcement measures also have to be introduced to ensure that the AFID targets are met in reality and to ensure coherence between the CO₂ targets and the number of charging points and refuelling stations needed. In other words, there needs to be a direct link between reduction targets set for vehicle manufacturers and the deployment level of charging and refuelling infrastructure throughout the EU.

In practical terms, ACEA supports the calculations made by the Commission during the last CO₂ review and endorses the estimates made by the Commission back then³ – see table below.

Table 1: European Commission projections on the number of electric vehicles (EVs) and the number of public electric charging points need in 2030

Projected number of EV and number of public electric charging points in 2030 (thousands)				
Scenario	Plug-in hybrid vehicles (PHEV)	Battery Electric Vehicles (BEV)	Total PHEV + BEV	Number of public charging points (thousands)
30%	16,494	9,780	26,274	2,627
40%	21,331	12,256	33,587	3,359
45%_40%ZLEV	35,906	27,086	62,992	6,299
50%	27,584	15,394	42,978	4,298
50%_30%ZLEV	29,008	23,481	52,489	5,249
50%_50%ZLEV	10,768	49,499	60,267	6,027
75%	61,035	27,158	88,193	8,819

Based on this approach, for example, a 50% CO₂ target scenario – including a 50% benchmark level – in the CO₂ Regulation must be accompanied by a binding agreement on the deployment of at least 6 million public charging points that need to be operational in the EU by 2030.

The number of required hydrogen refuelling stations can be calculated by applying the ratio of liquid

³ https://ec.europa.eu/clima/sites/clima/files/transport/vehicles/docs/non_paper_co2_proposal_en.pdf

fuel refuelling points for the existing fleet to the fleet-mix based on the 2030 scenarios developed by the European Commission. For example, based on the 2018 fleet mix (latest data available) and the 2030 ALLBNK scenario⁴, it would be recommended to have 5,209 hydrogen pumps or, if we take three pumps per station, 1,736 hydrogen refuelling stations by 2030 in order to meet the corresponding fleet mix.

4. Modalities to reach the targets

The current Regulation provides several modalities and incentives to stimulate a higher market uptake of low- and zero-emission vehicles. In order to minimise competitive distortions, every vehicle manufacturer should be allowed to select the most suitable technologies to meet the targets, based on the company's expertise, customer base and the competitive landscape. That is why all targets and related modalities need to be expressed in a technology-neutral fashion.

ACEA believes that the following key modalities should be available in the updated Regulation (although it should be noted that this is a non-exhaustive list, depending on the stringency level and overall Regulation framework):

- a. **Benchmarks for cars and vans:** The benchmark threshold and incentive in case of overachieving the target should be maintained in the Regulation, both for 2025 and 2030 as well as beyond. The introduction of low- and zero-emission vehicles is essential to reach the requested CO₂ reductions.
 - The ZLEV-benchmark approach is an important instrument that rewards those manufacturers that are pushing for a high share of clean mobility and deliver early actions at this stage of market development.
 - In the case of vans, the threshold values should be increased to take into account their specificities (eg 80g WLTP for 2025 onwards and current level of 50g WLTP as of 2030). The benchmark system should continue to be supported by the multiplier for sales in countries with minimal registrations, and should not be downgraded by the impact of other legislation (eg changes in the testing procedure). Moreover, this mechanism should also be extended to vans.
- b. **Eco-innovations:** The current eco-innovations system needs to be revisited and simplified. Eco-innovations have proved to support the uptake of new technologies, but the system should be simplified significantly in order to provide additional incentives for vehicle manufacturers to invest in new technologies (see Annex I for details).
- c. **Updated pooling conditions:** The current pooling provisions need to be revised in order to allow broader options, especially with respect to the M1 and N1 segments (see Annex III).

⁴ https://ec.europa.eu/clima/policies/eu-climate-action/2030_ctp_en

5. Specificities of vans

Light commercial vehicles (LCVs, better known as vans) represent a specific vehicle segment that serves society at large, as vans are mostly operated by small and medium-sized enterprises (SMEs) in Europe. LCVs are key players in the logistic chain, enabling the last-mile delivery of goods in urban areas. Essentially, vans are used as tools by SMEs to get their job done or provide a service.

Indeed, LCVs enable a broad range of economic and social activities, such as catering for the special transport needs of elderly people or those who are disabled. Vans are also essential to the e-commerce business model, which has seen a huge surge in recent months as personal mobility was reduced during the COVID-19 crisis.

