



## JRC SCIENCE FOR POLICY REPORT

# 2025 and 2030 CO<sub>2</sub> emission targets for Light Duty Vehicles

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2023



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JRC133502

EUR 31509 EN

PDF ISBN 978-92-68-03448-4 ISSN 1831-9424 doi:10.2760/901734 KJ-NA-31-509-EN-N

Luxembourg: Publications Office of the European Union, 2023

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How to cite this report: Suarez, J., Komnos, D., Ktistakis, M.A., Fontaras, G., *2025 and 2030 CO<sub>2</sub> emission targets for Light Duty Vehicles*, Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/901734, JRC133502.

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## Abstract

Road transport is the main contributor to transport emissions of carbon dioxide (CO<sub>2</sub>) in the European Union (EU), with passenger cars and light commercial vehicles (LCVs) accounting for almost 15% of the total emissions. In order to gradually decarbonise the fleet, the EU has established fleet-wide CO<sub>2</sub> targets for annually registered vehicles, assigning manufacturer specific targets based on their average vehicle mass. From 2025, new EU fleet-wide targets will be established applying a percentage reduction to a reference 2021 EU fleet-wide target. This value is calculated from the vehicles' CO<sub>2</sub> emissions for 2020 and the mass and registration figures of 2021. In 2025, the reduction will be 15% for both passenger cars and LCVs, while for 2030 it will increase to 55% and 50%, respectively, following the recent adoption of the more ambitious targets. This report provides the robust method used to calculate the EU fleet-wide targets in 2025 and 2030 and the parameters that will define the manufacturers' specific target line from 2025 onwards. The EU fleet-wide targets calculated for 2025 are 93.6 g/km for passenger cars and 153.9 g/km for LCVs. For 2030, the EU fleet-wide targets will be reduced to 49.5 g/km for passenger cars and 90.6 g/km for LCVs. The slope of the target line for 2025 will be -0.0144 g/(km·kg) for passenger cars and 0.0848 g/(km·kg) for LCVs, while for 2030 the slope will be -0.0076 g/(km·kg) and 0.0499 g/(km·kg), respectively. An indicative 2025 average test mass of 1,609.6 kg for cars and 2,163.0 kg for LCVs, was calculated.

## **Acknowledgements**

The views expressed here are purely those of the authors and may not, under any circumstances, be regarded as an official position of the European Commission.

The authors are grateful to the European Commission's colleagues from the Directorate General for Climate Action (DG CLIMA) in particular Filip François, Victor Bormand, Katalin Lakatos and Samuel Timmers, and to the colleagues from the European Environment Agency (EEA), especially Cinzia Pastorello and Stephanie Schilling, for their support, supplying the data and the valuable comments provided.

## **Authors**

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## Executive summary

### Policy context

This report has been prepared on request of the Directorate-General for Climate Action (DG CLIMA) in order to calculate the **2025 and 2030 European Union (EU) fleet-wide targets for passenger cars and light commercial vehicles**, as mandated in Regulation (EU) 2019/631. Once they are established by Commission Decision, the parameters calculated in this study will be utilised for the determination of the manufacturers' future targets that will apply in the run-up to the 2035 zero-emission targets for new vehicles registered in the EU.

### Key conclusions

The EU-fleet wide targets applying from 2025 onwards are expressed as a percentage reduction with respect to a 2021-based EU fleet-wide emissions target: a 15% reduction from 2025 for both passenger cars and light commercial vehicles, and a 55% and 50% reduction from 2030 for passenger cars and light commercial vehicles, respectively. This report calculates the 2021 EU fleet-wide target as set out in the Regulation. This target is based on the 2020 manufacturers' measured (Worldwide harmonized Light vehicles Test Procedure) WLTP emissions, the average mass in running order of the vehicles registered in 2021 and the number of registrations per manufacturer in 2021. For this purpose, a database combining the measured-WLTP and NEDC emissions of the new vehicles registered in the EU in 2020 has been built from the data submitted by the manufacturers and the Member States authorities.

Applying the agreed reduction factors to the 2021 fleet-wide target, the EU fleet-wide targets for passenger cars and light commercial vehicles in 2025 and 2030 are calculated and provided. The manufacturers' specific emission targets for 2025 onwards will be calculated from those EU fleet-wide targets, taking into account the average mass of their registered vehicles. The slopes of the target lines are also calculated in this exercise.

### Main findings

#### *Passenger cars.*

- The database containing the measured-WLTP emissions of passenger cars registered in 2020 has been subjected to the gap-filling procedure set out in Regulation (EU) 2017/1153 and to data cleansing, with a final total number of **11,382,143** vehicles considered.
- The calculated EU fleet-wide target<sub>2021</sub> for passenger cars is **110.1** g/km, resulting in EU fleet-wide targets for 2025 and 2030 of **93.6** g/km and **49.5** g/km, respectively.
- The slope of the regression line  $a_{2021}$  in passenger cars is **-0.0175** g/(km·kg), yielding a slope ( $a_{2025}$ ) of **-0.0144** g/(km·kg) for 2025 and a slope ( $a_{2030}$ ) of **-0.0076** g/(km·kg) for 2030.
- The indicative fleet-wide average test mass value for 2025 ( $TM_0$ ), calculated based on the 2021 new registered cars, has been calculated as **1,609.6** kg.

#### *Light commercial vehicles.*

- The database containing the measured-WLTP emissions of light commercial vehicles registered in 2020 has been subjected to the gap-filling procedure set out in Regulation (EU) 2017/1152 and to data cleansing, with a final total number of **1,198,214** vehicles considered.
- The calculated EU fleet-wide target<sub>2021</sub> for light commercial vehicles is **181.1** g/km, resulting in EU fleet-wide targets for 2025 and 2030 of **153.9** g/km and **90.6** g/km, respectively.
- The slope of the regression line  $a_{2021}$  in light commercial vehicles is **0.1064** g/(km·kg), yielding a slope ( $a_{2025}$ ) of **0.0848** g/(km·kg) for 2025 and a slope ( $a_{2030}$ ) of **0.0499** g/(km·kg) for 2030.
- The indicative fleet-wide average test mass value for 2025 ( $TM_0$ ), calculated based on the 2021 new registered light commercial vehicles, has been calculated as **2,163.0** kg.

### Related and future JRC work

Following a close collaboration between the Joint Research Centre (JRC), DG Climate Action and the European Environment Agency, this report provides a detailed description of the procedure followed for the determination

of the EU fleet-wide CO<sub>2</sub> targets for the period of 2025 to 2034. The Commission will formally adopt the targets and associated parameters.

### **Quick guide**

This report analyses CO<sub>2</sub> emissions data reported by countries and manufacturers for the new passenger cars and light commercial vehicles (together referred to as “light-duty vehicles”) registered in the EU (and Norway and Iceland) in the years 2020 and 2021.

The introduction establishes the background of this report, explaining the role of the targets in reducing the CO<sub>2</sub> emissions of light-duty vehicles.

Section 2 (CO<sub>2</sub> emission calculations and targets’ background) explains how targets are calculated for the different periods since they were first established.

Section 3 (Material) provides an analysis of the emission databases used in this exercise for both passenger cars and light commercial vehicles and the data cleaning procedure.

Section 4 (Calculation of the parameters for determining 2025 and 2030 targets) presents the calculation of the parameters relevant for defining the 2025 and 2030 target lines, in particular the EU fleet-wide target<sub>2021</sub> and the  $a_{2021}$  slope.

In the conclusions, the main outcomes of this work are presented.



# 1 Introduction

The transport sector contributes one-fourth of the greenhouse gas emissions in the European Union (EU) (European Environment Agency, 2022a), and it has shown the slowest carbon dioxide (CO<sub>2</sub>) emission reduction pace among all the sectors of the economy (European Environment Agency, 2022b). To achieve climate neutrality by 2050, a 90% reduction of the transport sector's greenhouse emissions is needed, compared to 1990. Currently, approximately 15% of the total CO<sub>2</sub> emissions are attributed to passenger cars (M1 fleet) and light commercial vehicles (N1 fleet - vans) due to fossil fuels being their primary propulsion fuel (Wang et al., 2022). Hence, the EU needs to substantially reduce road vehicle CO<sub>2</sub> emissions to meet its commitments.

Until 2009, the essential measure addressing road transport CO<sub>2</sub> emissions in Europe was a voluntary agreement between the European Commission (EC) and the three major car manufacturer associations: European Automobile Manufacturers' Association (ACEA), Japan Automobile Manufacturers Association (JAMA) and Korea Automobile Manufacturers' Association (KAMA). This agreement set a target of 140 g/km in average CO<sub>2</sub> emissions from new passenger cars by 2008-2009. The failure to achieve this target revealed that more action was needed and in 2007, the EC proposed the first Regulation setting CO<sub>2</sub> targets for new passenger cars (European Commission, 2009). This Regulation was adopted by the European Parliament and the Council in 2009. The EU fleet-wide CO<sub>2</sub> target in the period 2015-2019 was 130 g /km. From 2020, the EU fleet-wide target was set at 95 g CO<sub>2</sub>/km, and the implementation modalities for this target were adopted in 2014 (European Union, 2014a). CO<sub>2</sub> emission standards for new light commercial vehicles were first introduced in 2011 (European Union, 2011a), setting for 2017 a fleet-wide target of 175 g/km. The 2020 fleet target for light commercial vehicles was set to 147 g/km, with the implementation modalities agreed in 2014 (European Union, 2014b). All of the above target values are based on the New European Driving Cycle (NEDC). For determining the binding manufacturer targets, the EU fleet targets have to be adjusted to the average vehicle mass of the manufacturer's fleet.

To ensure the proper functioning of the emission performance standards, the Regulation requires Member States to record the technical characteristics of each new passenger car and van registered in their territory, including the specific CO<sub>2</sub> emissions. Since 2011, the European Environment Agency (EEA) keeps a central register of these data (European Environment Agency, 2023), which will be referred to in this report as the annual EU registrations monitoring datasets. On this basis, the Commission calculates the annual average CO<sub>2</sub> emissions and targets for all car and van manufacturers and assesses their compliance.

During the certification of the vehicles, their fuel consumption and CO<sub>2</sub> emissions are determined following a specific testing protocol that has evolved throughout the years under Regulation (EC) No 715/2007. Commission Regulation (EC) No 692/2008 set the NEDC (European Commission, 2007), originally designed in the 1970's, as the emission Type Approval procedure. However, as several studies showed (Fontaras et al., 2017; Tietge, 2019), there was a significant and increasing disparity between the (understated) NEDC official figures and the real-world CO<sub>2</sub> emissions, reaching almost 40% in 2017. The gap was attributed to the loose boundary conditions assumed in the official test (Pavlovic et al., 2020). In 2017, the new Worldwide harmonized Light vehicles Test Procedure (WLTP) was introduced in the EU via Regulation (EU) 2017/1151 (European Union, 2017a), substituting the outdated NEDC with the objective to provide a more robust test-basis that would better represent the actual on-road vehicle operation (Dornoff et al., 2020; Ktistakis et al., 2022). Among other significant differences, the WLTP includes a longer and more dynamic driving cycle than the NEDC, and consequently, the Cycle Energy Demand (CED) and the corresponding CO<sub>2</sub> emissions are expected to be higher. In WLTP, the Type Approval certification involves the definition of vehicle families, which are sets of vehicles with similar characteristics, which may share the same reference physical tests. The official emission values of each vehicle registered in the EU are derived from the Type Approval physical tests performed on reference vehicles of their family.

Regulation (EU) 2017/1151 established a transition period (2017-2020) during which the Certificate of Conformity (CoC) of the newly registered vehicles included both the WLTP emission values and the equivalent (verified with measurements or vehicle simulation) NEDC values (European Union, 2017b, 2017c). At the same time, it was ensured that from 2021 onwards the existing targets were translated into WLTP compatible values (Commission Delegated Regulations (EU) 2017/1502 (cars) and (EU) 2017/1499 (light commercial vehicles)). The targets were renormalized to reflect the increased CO<sub>2</sub> emissions under WLTP compared to NEDC. The NEDC-to-WLTP conversion factors were to be based on the manufacturer declared emissions of the vehicles registered in 2020.

The CO<sub>2</sub> emission standards for new passenger cars and light commercial vehicles were revised with the adoption in 2019 of Regulation (EU) 2019/631 (European Union, 2019), which replaced and repealed

Regulations (EC) No 443/2009 and (EU) No 510/2011. The new Regulation preserves the fundamentals of its predecessors, such as the methodology to calculate the manufacturer emission targets, the modalities for implementing them and the annual collection of monitoring data on the new EU vehicle registrations. It also maintains the target levels set for 2020 in NEDC terms, and specific WLTP-based targets for each manufacturer in the period 2021–2024. For passenger cars, new reduction targets of 15% and 37.5% were introduced for the years 2025 and 2030, respectively. These reductions are calculated based on a 2021 EU fleet-wide target, which is taking into account the *measured*-WLTP emissions for 2020 and the mass and registration figures of 2021. For light commercial vehicles, the new reduction targets set for 2025 and 2030 were 15% and 31%, respectively, using the same approach for calculating the 2021 EU fleet-wide target, which serves as the reference.

In 2023, Regulation (EU) 2019/631 was amended through Regulation (EU) 2023/851 (European Union, 2023), reflecting the EU's increased climate ambition for 2030 and 2050. The EU fleet-wide target levels for 2030 were tightened to 55% (passenger cars) and 50% (light commercial vehicles). The calculation method for determining those values remained unchanged. For 2035, a 100% reduction (i.e., 0 g/km) target was introduced for both passenger cars and light commercial vehicles.

The 2020 EU registrations monitoring dataset includes CO<sub>2</sub> emission values determined according to both the NEDC and WLTP. These data have been used so far for the following calculations, as reflected in Commission Implementing Decision (EU) 2022/2087 (European Union, 2022):

- The average NEDC 2020 CO<sub>2</sub> emission values for each manufacturer or pool of manufacturers, which had to be compared to the respective CO<sub>2</sub> emission targets for 2020 (either derived from the EU fleet-wide target or derogation targets).
- The ratios, per manufacturer or pool of manufacturers, between the average WLTP (2020) and NEDC (2020) emissions, which will be used for defining each manufacturer's 2021 WLTP *specific emissions reference target*, which in turn is the basis for defining the manufacturers' targets for the years 2021 until 2024 using the applicable mass corrections.

The main purpose of this report is to calculate the reference values<sub>2021</sub> and the EU fleet-wide target<sub>2021</sub> for both passenger cars and light commercial vehicles, which are the basis for determining the 2025 and 2030 EU fleet-wide reduction targets. As set out in point 6.0 of Annex I, part A (passenger cars) or B (light commercial vehicles) of Regulation (EU) 2019/631, the EU fleet-wide target<sub>2021</sub> is obtained by sales-weighting, with the number of new registrations in 2021, the reference values for each manufacturer or pool of manufacturers. These reference values are calculated by rescaling the 2020 fleet-wide CO<sub>2</sub> targets with the ratio between the 2020 average *measured* WLTP emissions and the 2020 average NEDC emissions of each manufacturer or pool of manufacturers.

One critical difference between the 2021 specific emissions targets (used to assess manufacturers' compliance) and the EU fleet-wide target<sub>2021</sub> (used as a reference for calculating the 2025 and 2030 fleet-wide targets) is that the first is determined using the manufacturers' *declared* WLTP CO<sub>2</sub> values in 2020, while the latter is based on the measured WLTP CO<sub>2</sub> values in 2020. The manufacturers were obliged to transmit those measured emission values to the EC according to the provisions of Regulations (EU) 2017/1153 (passenger cars) and (EU) 2017/1152 (light commercial vehicles). The use of the *measured* WLTP values guards against a potential artificial inflation of the WLTP declared values in 2020 and, thus, of the future targets.

The report provides a comprehensive description of the Regulation's provisions regarding the EU fleet CO<sub>2</sub> emissions calculation and the targets, separated in 4 sub-sections: pre-2020, 2020, 2021–2024 and 2025 onwards. Following that, the data sources are introduced, and the necessary data curation steps for applying the Regulation's provisions on the available data are detailed. In the results section, the datasets produced by the study team for passenger cars and light commercial vehicles are presented. Furthermore, insights about the composition of 2020 EU fleet are demonstrated. The final part of the results section presents the calculation of the parameters to determine the future 2025 and 2030 targets for both passenger cars and light commercial vehicles. These parameters are the *EU fleet-wide target*<sub>2021</sub>, the parameter  $a_{2021}$  used to calculate the slope of the target lines from 2025 onwards and the indicative TM<sub>0</sub> value, taken as the average test mass of the vehicles in 2021. Finally, the main conclusions and future implications are summarised.

## 2 CO<sub>2</sub> emission calculations and targets' background

This section includes a glossary of some relevant terms. Then it describes how the certification of CO<sub>2</sub> emissions of individual vehicles evolved over the last two decades, and the evolution of the fleet targets, split in four chronological periods: before 2020, 2020, 2021-2024, and from 2025 onwards.

### 2.1 Glossary

In this section, a description of essential elements of the CO<sub>2</sub> certification procedure is provided, so that the reader has a better understanding of specific principles:

- *Chassis-dyno test (CDM test)*: A CDM refers to a test bench on top of which the vehicle is placed. It can simulate different road conditions within a controlled environment. This type of testing is used in the CO<sub>2</sub> certification process of light-duty vehicles. Depending on the protocol followed, specific rules need to be followed, such as the velocity profile, the temperature of the cell, and the vehicle pre-conditioning. The load transferred through the test-bench rollers to the vehicle's wheels changes according to the instantaneous vehicle speed and the Road Load (RL) coefficients. In this way, different resistances that apply during on-road driving can be simulated (e.g., air drag), as the vehicle follows the predefined speed profile.
- *Type Approval procedure*: The procedure whereby an approval authority certifies that a type of vehicle, system, component, or separate technical unit satisfies the relevant administrative provisions and technical requirements (Regulation (EU) 2018/858) (European Union, 2018). Concerning the CO<sub>2</sub> emissions, this report will refer to the NEDC and the WLTP Type Approval procedures set out under Regulation (EC) 715/2007.
- *Certificate of Conformity*: The document issued by the manufacturer which certifies that a produced vehicle conforms to the approved type of vehicle and complies with all regulatory acts that were applicable at the time of its production (Regulation (EU) 2018/858).
- *Road load*: The force resisting the forward motion of a vehicle as measured with the coast down method or methods that are equivalent regarding the inclusion of frictional losses of the drivetrain (Reg. (EU) 2017/1151).
- *Road load coefficients*: An essential part of the CDM testing is the insertion of the RL coefficients that will accurately replicate inside the laboratory the load a specific vehicle would realise according to its speed. According to the certification procedure, these coefficients are obtained in proving grounds, using a representative test vehicle. Several methodologies are described and used to obtain the RL coefficients (Komnos et al., 2021), with the most popular to be the coast down method: the vehicle is left to decelerate from a high speed (130 km/h for passenger cars). The times intervals the vehicle needs to decelerate through pre-specified speed bins are translated into forces, as function of the vehicle speed. The coefficients are produced by applying a second order fit in the pairs of (speed, forces).
- *Cycle energy demand (CED)*: Is the calculated positive energy required by the vehicle to drive the prescribed cycle (Reg. (EU) 2017/1151). It is calculated as the integral of the instantaneous positive motive power to overcome the vehicle inertia, the inclination, and the resistances opposing the vehicle movement (air drag, tyre rolling resistance, etc.) over a predefined velocity profile.
- *Actual mass*: The vehicle's mass in running order plus the mass of the fitted optional equipment to an individual vehicle (Reg. (EU) 2017/1151).
- *Mass in running order*: The mass of the vehicle, with its fuel tank(s) filled to at least 90 per cent of its or their capacity/capacities, including the mass of the driver, fuel and liquids, fitted with the standard equipment in accordance with the manufacturer's specifications and, when they are fitted, the mass of the bodywork, the cabin, the coupling and the spare wheel(s) as well as the tools (Reg. (EU) 2017/1151).
- *Mass representative of the vehicle load*: means x per cent of the maximum vehicle load where x is 15 per cent for category M vehicles and 28 per cent for category N vehicles (Reg. (EU) 2017/1151).
- *Maximum vehicle load*: The technically permissible maximum laden mass minus the mass in running order, 25 kg and the mass of the optional equipment (Reg. (EU) 2017/1151).
- *Mass of the optional equipment*: Maximum mass of the combinations of optional equipment which may be fitted to the vehicle in addition to the standard equipment in accordance with the manufacturer's specifications (Reg. (EU) 2017/1151).

- *Test mass*: Is the sum of the actual mass of the vehicle, 25 kg and the mass representative of the vehicle load (Reg. (EU) 2017/1151).
- *Measured CO<sub>2</sub> emissions value*: CO<sub>2</sub> emissions combined value as determined and reported in accordance with Article 7a of Implementing Regulation (EU) 2017/1153 for passenger cars and with Article 6a of Implementing Regulation (EU) 2017/1152 for light-commercial vehicles. Under the WLTP, Regulation (EU) 2017/1151, the measured CO<sub>2</sub> value includes the correction for the difference in the speed profile followed on the CDM test versus the theoretical speed profile (speed and distance correction), and for the difference in the electric energy flowing from and to the rechargeable electric energy storage system (REES). Furthermore, the test results are renormalised to the average European ambient temperature (14°C).
- *Declared CO<sub>2</sub> emissions value*: CO<sub>2</sub> emissions value declared by the manufacturer and stated in the Certificate of Conformity. According to Regulation (EU) 2017/1151, the declared value cannot be lower than the value measured (and corrected) in the Type Approval emission test.
- *WLTP specific emissions reference target*: Value calculated in accordance with Point 3 of Annex I, Part A and B, to Regulation (EU) 2019/631, as an intermediate to calculate the WLTP specific emissions targets for each manufacturer (or pool of manufacturers) for the calendar years 2021 to 2024.
- *WLTP specific emissions target*: CO<sub>2</sub> emissions target for the specific manufacturer, calculated in accordance with Points 4 (2021-2024) and 6.3 (2025 onwards) of Annex I, Part A and B, to Regulation (EU) 2019/631.
- *Reference-value<sub>2021</sub>*: Value calculated for each manufacturer's (or pool of manufacturers) fleet in accordance with Point 6.0 of Annex I, Part A and B, to Regulation (EU) 2019/631, as an intermediate to calculate the EU fleet-wide target<sub>2021</sub>.
- *EU fleet-wide target<sub>2021</sub>*: Reference target value used to calculate the EU fleet-wide targets for 2025 and 2030, calculated in accordance with Point 6.0 of Annex I, Part A and B, to Regulation (EU) 2019/631.
- *a<sub>2021</sub>*: The slope of the best fitting straight line established by applying the linear squares fitting method to the test mass (independent variable) and the specific emissions of CO<sub>2</sub> (dependent variable) of each new vehicle registered in 2021.

## 2.2 Type Approval CO<sub>2</sub> calculation

Every car or light commercial vehicle of the EU fleet is assigned CO<sub>2</sub> emissions and fuel consumption values following a specific certification process, as established in Regulation (EC) 715/2007. Until 2017, the process was performed following the NEDC protocol detailed in Regulation (EC) 692/2008 (NEDC) (European Union, 2011b), where a physical CDM test was carried out on a representative parent vehicle. The final CO<sub>2</sub> emissions value declared by the manufacturer could be extended to vehicles with up to 4% higher CO<sub>2</sub> emissions, resulting to CO<sub>2</sub> values biased towards lower values by a factor ranging from 0-4% (Fontaras et al., 2017). Several procedural flexibilities and instrumentation tolerances allowed during the tests led to non-representative lower declared CO<sub>2</sub> values (Tietge et al., 2017). For example, the vehicle RL coefficients applied during the CDM test were obtained in optimised conditions, while the mass attributed to the vehicle was lower than the one occurring in actual operation, even considering a single driver occupancy (Fontaras et al., 2017). These lower declared values could be extended to vehicles sharing similar powertrain characteristics belonging to the same family. Thus, the same low values were assigned to many of the model variants in the family.

Since 2017, the transition from NEDC to the WLTP test protocol has led to a significant improvement of the situation. The introduction of the CO<sub>2</sub> Interpolation (IP) family allowed the attribution of vehicle-specific CO<sub>2</sub> values for each individual model. Under WLTP, manufacturers can group their vehicles into IP families, which include vehicles with the same technical powertrain characteristics (European Union, 2017a). Vehicle variants belonging to the same IP family may differ in terms of mass, optional equipment and body shape, tyre dimensions and tyre energy class, which affect the vehicle resistances and energy demand over the WLTP, but do not directly influence powertrain efficiency. These vehicle resistances determine the cycle energy demand (CED). For the same speed profile, changes in the CED among the members of the same IP family have a linear impact on CO<sub>2</sub> emissions. Consequently, each IP family is characterised by a linear function of CO<sub>2</sub> with respect to CED. This linear relationship is determined by testing two vehicle variants: the variants for which the equipment combination results in the highest (vehicle-High) and lowest (vehicle-Low) CED. Optionally, the manufacturers can characterise all the vehicles in the family with the CO<sub>2</sub> value of vehicle-High.

