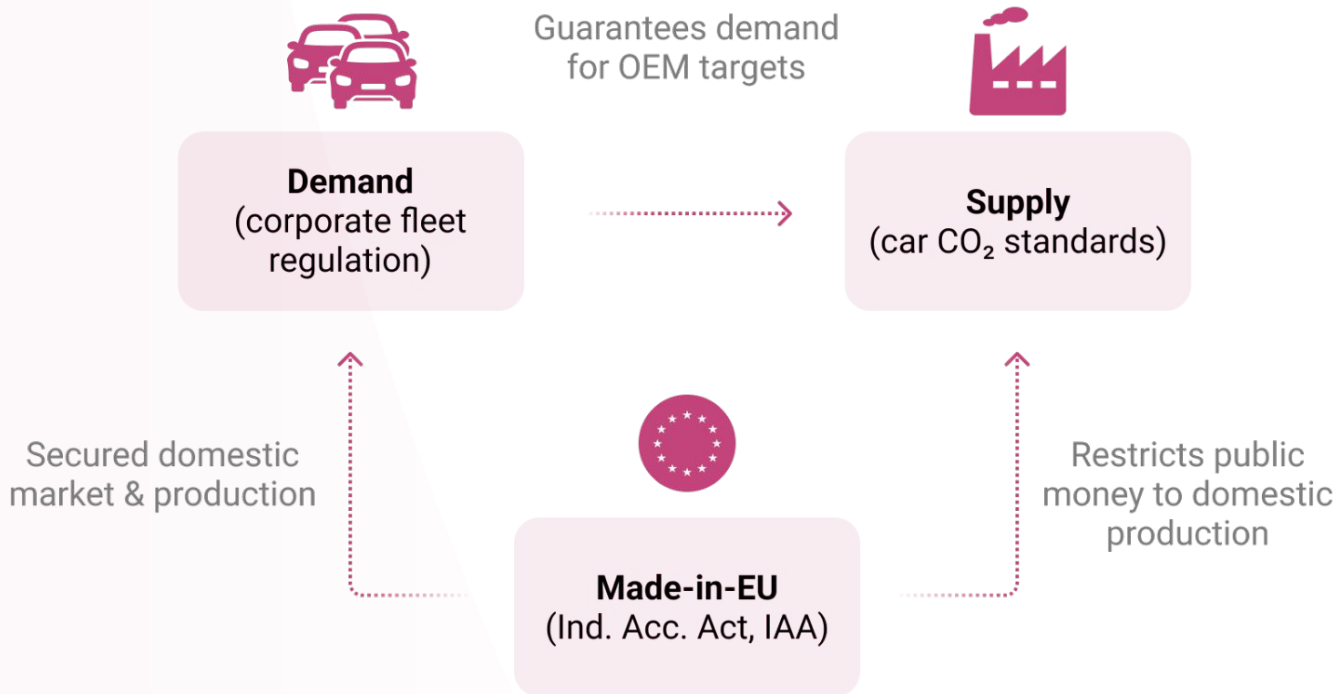


The EU Automotive package - T&E's analysis

Lucien Mathieu, Cars Director
03/02/2026



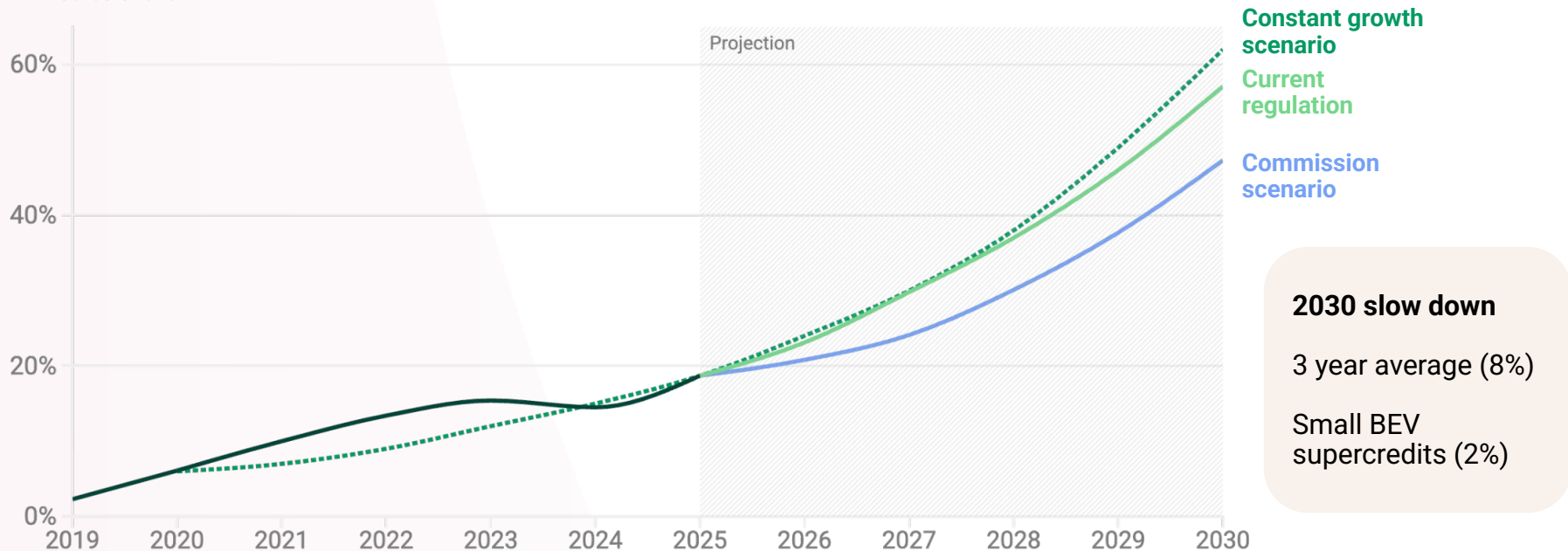
The EU's automotive package