The technological performance of vans, their longer development cycles, lower sales numbers, different mission, position in the value chain and the price sensitivity of their customers must be properly reflected in the differentiation between cars and vans within the CO₂ Regulation; this with the aim of supporting the decarbonisation of the LCV segment and not suppressing or reducing its potential. Given the particular powertrain options and energy carriers to be used in this specific segment in future, the contribution that renewable and low-carbon fuels can make to the transition to zero-emission LCVs should be considered, for example through an ambitious REDII reform.

The specificities of vans should in particular be addressed through:

- Less stringent ambition levels compared to passenger cars.
- Lower benchmark levels in order to reflect the different progression of the electrification rate due to the longer life cycle and mission of LCVs.
- In comparison to the current threshold of 50g CO₂/km WLTP for the benchmark, a higher future threshold (eg 80g CO₂/km WLTP) to take into account vehicle characteristics and specific mission profiles.
- A clear and stable definition of the in-scope perimeter for the 2025-2040 time frame, not to be challenged in the future by other pieces of legislation (eg Euro 7), providing investment stability for the LCV segment.

The Commission should incentivise the contribution that renewable and low-carbon fuels can make during the transition period towards fully zero-emission mobility and also consider increasing the contribution of renewable and low-carbon fuels through those incentives and through an ambitious REDII reform.

6. Targets beyond 2030

When it comes to discussions about targets beyond the year 2030, the methodology of fleet targets should be reconsidered and discussed properly.

Any CO₂ targets beyond 2030 should be also based on the development and availability of the required enabling conditions, and especially the deployment of appropriate charging and refuelling

infrastructure. Currently, the weak implementation of the AFID infrastructure targets by member states clearly shows that the auto industry cannot deliver alone.

Besides infrastructure deployment, the achievability of post-2030 ambition levels in the road transport sector will greatly depend on:

- Supportive measures on European and national level to stimulate **fleet renewal**, which will further speed up the decarbonisation of the sector.
- The skills transformation of the automotive workforce, as the sector goes through unprecedented structural changes. Industry needs measures that support and sustain the **up- and re-skilling of Europe's labour force**, which in turn will enable the sector's decarbonisation, digitalisation and other game-changing technological transformations.
- The decarbonisation of fuels: **All energy carriers need to be part of a stronger EU Emissions Trading System (ETS) to ensure the decarbonisation of the transport sector as a whole**. This will be instrumental to decarbonising Europe's current vehicle fleet, and through any kind of energy carrier (electricity, liquid and gaseous fuels, hydrogen).
- The use of penalties: The transformation of the sector should be supported not only through fiscal and non-fiscal measures on the national level. Given that it is expected that unfortunately not all manufacturers will meet the stringent EU CO₂ targets set for 2020/2021, the **penalties to be paid should be re-invested in the sector to help facilitate the transition to green and digital mobility**.

Considering the unpredictability of economic development and consumer behaviour, as well as the uncertainty surrounding AFID implementation by member states, ACEA would suggest including a **review both for the CO₂ fleet regulation as well as for the regulations dealing with infrastructure deployment (ie AFID and EPDB)**. Because **only if the targets laid down in all those regulations are achieved, the transport sector will be able to meet its climate goals**.

7. CO₂ monitoring process update

Right now, the CO₂ monitoring requirements represent a huge administrative burden and financial cost for automobile manufacturers and EU member states alike. In order to enable faster provision of final CO₂ data, which will allow continuous monitoring of CO₂ statuses, the current monitoring process needs to be updated (see Annex II for more details).

ANNEX I: PROPOSAL FOR SIMPLIFYING ECO-INNOVATIONS

The introduction of new technologies that enable reductions in fuel consumption in the real world is crucial to effectively bring CO₂ emissions down further. The eco-innovations system has the potential to be an effective tool, but the current mechanism is too complex and administratively burdensome.

Despite huge efforts made by vehicle manufacturers, their suppliers and the European Commission, only a few technologies have been deployed so far under the umbrella of the eco-innovations system.

In order to harness the system's true potential and refocus investment of technologies that are effective in the real world, the review of the CO₂ Regulation should introduce significant changes:

- Establish a list of **pre-defined technologies** and savings values and consider a relaxation of the savings threshold (currently 0.5 g/m) to maximise the deployment of technologies, which could be granted as soon as the technology is implemented in the vehicle (based on homologation). This list should be updated regularly.
- Modify the so-called '**innovativeness criterion**': This should simply become an incentive criterion (and not an eligibility criterion) in order to take into account all off-cycle technologies, regardless of their market penetration, while continuing to promote the most innovative technologies.
- **Enlarge the scope of eco-innovations** to all functions enabling energy savings in the real world, including comfort and driver-dependent functions (such as eco-driving), and provide clarity on how those technologies will be assessed (going beyond officially announced acceptance of the air conditioning systems).
- **Simplify the approval procedures**: The fact that it currently takes a long time to obtain recognition of an eco-innovation is one of the hindrances that make them less attractive and limit their wider uptake. Therefore, a quicker turnaround, especially for amendments to existing decisions, would be preferable for the industry (eg six months for a complex assessment and three months for an amendment).
- Reflect and adjust the eco-innovations to fully exploit their **potential in battery electric and other zero-emission vehicles**.