Regarding the vehicle motion resistances, referred to as RL, two enhancements in WLTP resulted in values more representative of real-world conditions. Firstly, the mass of the vehicle used is the “test mass”, as defined in Regulation (EU) 2017/1151, which is higher and more representative of the real-world operation than the equivalent NEDC mass since it takes into account optional equipment fitted to the vehicle and the vehicle payload. Secondly, similarly to IP families, RL families are constructed, and RL determination tests are performed for the variants with highest and lowest CED. The CED of individual vehicles are determined by linear interpolation of the vehicle-High and -Low. It should be noted that the members of the IP families and RL families may overlap but are not necessarily the same; hence an IP family may contain members of several RL families.

Thus, according to the specifications and CED value of the individual vehicle, the WLTP-based certification results in a unique CO<sub>2</sub> value for each vehicle. **Figure 1(a)** shows a graphical representation of the procedure for determining the WLTP and NEDC CO<sub>2</sub> emission values. The procedures can be summarised as follows:

**Step 1.** At least one CDM test is performed for vehicle-High according to WLTP. If no other test is performed, the same vehicle-High CO<sub>2</sub> value applies to all members of the IP family. In most cases, manufacturers also test vehicle-Low, and the IP line is established. The measured CO<sub>2</sub> values (blue line in **Figure 1(a)**) include the necessary corrections according to the WLTP provisions.

**Step 2.** The manufacturer needs to declare a WLTP CO<sub>2</sub> value for vehicle-High, and vehicle-Low that is equal or higher than the measured values (corrections applied) of the tests performed plus a margin for the test uncertainty. The margin is 1% in case of one single test performed and it is reduced to 0% in case of three tests. A new line for the IP family declared CO<sub>2</sub> is formed (red line in **Figure 1(a)**).

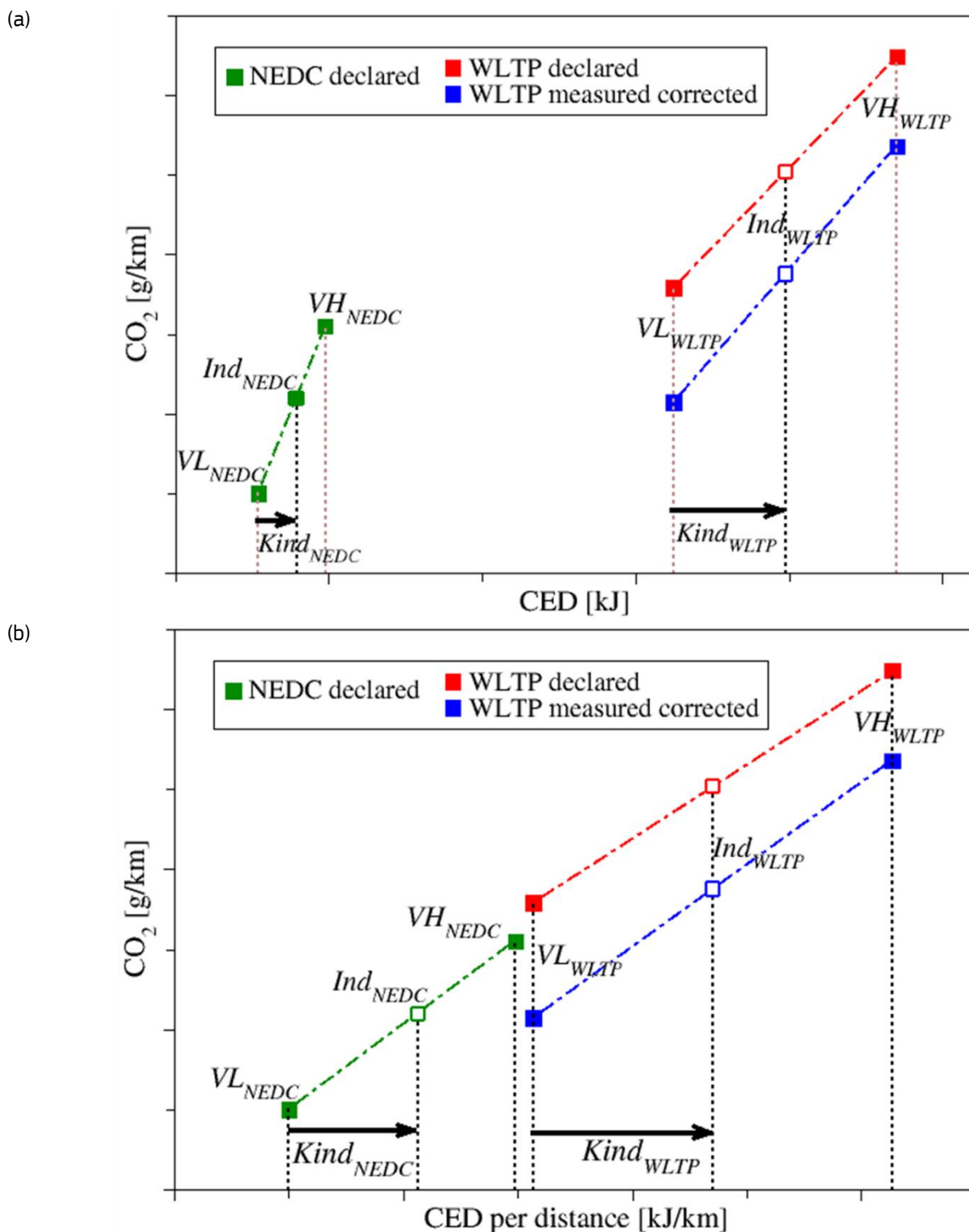
**Step 3.** The manufacturer registers the individual vehicles that will be sold in the EU, assigning to each vehicle a declared CO<sub>2</sub> value that is calculated from a linear interpolation formula between vehicle-Low and vehicle-High declared values and the specific CED of the vehicle (open red square in **Figure 1(a)**). These are the CO<sub>2</sub> emission values included in the annual monitoring databases.

**Step 4.** Only for the year 2020, the manufacturer calculates the measured CO<sub>2</sub> emission value for the individual vehicle (open blue square in **Figure 1(a)**) using the same CED as in Step 3 and a linear interpolation procedure from the measured CO<sub>2</sub> values of vehicle-Low and vehicle-High. The procedure is established in the correlation provisions of Regulation (EU) 2017/1153 for passenger cars and Regulation (EU) 2017/1152 for light-commercial vehicles. The individual measured values, together with the measured values of vehicle-High (and vehicle-Low), are submitted to the EC.

**Correlation steps (period 2017-2020).** For the period 2017-2020, the WLTP certification method applied for defining both RL and CO<sub>2</sub> IP families. However, the correlation Regulations (EU) 2017/1153 and (EU) 2017/1152 set provisions for determining the correlated NEDC CO<sub>2</sub> values. First, the individual vehicles would get a CED for NEDC derived from the WLTP CED. The NEDC declared CO<sub>2</sub> value of the individual vehicle (white-filled green square in Figure 1) was derived from the interpolation line defined from the NEDC vehicle-High and vehicle-Low values (green line in **Figure 1(a)**).

To reduce the cost of both physically testing under WLTP and NEDC while assuring the stringency of the out coming estimates, the option was provided to undertake the verification of the NEDC declared CO<sub>2</sub> values for the high- and low-variants by using the CO2MPAS (CO<sub>2</sub> Model for Passenger and commercial vehicles Simulation) vehicle simulation tool provided by the EC (Fontaras et al., 2018). CO2MPAS performs accurate simulation of vehicle fuel-consumption and CO<sub>2</sub> emissions under different operating conditions using mainly physical models.

**Figure 1.** Example case of construction of vehicle families in the transition period from 2017 to 2020, both for WLTP and NEDC cases, representing: (a) CO<sub>2</sub> emissions versus CED; (b) CO<sub>2</sub> emissions versus CED normalised to distance. The steps are detailed in section 2.2. The labels denote the CED of the Vehicle-Low, Vehicle-High and Individual vehicle for NEDC and WLTP. Black arrows represent the interpolation factors ( $Kind_{NEDC}$  and  $Kind_{WLTP}$ ) for each procedure.



Source: JRC analysis, 2023

It should be noted that, for the construction of a CO<sub>2</sub> IP family from low and high CO<sub>2</sub> values, certain restrictions are defined: an IP family should have a range of CO<sub>2</sub> values between 5 g/km and 30 g/km (which means that the vehicle-High CO<sub>2</sub> should be at least 5 g/km higher than the vehicle-Low CO<sub>2</sub>). Due to the lower limit, but also

at the manufacturer's request, a CO<sub>2</sub> family could consist of only one vehicle, with no intermediate variants, and thus no interpolation line; in such a case, the configuration type approved is defined as the vehicle-High, and all the different variants sold in Europe will share the same CO<sub>2</sub> emissions value.

**Figure 1** shows an example of realistic WLTP and NEDC values for the family and the individual vehicle. While the WLTP declared and measured (corrected) interpolation lines shown in the upper panel encompass the same CED range, the NEDC interpolation line spans a different energy domain, significantly lower than the WLTP one. The shorter length of the NEDC cycle (11 km against the 23.25 km in WLTP) only partially explains the difference in the energy required to move the vehicle. In the distance-normalised representation of the CED (**Figure 1(b)**), the abscissae of the NEDC line are still lower than for the WLTP, this is a consequence of the more favourable or loose RLs testing conditions in NEDC. For the same reason, the depicted interpolation factors  $Kind_{NEDC}$  and  $Kind_{WLTP}$ , corresponding to the normalised energy distance of the individual vehicle, are not necessarily equal in both cases. In contrast, the slope of the interpolation lines in the distance-normalised CED representation is very similar in both three cases, since the slope represents the engine's efficiency, which is similar in both WLTP and NEDC tests.

## 2.3 Definition of CO<sub>2</sub> targets

The Commission determines each year the average specific CO<sub>2</sub> emissions and the CO<sub>2</sub> emissions targets for every manufacturer and pool of manufacturers responsible for new passenger cars and light commercial vehicles registered in the EU (including the UK up to 2020), Iceland (since 2018) and Norway (since 2019) in order to assess compliance.

### 2.3.1 Targets for passenger cars and light commercial vehicles before 2020

Regulation (EC) No 443/2009 defined the first fleet CO<sub>2</sub> targets for the new passenger cars registered in the EU each calendar year (European Commission, 2009). For the period 2012–2019, the EU fleet-wide target was 130 g CO<sub>2</sub>/km. Acknowledging the diversity in the market, the manufacturers' annual CO<sub>2</sub> emissions targets were defined based on the average mass of the vehicles in their fleet during the target year (see points 1 and 2 of Annex I in Regulation (EC) No 443/2009):

$$2012-2019: \quad target_{m_i, NEDC}^{(yy)} = 130 + a(M_i^{(yy)} - M_0^{(yy)}) \quad (1)$$

where:

$yy$  is the year (2012–2019);

$a = 0.0457$ ;

$M_i^{(yy)}$  is the average mass in running order of all passenger cars of manufacturer  $i$  in kg in the year  $yy$ ;

$M_0^{(yy)}$  is the EU-fleet average mass value a priori defined in the Regulation for the year  $yy$ .

For each manufacturer or pool of manufacturers, the average CO<sub>2</sub> emissions obtained during NEDC Type Approval procedures were assessed against the target values  $target_{m_i, NEDC}^{(yy)}$ . In order to support a smooth transitional period between 2012–2015 to meet the 2015 target of 130 g/km, phase-in, super-credits, pooling, eco-innovations and derogations provisions were introduced in the Regulation.

For light-commercial vehicles, Regulation (EU) No 510/2011 set target values for manufacturers for the years 2014 to 2019 according to:

$$2014-2019: \quad target_{m_i, NEDC}^{(yy)} = 175 + a(M_i^{(yy)} - M_0^{(yy)}) \quad (2)$$

where:

$yy$  is the year (2014–2019);

$a = 0.093$ ;

$M_i^{(yy)}$  is the average mass in running order of all light commercial vehicles of manufacturer  $i$  in kg in the year  $yy$ ;

$M_0^{(yy)}$  is the EU-fleet average mass value a priori defined in the Regulation for the year  $yy$ .

### 2.3.2 2020 targets for passenger cars and light commercial vehicles

Regulation (EC) No 443/2009 also set an EU fleet-wide target of 95 g CO<sub>2</sub>/km for passenger cars from 2020 onwards. Through the amendments introduced by Regulation (EU) No 333/2014, this target was confirmed, and its implementation modalities were introduced (see below). Compared to the previous period, the slope of the mass-based limit value curve was lowered from 0.0457 to 0.0333 in order to account for the lower fleet target (reduction by 27%). It should also be noted that 2020 was the last year in which the target assessment was performed with respect to the NEDC protocol.

$$2020: \quad \text{Specific emissions target [g/km]} = (95 + 0.0333 \cdot (M_i - 1379.88)) \quad (3)$$

where:

$M_i$  is the average mass in running order of all passenger cars of manufacturer  $i$  in kg in 2020.

Similarly, Regulation (EU) No 510/2011 set an EU fleet-wide target value of 147 g CO<sub>2</sub>/km for 2020 for light-commercial vehicles, with the formula to calculate the manufacturer's specific emission targets:

$$2020: \quad \text{Specific emissions target [g/km]} = (147 + 0.096 \cdot (M_i - 1766.4)) \quad (4)$$

The evaluation of the manufacturers' performance is achieved by assessing the average specific emissions of CO<sub>2</sub> against the targets defined in eq. (3) for passenger cars and eq. (4) for light commercial vehicles. The calculation methodology for the average specific emissions is illustrated in Commission Notice C/2017/3563 ("Guidance on the monitoring and reporting of data on new light-duty vehicles") (European Commission, 2017), and the results for the 2020 monitoring exercise have been adopted and published (European Union, 2022).

A number of provisions have been introduced in Regulations (EC) No 443/2009 and (EU) 510/2011 to facilitate the implementation of the manufacturer targets from 2020 (and these were maintained under Regulation (EU) 2019/631):

1. Phase-in (2020 only, passenger cars only): For the purpose of evaluating the average specific CO<sub>2</sub> emissions of each car manufacturer, only 95% of the manufacturer's 2020-registered passenger cars – those with the lowest CO<sub>2</sub> emission levels – are considered (Article 4(3), Regulation (EU) 2019/631).
2. Super-credits (2020–2022, passenger cars only): Every new passenger car with NEDC emissions below 50 g CO<sub>2</sub>/km is counted more than once for the purpose of calculating the manufacturer's average specific CO<sub>2</sub> emissions, with a maximum emission reduction of 7.5 g CO<sub>2</sub>/km per manufacturer over the period 2020–2022. For 2020, the multiplier was 2 (1.66 in 2021 and 1.33 in 2022). (Article 5, Regulation (EU) 2019/631).
3. Pooling: Manufacturers can form pools of manufacturers to jointly achieve the targets of each calendar year (Article 6, Regulation (EU) 2019/631).
4. Eco-innovations: CO<sub>2</sub> savings (by reference to the NEDC until 2020) accomplished by using innovative technologies that make a verified/approved CO<sub>2</sub> reduction in real world are deducted (up to a total contribution of 7 g/km) during the calculation of the manufacturer's (pool's) average CO<sub>2</sub> emissions. (Article 11, Regulation (EU) 2019/631)
5. Derogations: Manufacturers (or pools) responsible for less than 10,000 new passenger car or light commercial vehicles registrations can apply for a "small volume" **derogation**. Manufacturers (or pools) with between 10,000 and 300,000 new passenger cars registered in the Union per calendar year can apply for a **niche derogation**. Specific derogation targets are established for each case. (Article 10, Regulation (EU) 2019/631)
6. Exemptions: Manufacturers with less than 1,000 registrations in the **previous** calendar year are **exempted** from the targets. However, it should be noted that if a manufacturer is granted a derogation, it should comply with its **derogation target** even if it would be eligible for the exemption.



### 2.3.3 2021-2024 targets for passenger cars and light commercial vehicles

Passenger cars and light commercial vehicles registered from 2021 onwards are type approved under the WLTP. The manufacturer's emission targets for the period 2021-2024 are established on the WLTP procedure, by renormalizing the NEDC manufacturer-specific targets with ratios calculated from the average (declared) WLTP and NEDC emissions of the manufacturer in 2020. In other words, to account for the higher CO<sub>2</sub> emissions in the WLTP cycle compared to NEDC, the WLTP-based emissions targets are proportionally increased. The same procedure, described below, applies for both passenger cars and light commercial vehicles.

First, Regulation (EU) 2019/631 establishes a 2021 WLTP specific emissions reference target for each manufacturer (see point 3 of Annex I):

$$2021-2024: \quad \text{ref}_{m_j, \text{WLTP}}^{(2021)} = \frac{\text{WLTP}_{m_j}^{(2020)}}{\text{NEDC}_{m_j}^{(2020)}} \cdot \text{target}_{m_j, \text{NEDC}}^{(2020)} \quad (5)$$

where:

$\text{target}_{m_j, \text{NEDC}}^{(2020)}$  is  $m_j$  manufacturer's specific emissions target 2020, as defined in equations (3) and (4);

$\text{WLTP}_{m_j}^{(2020)}$  is the average WLTP CO<sub>2</sub> emission value of  $m_j$  manufacturer's 2020 fleet;

$\text{NEDC}_{m_j}^{(2020)}$  is the average NEDC CO<sub>2</sub> emission value of  $m_j$  manufacturer's 2020 fleet.

For cases where the above approach is not applicable, specific rules are set out in points 3a-3c of Annex I of Regulation (EU) 2019/631.

The 2021 WLTP specific emissions reference targets have been calculated by the Commission and are set out in Annex II of Commission Implementing Decision (EU) 2022/2087 (European Union, 2022).

Then, the 2021-2024 targets per manufacturer are calculated by adjusting the specific emissions reference targets taking into account the deviations of the manufacturer's average mass from the EU-fleet average mass in 2020 and in the target year (see point 4 of Annex I to Regulation (EU) 2019/631):

$$2021-2024: \quad \text{target}_{m_j, \text{WLTP}}^{(yy)} = \text{ref}_{m_j, \text{WLTP}}^{(2021)} + a \left[ \left( M_{m_j}^{(yy)} - M_0^{(yy)} \right) - \left( M_{m_j}^{(2020)} - M_0^{(2020)} \right) \right] \quad (6)$$

where:

$yy$  is the year (2021, 2022, 2023, 2024);

$a$  is 0.0333 for passenger cars; and 0.096 for light commercial vehicles;

$M_{m_j}^{(yy)}$  is the average mass in running order of the manufacturer's vehicles in the  $yy$  year;

$M_0^{(yy)}$  is 1,379.88 in 2021 and 1,398.50 in 2022, 2023 and 2024 for passenger cars; and 1,825.23 in 2021, 2022 and 2023 and 1,875.07 in 2024 for light commercial vehicles.

$M_{m_j}^{(2020)}$  is the average mass in running order of manufacturer  $m_j$  in 2020;

$M_0^{(2020)}$  is 1,379.88 for passenger cars and 1,766.4 for light commercial vehicles.

For manufacturers (same applies for pools) that have been granted a (NEDC based) derogation target in 2021, that year's target is calculated as follows (see point 5 of Annex I to Regulation (EU) 2019/631):

$$2021-2024: \quad \text{target}_{m_j, \text{WLTP}}^{(yy)} = \frac{\text{WLTP}_{m_j}^{(2020)}}{\text{NEDC}_{m_j}^{(2020)}} \cdot \text{target}_{m_j}^{(2021), \text{spec}} \quad (7)$$

where:

$yy$  is the year (2021, 2022, 2023, 2024);

$WLTP_{m_j}^{(2020)}$  and  $NEDC_{m_j}^{(2020)}$  are defined in eq. (5);

$target_{m_j}^{(2021),spec}$  is the derogation target 2021 (NEDC) granted by the Commission.

### 2.3.4 2025 onward targets

Regulation (EU) 2019/631 introduced new fleet-wide targets for 2025 and 2030, which are determined applying reduction percentages to the 2021 emission targets. For 2025, the reduction will be 15% for passenger cars and light commercial vehicles, while for 2030, following the amendments introduced by Regulation (EU) 2023/851, the reduction will be 55% and 50%, respectively.

As the new targets were adopted at a time when the NEDC-to-WLTP transition was still ongoing, it was necessary to provide for a translation of the NEDC based 2021 targets into WLTP. For this, a similar approach as used for the 2021-2024 targets was applied. However, in order to guard against an over-inflation in the (WLTP/NEDC) ratio, Regulation (EU) 2019/631 requires the use of the *measured*, instead of the declared, 2020 WLTP values for calculating the 2021 fleet target and the corresponding 2025-onwards targets. Since the measured values are by mandate lower than the declared ones, this should result in lower EU fleet-wide target values when compared to a calculation based on declared WLTP values.

#### 1. Calculation of the EU fleet-wide targets

- (a) A specific reference value ( $ref_{m_i, WLTP_{meas}}^{(2021)}$ ) is calculated for each manufacturer  $m_i$ , based on its 2020 CO<sub>2</sub> emissions (the declared NEDC and the measured WLTP values) and the 2021 average mass in running order (see *point 6.0 of Annex I, Part A in Regulation (EU) 2019/631*):

$$ref_{m_i, WLTP_{meas}}^{(2021)} = \frac{WLTP_{m_i}^{(2020),meas}}{NEDC_{m_i}^{(2020)}} \cdot target_{EU-fleet, NEDC}^{(2020)} + a(M_{m_i}^{(2021)} - M_0^{(2021)}) \quad (8)$$

where:

$a = 0.0333$  for passenger cars and 0.096 for light commercial vehicles;

$target_{EU-fleet, NEDC}^{(2020)}$  is 95 g/km for passenger cars; and 147 g/km for light commercial vehicles;

$M_{m_i}^{(2021)}$  is the average mass in running order of the manufacturer's vehicles in 2021;

$M_0^{(2021)}$  is the average mass in running order of all new passenger cars (or light commercial vehicles) registered in 2021, excluding the manufacturers benefiting from an exemption or derogation in 2021;

$NEDC_{m_i}^{(2020)}$  is as defined in eq. (5), section 2.3.3;

$WLTP_{m_i}^{(2020),meas}$  is the average **measured** WLTP CO<sub>2</sub> emissions for each manufacturer.

- (b) The **EU fleet-wide target<sub>2021</sub>** ( $ref_{EU-fleet, WLTP_{meas}}^{(2021)}$ ), which is the reference for calculating the 2025 and 2030 EU fleet-wide targets, is then calculated as the weighted average of the above reference values in eq. (8). The weighting is based on the 2021 number of registrations of each manufacturer ( $w_{m_i}^{(2021)}$ ) – again excluding the manufacturers benefiting from an exemption or derogation in 2021 (see *point 6.0 of Annex I, Part A in Regulation (EU) 2019/631*).

As the manufacturers included are the same as the ones used for the calculation of the average mass ( $M_0^{(2021)}$ ), this value is independent of the mass of the vehicles and the EU fleet-wide target<sub>2021</sub> becomes:

$$\begin{aligned} ref_{EU-fleet, WLTP_{meas}}^{(2021)} &= \sum_{m_i} w_{m_i}^{(2021)} ref_{m_i, WLTP_{meas}}^{(2021)} \\ &= \sum_{m_i} w_{m_i}^{(2021)} \frac{WLTP_{m_i}^{(2020),meas}}{NEDC_{m_i}^{(2020)}} \cdot target_{EU-fleet, NEDC}^{(2020)} \end{aligned} \quad (9)$$

- (c) The **EU fleet-wide targets** from 2025 onwards (*point 6.1 of Annex I, Part A in Reg. (EU) 2019/631*) are then calculated by applying the reduction factors to the EU fleet-wide target<sub>2021</sub>.

For years 2025 to 2029:

$$2025-2029: \quad \text{target}_{EU-fleet, WLTP}^{(yy)} = \text{ref}_{EU-fleet, WLTP_{meas}}^{(2021)} \cdot (1 - r_{(2025)}) \quad (10)$$

where the reduction factor is 15% ( $r_{(2025)} = 0.15$ ) for both passenger cars and light commercial vehicles.

From 2030 onwards:

$$2030-2034: \quad \text{target}_{EU-fleet, WLTP}^{(yy)} = \text{ref}_{EU-fleet, WLTP_{meas}}^{(2021)} \cdot (1 - r_{(2030)}) \quad (11)$$

where the reduction is 55% ( $r_{(2030)} = 0.55$ ) for passenger cars and 50% ( $r_{(2030)} = 0.5$ ) for light commercial vehicles (Regulation (EU) 2023/851).