2030: Commission proposal locks in an EV slowdown

Based on average annual BEV share growth 2020 to 2025

BEV sales share

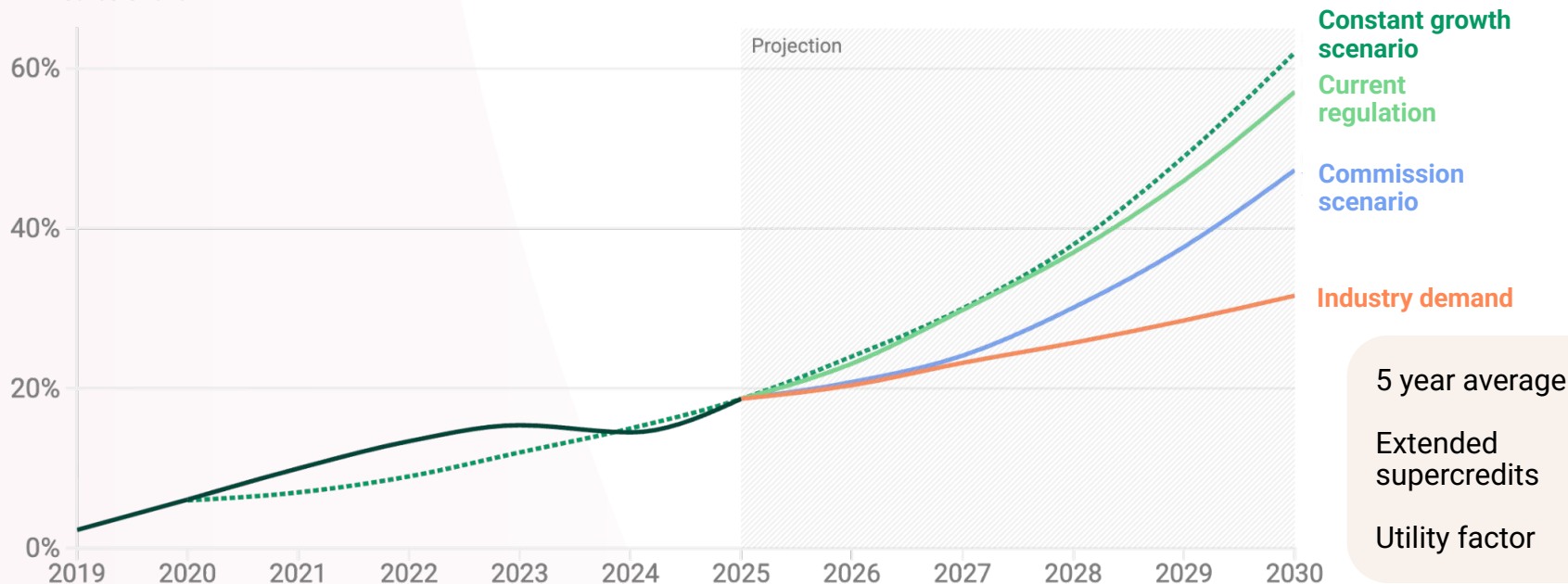


Source: ACEA (2025) and T&E projection • Scope: EU27+NO