ANNEX II: PROPOSAL FOR SIMPLIFYING CO₂ MONITORING

The CO₂ monitoring requirements represent a huge administrative burden and financial cost for automobile manufacturers and EU member states alike. Current practice also confirms that even after a decade of implementation, EU member states are not able to provide correct monitoring figures. The review of the CO₂ Regulation should thus be used to significantly modify and improve the CO₂ monitoring system.

Key elements of the ACEA proposal:

- To simplify and speed up the correction procedure in the transition period up to full implementation of the electronic Certificate of Conformity (eCOC), vehicle manufacturers can opt for the possibility that member states provide only the vehicle identification numbers (VINs) of the respective registrations for a given year. Given that all manufacturers have a COC database (especially with the implementation of the eCOC), manufacturers would then be invited to provide the corresponding COC data. This process would reduce the amount of data correction to a minimum and provide increased certainty for vehicle makers.
- In order to significantly improve data quality and monitoring outcomes, the process of collecting data from the member states should be conducted four times per year (ie on a quarterly basis).
- As a minimum change requested by the industry, the following process should be followed:
 - i. Member states⁵ provide VINs of year X registrations to European Commission by 28 February year X+1.
 - ii. European Commission provides respective VINs to manufacturers by 30 April year X+1 at the latest.
 - iii. Manufacturers provide corresponding COC data by 31 July year X+1.
 - iv. EU publication of provisional results on 1 September year X+1.
 - v. EU-manufacturer discussion period from 1 August year X+1 to 30 September year X+1.
 - vi. Publication of final results year X on 31 October year X+1.
- With respect to vans, the CO₂ monitoring of multi-stage vehicles should be based on the values valid for the first stage (ie complete vehicle data).
- Electronic COC to be introduced EU-wide as a mandatory tool for CO₂ monitoring as from 1 January 2026 and the system subsequently to be further simplified through the eCOCs.

Details of the simplified CO₂ monitoring system to be further elaborated and discussed with the European Commission in the respective CO₂ Monitoring Regulation.

⁵ Including Norway and Iceland, who are also part of the CO₂ monitoring exercise.

ANNEX III: PROPOSAL FOR POOLING SYSTEM

The following proposal reflects several amendments and suggestions that were tabled in the European Parliament and also during the discussion in the WG Environment of the Council. This ACEA proposal tries to balance all relevant suggestions and puts forward a coherent system that would be simple, consistent with other parts of the CO₂ Regulation and applicable without excessive administrative burden for all stakeholders – member states, the industry and the European Environment Agency (EEA).

The key parameters of the updated pooling system could be summarised as follows:

- i) The proposed system is based on the current legal set-up and definitions, it therefore operates with the system of current manufacturer-specific emission targets based on weight and to be defined for 2030.
- ii) The specific emission targets for manufacturers will define the point from which amount the overcompliance is defined (based on g/km distance to the specific target).
- iii) The system should allow trading between vehicle manufacturers in both segments (passenger cars and vans) and between manufacturers. That means trading is allowed within the pools or outside the pools.
- iv) The settlement of the transfer should be based on an agreement between entities.
- v) Trading should be limited in size as is the case with other flexibilities in the CO₂ Regulation (10g WLTP) to avoid market distortion and ensure a level playing field between manufacturers.
- vi) The EEA will monitor individual 'trading tranches' between entities.

1. Basic principles of the system

The system is based on the legally defined manufacturer-specific targets (currently based on the defined mass and target curve based on 95g mid-point at industry level), which in turn are the basis for verifying 2025 and 2030 compliance. Overcompliance with that manufacturer-specific target could be subjected to trading between entities.