## 2. Calculation of M1 manufacturer specific targets

- (a) **Specific emissions reference targets** for the M1 manufacturers are calculated based on a linear correlation with the average *test mass* of the manufacturer's fleet and the CO<sub>2</sub> emissions reference targets. From 2025 to 2029, the manufacturer's reference targets are:

$$2025-2029: \quad \text{ref}_{m_i, WLTP}^{(yy)} = \text{target}_{EU-fleet, WLTP}^{(2025)} + a_{2025} (TM_{m_i}^{(yy)} - TM_0^{(yy)}) \quad (12)$$

and for 2030 to 2034:

$$2030-2034: \quad \text{ref}_{m_i, WLTP}^{(yy)} = \text{target}_{EU-fleet, WLTP}^{(2030)} + a_{2030} (TM_{m_i}^{(yy)} - TM_0^{(yy)}) \quad (13)$$

where:

$TM_{m_i}^{(yy)}$  is the average **test mass** of all new passenger cars of the manufacturer registered in year *yy*

$TM_0^{(yy)}$  is the EU-fleet average reference test mass (in kg), which shall be determined in accordance with point *d*, Article 14(1) of Regulation (EU) 2019/631.

The parameters  $a_{2025}$  and  $a_{2030}$  employed in eq. (12) and (13), respectively, are the slope of the lines used for determining the manufacturer's specific reference target according to the manufacturer's fleet-averaged test mass. These parameters are obtained from the slope ( $a_{2021}$ ) of the best fitting linear regression in the CO<sub>2</sub> versus test mass representation of all the M1 vehicles registered in 2021, renormalised with the ratio between the 2025 and 2030 fleet-wide targets, respectively, and the average CO<sub>2</sub> emissions of M1 vehicles in registered in 2021 from non-derogated manufacturers:

$$a_{yy} = a_{2021} \frac{\text{target}_{EU-fleet, WLTP}^{(yy)}}{\text{CO}_{2EU-fleet, WLTP}^{(2021)}} \quad (14)$$

where:

$\text{CO}_{2EU-fleet, WLTP}^{(2021)}$  is the average emissions of the EU-fleet in 2021, excluding the manufacturers benefiting from an exemption or derogation in 2021 (see point 6.2 of Annex I, Part A in Regulation (EU) 2019/631).

$a_{2021}$  is the slope of the best fitting straight line for the CO<sub>2</sub> emissions versus test mass representation obtained for the whole EU fleet registered in 2021.

- (b) Finally, the **specific emissions targets** are calculated taking into account until 2029 a *ZLEV factor*, which reflects the share of zero- and low-emission vehicles in a manufacturer's fleet, as:

$$2025-2029: \quad \text{target}_{m_i, \text{WLTP}}^{(yy)} = \text{ref}_{m_i, \text{WLTP}}^{(yy)} \cdot ZLEV_{m_i}^{(yy)} \quad (15)$$

$$2030-2034: \quad \text{target}_{m_i, \text{WLTP}}^{(yy)} = \text{ref}_{m_i, \text{WLTP}}^{(yy)} \quad (16)$$

where:

$ZLEV_{m_i}^{(yy)}$  is a factor ranging from 1.00 to 1.05 introduced to increase the targets according to the percentage of zero- and low-emission vehicles in the manufacturer's fleet in case that exceeds the benchmark values set in the Regulation (see *Point 6.3, Annex I, part A, Regulation (EU) 2019/631*).

### 3. Calculation of N1 manufacturer specific targets

- (a) **Specific emissions reference targets** for the N1 manufacturers are calculated based on a similar correlation with the average *test mass* of the manufacturer's fleet and the CO<sub>2</sub> emissions reference targets. However, the values are now calculated based on a regression formula with two different slopes below and above the fleet-wide average mass  $TM_0^{(yy)}$ , respectively.

From 2025 to 2029, the manufacturer's specific reference targets are:

$$\text{ref}_{m_i, \text{WLTP}}^{(yy)} = \text{target}_{EU\text{-}fleet, \text{WLTP}}^{(2025)} + \alpha_{yy} (TM_{m_i}^{(yy)} - TM_0^{(yy)}) \quad (17)$$

$$\text{with } \alpha_{yy} = \begin{cases} a_{2025} \text{ for } TM_{m_i}^{(yy)} \leq TM_0^{(yy)} \\ a_{2021} \text{ for } TM_{m_i}^{(yy)} > TM_0^{(yy)} \end{cases} \quad (18)$$

and for 2030 to 2034:

$$\text{ref}_{m_i, \text{WLTP}}^{(yy)} = \text{target}_{EU\text{-}fleet, \text{WLTP}}^{(2025)} + \alpha_{yy} (TM_{m_i}^{(yy)} - TM_0^{(yy)}) \quad (19)$$

$$\text{with } \alpha_{yy} = \begin{cases} a_{2025} \text{ for } TM_{m_i}^{(yy)} \leq TM_0^{(yy)} \\ a_{2021} \text{ for } TM_{m_i}^{(yy)} > TM_0^{(yy)} \end{cases} \quad (20)$$

where:

$TM_{m_i}^{(yy)}$  is the average **test mass** of all new light commercial vehicles of the manufacturer registered in year  $yy$

$TM_0^{(yy)}$  is the EU-fleet average reference test mass (in kg), which shall be determined in accordance with point *d*, Article 14(1) of Regulation (EU) 2019/631.

$a_{2025}$  and  $a_{2030}$  are calculated as explained in eq. (14), with the corresponding values referring to N1 vehicles.

- (b) Finally, the **specific emissions targets** are calculated taking into account until 2029 a *ZLEV factor*, which reflects the share of zero- and low-emission vehicles in a manufacturer's fleet and a parameter  $\Phi_{\text{targets}}^{(yy)}$ , which is introduced as a safe-guard to ensure that the average value of the specific emissions reference targets coincides with the EU fleet-wide target, as:

$$2025-2029: \quad \text{target}_{m_i, \text{WLTP}}^{(yy)} = \left( \text{ref}_{m_i, \text{WLTP}}^{(yy)} - \left( \Phi_{\text{targets}}^{(yy)} - \text{target}_{EU\text{-}fleet, \text{WLTP}}^{(yy)} \right) \right) \cdot ZLEV_{m_i}^{(yy)} \quad (21)$$

$$2030-2034: \quad \text{target}_{m_i, \text{WLTP}}^{(yy)} = \text{ref}_{m_i, \text{WLTP}}^{(yy)} - \left( \Phi_{\text{targets}}^{(yy)} - \text{target}_{EU\text{-}fleet, \text{WLTP}}^{(yy)} \right) \quad (22)$$

where:

$ZLEV_{m_i}^{(yy)}$  is a factor ranging from 1.00 to 1.05 introduced to increase the targets according to the percentage of zero- and low-emission vehicles in the manufacturer's fleet in case that exceeds the benchmark values set in the Regulation (see *Point 6.3, Annex I, part B, Regulation (EU) 2019/631*).

$\Phi_{\text{targets}}^{(yy)}$  is the average, weighted by the number of light commercial vehicles of each manufacturer, of all the specific emissions reference targets determined according to eq. (17) for the year (yy) in the period [2025,2029] and eq. (19) for the year (yy) in the period [2030,2034].

## 3 Material

This chapter introduces the data sources used in the present analysis and the data cleaning performed. Manufacturers and their corresponding pools have been assigned with an acronym that will be used in the following sections. The correlation between the manufacturer names and the acronyms can be found in **Table 5** and **Table 7** of Annex 2, for passenger cars and light commercial vehicles, respectively.

### 3.1 Data sources

The main datasets considered in the present study have been collected by the EEA on behalf of the EC, according to Regulations (EU) 2019/631 and (EU) 2021/392. First, this concerns the official EU registration datasets collected and published by EEA for the years 2020 and 2021, hereafter called **EEA monitoring datasets** (European Environment Agency, 2023). The **2020 EEA measured WLTP dataset**, as provided by EEA, contains the measured WLTP values of the vehicles registered in 2020, which have to be combined with the 2020 EEA monitoring data for calculating the EU fleet-wide target<sub>2021</sub> and the 2025 and 2030 EU fleet-wide emission targets. The **Database for In-service verification of CO<sub>2</sub> Emissions (DICE)** which incorporates Type Approval information per CO<sub>2</sub> IP family, as provided by the Type Approval Authorities (TAAs), and the **European Type Approval Exchange System (ETAES)** were utilised to supplement these datasets.

#### 3.1.1 EEA monitoring datasets

Regulation (EU) 2019/631 sets the requirements for collecting every calendar year information on each light-duty vehicle registered in EU. The EEA operates the central register that collects all the data from each Member State. The dataset contains information about the CO<sub>2</sub> emissions from each vehicle (NEDC until 2017, both NEDC and WLTP for the period 2017-2020, and only WLTP from 2021 onwards), as well as other relevant information about the vehicle's specifications and the Type Approval information. Further details about the published data can be found in the dedicated EEA webpage (European Environment Agency, 2023); details of the available variables can be found in **Table 4** of Annex 1.

Additionally, for the calculation of the EU fleet-wide target<sub>2021</sub> and the fleet targets from 2025 onwards, an extended 2020 dataset including also the WLTP measured CO<sub>2</sub> emissions was used. This dataset, the **2020 EEA measured WLTP dataset**, is filled according to the specifications in (EU) 2017/1153 for passenger cars and (EU) 2017/1152 for light commercial vehicles: For the calendar year 2020, manufacturers had to calculate the combined or, for plug-in-hybrid vehicles, weighted combined CO<sub>2</sub> emissions for each new passenger car and van registered, and submit all these values to Commission. In more detail, the reported information had to contain:

- **VIN**: Vehicle Identification Number, as specified in the CoC.
- **MC02**: Measured CO<sub>2</sub> emissions value [g/km] (including corrections) for the individual vehicle, calculated according to the WLTP procedure (see Step 4 in section 2.2).
- **MC02VL**: (where applicable) Measured CO<sub>2</sub> emissions value [g/km] (including corrections) according to the WLTP test for the vehicle-Low of the IP family.
- **MC02VH**: Measured CO<sub>2</sub> emissions value [g/km] (including corrections) according to the WLTP test for the vehicle-High of the IP Family.
- **Kind**: (for Off Vehicle Charging Hybrid Electric Vehicles (OVC-HEVs, i.e., plug-in hybrid electric vehicles) - and Not Off Vehicle Charging hybrid electric vehicles (NOVC-HEV)) Interpolation Factor for the Cycle Energy Demand

The 2020 EEA monitoring and the 2020 EEA measured WLTP datasets were combined to produce the **EEA combined 2020 datasets**, detailed in 3.2 (passenger cars) and in 3.3 (light commercial vehicles), used to calculate the parameter EU fleet-wide target<sub>2021</sub>.

#### 3.1.2 DICE dataset

During the Type Approval transition period from NEDC to WLTP (from September 2017 to the end of 2020), the EC implemented a correlation framework to monitor the compliance of the manufacturer's average CO<sub>2</sub> emissions with the NEDC-based targets. In this way, for each vehicle, the WLTP-CO<sub>2</sub> emission values were translated into equivalent NEDC levels, either on the basis of duplicate measurements or by using a vehicle

simulation tool (Fontaras et al., 2018) specifically developed for the purpose of this correlation exercise. By collecting the input and output data of this schema, a database was created that contains, for each CO<sub>2</sub> IP family, the Type Approval data for the vehicles with highest energy demand (vehicle-High) and, where applicable, lowest energy demand (vehicle-Low) including:

- General information on vehicle characteristics.
- Relevant recordings during the WLTP CDM tests (Type 1 test in Regulation (EU) 2017/1151).
- Measured CO<sub>2</sub> emissions (before and after corrections) during WLTP test.
- Declared WLTP and NEDC CO<sub>2</sub> values.

These data are safely encrypted and stored in DICE for every new IP family. When an IP family CO<sub>2</sub> extension was performed according to the certification Regulation, or when a correction was needed in the Type Approval documentation, the DICE database was also updated.

### 3.1.3 ETAES dataset

The ETAES is an electronic platform that contains Type Approval documents from different Member States, as reported by the corresponding Granting Type Approval Authority and/or the Technical Service. This platform was established in Regulation (EU) 2020/1812 (European Union, 2020), laying down rules on the notification of EU Type Approvals, as the common secure electronic exchange system for the purposes of notifying EU type Approvals. The submission of documents to this platform is performed voluntarily and therefore it does not include all the IP families type approved. The ETAES dataset is not publicly available, but the Commission has access to it.

## 3.2 EEA combined 2020 dataset for M1 vehicles (passenger cars)

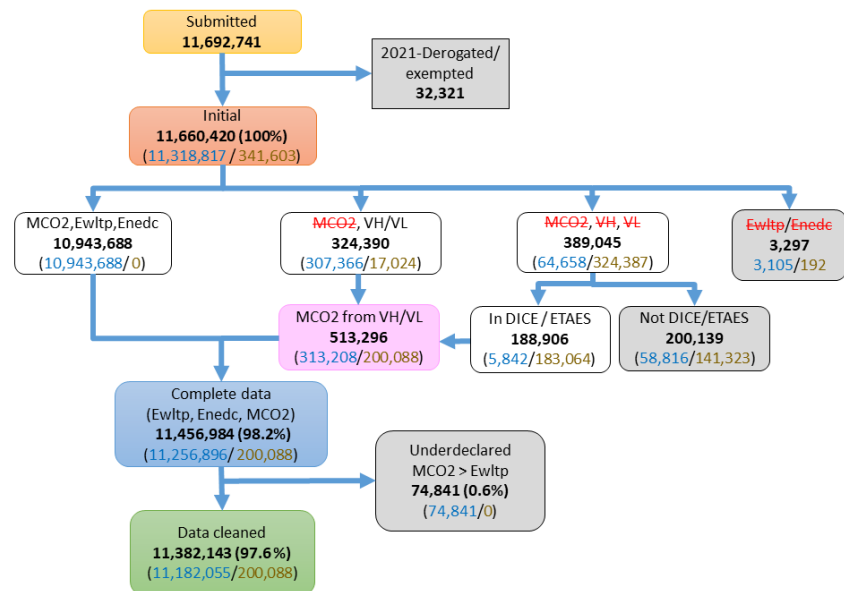
For the purpose of calculating the EU fleet-wide target 2021, the ratios per manufacturer/pool of the average measured-WLTP values against the average declared NEDC values need to be determined. As a first step, a combined dataset is created by merging the 2020 EEA measured WLTP dataset provided by the manufacturers with the 2020 EEA monitoring one (containing the declared WLTP and NEDC values that the Granting Type Approval Authorities (GTAAAs) submitted and later manufacturers ratified). Then, a cleaning and gap-filling procedure is applied in order to obtain a complete set of **measured, declared-WLTP** and **declared-NEDC** values for each vehicle. In case of missing measured-WLTP values, the gap-filling procedure detailed in Article 7a of Regulation (EU) 2017/1153 determines how to calculate it from the vehicle-High and vehicle-Low measured-WLTP emissions. As a final verification, a comparison between the measured- and the declared-WLTP value was established to assure that no vehicle with a measured value above the declared one was considered, as this would not be consistent with the requirements for vehicle-Low and vehicle-High in Regulation (EU) 2017/1151. The gap-filling/cleaning procedure for passenger cars is illustrated **Figure 2**.

The original EEA combined 2020 dataset contains **11,692,741** passenger cars registered in the year 2020. From this set, **32,321** cars correspond to manufacturers that were exempted or have been granted a (NEDC based) derogation target in 2021, and which therefore will not be used for the calculation of the EU fleet-wide target<sub>2021</sub>. The remaining **11,660,420** cases are considered the initial set for the cleaning/gap-filling process (100%). For deeper analysis, **Figure 2** specifies the number of cases belonging to non-derogated manufacturers and derogated or exempted manufacturers in 2020. Both sets should be considered for the calculation of the specific reference value ( $ref_{m_i, WLTP_{meas}}^{(2021)}$ ), but derogated/exempted manufacturers in 2020 were not obliged to report their emissions, and therefore the gap-filling provision is more relevant (**324,387** out of **341,603** cases did not report any of the three measured values, and gap-filling with DICE and ETAES was necessary to obtain a final fair share of **200,088** vehicles).

Concerning the data cleaning process, three main issues were identified. The first one, previously mentioned, regards the manufacturers exempted or with derogation targets in 2021, which according to Point 6 of Annex I in Regulation (EU) 2019/631 shall not be considered for the calculation of the EU fleet-wide target<sub>2021</sub>. The other two issues, missing data and underdeclared CO<sub>2</sub> emission values, will be discussed in the two following sub-sections.

The **11,382,143** vehicles at the end of the cleaning process (green box) are **97.6 %** of the initial vehicles and are the set of data on which the specific reference values will be calculated<sup>1</sup>.

**Figure 2.** EEA combined 2020 dataset cleaning procedure for passenger cars. Pink cells represent gap-filling cases, grey cells represent cleaned (discarded) cases. Numbers in bracket refer to number of cases (**not-derogated/derogated**) in 2020. Red strikethrough are missing parameters in the submissions.



Source: JRC analysis, 2023.

### 3.2.1 Missing data in M1 fleet

There were some gaps in the declared-NEDC (Eneadc), declared-WLTP (Ewltpl), and measured-WLTP CO<sub>2</sub> emissions (MCO2) values reported. A step-by-step approach was followed to produce a final dataset which includes the complete set of MCO2, Eneadc and Ewltpl values for each vehicle. The following cases were identified and dealt with as explained below:

- Missing declared values** (“Ewltpl/Eneadc missing” in **Figure 2**): For **3,297** cars, at least one of the two declared values (Eneadc and Ewltpl) was missing. These vehicles were discarded. Details on the number of discarded vehicles per manufacturer are presented in **Table 9** of Annex 3.
- Missing measured values** (“MCO2 & VH & VL missing” in **Figure 2**): For **389,045** vehicles (**64,658** from not-derogated<sub>2020</sub> and **324,387** from derogated<sub>2020</sub>), all measured-WLTP values were missing: for the individual vehicle, vehicle-High and vehicle-Low. As foreseen in the correlation regulation (EU) 2017/1153, using the IP family identifier (Vehicle Family Number, VFN) to make the link with the Interpolation family information collected in DICE, two different cases were identified:
  - 188,906** vehicles (**5,842** not-derogated<sub>2020</sub> and **183,064** derogated<sub>2020</sub>) could be linked to IP families present in the DICE database, which allowed to determine the measured CO<sub>2</sub> for vehicle-High (MCO2VH) and –optionally– for vehicle-Low (MCO2VL). These values were processed to provide a reference MCO2 for the individual vehicles as explained below (“MCO2 from VH/VL” in **Figure 2**).
  - 200,139** vehicles (**58,816** not-derogated<sub>2020</sub> and **141,323** derogated<sub>2020</sub>) could not be linked to any family reported in DICE, either because of a wrong reporting of the VFN code or because the family had been registered in DICE before 2019, when reporting CO<sub>2</sub> values started to be mandatory. Since there was no way to fill the missing values, these vehicles were discarded (**Table 10** of Annex 3).

<sup>1</sup> The manufacturers' names and the corresponding pools have been anonymised throughout the following sections. The correspondence between manufacturers and pools and the number of vehicles registered in 2020 for each case before and after the cleaning process is detailed in Part A of Annex 2.



3. **Missing individual measured (MCO2) values but with VH or VL measured values** (“MCO2 missing, VH/VL present” in **Figure 2**): in **324,390** cases (**307,366** not-derogated<sub>2020</sub> and **17,024** derogated<sub>2020</sub>), the measured-WLTP value of the individual vehicle (MCO2) was missing, while either the VH or VL (or both) measurements were available. These values were later processed to provide a reference MCO2 for the individual vehicles as explained below (“Calculate MCO2 from VH/VL” in **Figure 2**).

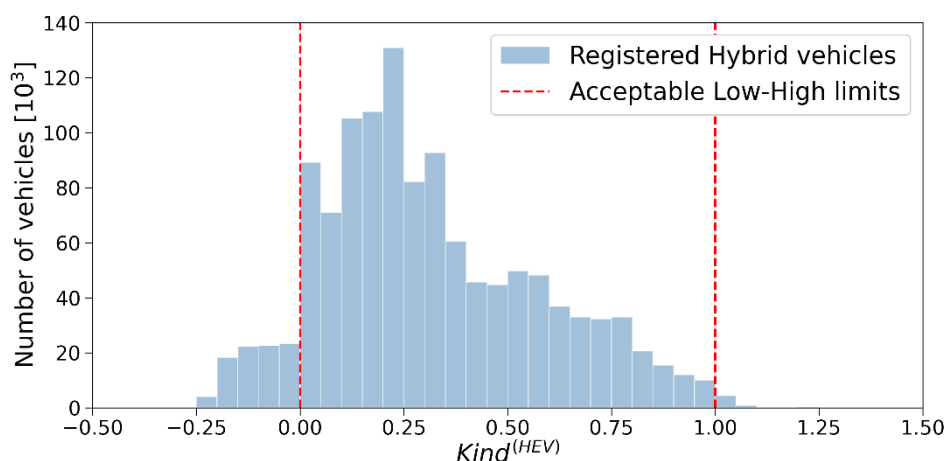
For the **513,296** cases (**313,208** not-derogated<sub>2020</sub> and **200,088** for derogated<sub>2020</sub>) where the MCO2 was missing but MCO2VH and/or MCO2VL was/were present or could be identified in DICE (merge of cases 2a and 3), the gap-filling strategy for calculating the MCO2 was as follows, based on Regulation (EU) 2017/1153:

- For the cases with only MCO2VH available, MCO2 is taken from MCO2VH.
- For the cases with both MCO2VH and MCO2VL available, or only MCO2VL, MCO2 is taken from MCO2VL.
- In the case of OVC-HEVs and NOVC-HEVs, when both MCO2VH and MCO2VL were available, the MCO2 value was calculated according to the following formula:

$$MCO2 = MCO2VL + Kind * (MCO2VH - MCO2VL) \quad (23)$$

where *Kind* must be defined in the interval [0,1]. As seen in **Figure 3**, there were 96,019 cases where the *Kind* value reported was outside these limits. For those cases, *Kind* was taken as 0 for negative values and 1 for values above 1.

**Figure 3** *Kind* values distribution as reported in the 2020 registrations dataset.



Source: JRC analysis, 2023.

As a result of this step, 1.5% of the vehicles were discarding, keeping **11,456,984** passenger cars (98.5%) for further data cleaning.

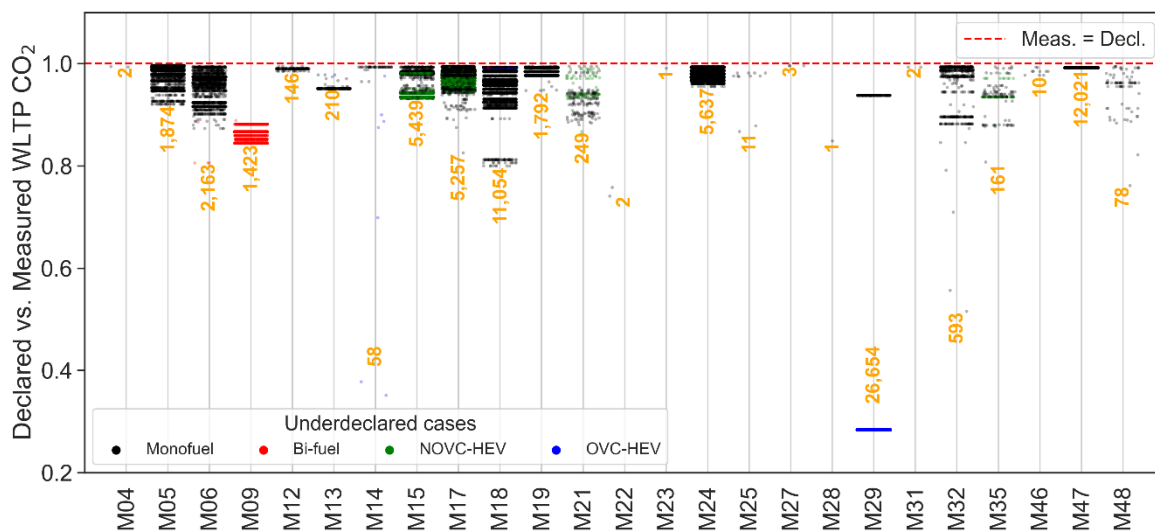
### 3.2.2 Underdeclared WLTP CO<sub>2</sub> values in M1 fleet

For a total of **74,841** vehicles, the measured WLTP CO<sub>2</sub> value reported was higher than the one declared by the manufacturer. However, it is explicitly established in Paragraph 1.2.3.8 of Sub-Annex 6, Annex XX1 to Regulation (EU) 2017/1151 that the manufacturer should declare a WLTP-CO<sub>2</sub> value for both vehicle-Low and vehicle-High of the IP family which cannot be lower than the values measured. The margin depends on the number of test repetitions performed in the Type Approval WLTP test: In case of one single test, the declared value should be at least 1% higher than the measured (corrections included) value; for two tests, the margin is reduced to 0.5%, taking the average of both measurements, while for three or more tests any declared value above or equal to the measured one is valid. Consequently, these **74,841** vehicles have been excluded from the further calculations.

