



## CO2 TARGETS KEY RECOMMENDATIONS

- Leave 2025 target unchanged
- 2030 ambition level must be fully in sync with AFIR targets
- Too early to set long-term 2035 target; wait until 2028, together with strong review

**Zero-emission vehicles & CO2 reduction targets**  
CO2 regulation for cars and vans

**CO2 regulation and AFIR must be seen as one interlinked package**

- CO2 targets have to be accompanied by equally ambitious mandatory targets for charging points and hydrogen stations in all 27 EU member states

**Decarbonisation of the fleet already on the road**  
Renewable Energy Use Directive (RED) and Energy Taxation Directive (ETD)

**Public infrastructure:**

- Electric charging points
- Hydrogen refuelling stations

Alternative Fuels Infrastructure Regulation (AFIR)

**All 5 pieces of the 'Fit for 55' puzzle are strongly interconnected**  
→ None should be seen as stand-alone

**If one puzzle piece is missing, the whole puzzle falls apart!**  
→ Ambitious CO2 targets are not possible if the other 4 pieces are not equally ambitious

**Incentives to make zero-emission mobility affordable for all**  
(Taxation policies, purchase incentives)

**Charging points and refuelling stations at home and work**  
(Energy Performance of Buildings Directive)

## AFIR KEY RECOMMENDATIONS

	COMMISSION PROPOSAL	NEEDED IN REALITY
Charging capacity per battery electric vehicle (BEV)	1kW	3kW
Charging capacity per plug-in hybrid electric vehicle (PHEV)	0.66kW	2kW
<b>Total charging points</b>	<b>3.9 million</b>	<b>7 million</b>



2019



Current CO2 targets for 2025 (-15% for cars and vans) and 2030 (-37.5% for cars; -31% for vans) were set under Regulation 2019/631 only two years ago

2020



The **auto industry's investment in electric cars is outpacing investment in infrastructure** by a long way:

- EU sales of electrically-chargeable cars grew more than six fold between 2017 and 2020
- The number of charging points only doubled over the same period (to 200,000)

2021



European Commission published proposal for review of Regulation 2019/631, as part of Fit for 55 package (just two years after Regulation was adopted)

2025



ACEA welcomes the proposal to **leave 2025 targets unchanged** – any change to this would not leave enough time to adapt due to vehicle development and production cycles

2030



A **-55% CO2 target for cars** (compared to 2021 baseline) is **very challenging**



It would **only be achievable with a massive ramp up of infrastructure** to reach a total of some **7 million chargers** (3kW / BEV and 2kW / PHEV)



Aiming only for **3.9 million chargers** (1kW / BEV and 0.66kW / PHEV), the current **AFIR proposal falls far short** of this ambition level. Its stringency must be increased!



The -50% target for vans is also extremely demanding, bordering on being unrealistic, especially in conjunction with other measures like the changed slope of the limit curve



An ambitious 2030 target will **speed up structural transformation** of the automotive value chain

- It will require careful management of the workforce and a 'Just Transition' plan to for reskilling



The existing derogation for small volume manufacturers in Regulation 2019/631 should be maintained as these vehicles only make up 0.2% of total fleet

2028



ACEA calls for a much stronger mid-term review, with a **clear safeguard that sufficient infrastructure will be in place** (linking to AFIR and EPBD)



2028 would be the **best time to set a long-term target**

2035



A 2035 target should be set as part of the 2028 review. It is **too early today to fix a 100% CO2 reduction target** – which essentially is a ban on the internal combustion engine – at a time when there are still too many open questions:

- How will infrastructure roll-out and consumer uptake develop in the next few years?
- What kind of game-changing technologies will hit the market between now and 2035?

2050



Motor vehicle manufacturers are **fully committed to bringing CO2 emissions down to zero**, supporting Europe's target of reaching climate neutrality by 2050