More flexibilities leads to EV stagnation

Based on average annual BEV share growth 2020 to 2025

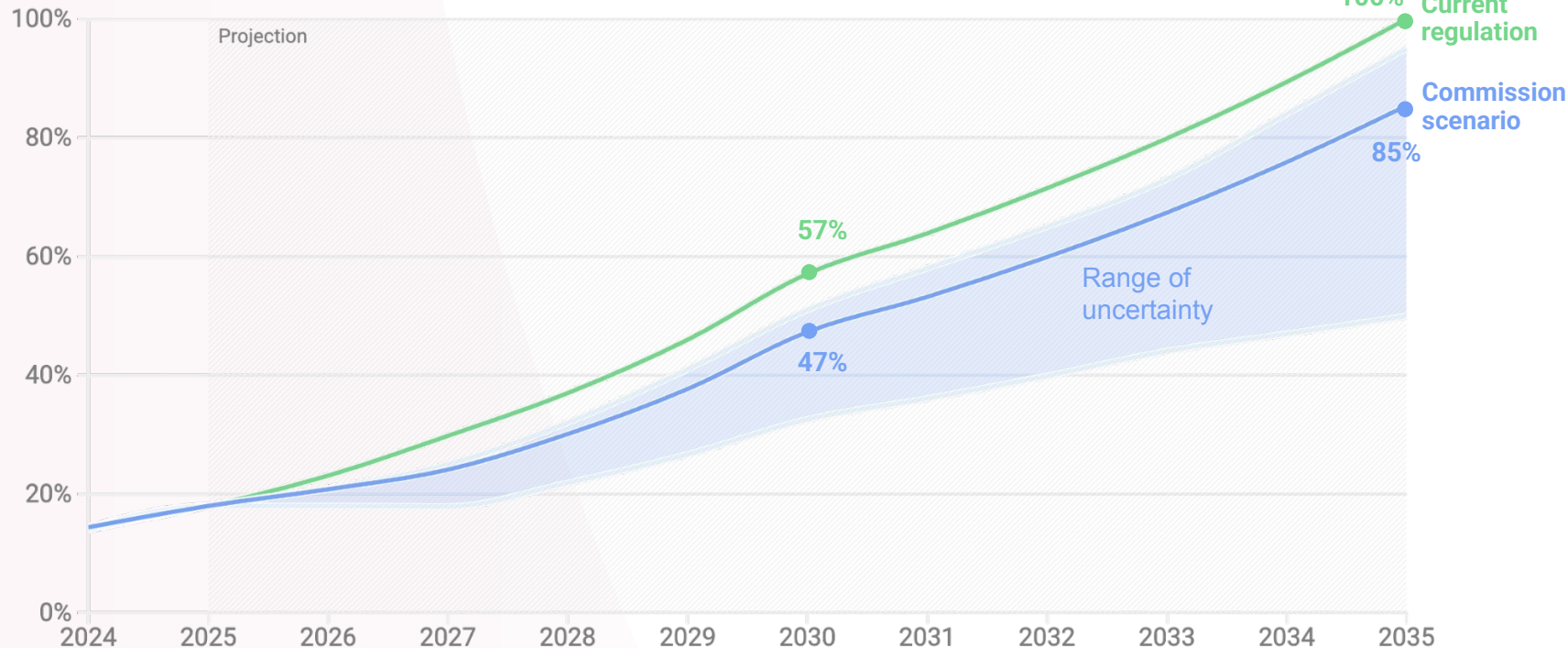
BEV sales share



Source: ACEA (2025) and T&E projection • Scope: EU27+NO