The **74,841** cases are shown in **Figure 4** split by manufacturer, plotting the underdeclaration ratio (declared WLTP / measured WLTP) in addition to the fuel mode. The number of cases per manufacturer is both in the figure and in **Table 11** of the Annex 3. One-third of the cases stem from **Mitsubishi (M29)**, involving only 2

IP families. One of the families represents PHEV vehicles, and in view of the magnitude of the underdeclaration, the discrepancy seems to stem from considering a combined declared value while the measured one might be reflecting only the Charge Sustaining part. The manufacturers **Skoda (M47)**, with one single family, and **Kia (M18)** account for another third of the cases, while manufacturers **Opel (M24)**, **Hyundai (M15)** and **Hyundai Czech (M17)** account for less than 7% each. The rest of manufacturers have a marginal contribution to the underdeclared values. As regards the fuel types, 40,488 vehicles are mono-fuels (diesel and gasolines) followed by OVC-HEVs (26,672 vehicles).

**Figure 4.** CO<sub>2</sub> declared vs measured in 2020 combined dataset, by M1 manufacturer. Black, red, green, blue dots represent the vehicles that are mono-fuel, bi-fuel, NOVC-HEV, and OVC-HEVs, respectively, and their declared value was found lower than their measured. Yellow numbers represent the number of vehicles affected by underdeclarations per manufacturer.



Source: JRC analysis, 2023.

### 3.2.3 Pools and derogation situation in M1 fleet

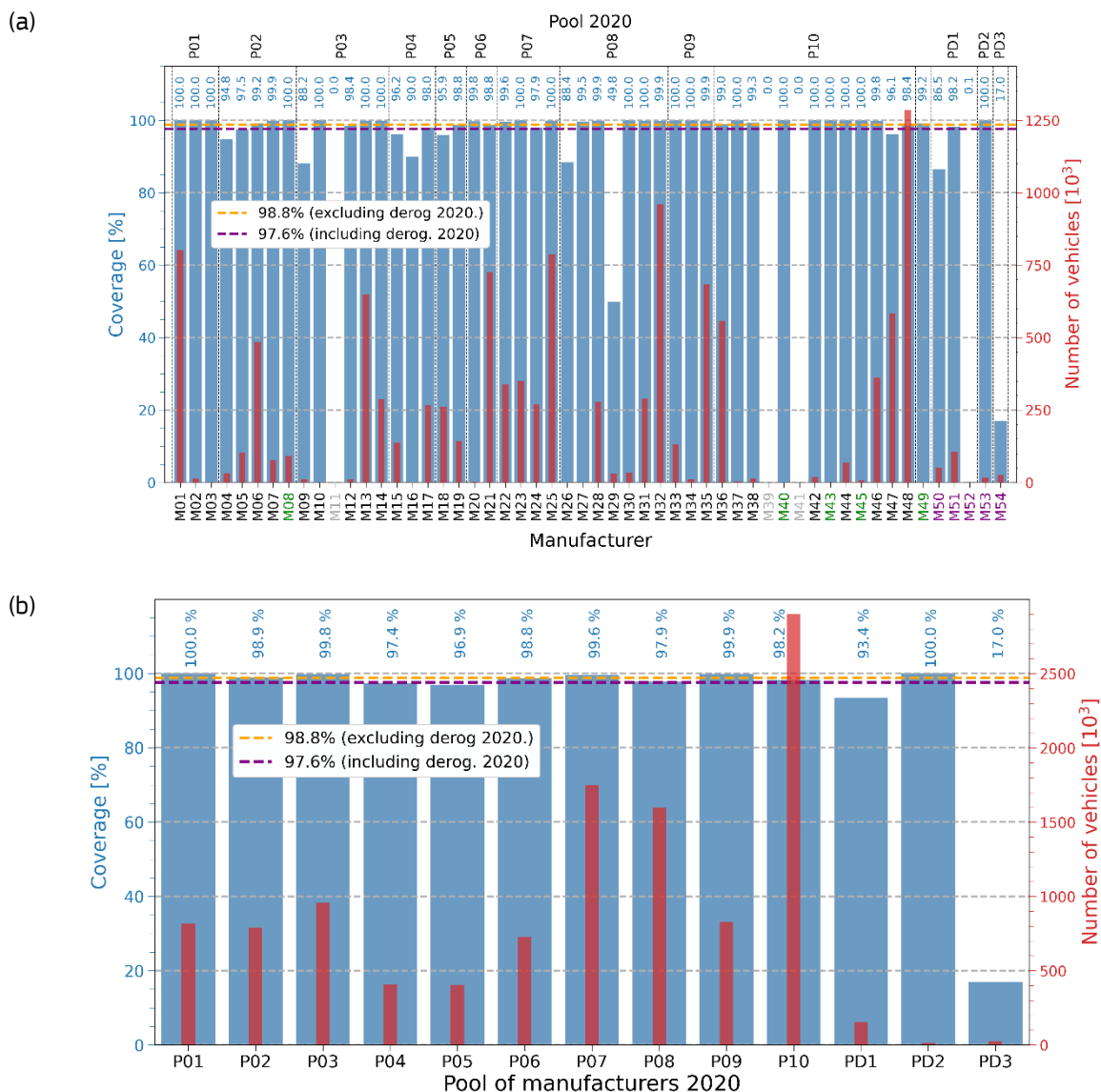
There were 11 pools of M1 manufacturers in 2020, one of them (**SUZUKI** pool) benefitting from a derogation in 2020. In 2021, a rearrangement of manufacturers into different pools resulted in 10 pools of manufacturers, none of them derogated. Five individual car manufacturers (**M50**, **M51**, **M52**, **M53**, **M54**) benefited from a derogation in 2020, but not anymore in 2021. Therefore, the reference values for 2021 of all these manufacturers should be calculated and taken into account for the determination of the EU fleet-wide target<sub>2021</sub>. However, reporting measured-WLTP values was not required from manufacturers, which were benefitting from a derogation in 2020. For the **341,603** vehicles of the concerned manufacturers, no measured-WLTP values (MC02) were reported. Consequently, the gap-filling procedure set out in Regulation (EU) 2017/1153 was applied, as illustrated in **Figure 2** (figures in brackets). **Subaru (M53)** submitted the measured WLTP values of vehicle-High (MC02VH) for almost all the vehicles. For the other manufacturers, no vehicle-Low or vehicle-High values were reported, and gap-filling with the DICE and the ETAES databases based on the IP family identification allowed to approximately cover half of the vehicles.

After the whole cleaning procedure, **141,957** vehicles (**41.5%** of the 341,603 vehicles) had to be discarded (**192** because the declared WLTP/NEDC value was missing and **141,765** because the data for the Interpolation Family concerned was not reported in DICE/ETAES), so in the end **200,124** vehicles (**58.5%** of the 341,603 vehicles) could be included in the final cleaned database 2020.

Three manufacturers present in the cleaned 2020 database did not register any vehicle in 2021: **Ford India (M10)**, with 53 vehicles in the cleaned 2020 database; **Avtovaz (M27)**, with 880 vehicles; and **MG Motor (M42)**, with 18,459 vehicles. Finally, **Saic Maxus (M49)** did not belong to a pool in 2020 or 2021 and had only pure-electric vehicles registered, with zero average NEDC and measured-WLTP CO<sub>2</sub> emissions. Therefore, it is also excluded from the calculation of the EU fleet-wide target<sub>2021</sub>.

### 3.2.4 Data coverage in M1 fleet

**Figure 5.** (a) Coverage by M1 manufacturer in % (blue) and number of vehicles (red) after the gap-filling and data cleaning procedure. Purple labels for manufacturers derogated in 2020, green labels for manufacturers of pure electric vehicles, grey labels for manufacturers for which all vehicles have been excluded during the data curation. (b) Same as (a) but expressed per pool of manufacturers. The average coverage is calculated in both cases, with and without considering derogated manufacturers in 2020 to illustrate their impact in data completeness.



Source: JRC analysis, 2023.

**Figure 5(a)** shows the result of the data cleaning and gap filling procedure for the generation of the EEA combined 2020 dataset, grouped by manufacturer. Most manufacturers have close to 100% representation (one fifth have 100% coverage, and almost half of the manufacturers have coverage above 99.9%). Overall, the average coverage of the non-derogated<sub>2020</sub> manufacturers is 98.8%. When including the derogated<sub>2020</sub> manufacturers **M50**, **M51**, **M52**, **M53** and **M54**, the coverage ratio drops mainly due to the remaining gaps for **M54 (Jaguar and Land Rover)**, but remains very high at 97.6%. There are three manufacturers, **M11 (Ford Australia)**, **M39 (Bugatti)** and **M41 (LEVC)** that belong to a pool in 2020, but for which all the vehicles were excluded during the cleaning procedure and consequently are not considered for the EU fleet-wide target<sub>2021</sub> determination. Apart from the two derogated<sub>2020</sub> manufacturers **M50** and **M54**, a few other manufacturers

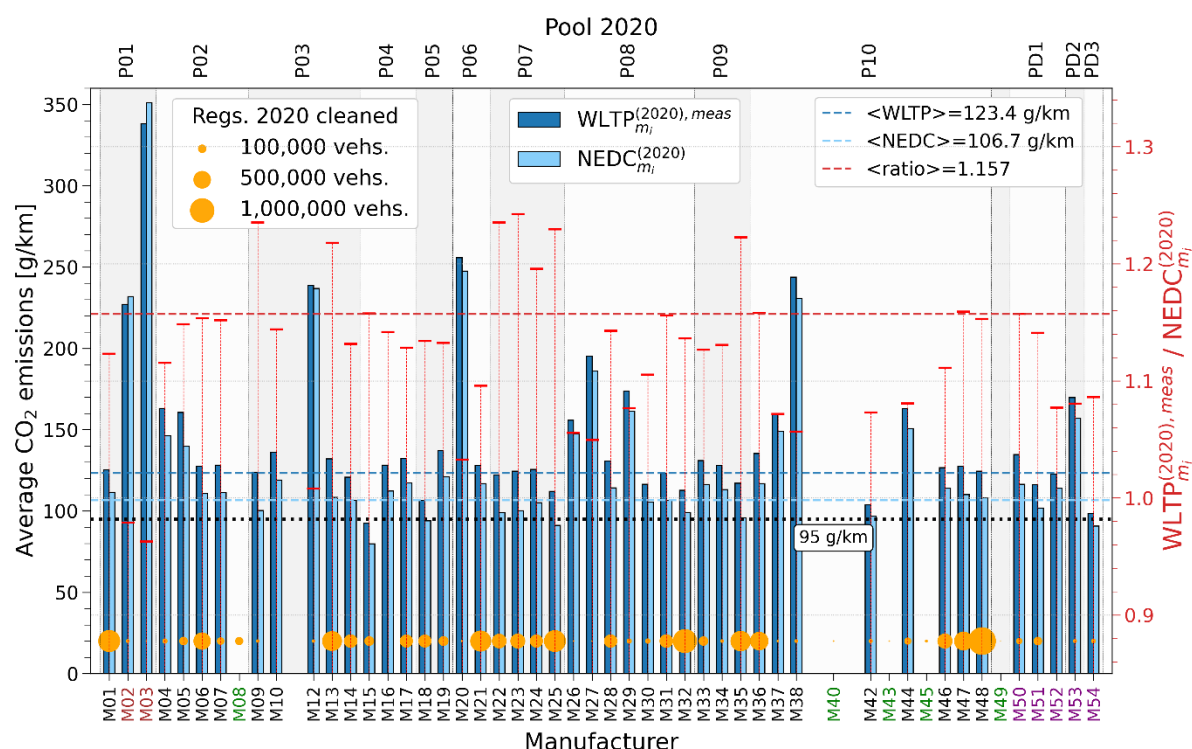
have significantly lower coverage than the average (**M09**, **M16**, **M26**, **M29**). However, all of them have less than 50,000 registrations and the impact on the calculation of the EU fleet-wide target<sub>2021</sub> is small.

The coverage per pool of manufacturers is presented **Figure 5(b)**, including the pools **PD1**, **PD2** and **PD3** derogated in 2020 (the last two representing the individual manufacturers **M53** and **M54**). The pool percentage coverage ranges from 96.9 % to 100 %, except for **PD3** (**Jaguar Land Rover**, **M54**). Overall, the representativeness of all pools is considered satisfactory for the next steps of the exercise.

### 3.2.5 Average measured-WLTP and NEDC emissions per M1 manufacturer

**Figure 6** depicts the average measured-WLTP and NEDC-declared emissions in 2020 per manufacturer in the EEA combined 2020 database, which were used for determining the reference values<sub>2021</sub> that will be calculated at pool (2021) level. The average values per M1 manufacturer and the number of vehicles in the EEA combined 2020 dataset are provided in **Table 6** of Annex 2, Part A. For better benchmarking each manufacturer's contribution, the ratio between the WLTP and the NEDC average emissions is also shown, excluding the manufacturers of exclusively electric vehicles. The fleet-averaged measured-WLTP and NEDC values are displayed in horizontal dashed lines. The average measured-WLTP value in 2020 is 123.4 g/km, while the average NEDC-declared value is 106.7 g/km, yielding an average measured-WLTP to NEDC ratio of 1.157.

**Figure 6.** 2020 WLTP measured and NEDC (cleaned) average values grouped per M1 manufacturer (blue bars) and their corresponding ratio (red dashes). The pool of the manufacturer in 2020 is indicated in the upper axis. Brown manufacturer labels represent cases where the average measured WLTP (MCO2) is lower than the average NEDC, green labels for manufacturers producing exclusively electric cars, and purple labels for manufacturers derogated in 2020.



Source: JRC analysis, 2023.

There are two cases, **BMW GMBH (M02)** and **Rolls Royce (M03)**, where the NEDC value is higher than the measured-WLTP value and the ratio lower than 1. These are cases of high-consumption vehicles, for which the usual benefits of the favourable testing conditions in NEDC may not be so evident. **Ford M.C. (M12)** presents measured-WLTP average very close to NEDC, with a ratio very close to 1, same as **Mercedes AMG**. Four manufacturers registered exclusively zero-emission vehicles: **Tesla (M08)**, **Jiangling Motor (M40)**, **NEXT EGO Mobile (M43)** and **Saic M.C (M45)**, displayed in green in the figure.

The measured-WLTP to NEDC ratio is notably higher than the rest for all the manufacturers from the pool **PSA-OPEL (P07)**, which will be in the **STELLANTIS** pool in 2021. Another manufacturer with a high ratio of 1.22 is

**Toyota (M35)**, showing a distinctive higher ratio than the rest of manufacturers in the **P09 pool (TOYOTA-MAZDA)**. Interestingly, the magnitude of the ratio does not seem to be related to the number of cases with only vehicle-High declared. In fact, the manufacturers declaring only vehicle-High values have a rather low ratio (**Alpine (M26)**, **Avtovaz (M27)**, **Mitsubishi Motor (M29)**, **MG Motor (M42)** and **Subaru (M53)**) or at least lower than the fleet-wide average value (**Mazda M33**, **Mazda Europe M34** and **Mitsubishi Thailand M30**).

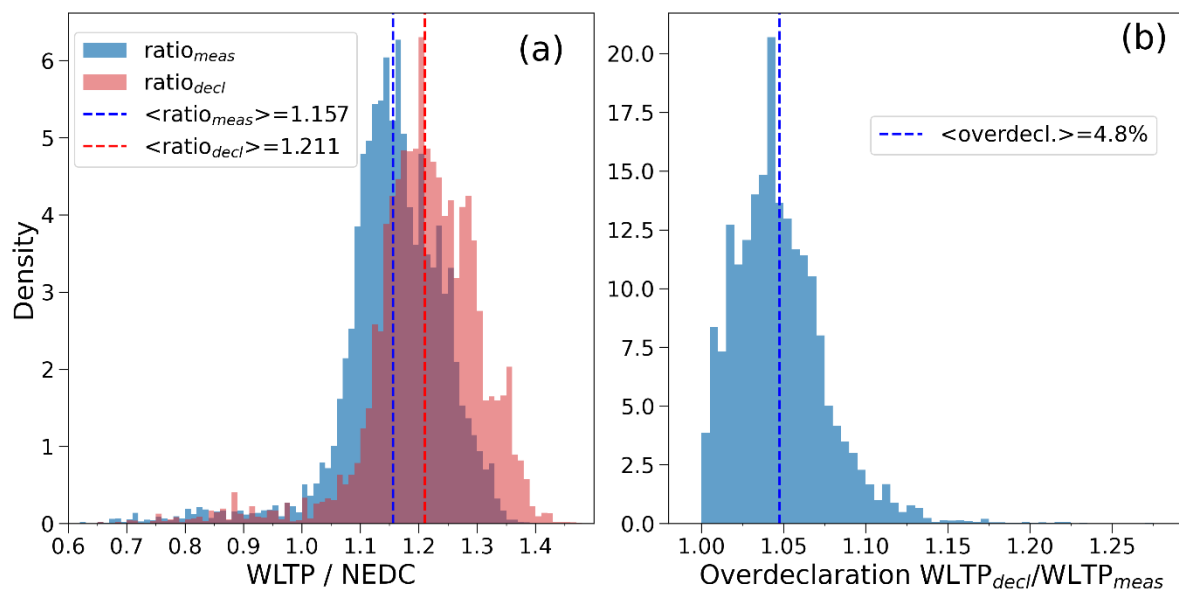
### 3.2.6 Analysis of 2020 WLTP overdeclaration in M1 fleet

**Overdeclaration** is a concept intrinsically linked to the WLTP procedure. As explained in **section 2.2** and illustrated in **Figure 1**, the CO<sub>2</sub> emissions reported in the CoC of each vehicle are interpolated from the **values declared** after the Type Approval tests, according to Regulation (EU) 2017/1151. Similarly, a measured CO<sub>2</sub> emissions value can be defined for the individual vehicle by interpolating from the **values measured** for the vehicle-High and vehicle-Low (or alternatively only vehicle-High, in case the vehicle-Low is not defined). The declared values should never be lower than the measured counterparts, but there are no upper bounds in the Type Approval legislation. Consequently, the magnitude of the overdeclaration for the individual vehicles is variable and determined by the manufacturer.

Overdeclaration is an issue that occurred in the past and may still occur to some extent for justifiable reasons. Manufacturers overdeclare the CO<sub>2</sub> emission values in order to avoid failure during the CoP testing of new vehicles. However, the overdeclaration in 2020 had quantifiable implications on the targets' baseline definition from 2021 to 2024, since the translation from NEDC based targets to WLTP based ones relied on the 2020 data. Indeed, a transitional high overdeclaration during the NEDC to WLTP transition period, with the targets still based on NEDC, would increase the future targets and could thus facilitate the target compliance from 2021 onwards without bringing any negative consequence to the manufacturer. To safeguard against the effects of a possible undue degree of inflation, the measured WLTP values instead of the declared values were used for determining the 2025 and 2030 targets. Using the combination of measured and declared WLTP values reported in 2020, the magnitude of the overdeclaration can be established for 2020 at a complete fleet-wide level, considering all the registered vehicles in that year.

Even before the WLTP certification procedure entered into force, several studies (Pavlovic et al., 2018; Tsiakmakis et al., 2016) tried to predict its impact on the CO<sub>2</sub> emissions and energy efficiency declaration. Two main questions were raised. The first question was on the difference between the CO<sub>2</sub> emissions under the NEDC procedure and under WLTP. Literature (Chatzipanagi et al., 2022) quantified this increase in declared official CO<sub>2</sub> emissions being 21% (the ratio being 1.21), which coincides with the ratio of **1.211** found for the non-electric vehicles included in the EEA combined 2020 dataset – see **Figure 7(a)**. The distribution of the ratio among the EU fleet is quite broad, ranging from 0.8 to 1.4. This ratio is related to the renormalisation used to calculate the 2021-2024 targets, and therefore the higher it is, the higher will be the EU fleet-wide targets for those four years.

**Figure 7.** Distributions as calculated from the EEA combined 2020 dataset of M1 vehicles for: (a) the ratio between WLTP and NEDC CO<sub>2</sub> values, considering measured-WLTP (blue) and declared-WLTP (red). (b) the overdeclaration (ratio between the declared-WLTP and the measured-WLTP CO<sub>2</sub> values). Vertical lines denote the average ratios in both figures.



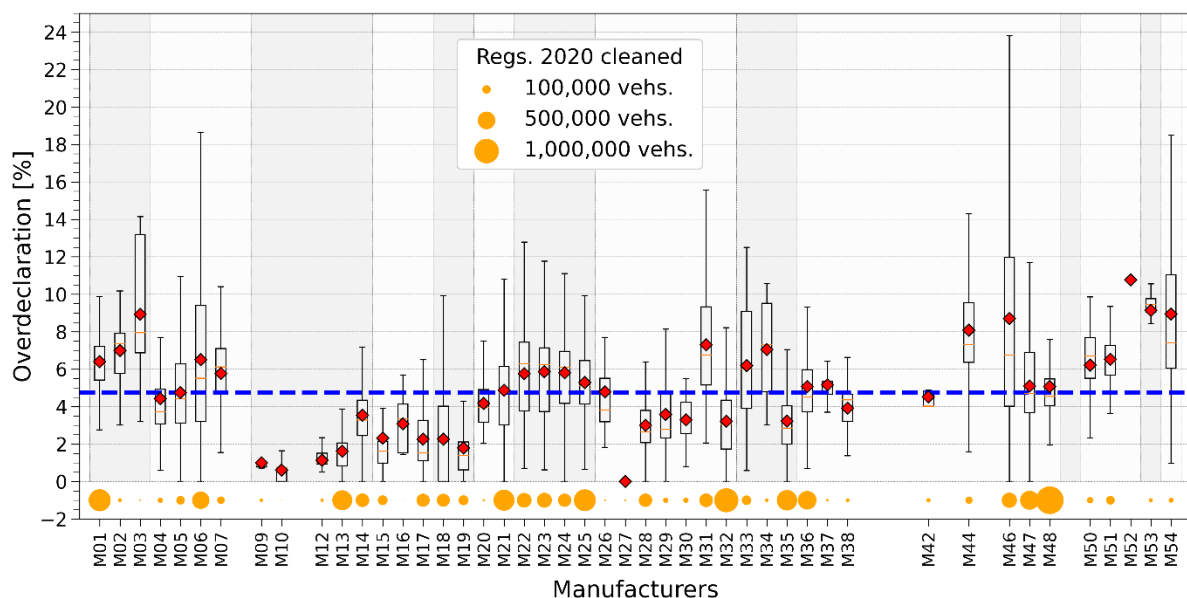
Source: JRC analysis, 2023.

The second question was to estimate the overdeclaration in WLTP, and how it might evolve over the following years. For the same set of vehicles as in the previous figure, **Figure 7(b)** shows an average overdeclaration at EU fleet level of 4.8% in 2020, with a standard deviation of 3.0%. The distribution shows a cut-off at 1 due to the impossibility to declare lower values than those measured. In line with this overdeclaration pattern, the measured-WLTP to NEDC ratios are lower – see **Figure 7(a)** – than the declared-WLTP to NEDC ratios, moving in average from **1.211 to 1.157**. This last value, calculated from the measured-WLTP, is the one to be used for calculating the 2025 and 2030 targets, which means that the 2025 onwards targets are established safeguarding against the **4.8% WLTP overdeclaration** in 2020.

**Figure 8** represents the distribution of the overdeclaration in WLTP CO<sub>2</sub> values obtained for each manufacturer (a) and each pool (b) in 2020. Combining the analysis of this figure with the fleet-wide one presented above, we try to determine what could be considered as reasonable values for the overdeclaration of each manufacturer. The average observed overdeclaration for the whole fleet is 4.8%. Manufacturers **Ford India (M10)**, **Hyundai (M15)**, **Hyundai Czech (M17)**, **Kia (M18)** and **Kia Slovakia (M19)** exhibit the lowest average overdeclaration, below 2%. On the opposite side, manufacturers **Rolls Royce (M3)**, **Ford Werke (M13)**, **Mazda Europe (M34)**, **Seat (M46)** and **Suzuki Thailand (M52)** are overdeclaring on average by more than 6%. From these cases, only **Mazda Europe (M34)** and **Subaru (M53)** are manufacturers declaring vehicle-High only, so it cannot be established a direct link between the overdeclaration and the share of vehicle-High only declarations. Finally, **Fiat (M06)**, **Seat (M46)** and **Jaguar Land Rover (M54)** show a much higher variability than other manufacturers, reaching for some of their vehicles an overdeclaration above 15%.



