

AOB request from France and Spain for the Environment Council of 21 October 2025

« Staying on track for zero-emission vehicles in 2035 is indispensable »

On the occasion of the strategic dialogue on the future of the automotive industry, **the European Commission announced a revision of EU Regulation 2019/631 on CO2 emissions from light vehicles by the end of the year.**

In a previous revision that came into force in April 2023, the European Union made the strategic choice to adopt a “zero emissions” target for new cars and vans sold from 2035. This founding choice, which has guided several tens of billions of euros of industrial investment in Europe since 2023, must not be called into question. The future of the European automotive industry will be electric.

First of all, the European Union will not achieve carbon neutrality in 2050, without gradually replacing thermal vehicles with electric vehicles, light vehicles being responsible today for about 15% of European CO2 emissions.

Secondly, the electric car represents a major industrial and economic opportunity, enabling the development of new strategic value chains on European soil and reducing our dependence on hydrocarbon imports. While the electric market has increased sixfold in volume since 2019, the 2035 milestone is an essential benchmark for the automotive sector. It determines the continuation of industrial projects, including “giga-factories” of batteries.

France and Spain therefore hope that the upcoming review will preserve the 2035 cap and the environmental ambition of the CO2 emissions trajectory that underpins it.

In particular, this revision should in no way call into question the “zero emissions” exhaust target in 2035. It would also not be acceptable for plug-in hybrid vehicles (RVs), mainly used in thermal mode, to be favoured after 2035. In 2024, the Commission demonstrated that the actual emissions of these vehicles are 3.5 times higher than those measured during WLTP approval procedures.

To accompany this objective, however, additional measures are necessary. The automotive sector is facing slower-than-expected growth in electricity sales and is facing increasing pressure from third countries whose industry has electrified more rapidly. In this context, the existing regulation must be amended to ensure that it provides an incentive for European manufacturers to invest in the electrification of their industrial production base in Europe.

To this end, flexibilities should be put in place to support the sector in achieving its 2030 and 2035 targets. However, to ensure the incentive to produce in Europe, these flexibilities should be strictly conditioned for each car manufacturer on production efforts in Europe.

These flexibilities could take the form of preferential accounting (“super-credits”) for vehicles that meet European content objectives directly defined in the Regulation. This flexibility would aim at enhancing the CO2 reduction associated with the production of these vehicles in Europe, compared to the more carbon-intensive reduction observed in third countries. It would support manufacturers producing and sourcing in Europe and ensure that the transition to electricity fully benefits European industries and workers.

In addition, an extension to 5 years of the CO2 emissions smoothing period for light commercial vehicles (LUVs) and the authorisation for manufacturers to account for all registrations of N2 category electric vehicles in their N1 targets, without a minimum weight limit, would support the VUL segment, which is struggling to electrify. While manufacturers now offer an electric equivalent for their entire VUL range, VULs account for only 9% of sales in the European Union. Manufacturers should not be penalised due to insufficient demand.

The adoption of clear guidelines to this effect in the Environment Council would ensure that the revision of the regulation on CO2 emissions from light vehicles in the future reconciles climate ambition, competitiveness and European leadership.