2035: The proposal creates market uncertainty

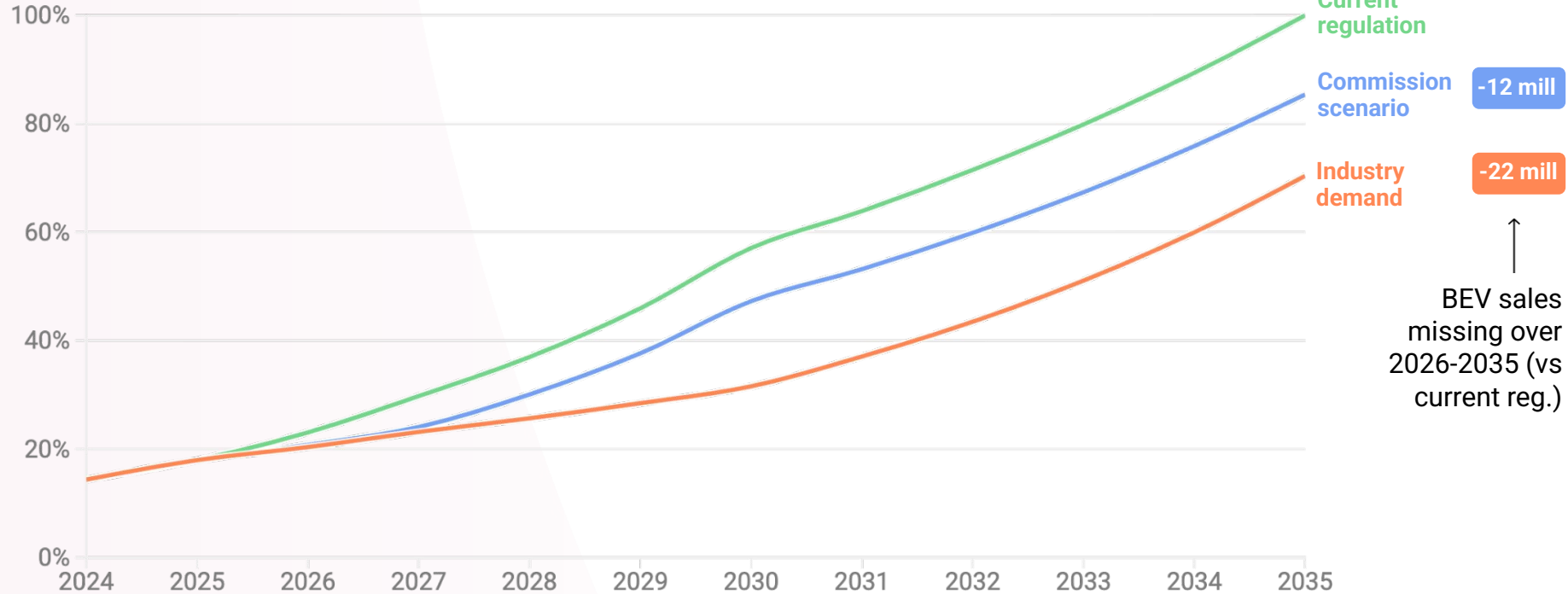
BEV sales share



Source: T&E modelling

Impact: Up to 22 million BEVs missing

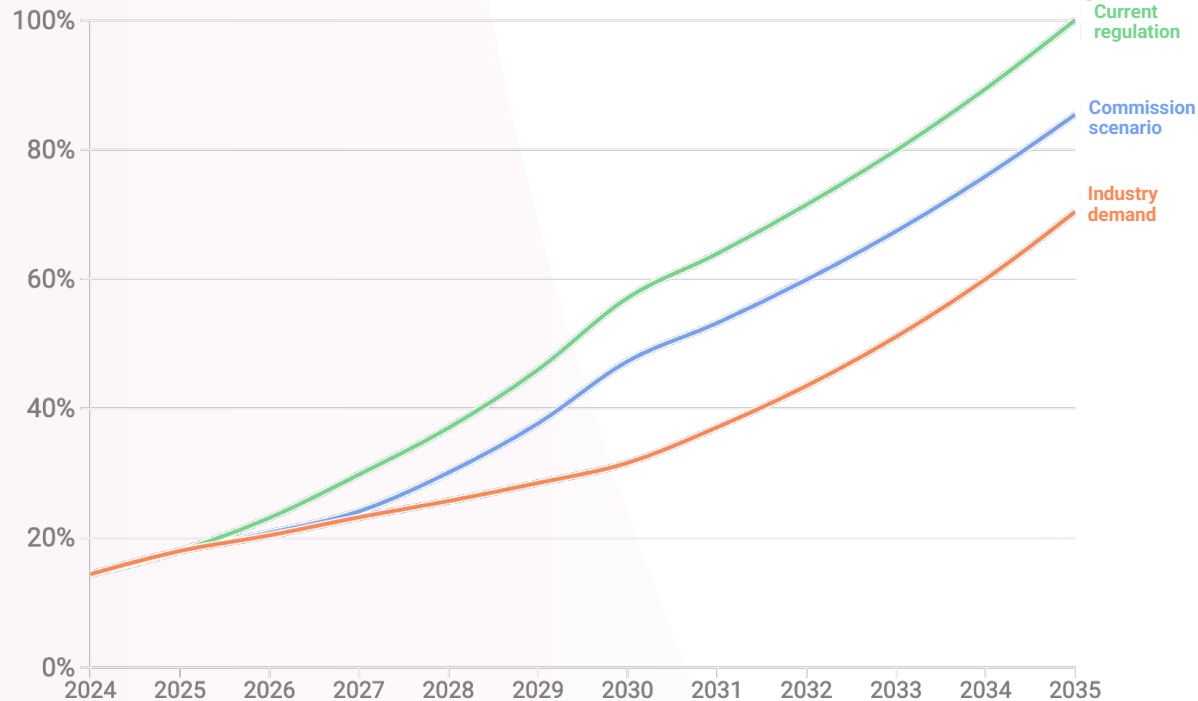