**Figure 8.** Overdeclaration of M1 non-electric registered vehicles for each 2020 manufacturer. Each box represents the 1<sup>st</sup> and 3<sup>rd</sup> quartile; red diamond is the average value; whiskers quantify the 1.5\*IQR (interquartile range). The number of registrations in 2020 for each manufacturer/pool is correlated to the size of the orange bullet. The average fleet-wide overdeclaration of 4.8% obtained excluding electric vehicles is shown with a blue dashed line.



Source: JRC analysis, 2023

### 3.3 EEA combined 2020 dataset for N1 vehicles (light commercial vehicles)

This section details the procedure followed for the calculation of the EU fleet-wide target 2021 for light commercial vehicles (light commercial vehicles), also referred in the regulation as N1 category vehicles. For this purpose, the data curation and gap-filling procedure is presented, followed by the analysis of the emissions reported.

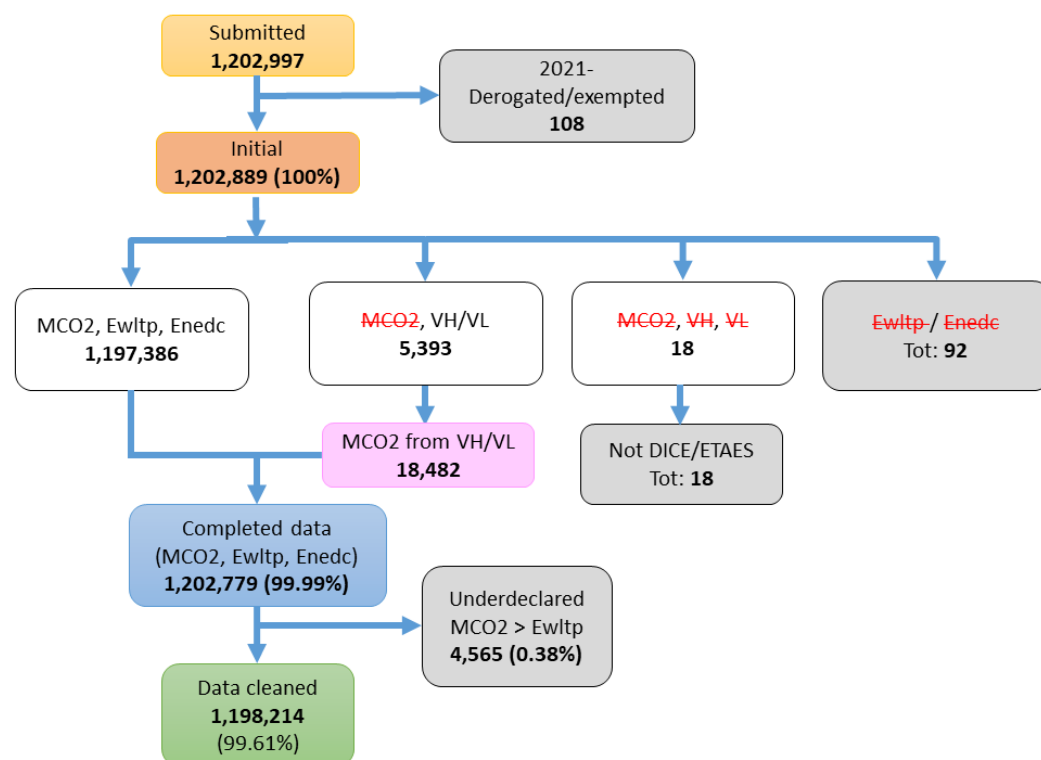
#### 3.3.1 Missing data in N1 fleet

The first step to obtain the EEA combined 2020 dataset involves the data curation and gap-filling process as shown in **Figure 9**. In the case of light commercial vehicles, all the pools of manufacturers derogated in 2020 were also derogated in 2021, and consequently there is no distinction between derogated<sub>2020</sub> and not-derogated<sub>2020</sub> cases in the figure, as there was for M1 vehicles.

The original 2020 combined EEA dataset contained data for **1,202,997** light commercial vehicles. Out of this set, **92** vehicles, either NEDC or WLTP (see **Table 9** of Annex 3). For **5,393** vehicles (1.53%) where the measured-WLTP value was missing, the value could be gap-filled from the measured values for the Vehicle-High and/or Vehicle-Low. For **18** vehicles identified, also not when using the DICE database as an auxiliary source (see **Table 10** of Annex 3 for identification of the manufacturers). With this, a total of **1,202,779** light commercial vehicles with all necessary data (measured-WLTP, declared-WLTP and declared-NEDC) were considered for further data cleaning.

The majority (99.2%) of the vehicles for which measured WLTP data was received are coming from defined IP families using both on vehicle-Low and vehicle-High. Only **Fiat (N05)** with 1.6%, **Opel (N06)** with 2.6% and **Renault-Trucks (N25)** with 27%, presented a certain share of vehicles registered based exclusively on vehicle-High measurements.

**Figure 9.** EEA combined 2020 dataset cleaning procedure for light commercial vehicles. Pink cells represent gap-filling cases, grey cells represent cleaned (discarded) cases. Red strikethrough are missing parameters in the submissions.



Source: JRC analysis, 2023

### 3.3.2 Underdeclared WLTP CO<sub>2</sub> values in N1 fleet

**Figure 10.** CO<sub>2</sub> declared vs measured in 2020 combined dataset, by N1 manufacturer. Black, red, green, blue dots represent the vehicles that are mono-fuel, bi-fuel, NOVC-HEV, and OVC-HEVs, respectively, and their declared value was found lower than their measured. Yellow numbers represent the number of vehicles affected by underdeclarations per manufacturer.



Source: JRC analysis, 2023

The presence of a declared-WLTP value was required in order to identify and exclude from the dataset vehicles for which the WLTP CO<sub>2</sub> emissions had been incorrectly underdeclared (the declared value should always be



higher than the one measured –and corrected– during the WLTP test). On this basis, **18,482** underdeclared cases, represented in **Figure 10**, were filtered out, resulting in a final total dataset of 1,198,214 vehicles (99.61% of the original dataset) on which the emission reference targets will be calculated. The number of underdeclared vehicles per manufacturer is detailed in **Table 11** of Annex 3.

### 3.3.3 Pools and derogation situation in N1 fleet

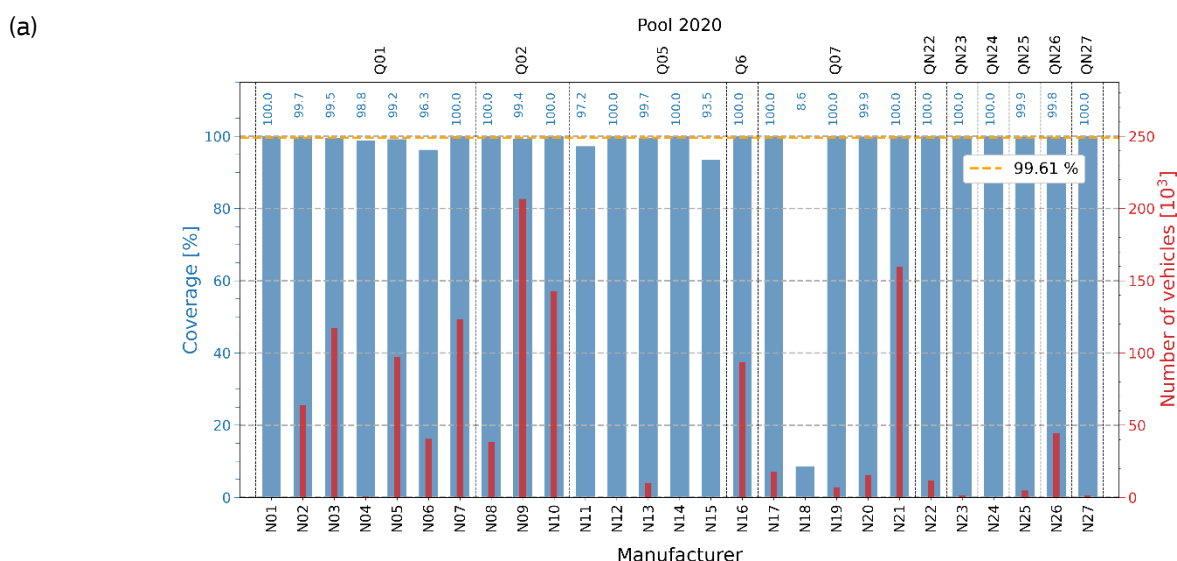
Two pools benefited from a derogation in 2020, **HYUNDAI** and **KIA**, and they were also derogated in 2021. Therefore, they were not considered for our calculations. The final cleaned database of the measured 2020 data contains vehicles from 27 manufacturers, which involved 5 different pools (**FCA-PSA**, **FORD-VW**, **MAN-SAIC**, **MERCEDES-BENZ** and **RENAULT-NISSAN-MITSUBISHI**) and 6 individual manufacturers not pooling: **Iveco (N22)**, **Jaguar Land Rover (N23)**, **Porsche (N24)**, **Renault Trucks (N25)**, **Toyota (N26)** and **Volvo (N27)**. Three manufacturers were not included in this measured 2020 database for different reasons and are therefore not considered either for the EU fleet-wide target<sub>2021</sub> calculation: **BMW AG** was exempted due to less than 1,000 vehicles registered in the previous year, while **Avtovaz** and **CNG** had no registrations in 2021.

In addition, there was a rearrangement in 2021 of the pooling arrangements. **STELLANTIS** substituted **FCA-PSA**, the pool **VOLKSWAGEN-FORD-SAIC-GOUPIL** was formed from the merging of **FORD-VW** and **MAN-SAIC**, and **MERCEDES** did not pool and became an individual manufacturer.

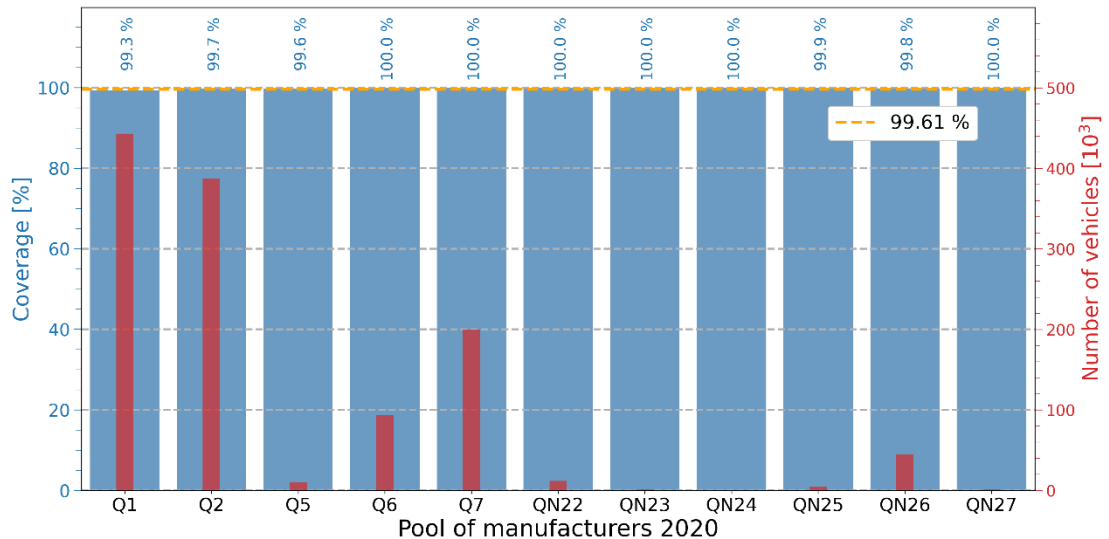
### 3.3.4 Data coverage in N1 fleet

**Figure 11** illustrates the cleaning procedure and the coverage per manufacturer. Figure 11 (a) displays a comparison of the percentage of vehicles for which the manufacturers reported the measured CO<sub>2</sub> emissions) with the number of records in the monitoring database. In total, the number of reported measured emissions in the whole 2020 N1-fleet (**1,202,997**) is **12% lower** than the number of registrations from the monitoring database (**1,368,395** declared emissions). The non-reported vehicles are distributed among the largest fleet's manufacturers, **Mercedes-Benz (N16)** takes the lion's share with almost one-third of the missing vehicles.

**Figure 11.** (a) Coverage by N1 manufacturer in % (blue) and number of vehicles (red) after the gap-filling and curation procedure. (b) Same as (a) but expressed per pool of manufacturers. The average coverage is displayed in both cases with a yellow dashed horizontal line.



(b)



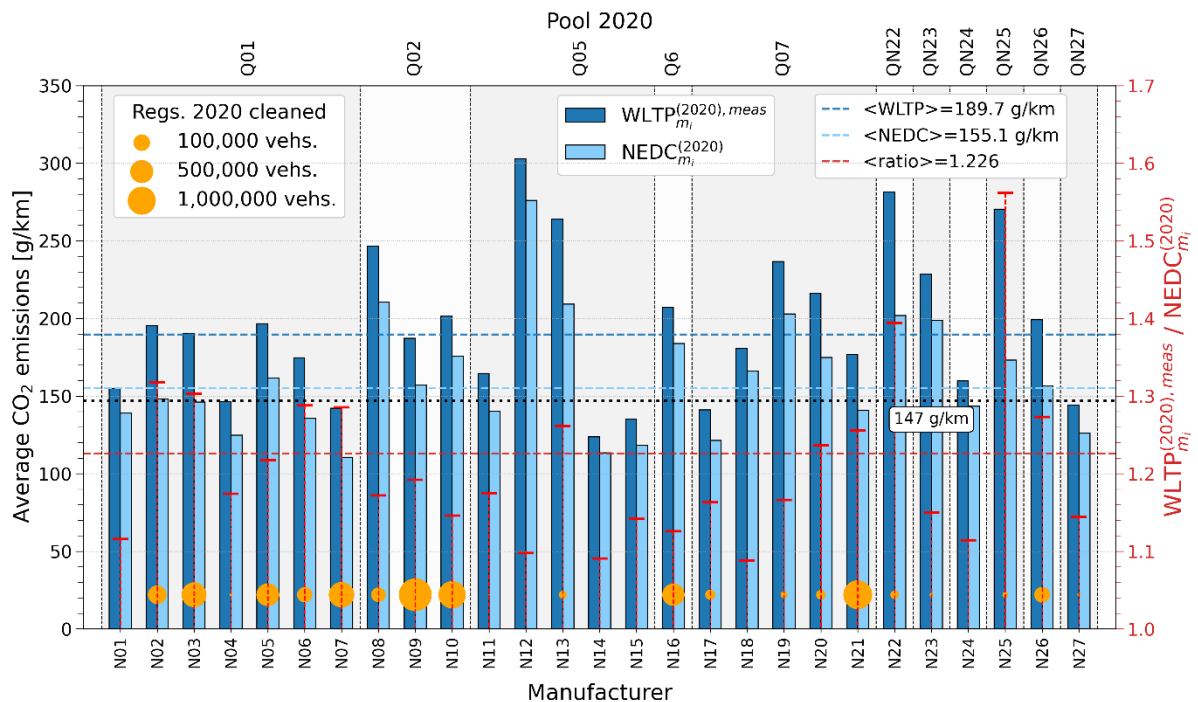
Source: JRC analysis, 2023

### 3.3.5 Average measured-WLTP and NEDC emissions for N1 manufacturers

This section analyses the average measured-WLTP and declared-NEDC emissions, used in the determination of the EU fleet-wide target<sub>2021</sub>. A detailed description of the average values per N1 manufacturer and of the number of cases considered is provided in **Table 8** of Annex 2, Part B.

The average measured-WLTP value across the whole N1 fleet is **189.7 g/km**, while the average-NEDC value is **155.1 g/km**, which leads to a ratio of **1.226** between the two values. The average emissions from each manufacturer are displayed in **Figure 12**.

**Figure 12.** 2020 WLTP measured and NEDC average values grouped per N1 manufacturer (blue bars) and their corresponding ratio (red dashes). The pool of the manufacturer in 2020 is indicated in the upper axis.

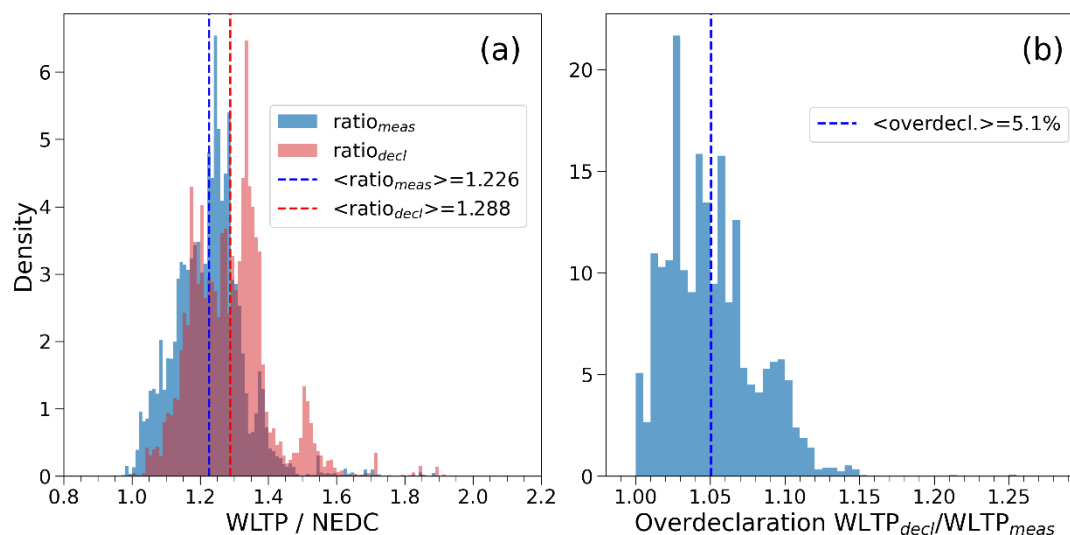


Source: JRC analysis, 2023.

### 3.3.6 Analysis of 2020 WLTP overdeclaration in N1 fleet

**Figure 13(a)** shows the WLTP to NEDC ratio per vehicle in the N1 fleet, according to the cleaned 2020 EEA combined database (excluding the 8,631 electric vehicles). The distributions are broader than for the M1 fleet. For the ratio of the declared WLTP value over the declared NEDC value, the range extends from ca. 1.05 to 1.6, with an average of 1.29. For the ratio of the measured WLTP value over the declared NEDC value, the average is 1.226, which is reflecting the effect of a **5.1%** overdeclaration – see **Figure 13(b)**.

**Figure 13.** Distributions as calculated via the 2020 EU fleet registrations of N1 vehicles for: (a) the ratio between WLTP and NEDC CO<sub>2</sub> values, considering measured-WLTP (blue) and declared-WLTP (red). (b) the overdeclaration (ratio between the declared-WLTP and the measured-WLTP CO<sub>2</sub> values). Vertical lines denote the average ratios in both figures.

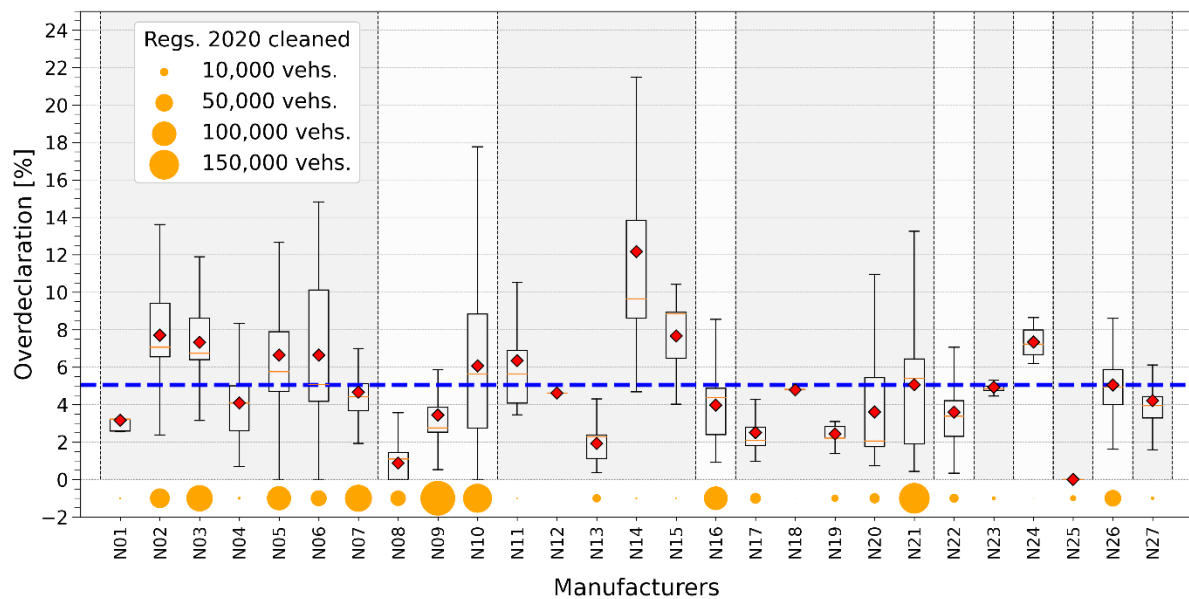


Source: JRC analysis, 2023

**Figure 14** depicts a representation of the overdeclaration in terms of the individual manufacturers considered in the 2020 cleaned measured dataset. Manufacturers with exclusively pure electric vehicles have been excluded. Most of the larger manufacturers have an overdeclaration close to the 5.1% average value, with values slightly below the average for **Ford Werke (N09)** and **Mercedes-Benz (N16)**.

Manufacturer **Renault Trucks (N25)** stands as a particular case, with a zero overdeclaration, which means that the declared values are exactly equal to the measured emissions for the 4,687 vehicles in the fleet, stemming from 10 different interpolation families. This indicates that each of those families must have been approved on the basis of three vehicle tests.

**Figure 14.** Overdeclaration in the EEA combined 2020 database for N1 non-electric vehicles per 2020 manufacturer. Each box represents the 1<sup>st</sup> and 3<sup>rd</sup> quartile; red diamond is the average value; whiskers represent 1.5\*IQR (interquartile range). The number of registrations in 2020 for each manufacturer/pool is correlated to the size of the orange bullet. The average fleet-wide overdeclaration of 5.1%, excluding electric vehicles, is shown with blue dashed line.



Source: JRC analysis, 2023

## 4 Calculation of the parameters for determining 2025 and 2030 targets

This section presents the calculation of the parameters necessary for the determination of the 2025 and 2030 CO<sub>2</sub> emission targets for light-duty vehicles. These targets will be established for each manufacturer (or pool of manufacturers) based on a linear correlation with the average test mass of the corresponding manufacturer's vehicles fleet. To determine the target lines of 2025 and 2030 three parameters are needed: i) The fleet-wide target (EU fleet-wide target<sub>2025</sub> and EU fleet-wide target<sub>2030</sub>), calculated as a % reduction of a reference 2021 value (EU fleet-wide target<sub>2021</sub>); ii) the fleet-wide reference test mass (TM<sub>0</sub>), calculated biannually from the average test mass of the vehicles registered in the preceding two years; and iii) the slope(s) of the target line (a<sub>2021</sub>, a<sub>2025</sub> and a<sub>2030</sub>), with the latter two calculated from the slope of the best fitting straight line in a 2021 CO<sub>2</sub> emissions to test mass representation (a<sub>2021</sub>). The following subsections are devoted to the calculation of the EU fleet-wide target<sub>2021</sub>, a<sub>2021</sub> and to the indicative TM<sub>0</sub> value for 2025 for both passenger cars and light commercial vehicles.