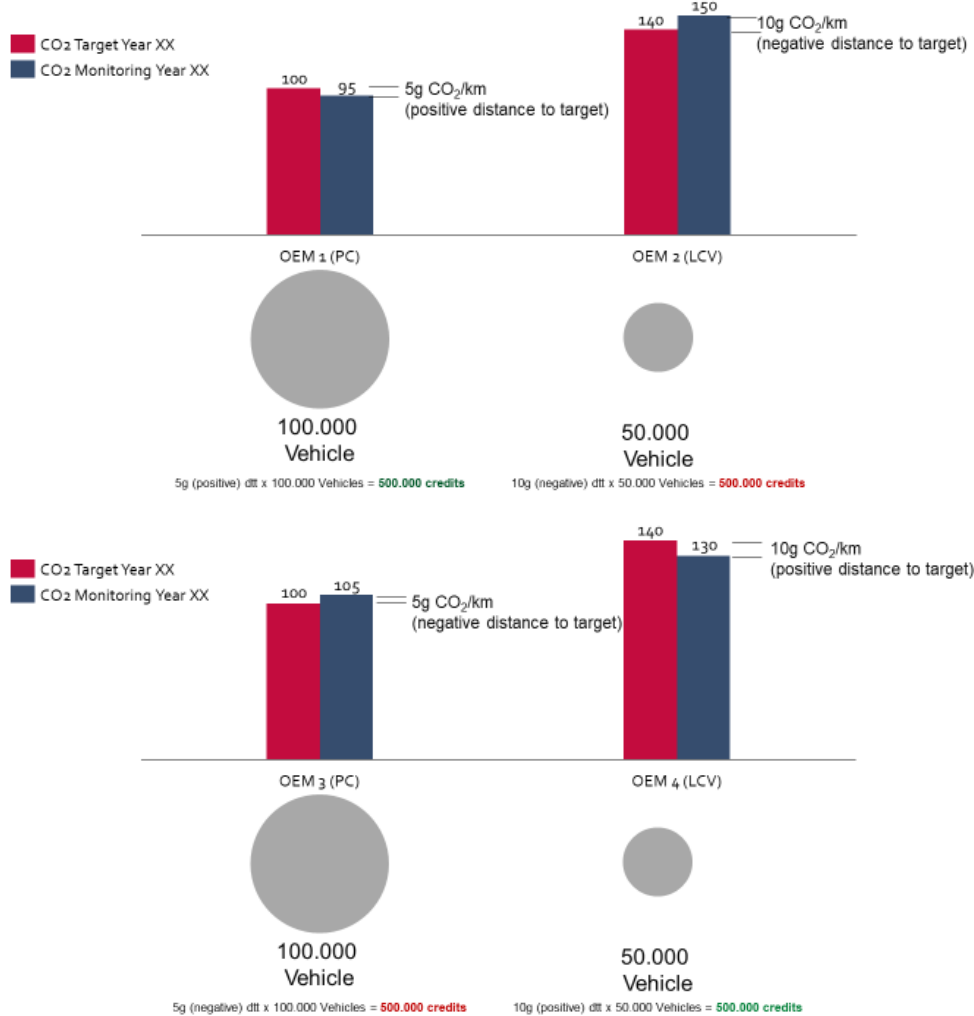
Trading is allowed between individual manufacturers, including trading between the M1 and N1 segments. For fleet compliance, the maximum amount of grammes to be used to offset underperformance/overachievement to be traded is capped to 10g WLTP (this should be adjusted to WLTP as is done for other flexibilities like eco-innovations).

Within this cap of 10g, the manufacturer that overperforms its manufacturer-specific target, could offer this overperformance to other manufacturers in both segments. The value of transfer should be defined between entities, as well as the way of settlement in order to fulfil all national fiscal requirements. The overperformance (eg 1g below the given manufacturer-specific target with one million sales would imply one million grammes to be traded) should be sales-weighted to reflect the differences in the size of the manufacturers' compliance fleet. This will also ensure fair distribution

between manufacturers and segments. The underperformance of other manufacturers could be compensated by the purchase of the overperformance of another manufacturer (in our case, one million grammes – if the receiving manufacturer has a fleet of two million vehicles, the benefit to its overall fleet compliance will be 0.5g).

This sales-weighted approach will also solve the issue of trading between passenger cars and vans. It allows to keep a 1:1 ratio for g/km metric (CO₂ emissions saved in passenger cars is equal to one produced in the vans segment), but reflects the different sizes of the fleets and vice-versa.

Figure 1: visualisation of credit transfer mechanism



2. Monitoring

The system must be constructed in a way that limits the administrative burden for all actors. That is why it must be transparent and excessive complexity should be avoided.

The credit exchange between manufacturers should be reported to the EEA under the valid rules for CO₂ monitoring.



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ABOUT THE EU AUTOMOBILE INDUSTRY

- 14.6 million Europeans work in the auto industry (directly and indirectly), accounting for 6.7% of all EU jobs.
- 11.5% of EU manufacturing jobs – some 3.7 million – are in the automotive sector.
- Motor vehicles account for €440.4 billion in taxes in major European markets.
- The automobile industry generates a trade surplus of €74 billion for the EU.
- The turnover generated by the auto industry represents over 7% of EU GDP.
- Investing €60.9 billion in R&D annually, the automotive sector is Europe's largest private contributor to innovation, accounting for 29% of total EU spending.

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