BEV sales share



Source: T&E modelling

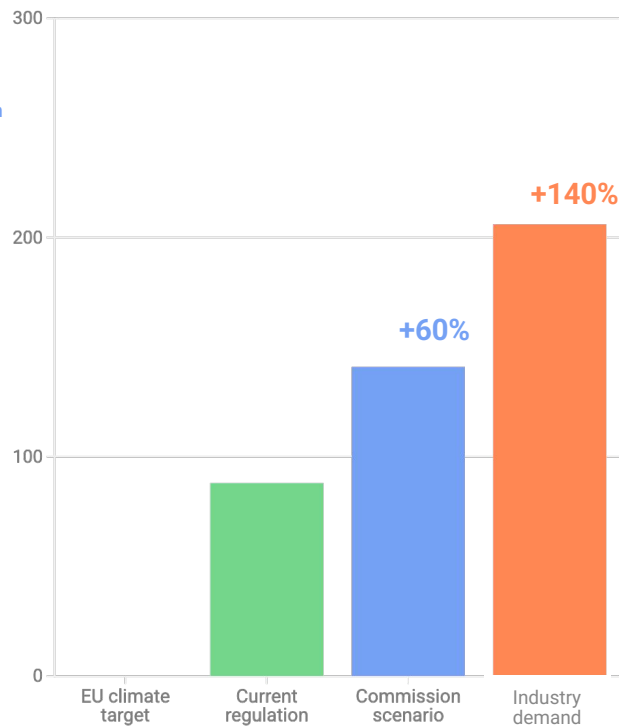
Impact: extra 720 million tonnes of CO₂

BEV sales share



Source: T&E modelling

Car fleet emissions in 2050 (MtCO₂e)



