

Dear President von der Leyen,

We write on behalf of Europe's e-mobility, charging, and electricity sectors, partnering with civil society, to express our shared concern about the "flexibilities" the European Commission is now considering for easing compliance with the 2025 CO₂ limit for cars.

This an exciting and crucial year for electric car sales in the EU, with eleven new models being launched under €25,000. We are already seeing positive impacts, with January's electric car sales rising by nearly 40 percent year-on-year compared with 2024. Our view is that the 2025 CO₂ limits are achievable, with many EU automakers publicly confirming their intention to meet the targets¹.

The EU's Automotive Action Plan should therefore work to enhance the facilitation of this year's sales push by the auto industry to meet the 2025 CO₂ limits, delivering an ambitious package of demand-side measures. These could include targeted EU-level incentives, an ambitious corporate fleets legislative drive, incentives guidance to Member States, and action to accelerate the roll-out of the charging infrastructure.

But any "flexibility" that pushes back this year's CO₂ limit will only put Europe further behind China's electric vehicle market lead, while having a chilling effect on EU investment plants into charging infrastructure, battery development and manufacturing, and the wider e-mobility ecosystem. These sectors can deliver new jobs to Europe, but rely on a steady and predictable increase in the number of electric vehicles entering the market, and the urgent success of the clean energy transition.

Flexibilities that push back the 2025 target will also:

- Delay the much-needed uptake of battery electric cars among consumers
- Unfairly penalize the companies that have invested into compliance
- Open the door for potential attacks on the 2030 and 2035 CO₂ limits in the upcoming years

We also believe that the risks of potential fines of up to €15 billion have been overstated and expect no or minimal fines to be issued, just as was experienced in 2020.

As a united voice, we urge you to only consider options that keep the integrity of the 2025 CO₂ limit in place – in particular, demand-side actions to improve electric vehicle market

¹ [Add reference](#)

conditions – without re-opening the car CO₂ regulation. This is essential to guarantee healthy regulatory pressure to increase electric car sales this year.

We urge the European Commission to:

- **Reject the proposal for “phasing-in” of the 2025 CO₂ limits, as this will effectively delay their ambition and is a worst-case option²**
- **Reject multi-year averaging to ensure that the 2025 CO₂ limit still stays meaningful and EV transition is not delayed.**
- **In an unlikely case that carmakers will need to pay fines incurred through the CO₂ limits, any deductions of member states contributions to the EU budget resulting from the fines should be allocated to the electric vehicle ecosystem (w.g. CEF, AFIF, battery supply chain finance)**
- **Do not re-open the CO₂ regulation in 2025.**

Overall, the EU’s CO₂ limits are an effective driver of electric vehicle demand, and we ask you to direct your political energy at the higher priorities of boosting the electric vehicle market and improving value chain competitiveness. We want to work with you to make your 2035 zero-emission goal a societal and economic success.

Now is the time for the EU’s auto industry, the e-mobility, charging, and electricity sectors, and policymakers to unite on driving the electric vehicle market forward, not to step back from it.

Yours faithfully,

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² ICCT has estimated that a 90% phase-in in 2025 will weaken the EU CO₂ standards for new cars by 8 g/km in 2025, more than half of the regulation’s intended reduction - resulting in a 6%-points lower market share for electric cars in 2025