T&E RECOMMENDATIONS TO IMPROVE EP PLATFORM DEAL

ENVI vote on the revision of CO_2 standards for cars and vans

T&E modelling shows that the EP deal would cut the minimum BEV share to 39% in 2030 (instead of 57% with the current regulation) and 69% in 2035 (instead of 100%). As a consequence, it puts at risk the €200 billion already invested in Europe's EV ecosystem. Therefore, we encourage MEPs to pay special attention to the following issues ahead of the vote :

1. **VEEFs**
    a. **The problem:** Crop biofuels count as "eligible", VEEFs count as zero emissions, and sales are uncapped, so carmakers could comply without selling a single BEV.
    b. T&E recommendation: Reject VEEF. If not possible:
        i. Exclude first-generation biofuels and ideally limit eligible fuels to Made-in-EU e-fuels
        ii. cap VEEF sales at 5%
        iii. Delay the entry into force of the category to 2035
        iv. Do not count VEEF as a Zero-emission vehicle but rather count it with real emissions (~40 g/km) should biofuels be included.
        v. set tamper-proof requirements in the primary law.
2. **2030 target averaging**
    a. **The problem**: The 8 g/km carry-over from 2029 is a free lunch for carmakers, as it is based on outdated targets. It will cut the 2030 BEV share by 4 points.
    b. **T&E recommendation**:Reject averaging. If not possible keep the 2030-31 average but remove the 8 g/km carry-over.
3. **PHEV Utility Factor**
    a. **The problem:** Electric range alone is the wrong criterion: real-world emissions depend on the electric-to-combustion power ration
    b. T&E recommendation:
        i. Keep the Commission's UF correction schedule.
        ii. If a freeze is unavoidable, make sure a 2 year freeze only concerns PHEVs with a 150km range, an electric motor that is 50% bigger than the combustion engine, which work in mandatory EV-priority mode. In addition, support for OEM-specific UF updates after 2030 would help improve PHEVs design and climate/consumption efficiency.
4. **Supercredits**
    a. **The problem:** The "efficient BEV" bonus rewards large premium cars (avg. €45,700) instead of small, affordable ones (avg. €27,000).
    b. **T&E recommendation** : Limit only to small Made-in-EU BEVs (under 4.1- 4.2 m) with a 1.2 multiplier · end supercredits in 2035 · drop the "efficient" category.
5. **Green steel credits**
    a. **The problem**: Without a fossil-free or Made-in-EU requirement, credits could create windfalls of up to 4 g/km and weaken the target by ~2% (2030) and ~11% (2035).
    b. **T&E recommendation**: Credit only fossil-free steel made in the EU, including the iron making.