



https://ec.europa.eu/info/index_en

http://ec.europa.eu/info/law_en

Feedback from: ENEL spa

Feedback reference

F1290870

Submitted on

25 November 2020

Submitted by

Michele Nesa

User type

Company/business organisation

Organisation

ENEL spa

Organisation size

Large (250 or more)

Transparency register number

6256831207-27 (<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=6256831207-27&locale=en>)

Country of origin

Italy

Initiative

[CO2 emissions for cars and vans – revision of performance standards \(/info/law/better-regulation/have-your-say/initiatives/12655-CO2-emissions-for-cars-and-vans-revision-of-performance-standards\)](/info/law/better-regulation/have-your-say/initiatives/12655-CO2-emissions-for-cars-and-vans-revision-of-performance-standards)

Since 1990, emissions from road transport have increased significantly and as of today account for almost a fifth of EU's GHG emissions. The next years are critical for curbing CO2 emission. If action is insufficient in the short-medium term, it will likely be impossible to make up for the deficit later, this requires a substantial decrease in CO2 emissions in the transport sector. Transport also affects heavily air quality, noise pollution and health. Despite improvements in fuel quality and vehicle efficiency, road transport remains the major cause of air pollution (in particular, totaling 39% of NOx emissions). Although emissions of the main air pollutants from transport have been declining over the last two decades, many of the EU’s urban dwellers remain exposed to air pollutants concentration levels that exceed the EU’s air quality standards.

Against this background and as underlined in the European Green Deal Communication, transport should become drastically less emitting, especially in cities: “To achieve climate neutrality, a 90% reduction in transport emissions is needed by 2050”.

Road transportation is the most emitting subsector, but also the most feasible to decarbonize thanks to proven and soon cost-efficient technologies. Electric mobility is key to reach both the EU’s climate and energy efficiency objectives. It represents the clear pathway towards zero-emission mobility goal of EU. Driven by the entry into force of 2020/21 CO2 emission limit targets for cars and vans, the growing sales of electric cars across Europe have already resulted in a significant drop in new car CO2 emissions.

In this context, Enel welcomes the European Commission proposal to review the Regulation (EU) 2019/631 on CO2 emission performance standards for cars and vans as a necessary policy action to foster a further shift toward zero emission electric vehicles and thus decarbonize the road transport sector. As underlined in the IIA, changes in the current regulation are deemed necessary to enable the EU to meet its long-term GHG emission reduction targets, effectively address the air quality issue and foster Europe’s industrial growth and its vehicle manufacturers’ leadership in the world.

Against this background, the following main measures should be considered:

- Strengthening of the stringency of the CO2 emission limit targets for both cars and vans: more ambitious targets should be set in order to put Europe on track to reach the long term target of reducing by 90% transport GHG emissions by 2050 compared to 1990
- Revision of the incentive mechanism for zero- and low-emission vehicles, in particular by:
 - o Replacing the current crediting system with a one-way CO2 target adjustment with a more effective “ZLEV mandate” requiring vehicle manufacturers to sell a minimum proportion of ZLEV including non-compliance penalties
 - o Revising the threshold to classify a vehicle as zero and low emission vehicles (ZLEV) and to be eligible to ZLEV incentive mechanism (e.g. the Clean Vehicles Directive set a og CO2 /km from 2026 threshold for clean vehicles)

Moreover, we believe that metric based on WTW approach, the potential inclusion into CO2 emission performance standards of carbon correction factor (CCF) or similar credit based mechanisms should be discarded as this could undermine the environmental effectiveness of CO2 standards and lead to double regulation /counting, interfering with other policy instruments (e.g. fuels policies).

[Report an issue with this feedback \(/info/law/better-regulation/have-your-say/initiatives/12655-revision-of-the-co2-emission-standards-for-cars-and-vans-F1290870/report\)](/info/law/better-regulation/have-your-say/initiatives/12655-revision-of-the-co2-emission-standards-for-cars-and-vans-F1290870/report)

[All feedback](#)

The views and opinions expressed here are entirely those of the author(s) and do not reflect the official opinion of the European Commission. The Commission cannot guarantee the accuracy of the information contained in them. Neither the Commission, nor any person acting on the Commission's behalf, may be held responsible for the content or the information posted here. Views and opinions that violate the Commission's feedback rules will be removed from the site.