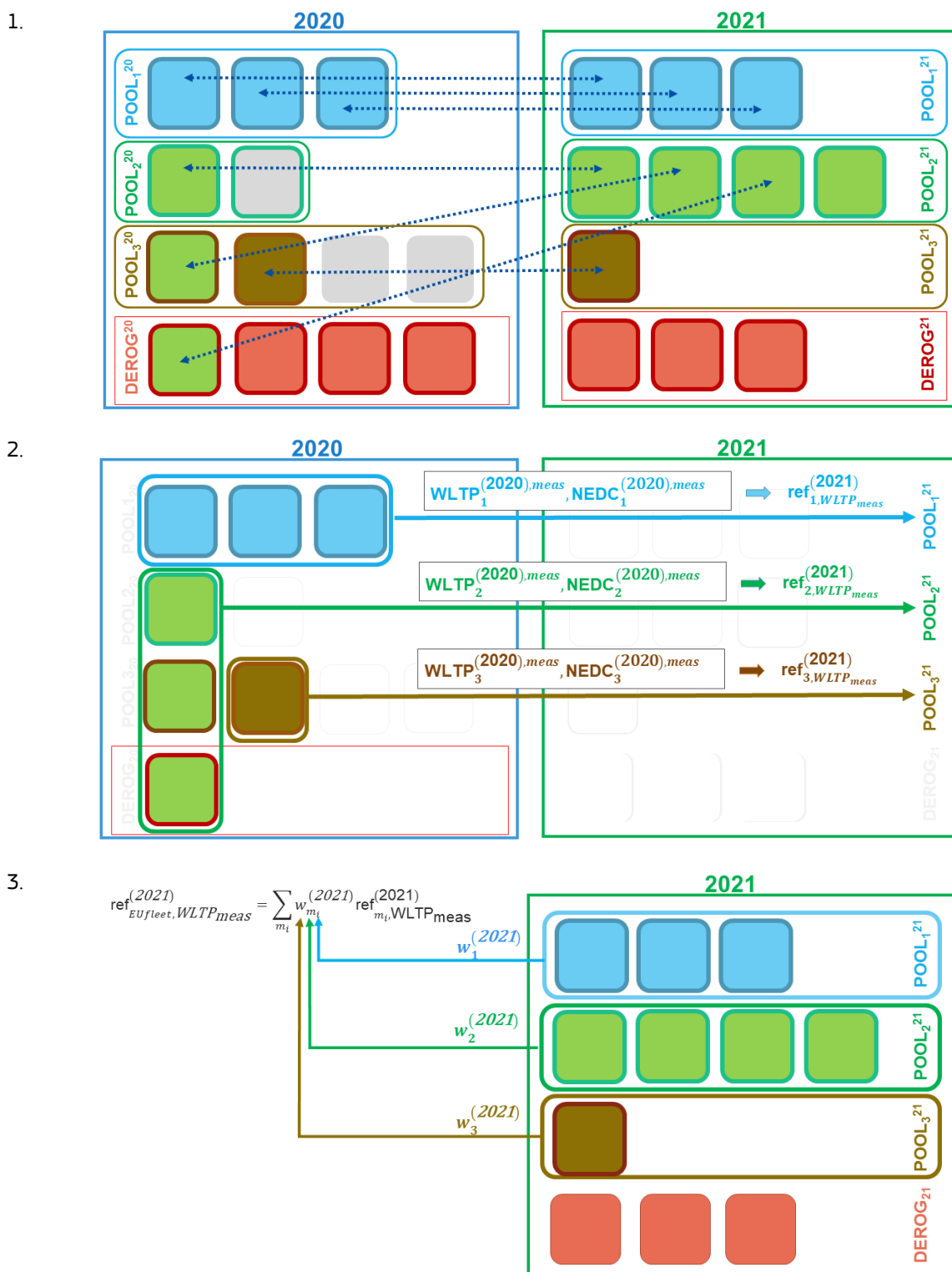
### 4.1 General procedure for the determination of the EU fleet-wide target<sub>2021</sub>

The procedure used for the determination of the EU fleet-wide target<sub>2021</sub> involved three steps that are illustrated in the schema of **Figure 15**. According to Article 6(7) of Regulation (EU) 2019/631, manufacturers which are part of a pool “shall be considered as one manufacturer for the purposes of meeting their obligations under Article 4”. Therefore, the determination of the specific individual 2021 reference values is done at pool level.

The combination of 2020 and 2021 data involves the consideration of several issues regarding the determination of the EU fleet-wide target<sub>2021</sub>, which are:

- The configuration of a pool might change from one year to another (in the example in Figure 15, e.g., POOL<sub>2</sub><sup>20</sup> and POOL<sub>3</sub><sup>20</sup> are differently composed than POOL<sub>2</sub><sup>21</sup> and POOL<sub>3</sub><sup>21</sup>). In fact, for passenger cars only the pools **P01**, **P04**, **P05**, **P06**, **P08** and **P10** existed both in 2020 and 2021, while pools **P12**, **P13**, **P14** and **P15** were new in 2021. For light commercial vehicles, only pool **Q03** exists in both years.
- Manufacturers which did not form a pool in 2021 and were not derogated or exempted, must be considered at individual level: **Volvo (PM14)**, and **Suzuki Thailand (PM52)** for passenger cars. **Saic Maxus (PM49)** is a particular individual case which has been excluded for the EU fleet-wide target<sub>2021</sub> calculation exercise as all the individual vehicles registered are electric, and therefore the corresponding reference-value<sub>2021</sub> could not be calculated. In the case of light commercial vehicles, the individual manufacturers not pooling are: **Mercedes-Benz (QN16)**, **Iveco (QN22)**, **Jaguar Land Rover (QN23)**, **Porsche (QN24)**, **Renault Trucks (QN25)**, **Toyota (QN26)** and **Volvo (QN27)**.
- A manufacturer or pool might have registered vehicles in 2020 but not in 2021 (light-brown cases in POOL<sub>3</sub><sup>20</sup> in the example figure). Consequently, the corresponding 2021 reference values will not be considered for the calculation of the EU fleet-wide target<sub>2021</sub>. These cases are **Ford India (M10)**, **Avtovaz (M27)** and **MG Motor (M42)**.
- Some manufacturers present in 2021 did not register any vehicle in the final EEA 2020 combined dataset (e.g., last green box of POOL<sub>2</sub><sup>21</sup> in the example), either because the manufacturer did not exist in 2020 (such as **Geely** and **Polestar**), or because no registrations were left after the cleaning process (**Ford Australia (M11)**, **Bugatti (M39)** and **LEVC (M41)**). In both cases, these manufacturers are not considered for the calculation of the specific reference value or the weighting factor.
- Finally, those manufacturers derogated in 2020 but not in 2021 (**Magyar Suzuki (M50)**, **Suzuki Motor Corporation (M51)**, **Suzuki Thailand (M52)**, **Subaru (M53)** and **Jaguar Land Rover (M54)**) are fully considered in this exercise, in accordance with Point 4, Annex I to Regulation (EU) 2019/631, despite the fact that reporting the 2020 CO<sub>2</sub> values was not mandatory for them

**Figure 15.** Schematic example of the three-step procedure for determining the EU fleet-wide target<sub>2021</sub>.



Source: JRC analysis, 2023

Taken these considerations into account, the steps for determining the EU fleet-wide target<sub>2021</sub> are:

1. First, the 2021 pools or individual manufacturers, for which Point 4 of Annex I (Part A) of Regulation (EU) 2019/631 applies (not-derogated in 2021) are considered. All the manufacturers involved are identified also in 2020, establishing a link at manufacturer level between 2020 and 2021 (dotted arrows in Figure 15).

- Secondly, average values of the 2020 measured-WLTP and NEDC emissions are calculated for each group of manufacturers that: i) have available data in 2020 and ii) are pooling together in 2021. These manufacturers are shown in the same color in **Figure 15**. Both the average measured-WLTP and the NEDC value are calculated on the EEA 2020 combined dataset. Combining the previous information with the number of registrations per pool in 2021 and the average mass in running order, the reference-value<sub>2021</sub> ( $\text{ref}_{m_i, \text{WLTP}_{\text{meas}}}^{(2021)}$ ) is calculated for each 2021 pool/manufacturer according to equation (8).
- Finally, these reference values are averaged weights according to the number of registrations of the pool/manufacturer in 2021 ( $w_{m_i}^{(2021)}$ ) to yield the EU fleet-wide target<sub>2021</sub> according to eq. (9).

## 4.2 Precision in the determination of the EU fleet-wide target<sub>2021</sub>

The robustness of the procedure to calculate the EU fleet-wide target<sub>2021</sub> relies on the representativeness of the sample used to evaluate the measured-WLTP and NEDC average values. The maximum precision that can be achieved in the calculation is therefore affected by the missing data following the cleaning/gap-filling of the EEA combined 2020 datasets, as the value target value should be safeguarded against possible variations in the emission values reported. The quality of the procedure and the reliability of the value builds upon the high coverage of vehicles correctly reported, shown in **Figure 5** (97.6%) and **Figure 11** (99.61%) for the complete M1 and N1 fleets, respectively.

Nevertheless, for the M1 case there are significant differences in the coverage upon manufacturers. This issue particularly concerns the M1 manufacturer **Jaguar Land Rover (M54)**, with a poor 17% share of vehicles represented. To quantify the impact of these gaps on the precision of the EU fleet-wide target<sub>2021</sub> calculation, different scenarios were simulated exploring different WLTP to NEDC ratios for this manufacturer. The WLTP to NEDC ratio of the individual vehicles from M54 presents a quasi-normal statistical distribution.

**Table 1** shows how different percentiles of such ratio affect the calculated EU fleet-wide target<sub>2021</sub>, and therefore establishes a variability range for the latter. A maximum variation of  $\pm 0.04\%$  in the EU fleet-wide target<sub>2021</sub> value is found between the 1% and the 99% percentile. This relative variation translates into ca.  $\pm 0.04 \text{ gCO}_2/\text{km}$  in absolute terms when considering the approximately  $110.1 \text{ gCO}_2/\text{km}$  found in the next section (eq. (24)) for this parameter. Since the precision of the EU fleet-wide target<sub>2021</sub> must be in line with this variability range, a **precision of  $\pm 0.5\%$**  can be established. In other words, the EU fleet-wide target<sub>2021</sub> must be given with one decimal figure. For the sake of consistency, the same precision will be applied to the value of the N1 fleet.

**Table 1.** Variation in the final EU fleet-wide ratio  $\text{ref}_{EU \text{ fleet, WLTP}_{\text{meas}}}^{(2021)}$  taking different percentiles of the reference-value<sub>2021</sub> ( $\text{ref}_{M54, \text{WLTP}_{\text{meas}}}^{(2021)}$ ) distribution of Jaguar Land Rover (M54). The reference value for the variation is the final EU fleet-wide reference value as calculated in the next subsection.

Percentile	1%	10%	25%	75%	90%	99%
Variation	-0.04%	0%	0%	0.032%	0.041%	0.044%

Source: JRC analysis, 2023.

## 4.3 Calculation of parameters determining the 2025/2030 specific emissions targets for M1 vehicles

### 4.3.1 Calculation of EU fleet-wide target 2021 for M1 vehicles

The reference-value<sub>2021</sub> of each M1 pool (or individual manufacturer) in 2021 is shown in **Table 2**. Values used for determining the M1 reference values<sub>2021</sub> and EU fleet-wide target<sub>2021</sub> and illustrated in **Figure 16**.

**Table 2.** Values used for determining the M1 reference values<sub>2021</sub> and EU fleet-wide target<sub>2021</sub>

Pools 2021 acronym	Pools 2021 name	<NEDC> <sub>2020</sub> (g/km)	<WLTP <sub>meas</sub> > <sub>2020</sub> (g/km)	<MRO> <sub>2021</sub> (kg)	Reference Value <sub>2021</sub> (g/km)	Registrations 2021
P01	BMW	113.790	127.185	1714.52	113.860	666,275
P04	HYUNDAI	104.374	118.567	1441.46	106.502	439,580
P05	KIA	103.454	117.260	1421.34	105.592	412,967
P06	MERCEDES-BENZ	117.395	128.570	1812.13	114.971	543,342
P08	RENAULT-NISSAN-MITSUBISHI	104.508	118.996	1331.74	103.100	1,302,737
P10	VW-SAIC	112.190	128.618	1530.75	110.468	2,490,908
P12	FORD	110.188	133.468	1553.29	117.379	426,013
P13	MAZDA-SUBARU-SUZUKI-TOYOTA	101.409	120.744	1367.90	109.248	922,651
P14	STELLANTIS	102.028	122.871	1326.50	109.163	2,139,576
P15	TESLA	56.352	64.098	1907.55	122.163	232,459
PM14	VOLVO	106.646	120.678	1941.33	122.729	241,475
PM52	SUZUKI THAILAND	114.000	122.780	890.00	82.537	12

Source: JRC analysis, 2023.

Combining the previously calculated reference-value<sub>2021</sub> for each manufacturer (at pool level where applicable) with the number of car registrations in 2021, the EU fleet-wide target<sub>2021</sub> for passenger cars is calculated according to the rules set out in **Section 2.3.4** as:

$$M1: \quad \boxed{ref_{EU\text{-}fleet, WLTP_{meas}}^{(2021)} = 110.1 \text{ g/km}} \quad (24)$$

The previous parameter has been determined with one decimal digit in view of the precision estimated in section 4.2.

The EU fleet-wide target for 2025 is a 15% reduction of the EU fleet-wide target<sub>2021</sub>, i.e.:

$$M1: \quad \boxed{target_{EU\text{-}fleet, WLTP}^{(2025)} = 93.6 \text{ g/km}} \quad (25)$$

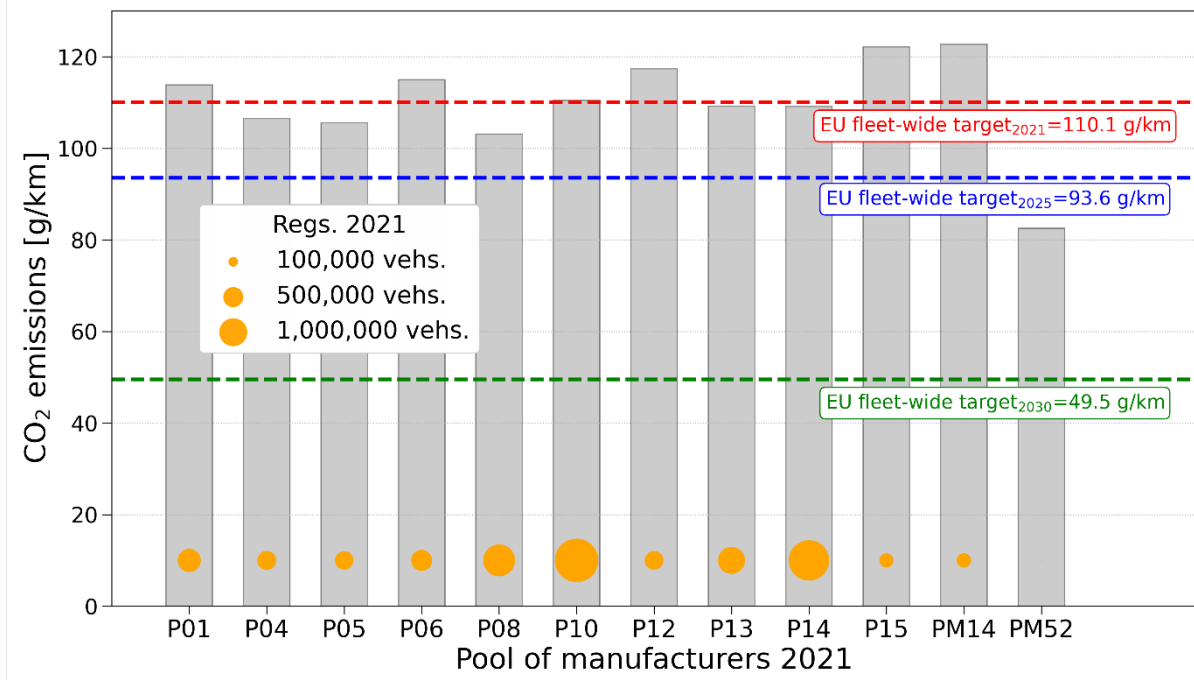
The EU fleet-wide target for 2030 is a 55% reduction of the EU fleet-wide target<sub>2021</sub>, i.e.

$$M1: \quad \boxed{target_{EU\text{-}fleet, WLTP}^{(2030)} = 49.5 \text{ g/km}} \quad (26)$$



**Figure 16** displays the reference value 2021 for each pool/manufacturer in 2021. The calculated EU fleet-wide target<sub>2021</sub> of 110.1 g/km is shown in comparison to the specific values of manufacturers/pools, together with future EU fleet-wide targets for 2025 and 2030.

**Figure 16.** Reference-values<sub>2021</sub> per pools of M1 manufacturers in 2021 (grey bars) and EU fleet-wide target<sub>2021</sub>=110.1 g/km (red dashed line). The size of the orange bullets reflects the number of registrations in 2021. The EU fleet-wide target<sub>2025</sub> (93.6 g/km, blue dashed line), taken as 15% reduction of EU fleet-wide target<sub>2021</sub>, and the EU fleet-wide target<sub>2030</sub> (49.5 g/km, green dashed line), taken as 55% reduction, are also displayed.



Source: JRC analysis, 2023

#### 4.3.2 Calculation of the target line slopes for M1 vehicles

The calculation of the  $a_{2021}$  parameter is performed according to a best fitting straight line established by applying the linear least squares fitting method to the test mass (independent variable) and CO<sub>2</sub> emissions of each new vehicle registered in 2021.

According to this calculation and as shown in **Figure 17**, the slope of the line for 2021 is:

$$\text{M1: } a_{2021} = -0.0175 \frac{g}{km \cdot kg} \quad (27)$$

The negative value of the slope is the result of the high number of heavy zero- and low-emission vehicles.

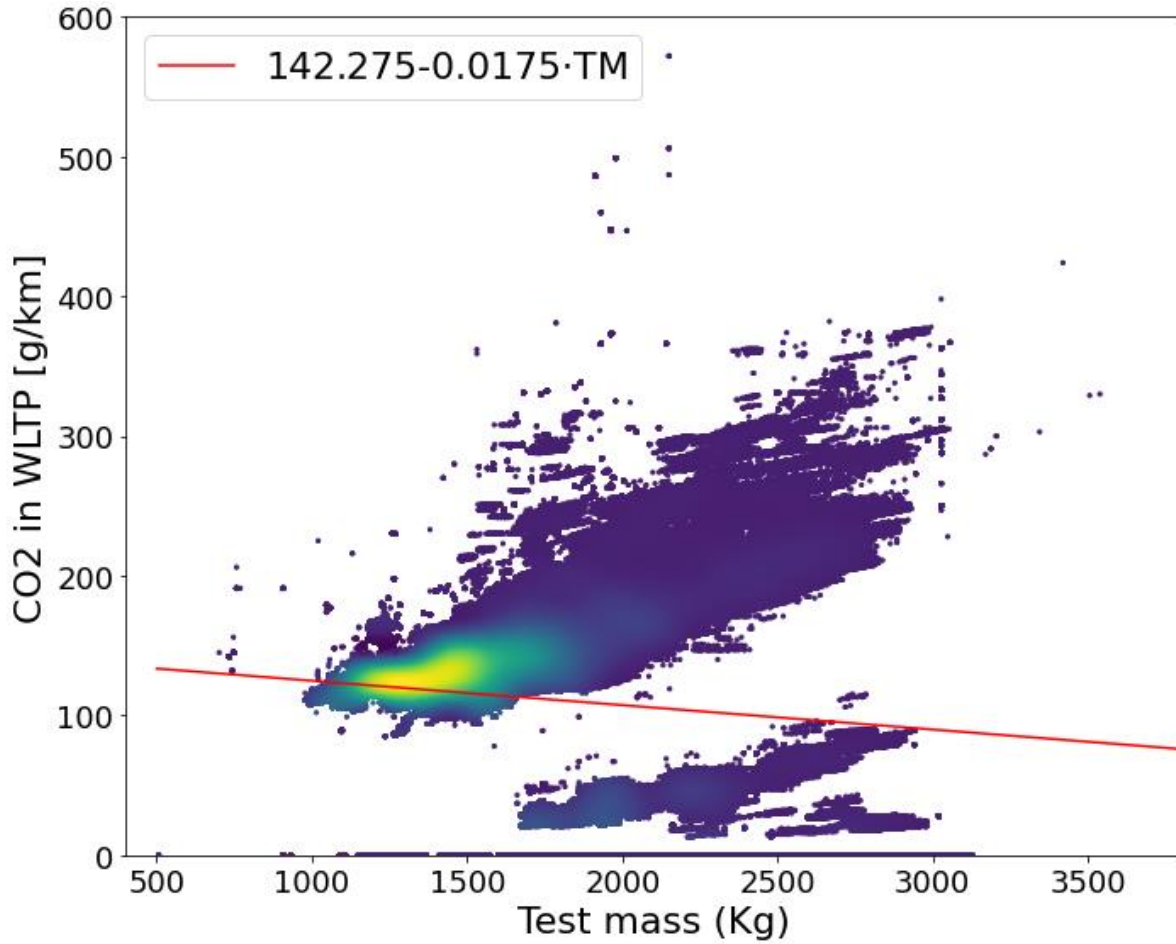
Following eq. (14), the  $a_{2025}$  parameter that determines the slope of the target line in 2025 is:

$$\text{M1: } a_{2025} = -0.0144 \frac{g}{km \cdot kg} \quad (28)$$

while the  $a_{2030}$  parameter, slope of the target line in 2030, is:

$$\text{M1: } a_{2030} = -0.0076 \frac{g}{km \cdot kg} \quad (29)$$

**Figure 17.** Best linear fitting of the WLTP CO<sub>2</sub> emissions for the fleet of new passenger cars (M1) registered in 2021, as a function of the test mass of the vehicle.



Source: JRC analysis, 2023

#### 4.3.3 Calculation of the indicative TMO value for M1 vehicles

The indicative  $TM_0$  value for 2025, calculated from the average test mass of all new passenger cars registered in 2021 to be used in eq. (12) and (13), is:

$$\text{M1:} \quad \boxed{TM_0 = 1,609.6 \text{ kg}} \quad (30)$$

#### 4.3.4 Determination of the specific emissions reference target lines for 2025/2030 for M1 manufacturers

Combining the EU fleet-wide targets for the years 2025 and 2030 presented in section 4.3.1 and the slopes  $a_{2025}$ ,  $a_{2030}$  for the CO<sub>2</sub> to test mass correlation and the indicative reference test mass  $TM_0$  for the year 2025 presented in sections 4.3.2 and 4.3.3, the specific emissions reference target line for the years 2025 and 2030 for M1 manufacturers is determined according to:

$$2025-2029: \quad \text{ref}_{m_i, \text{WLTP}}^{(yy)} = 93.6 - 0.0144 (TM_{m_i}^{(yy)} - TM_0^{(yy)}) \quad (31)$$

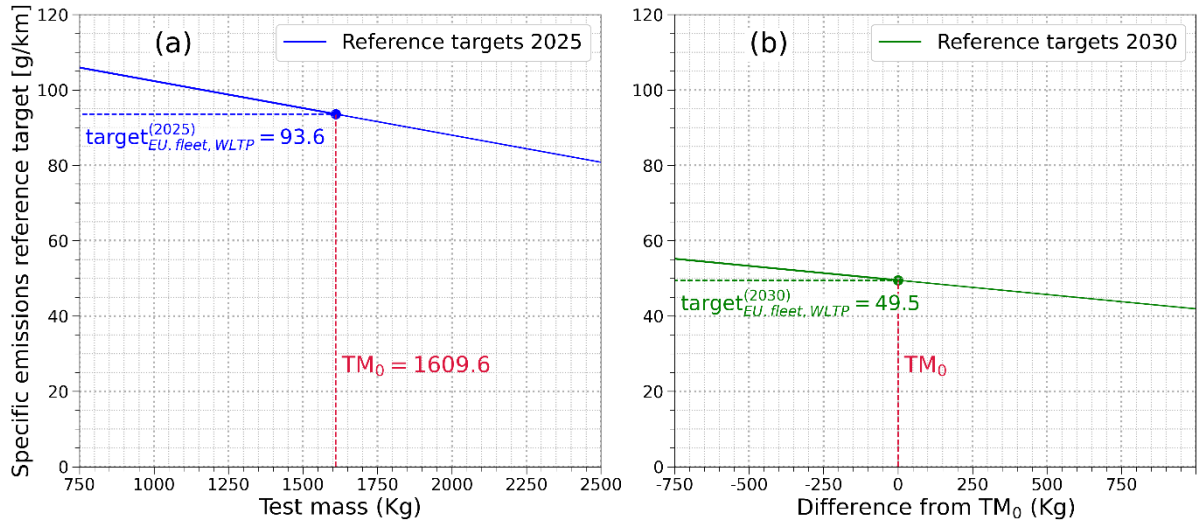
with (yy) from 2025 to 2029. The value  $TM_0^{(2025)}$  is equal to 1,609.6 kg. (indicative value based on 2021 data).

$$2030-2034: \quad \text{ref}_{m_i, \text{WLTP}}^{(yy)} = 49.5 - 0.0076 (TM_{m_i}^{(yy)} - TM_0^{(yy)}) \quad (32)$$

with (yy) from 2030 to 2034. The value  $TM_0^{(yy)}$  will be determined every second year starting from October 2024.

The target lines for both 2025 and 2030 are represented in **Figure 18**. For 2030, the position of the fleet target related to  $TM_0$  (reference test mass) cannot be determined yet; however, the shape of the reference target formula in terms of slope is reflected in the figure.

**Figure 18.** Specific emissions reference target lines for (a) 2025 and (b) 2030 for passenger cars (M1) manufacturers. For 2025, the indicative fleet-wide average test mass  $TM_0$  obtained in equation (30) has been used. For 2030, the abscissa refers to an undetermined reference  $TM_0$ .



Source: JRC analysis, 2023

## 4.4 Calculation of parameters for the 2025/2030 specific emissions targets for N1 vehicles

### 4.4.1 Calculation of the EU fleet-wide target<sub>2021</sub> for N1 vehicles

Similarly, to the previous section for passenger cars, the final EU fleet-wide target<sub>2021</sub> for **N1 category vehicles** is determined according to:

$$\text{N1: } \boxed{ref_{EU\text{-}fleet, WLTP_{meas}}^{(2021)} = 181.1 \text{ g/km}} \quad (33)$$

The EU fleet-wide target for 2025 is a 15% reduction of the EU fleet-wide target<sub>2021</sub>, i.e.

$$\text{N1: } \boxed{target_{EU\text{-}fleet, WLTP}^{(2025)} = 153.9 \text{ g/km}} \quad (34)$$

The EU fleet-wide target for 2030 is a 50% reduction of the EU fleet-wide target<sub>2021</sub>, i.e.

$$\text{N1: } \boxed{target_{EU\text{-}fleet, WLTP}^{(2030)} = 90.6 \text{ g/km}} \quad (35)$$

An overview of the data used to calculate the targets is given in **Table 3** and illustrated **Figure 19**, displaying the reference-value<sub>2021</sub> for each pool of manufacturers in 2021. The calculated EU fleet-wide target<sub>2021</sub> of 181.1 g/km is shown in comparison to the specific values of manufacturers/pools, together with future EU fleet-wide targets for 2025 and 2030.

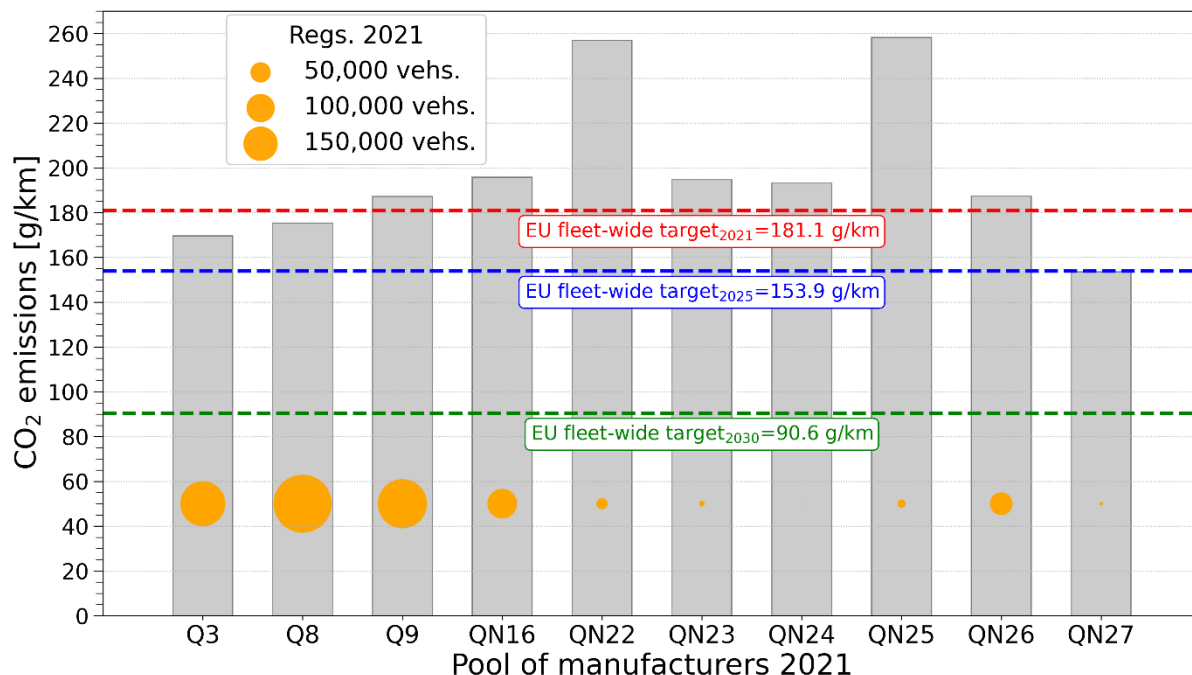
The measured-WLTP and NEDC-declared average emissions and corresponding reference-values<sub>2021</sub> for the 3 pools and 7 individual manufacturers used in the calculation of the final EU fleet-wide target<sub>2021</sub> for N1 vehicles are included in **Table 3**, respectively.

**Table 3.** Values used for determining the N1 reference values<sub>2021</sub> and EU fleet-wide target<sub>2021</sub>

Pools 2021 acronym	Pools 2021	<NEDC> <sub>2020</sub> (g/km)	<WLTP <sub>meas</sub> > <sub>2020</sub> (g/km)	<MRO> <sub>2021</sub> (kg)	Reference Value (g/km)	Registrations 2021
<b>Q3</b>	RENAULT-NISSAN-MITSUBISHI	143.981	178.886	1,745.71	169.580	261,926
<b>Q8</b>	STELLANTIS	138.951	177.586	1,751.59	175.381	440,185
<b>Q9</b>	VOLKSWAGEN-FORD-SAIC-GOUPIL	170.154	199.872	2,040.03	187.258	308,159
<b>QN16</b>	MERCEDES-BENZ AG	183.867	207.011	2,196.88	195.759	11,1042
<b>QN22</b>	IVECO	201.863	281.422	2,423.59	256.956	13,506
<b>QN23</b>	JAGUAR LAND ROVER LIMITED	198.758	228.477	2,149.70	194.706	2,810
<b>QN24</b>	PORSCHE	143.400	159.800	2,187.50	193.167	2
<b>QN25</b>	RENAULT TRUCKS	173.172	270.496	2,180.09	258.259	6,584
<b>QN26</b>	TOYOTA	156.450	199.144	1,884.85	187.416	6,3019
<b>QN27</b>	VOLVO	126.986	144.139	1,729.83	153.599	725

Source: JRC analysis, 2023.

**Figure 19.** Reference-values<sub>2021</sub> for light commercial vehicles (N1), calculated per 2021 pools, in comparison with the EU fleet-wide target<sub>2021</sub>=181.1 g/km (red dashed line). The size of the orange bullets reflects the number of registrations in 2021. The EU fleet-wide targets for 2025 (153.9 g/km) and 2030 (90.6 g/km), introduced as a 15% and 50% reduction of the EU fleet-wide target<sub>2021</sub> are displayed in blue and green dashed lines, respectively.



Source: JRC analysis, 2023

#### 4.4.2 Calculation of the target line slopes for N1 vehicles

The calculation of the  $a_{2021}$  parameter is performed according to a best fitting straight line method to the test mass (independent variable) and CO<sub>2</sub> emissions of each new light commercial vehicle registered in 2021.

According to this calculation and as shown in **Figure 20** the slope of the line for 2021 has a value of:

$$\text{N1: } a_{2021} = 0.1064 \frac{g}{km \cdot kg} \quad (36)$$

In the case of light commercial vehicles, where the number of zero- and low-emission vehicles is quite limited, the slope of the line is positive and slightly higher than the 0.096 slope of the target lines in 2020-2024.

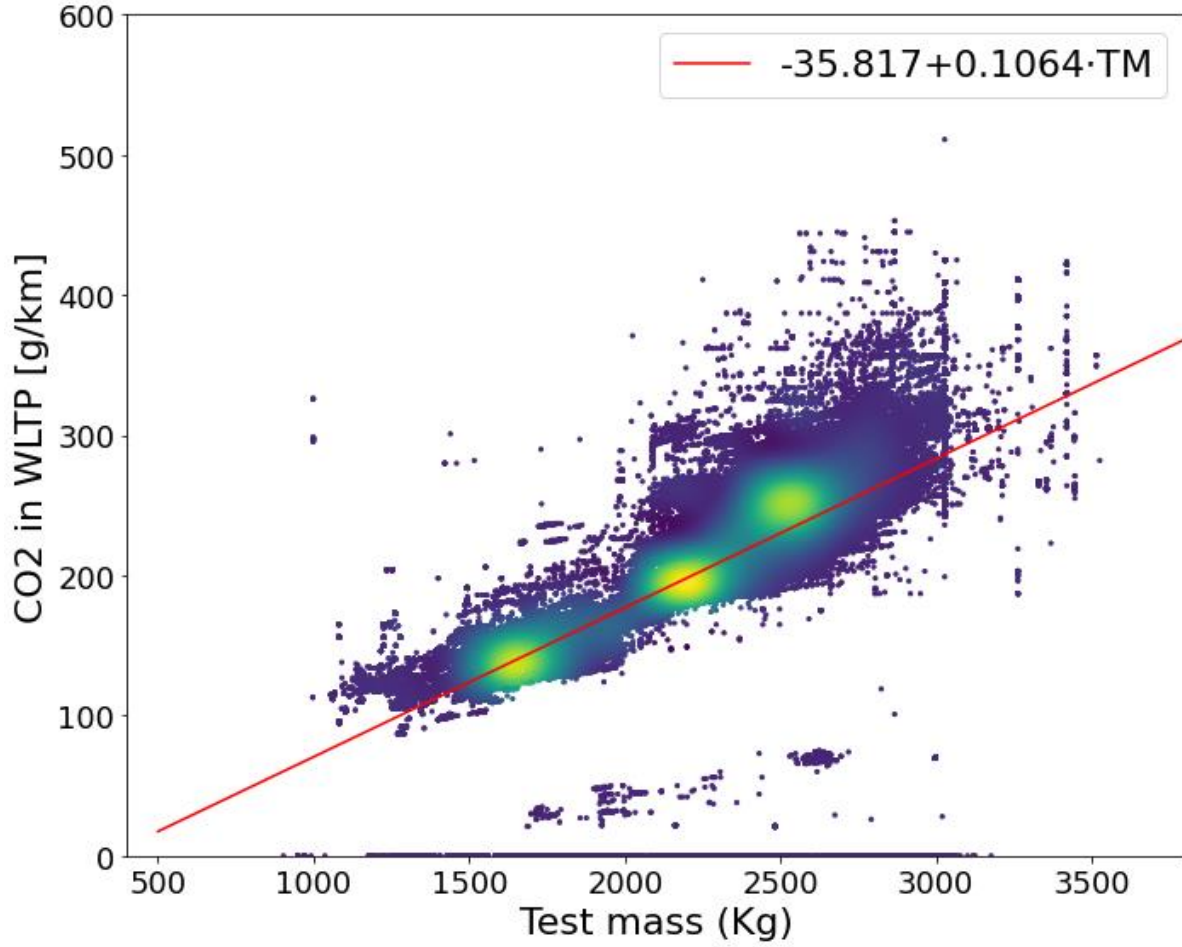
Using the expression in eq. (14), the  $a_{2025}$  used to calculate the slope of the target line in 2025 becomes:

$$\text{N1: } a_{2025} = 0.0848 \frac{g}{km \cdot kg} \quad (37)$$

while the parameter  $a_{2030}$ , calculated according to eq. (14) as well, is:

$$\text{N1: } a_{2030} = 0.0499 \frac{g}{km \cdot kg} \quad (38)$$

**Figure 20.** Best linear fitting of the WLTP CO<sub>2</sub> emissions for the fleet of new light commercial vehicles (N1) registered in 2021, as a function of the test mass of the vehicle.



Source: JRC analysis, 2023

#### 4.4.3 Calculation of the indicative TMO value for N1 vehicles

The indicative  $TM_0$  value for 2025, calculated from the average test mass of all new light commercial vehicles registered in 2021 to be used in eq. (17) and (19), is:

$$\text{N1:} \quad \boxed{TM_0 = 2,163.0 \text{ kg}} \quad (39)$$

#### 4.4.4 Determination of the specific emissions reference target lines for 2025/2030 for N1 manufacturers

Combining the EU fleet-wide targets for the years 2025 and 2030 presented in section 4.4.1 and the slopes  $a_{2025}$ ,  $a_{2030}$  for the CO<sub>2</sub> to test mass correlation and the reference test mass  $TM_0$  for the year 2025 presented in sections 4.4.2 and 4.4.3, the specific emissions reference target lines for the years 2025 and 2030 for N1 manufacturers are determined according to:

$$\text{2025-2029:} \quad \text{ref}_{m_i, \text{WLTP}}^{(yy)} = 153.9 + 0.0848 (TM_{m_i}^{(yy)} - TM_0^{(yy)}) \quad (40)$$

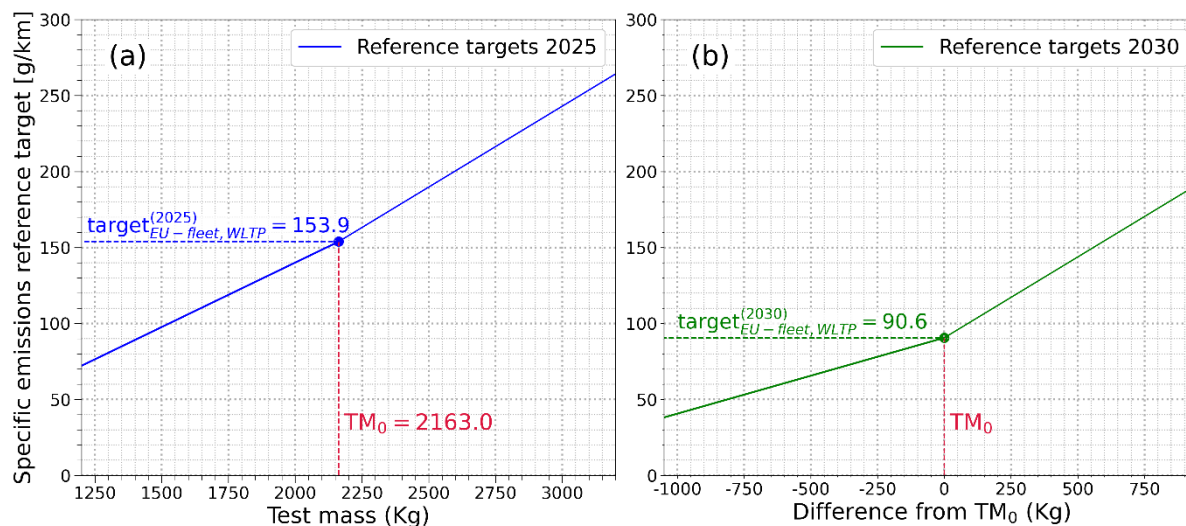
with (yy) from 2025 to 2029. The value  $TM_0^{(2025)}$  is equal to 2163,0 kg (indicative value based on 2021 data).

$$\text{2030-2034:} \quad \text{ref}_{m_i, \text{WLTP}}^{(yy)} = 90.6 + 0.0499 (TM_{m_i}^{(yy)} - TM_0^{(yy)}) \quad (41)$$

with (yy) from 2030 to 2034.

The target lines for both 2025 and 2030 are represented in **Figure 21**, showing the two different slopes, for lower and higher average test mass values. For 2030, the position of the merging point  $TM_0$  (reference test mass) cannot be determined yet; however, the shape of the reference target formula in terms of slope is reflected in the figure.

**Figure 21.** Specific emissions reference target lines for (a) 2025 and (b) 2030 for light commercial vehicles (N1) manufacturers. For 2025, the indicative fleet-wide average test mass  $TM_0$  obtained in eq. (39) has been used. For 2030, the abscissa refers to an undetermined reference  $TM_0$ .



Source: JRC analysis, 2023

## 5 Conclusions

The average CO<sub>2</sub> emissions of new passenger cars and light commercial vehicles registered in the EU (and Iceland and Norway) are assessed annually by the Commission for each manufacturer against the targets set out in Regulation (EU) 2019/631. The year 2020 was highly important concerning light-duty vehicle CO<sub>2</sub> emissions for four main reasons. Firstly, new and stricter EU fleet-wide targets entered into effect for both passenger cars and light commercial vehicles. Secondly, it was the last year that the average CO<sub>2</sub> emissions were assessed based on the NEDC Type Approval procedure. As a third point, the 2020 CO<sub>2</sub> emission data are also utilised for the calculation of the 2021 to 2024 targets. Finally, the 2020 WLTP emission values measured during the WLTP tests are used as the basis for determining the 2025 onwards targets.

This report presents the calculation of the relevant parameters for determining the CO<sub>2</sub> emissions targets to be applied from 2025 to 2034 for passenger cars (M1) and light commercial vehicles (N1) in the EU (and Iceland and Norway) in the run-up to the zero-emission targets agreed for 2035. The relevant parameters specified in Regulation (EU) 2019/631 are the EU fleet-wide targets for 2025 and 2030 (EU fleet-wide target<sub>2025</sub> and EU fleet-wide target<sub>2030</sub>, respectively), the slopes of the reference target lines used to determine each manufacturer's target ( $a_{2025}$  and  $a_{2030}$ ), and the average test mass of the EU fleet ( $TM_0$ ) to be used as reference. For the latter, an indicative value should be determined based on the 2021 data.

The calculation of the above-mentioned parameters follows a solid scientific procedure, where the calculation of the EU fleet-wide target<sub>2021</sub> is the keystone. The robustness of the procedure relies on the quality of the emissions data used. To calculate the EU fleet-wide target<sub>2021</sub>, the 2020 and 2021 CO<sub>2</sub> emissions data for the new passenger cars and light commercial vehicles, received by the Commission from countries and manufacturers, have been thoroughly and meticulously processed. As a preliminary step, a comprehensive data cleaning and gap-filling process, involving the Type Approval related datasets DICE and ETAES, was carried out for the emissions data from 2020 registered vehicles (compiled in the **EEA 2020 combined dataset**). Based on this processed dataset, an EU fleet-wide target for 2021, reference for the future targets in 2025 and 2030, is calculated. The main issues found during the cleaning process were vehicles with missing CO<sub>2</sub> values (1.7% for M1 and only 0.001% for N1 vehicles) and cases, where the declared WLTP CO<sub>2</sub> value was lower than the measured one (0.67% in M1 and 0.28% in the N1 dataset). On the other hand, five M1 manufacturers belonged to a pool that was derogated in 2020 but not anymore in 2021, some of them showing a low reporting share. These issues are overcome by adopting the gap-filling strategy foreseen in the regulations (EU) 2017/1153 for passenger cars and (EU) 2017/1152 for light commercial vehicles.

The high representativeness of the sample following the cleaning and gap-filling process for both passenger cars and light commercial vehicles enhances the consistency, accuracy and reliability of the calculated values. A sample of **11,382,143** passenger cars was finally considered for the calculations, representing **97.6%** of the initially reported vehicles. This sample involved 54 different manufacturers, grouped in 10 non-derogated pools and 2 individual manufacturers in 2021. The sample representativeness is excellent also for light commercial vehicles, with **1,198,214** registrations representing a **99.61%** share of the initially reported cases. The sample in this case covered 27 different manufacturers, grouped into 3 pools and 7 individual manufacturers in 2021.

The analysis of the 2020 combined dataset for M1 vehicles shows an average declared-WLTP of 129.3 g/km, while the average measured-WLTP was 123.4 g/km and the average NEDC emissions were 106.6 g/km. This means an overdeclaration in WLTP (against measured WLTP) of 4.8% and a measured-WLTP to NEDC ratio of 1.157. For N1 vehicles, the average declared-WLTP was 199.4 g/km, the average measured-WLTP was 189.7 g/km and the average NEDC 155.1 g/km, yielding an average overdeclaration of 5.1% and a measured-WLTP to NEDC ratio of 1.226.

For the determination of the post-2025 EU fleet-wide targets, first the reference value EU fleet-wide target<sub>2021</sub> was calculated. This value is determined by sales-weighting (with the number of 2021 registrations) the reference values calculated for each manufacturer (or, where applicable, pool of manufacturers) that is not benefitting from an exemption or derogation in 2021. The EU fleet-wide target<sub>2021</sub> calculated is **110.1 g/km** for M1 and **181.1 g/km** for the N1-category fleet. Applying the amended reduction factors for 2025 and 2030 as established by Regulation (EU) 2023/851, the corresponding EU fleet-wide targets will be **93.6** and **49.5 g/km** for passenger cars, and **153.9 g/km** and **90.6 g/km**, respectively, for light commercial vehicles. Concerning the slopes of the reference targets line, the  $a_{2021}$  parameter is calculated based on the slope of the best linear fitting for the CO<sub>2</sub> emissions versus test mass representation of all the vehicles registered in 2021. The regression line has a negative slope for M1 vehicles ( $a_{2021} = -0.0175 \text{ g/km/kg}$ ), yielding a slope



$a_{2025} = -0.0144$  g/km/kg for 2025 and  $a_{2030} = -0.0076$  g/km/kg for 2030. For the case of N1 vehicles, the slope is positive ( $a_{2021} = 0.1064$  g/km/kg) and slightly above the slope of the NEDC target line in 2020 ( $a = 0.096$  g/km/kg). The slope of the future target lines for 2025 and 2030 will be  $a_{2025} = 0.0848$  g/(km·kg) for 2025 and  $a_{2030} = 0.0499$  g/km/kg, respectively. Finally, an indicative test mass fleet-wide average value for the 2025 specific target determination has been calculated based on the 2021 new registered cars, with  $TM_0 = 1,609.6$  kg for M1 and  $TM_0 = 2,163.0$  kg for N1 vehicles. Combining the previous calculated parameters, expressions for the determination of the 2025 and 2030 specific reference targets per manufacturer have been generated.

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## List of abbreviations and definitions

ACEA	European Automobile Manufacturers' Association
CO <sub>2</sub>	Carbon dioxide
CO2MPAS	CO2 Model for Passenger and commercial vehicles Simulation
CoC	Certificate of Conformity
DICE	Database for In-service verification of CO <sub>2</sub> Emissions
EC	European Commission
EEA	European Environment Agency
EU	European Union
ETAES	European Type Approval Exchange System
GTAA	Granting Type Approval Authority
IP	Interpolation
JAMA	Japan Automobile Manufacturers' Association
KAMA	Korea Automobile Manufacturers' Association
NEDC	New European Driving Cycle
RL	Road Load
TAA	Type Approval Authority
VFN	Vehicle Family Number
VIN	Vehicle Identification Number
WLTP	Worldwide Harmonized Light Vehicles Test Procedure

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## Annexes

### Annex 1. EEA monitoring dataset variables

**Table 4.** EEA monitoring datasets published per year. The table shows the available data for each vehicle registered in 2020.

Field name	Field Definition
<b>ID</b>	Identification number
<b>MS</b>	Member state
<b>Mp</b>	Manufacturer pooling
<b>VFN</b>	Vehicle family identification number
<b>Mh</b>	Manufacturer name (EU standard denomination)
<b>Man</b>	Manufacturer name (manufacturer declaration)
<b>MMS</b>	Manufacturer name (MS registry denomination)
<b>TAN</b>	Type Approval number
<b>T</b>	Type
<b>Va</b>	Variant
<b>Ve</b>	Version
<b>Mk</b>	Make
<b>Cn</b>	Commercial name
<b>Ct</b>	Category of the vehicle type approved
<b>Cr</b>	Category of the vehicle registered
<b>m (kg)</b>	Mass in running order (Completed/complete vehicle)
<b>Mt</b>	WLTP test mass
<b>Enedc (g/km)</b>	Specific CO <sub>2</sub> Emissions (NEDC)
<b>Ewltp (g/km)</b>	Specific CO <sub>2</sub> Emissions (WLTP)
<b>W (mm)</b>	Wheel Base
<b>At1 (mm)</b>	Axle width steering axle
<b>At2 (mm)</b>	Axle width other axle
<b>Ft</b>	Fuel type

<b>Fm</b>	Fuel mode
<b>ec (cm<sup>3</sup>)</b>	Engine capacity
<b>ep (KW)</b>	Engine power
<b>z (Wh/km)</b>	Electric energy consumption
<b>IT</b>	Innovative technology or group of innovative technologies
<b>Ernedc (g/km)</b>	Emissions reduction through innovative technologies (NEDC)
<b>Erwltp (g/km)</b>	Emissions reduction through innovative technologies (WLTP)
<b>De</b>	Deviation factor
<b>Vf</b>	Verification factor
<b>R</b>	Total new registrations
<b>year</b>	Reporting year
<b>Zr</b>	Electric range

Source: JRC analysis, 2023.

## Annex 2. EEA 2020 combined dataset

### Part A. Passenger cars (M1 vehicles)

**Table 5.** Correlation between acronyms used in this report for all the M1 manufacturer and pools in 2020 and 2021

Manufacturer		Pool 2020		Pool 2021	
<b>BMW AG</b>	M01	BMW	P01	BMW	P01
<b>BMW GMBH</b>	M02	BMW	P01	BMW	P01
<b>ROLLS ROYCE</b>	M03	BMW	P01	BMW	P01
<b>ALFA ROMEO</b>	M04	FCA	P02	STELLANTIS	P14
<b>CHRYSLER</b>	M05	FCA	P02	STELLANTIS	P14
<b>FIAT GROUP</b>	M06	FCA	P02	STELLANTIS	P14
<b>HONDA MOTOR CO</b>	M07	FCA	P02	TESLA	P15
<b>TESLA</b>	M08	FCA	P02	TESLA	P15
<b>CNG TECHNIK</b>	M09	FORD-VOLVO	P03	FORD	P12
<b>FORD INDIA</b>	M10	FORD-VOLVO	P03		
<b>FORD MOTOR AUSTRALIA</b>	M11	FORD-VOLVO	P03		
<b>FORD MOTOR COMPANY</b>	M12	FORD-VOLVO	P03	FORD	P12
<b>FORD WERKE GMBH</b>	M13	FORD-VOLVO	P03	FORD	P12
<b>VOLVO</b>	M14	FORD-VOLVO	P03	VOLVO	PM14
<b>HYUNDAI</b>	M15	HYUNDAI	P04	HYUNDAI	P04
<b>HYUNDAI ASSAN</b>	M16	HYUNDAI	P04	HYUNDAI	P04
<b>HYUNDAI CZECH</b>	M17	HYUNDAI	P04	HYUNDAI	P04
<b>KIA</b>	M18	KIA	P05	KIA	P05
<b>KIA SLOVAKIA</b>	M19	KIA	P05	KIA	P05
<b>MERCEDES AMG</b>	M20	MERCEDES-BENZ	P06	MERCEDES-BENZ	P06
<b>MERCEDES-BENZ AG</b>	M21	MERCEDES-BENZ	P06	MERCEDES-BENZ	P06
<b>AUTOMOBILES CITROEN</b>	M22	PSA-OPEL	P07	STELLANTIS	P14
<b>AUTOMOBILES PEUGEOT</b>	M23	PSA-OPEL	P07	STELLANTIS	P14
<b>OPEL AUTOMOBILE</b>	M24	PSA-OPEL	P07	STELLANTIS	P14

<b>PSA</b>	M25	PSA-OPEL	P07	STELLANTIS	P14
<b>ALPINE</b>	M26	RENAULT-MITSUBISHI	P08	RENAULT-NISSAN-MITSUBISHI	P08
<b>AVTOVAZ</b>	M27	RENAULT-MITSUBISHI	P08		
<b>DACIA</b>	M28	RENAULT-MITSUBISHI	P08	RENAULT-NISSAN-MITSUBISHI	P08
<b>MITSUBISHI MOTORS CORP.</b>	M29	RENAULT-MITSUBISHI	P08	RENAULT-NISSAN-MITSUBISHI	P08
<b>MITSUBISHI MOTORS THAILAND</b>	M30	RENAULT-MITSUBISHI	P08	RENAULT-NISSAN-MITSUBISHI	P08
<b>NISSAN</b>	M31	RENAULT-MITSUBISHI	P08	RENAULT-NISSAN-MITSUBISHI	P08
<b>RENAULT</b>	M32	RENAULT-MITSUBISHI	P08	RENAULT-NISSAN-MITSUBISHI	P08
<b>MAZDA</b>	M33	TOYOTA-MAZDA	P09	MAZDA-SUBARU-SUZUKI-TOYOTA	P13
<b>MAZDA EUROPE</b>	M34	TOYOTA-MAZDA	P09	MAZDA-SUBARU-SUZUKI-TOYOTA	P13
<b>TOYOTA</b>	M35	TOYOTA-MAZDA	P09	MAZDA-SUBARU-SUZUKI-TOYOTA	P13
<b>AUDI AG</b>	M36	VW-SAIC	P10	VW-SAIC	P10
<b>AUDI HUNGARIA</b>	M37	VW-SAIC	P10	VW-SAIC	P10
<b>AUDI SPORT</b>	M38	VW-SAIC	P10	VW-SAIC	P10
<b>BUGATTI</b>	M39	VW-SAIC	P10	VW-SAIC	P10
<b>JIANGLING MOTOR</b>	M40	VW-SAIC	P10	VW-SAIC	P10
<b>LEVC</b>	M41	VW-SAIC	P10	VW-SAIC	P10
<b>MG MOTOR</b>	M42	VW-SAIC	P10		
<b>NEXT EGO MOBILE</b>	M43	VW-SAIC	P10	VW-SAIC	P10
<b>PORSCHE</b>	M44	VW-SAIC	P10	VW-SAIC	P10
<b>SAIC MOTOR CORPORATION</b>	M45	VW-SAIC	P10	VW-SAIC	P10
<b>SEAT</b>	M46	VW-SAIC	P10	VW-SAIC	P10
<b>SKODA</b>	M47	VW-SAIC	P10	VW-SAIC	P10
<b>VOLKSWAGEN</b>	M48	VW-SAIC	P10	VW-SAIC	P10
<b>SAIC MAXUS</b>	M49	SAIC MAXUS	PM1	SAIC MAXUS	PM49

<b>MAGYAR SUZUKI</b>	M50	SUZUKI	PD1	MAZDA-SUBARU-SUZUKI-TOYOTA	P13
<b>SUZUKI MOTOR CORPORATION</b>	M51	SUZUKI	PD1	MAZDA-SUBARU-SUZUKI-TOYOTA	P13
<b>SUZUKI THAILAND</b>	M52	SUZUKI	PD1	SUZUKI THAILAND	PM52
<b>SUBARU</b>	M53	SUBARU	PD2	MAZDA-SUBARU-SUZUKI-TOYOTA	P13
<b>JAGUAR LAND ROVER LIMITED</b>	M54	JAGUAR LAND ROVER LIMITED	PD3	TESLA	P15

Source: JRC analysis, 2023.

**Table 6.** Values calculated for each M1 manufacturer from the EEA database to be used in the determination of the EU fleet-wise target 2021

A	B	C	D	E	F	G	H	I
Manufacturer	Pools 2020	Registrations 2020 cleaned	<Enedc>	<MCO2>	<Ewltp>	Pools 2021	Registrations 2021	M.R.O 2021
<b>M01</b>	P01	801,922	111.503	125.245	133.352	P01	656,243	1710.36
<b>M02</b>	P01	14,510	231.883	227.026	242.690	P01	9,790	1969.35
<b>M03</b>	P01	508	351.008	337.957	367.717	P01	242	2672.02
<b>M04</b>	P02	32,690	146.167	163.034	170.419	P14	23,210	1704.15
<b>M05</b>	P02	102,755	139.800	160.527	168.104	P14	69,747	1605.31
<b>M06</b>	P02	484,389	110.612	127.594	135.703	P14	491,207	1231.23
<b>M07</b>	P02	78,221	111.295	128.180	135.763	P15	38,558	1454.83
<b>M08</b>	P02	92,526	0.000	0.000	0.000	P15	127,791	1912.45
<b>M09</b>	P03	10,636	100.237	123.817	125.044	P12	1,021	1713.00
<b>M10</b>	P03	53	118.981	136.132	136.925			
<b>M11</b>	P03							
<b>M12</b>	P03	10,058	236.866	238.739	241.469	P12	3,010	1847.61
<b>M13</b>	P03	648,706	108.387	131.994	134.230	P12	421,982	1550.81
<b>M14</b>	P03	286,552	106.646	120.678	124.973	PM14	241,475	1941.33
<b>M15</b>	P04	138,742	79.855	92.435	94.557	P04	111,362	1585.98

<b>M16</b>	P04	9	112.222	128.111	132.000	P04	120,572	1086.61
<b>M17</b>	P04	267,202	117.105	132.136	135.058	P04	207,646	1569.99
<b>M18</b>	P05	261,929	93.911	106.509	109.119	P05	237,103	1373.94
<b>M19</b>	P05	143,043	120.928	136.946	139.548	P05	175,864	1485.25
<b>M20</b>	P06	3,243	247.558	255.683	265.968	P06	805	1670.54
<b>M21</b>	P06	726,313	116.814	128.003	134.038	P06	542,537	1812.34
<b>M22</b>	P07	339,444	98.893	122.156	129.237	P14	288,043	1166.56
<b>M23</b>	P07	351,477	100.155	124.427	131.626	P14	271,525	1487.73
<b>M24</b>	P07	271,063	105.055	125.612	132.756	P14	185,952	1396.75
<b>M25</b>	P07	788,483	91.145	112.070	117.969	P14	809,892	1336.15
<b>M26</b>	P08	994	147.622	155.830	163.244	P08	2,158	1177.27
<b>M27</b>	P08	880	185.970	195.167	195.167			
<b>M28</b>	P08	278,629	114.306	130.634	134.530	P08	252,389	1176.07
<b>M29</b>	P08	31,999	161.314	173.678	179.964	P08	31,099	1805.62
<b>M30</b>	P08	33,956	105.381	116.469	120.279	P08	34,027	950.89
<b>M31</b>	P08	289,655	106.477	123.077	132.137	P08	179,976	1386.09
<b>M32</b>	P08	960,438	99.104	112.618	116.128	P08	803,088	1366.69
<b>M33</b>	P09	132,704	116.238	130.958	138.885	P13	108,477	1438.04
<b>M34</b>	P09	11,822	113.180	127.966	136.949	P13	16,868	1412.22
<b>M35</b>	P09	683,778	95.762	117.083	120.941	P13	612,548	1409.40
<b>M36</b>	P10	558,808	116.823	135.279	142.444	P10	444,872	1724.69
<b>M37</b>	P10	3,824	148.954	159.628	167.871	P10	2,953	1463.30
<b>M38</b>	P10	13,412	230.791	243.848	253.557	P10	11,077	1942.13
<b>M39</b>	P10					P10	13	2070.00
<b>M40</b>	P10	697	0.000	0.000	0.000	P10	1,060	1835.92
<b>M41</b>	P10					P10	1	2305.00
<b>M42</b>	P10	18,459	96.696	103.759	108.368			
<b>M43</b>	P10	490	0.000	0.000	0.000	P10	131	1255.46
<b>M44</b>	P10	68,113	150.696	162.858	175.832	P10	58,891	2039.29

<b>M45</b>	P10	7,209	0.000	0.000	0.000	P10	22,311	1703.27
<b>M46</b>	P10	363,229	113.996	126.650	137.183	P10	339,380	1391.26
<b>M47</b>	P10	583,027	110.071	127.578	134.128	P10	511,393	1444.29
<b>M48</b>	P10	1,285,458	107.971	124.481	130.928	P10	1,090,431	1497.21
<b>M49</b>	PM1	120	0.000	0.000	0.000	PM49	368	1884.54
<b>M50</b>	PD1	50,946	116.411	134.702	142.992	P13	78,841	1305.30
<b>M51</b>	PD1	105,299	101.814	116.168	123.821	P13	90,409	999.21
<b>M52</b>	PD1	1	114.000	122.780	136.000	PM52	12	890.00
<b>M53</b>	PD2	17,024	157.032	169.682	185.195	P13	15,508	1657.68
<b>M54</b>	PD3	26,698	90.670	98.489	106.560	P15	66,110	2162.14

Source: JRC analysis, 2023.

Description of columns in **Table 6**:

- A. **Manufacturer:** Vehicle manufacturer
- B. **Pools 2020:** Pools formed in 2020 pursuant to Article 6 of Regulation (EU) 2019/631.
- C. **Registrations 2020 clean:** Number of M1 vehicles in the EEA 2020 combined dataset, obtained after the cleaning process. All registers have defined values for MCO<sub>2</sub>, Ewlt<sub>p</sub> and Ene<sub>dc</sub>
- D. **<Ene<sub>dc</sub>>:** Average CO<sub>2</sub> emissions in 2020 for a manufacturer according to the NEDC procedure
- E. **<MCO<sub>2</sub>>:** Average measured CO<sub>2</sub> emissions in 2020 for a manufacturer according to the WLTP procedure
- F. **<MCO<sub>2</sub>>:** Average declared CO<sub>2</sub> emissions in 2020 for a manufacturer according to the WLTP procedure
- G. **Pools 2021:** Pools formed in 2021 pursuant to Article 6 of Regulation (EU) 2019/631.
- H. **Registrations 2021:** Number of registrations per manufacturer in 2021
- I. **M.R.O 2021:** Average mass in running order of the manufacturer's fleet of vehicles registered in 2021.

## Part B. Light Commercial Vehicles (N1 vehicles)

**Table 7.** Correlation between acronyms used in this report for all the N1 manufacturer and pools in 2020 and 2021

Manufacturer		Pool 2020		Pool 2021	
<b>ALFA ROMEO</b>	N01	FCA-PSA	Q1	STELLANTIS	Q8
<b>AUTOMOBILES CITROEN</b>	N02	FCA-PSA	Q1	STELLANTIS	Q8
<b>AUTOMOBILES PEUGEOT</b>	N03	FCA-PSA	Q1	STELLANTIS	Q8
<b>CHRYSLER</b>	N04	FCA-PSA	Q1	STELLANTIS	Q8
<b>FIAT GROUP</b>	N05	FCA-PSA	Q1	STELLANTIS	Q8
<b>OPEL AUTOMOBILE</b>	N06	FCA-PSA	Q1	STELLANTIS	Q8
<b>PSA</b>	N07	FCA-PSA	Q1	STELLANTIS	Q8
<b>FORD MOTOR AUSTRALIA</b>	N08	FORD-VW	Q2	VOLKSWAGEN-FORD-SAIC-GOUPIL	Q9
<b>FORD WERKE GMBH</b>	N09	FORD-VW	Q2	VOLKSWAGEN-FORD-SAIC-GOUPIL	Q9
<b>VOLKSWAGEN</b>	N10	FORD-VW	Q2	VOLKSWAGEN-FORD-SAIC-GOUPIL	Q9
<b>AUDI AG</b>	N11	MAN-SAIC	Q5	VOLKSWAGEN-FORD-SAIC-GOUPIL	Q9
<b>AUDI SPORT</b>	N12	MAN-SAIC	Q5	VOLKSWAGEN-FORD-SAIC-GOUPIL	Q9
<b>MAN</b>	N13	MAN-SAIC	Q5	VOLKSWAGEN-FORD-SAIC-GOUPIL	Q9
<b>SEAT</b>	N14	MAN-SAIC	Q5	VOLKSWAGEN-FORD-SAIC-GOUPIL	Q9
<b>SKODA</b>	N15	MAN-SAIC	Q5	VOLKSWAGEN-FORD-SAIC-GOUPIL	Q9
<b>MERCEDES-BENZ AG</b>	N16	MERCEDES-BENZ	Q6		QN16
<b>DACIA</b>	N17	RENAULT-NISSAN-MITSUBISHI	Q7	RENAULT-NISSAN-MITSUBISHI	Q3
<b>MITSUBISHI MOTORS CORPORATION</b>	N18	RENAULT-NISSAN-MITSUBISHI	Q7	RENAULT-NISSAN-MITSUBISHI	Q3
<b>MITSUBISHI MOTORS THAILAND</b>	N19	RENAULT-NISSAN-MITSUBISHI	Q7	RENAULT-NISSAN-MITSUBISHI	Q3
<b>NISSAN</b>	N20	RENAULT-NISSAN-MITSUBISHI	Q7	RENAULT-NISSAN-MITSUBISHI	Q3



<b>RENAULT</b>	N21	RENAULT-NISSAN-MITSUBISHI	Q7	RENAULT-NISSAN-MITSUBISHI	Q3
<b>IVECO</b>	N22	IVECO	QN22		QN22
<b>JAGUAR LAND ROVER</b>	N23	JAGUAR LAND ROVER	QN23		QN23
<b>PORSCHE</b>	N24	PORSCHE	QN24		QN24
<b>RENAULT TRUCKS</b>	N25	RENAULT TRUCKS	QN25		QN25
<b>TOYOTA</b>	N26	TOYOTA	QN26		QN26
<b>VOLVO</b>	N27	VOLVO	QN27		QN27

Source: JRC analysis, 2023.

**Table 8.** Values calculated for each N1 manufacturer from the EEA database to be used in the determination of the EU fleet-wise target 2021

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>G</b>	<b>H</b>	<b>I</b>
<b>Manufacturer</b>	<b>Pools 2020</b>	<b>Registrations 2020 cleaned</b>	<b>&lt;Ene<sub>dc</sub>&gt;</b>	<b>&lt;MCO<sub>2</sub>&gt;</b>	<b>&lt;Ew<sub>tp</sub>&gt;</b>	<b>Pools 2021</b>	<b>Registrations 2021</b>	<b>MRO 2021</b>
<b>N01</b>	Q1	149	138.946	155.013	159.913	Q8	380	1745.37
<b>N02</b>	Q1	63,979	148.204	195.307	210.906	Q8	66,827	1886.15
<b>N03</b>	Q1	117,133	146.171	190.478	204.830	Q8	111,686	1884.09
<b>N04</b>	Q1	671	124.727	146.459	152.323	Q8	2,177	2124.06
<b>N05</b>	Q1	97,349	161.525	196.646	210.119	Q8	118,595	1820.12
<b>N06</b>	Q1	40,551	135.603	174.674	187.542	Q8	36,897	1738.23
<b>N07</b>	Q1	123,217	110.629	142.225	148.865	Q8	103,623	1440.51
<b>N08</b>	Q2	38,327	210.420	246.580	248.750	Q9	34,206	2376.18
<b>N09</b>	Q2	206,623	157.001	187.148	193.722	Q9	142,823	2028.56
<b>N10</b>	Q2	142,653	175.805	201.493	213.123	Q9	121,485	1948.18
<b>N11</b>	Q5	35	140.114	164.657	175.114	Q9	23	1854.57
<b>N12</b>	Q5	1	276.000	303.000	317.000	Q9	3	2041.67
<b>N13</b>	Q5	9,760	209.152	263.784	268.891	Q9	9,290	2203.11
<b>N14</b>	Q5	159	113.428	123.711	138.711	Q9	211	1468.15

<b>N15</b>	Q5	43	118.419	135.186	145.419	Q9	118	1261.76
<b>N16</b>	Q6	93,781	183.867	207.011	215.272	QN16	111,042	2196.88
<b>N17</b>	Q7	17,812	121.341	141.148	144.705	Q3	19,933	1308.26
<b>N18</b>	Q7	3	166.000	180.667	189.333	Q3	67	2083.19
<b>N19</b>	Q7	7,109	202.931	236.678	242.492	Q3	10,514	2071.06
<b>N20</b>	Q7	15,530	174.843	216.217	223.335	Q3	22,818	1971.18
<b>N21</b>	Q7	159,566	140.878	176.890	186.697	Q3	208,594	1746.34
<b>N22</b>	QN22	11,750	201.863	281.422	291.638	QN22	13,506	2423.59
<b>N23</b>	QN23	1,605	198.758	228.477	239.681	QN23	2,810	2149.70
<b>N24</b>	QN24	5	143.400	159.800	171.400	QN24	2	2187.50
<b>N25</b>	QN25	4,687	173.172	270.496	270.496	QN25	6,584	2180.09
<b>N26</b>	QN26	44,535	156.450	199.144	209.030	QN26	63,019	1884.85
<b>N27</b>	QN27	1,181	125.986	144.139	150.179	QN27	725	1729.83

Source: JRC analysis, 2023.

Description of columns in **Table 8**:

- A. **Manufacturer:** Vehicle manufacturer
- B. **Pools 2020:** Pools formed in 2020 pursuant to Article 6 of Regulation (EU) 2019/631.
- C. **Registrations 2020 clean:** Number of N1 vehicles in the EEA 2020 combined dataset, obtained after the cleaning process. All registers have defined values for MCO<sub>2</sub>, Ewlt<sub>p</sub> and Ene<sub>dc</sub>
- D. **<Ene<sub>dc</sub>>:** Average CO<sub>2</sub> emissions in 2020 for a manufacturer according to the NEDC procedure
- E. **<MCO<sub>2</sub>>:** Average measured CO<sub>2</sub> emissions in 2020 for a manufacturer according to the WLTP procedure
- F. **<MCO<sub>2</sub>>:** Average declared CO<sub>2</sub> emissions in 2020 for a manufacturer according to the WLTP procedure
- G. **Pools 2021:** Pools formed in 2021 pursuant to Article 6 of Regulation (EU) 2019/631.
- H. **Registrations 2021:** Number of registrations per manufacturer in 2021
- I. **M.R.O 2021:** Average mass in running order of the manufacturer's fleet of vehicles registered in 2021.

### Annex 3. Data cleaning

**Table 9.** Number of registrations with missing Ewltp and/or Enedc for M1 (left) and N1 vehicles (right).

M1				N1	
Manufacturer	Cases	Manufacturer	Cases	Manufacturer	Cases
<b>M21</b>	2,222	<b>M25</b>	14	<b>N02</b>	55
<b>M29</b>	216	<b>M19</b>	12	<b>N26</b>	35
<b>M46</b>	201	<b>M44</b>	6	<b>N25</b>	1
<b>M48</b>	188	<b>M07</b>	6	<b>N11</b>	1
<b>M54</b>	103	<b>M22</b>	6		
<b>M51</b>	83	<b>M23</b>	5		
<b>M35</b>	56	<b>M15</b>	3		
<b>M18</b>	37	<b>M13</b>	3		
<b>M24</b>	30	<b>M47</b>	3		
<b>M32</b>	28	<b>M50</b>	3		
<b>M17</b>	27	<b>M53</b>	3		
<b>M28</b>	20	<b>M20</b>	2		
<b>M14</b>	19	<b>M12</b>	1		

Source: JRC analysis, 2023.

**Table 10.** Vehicles discarded due to MCO2, MCO2VH, MCO2VL missing values: M1 (left) and N1 vehicles (right).

M1				N1	
Manufacturer	Cases	Manufacturer	Cases	Manufacturer	Cases
<b>M54</b>	130,294	<b>M07</b>	50	<b>N21</b>	17
<b>M48</b>	21,303	<b>M17</b>	35	<b>N17</b>	1
<b>M47</b>	11,588	<b>M14</b>	31		
<b>M50</b>	7,935	<b>M13</b>	29		
<b>M21</b>	6,685	<b>M24</b>	28		
<b>M36</b>	5,787	<b>M17</b>	24		
<b>M29</b>	5,347	<b>M12</b>	15		
<b>M51</b>	1,943	<b>M44</b>	10		
<b>M04</b>	1,791	<b>M39</b>	7		
<b>M06</b>	1,787	<b>M20</b>	6		
<b>M22</b>	1,385	<b>M01</b>	3		
<b>M52</b>	1,149	<b>M18</b>	3		
<b>M05</b>	809	<b>M11</b>	2		
<b>M32</b>	608	<b>M30</b>	2		
<b>M46</b>	382	<b>M34</b>	1		
<b>M25</b>	328	<b>M09</b>	1		
<b>M35</b>	283	<b>M32</b>	1		
<b>M28</b>	164	<b>M45</b>	1		
<b>M26</b>	130	<b>M16</b>	1		
<b>M38</b>	93	<b>M41</b>	1		
<b>M31</b>	77	<b>M19</b>	1		
<b>M23</b>	64	<b>M27</b>	1		

Source: JRC analysis, 2023.

**Table 11.** Number of cases where the measured CO<sub>2</sub> value is higher than the declared one (MC02>Ewlt<sub>p</sub>) for M1 (left) and N1 vehicles (right).

M1			N1		
Manufacturer	Cases	IP families	Manufacturer	Cases	IP families
<b>M29</b>	26,654	2	<b>N06</b>	1,575	3
<b>M47</b>	12,021	1	<b>N05</b>	793	22
<b>M18</b>	11,054	21	<b>N03</b>	582	3
<b>M24</b>	5,637	11	<b>N09</b>	120	2
<b>M15</b>	5,439	14	<b>N02</b>	114	5
<b>M17</b>	5,257	47	<b>N26</b>	47	4
<b>M06</b>	2,163	20	<b>N13</b>	33	7
<b>M05</b>	1,874	12	<b>N18</b>	32	1
<b>M19</b>	1,792	19	<b>N21</b>	27	2
<b>M09</b>	1,423	1	<b>N20</b>	14	5
<b>M40</b>	593	16	<b>N10</b>	13	6
<b>M32</b>	249	34	<b>N04</b>	8	2
<b>M13</b>	210	2	<b>N08</b>	4	1
<b>M35</b>	161	11	<b>N22</b>	3	1
<b>M12</b>	146	1	<b>N15</b>	3	1
<b>M48</b>	78	12	<b>N25</b>	3	3
<b>M14</b>	58	9	<b>N07</b>	2	1
<b>M25</b>	11	4			
<b>M46</b>	10	2			
<b>M27</b>	3	1			
<b>M04</b>	2	2			
<b>M22</b>	2	1			
<b>M31</b>	2	1			
<b>M23</b>	1	1			
<b>M28</b>	1	1			

Source: JRC analysis, 2023.

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