Source: T&E modelling

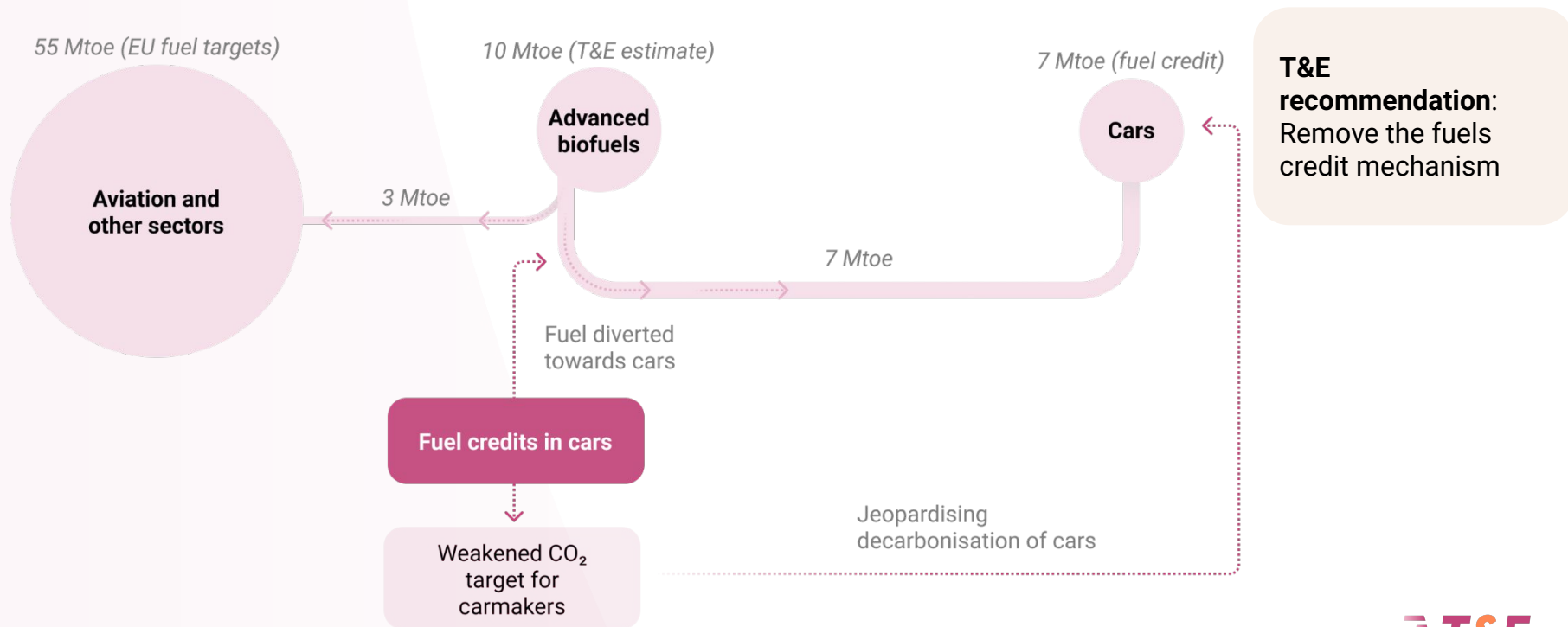
Flexibilities: a closer look

Flexibilities:

1. Fuel credits

Fuels credits for cars won't decarbonise transport

They promote a false solution for cars while undermining decarbonisation in other sectors



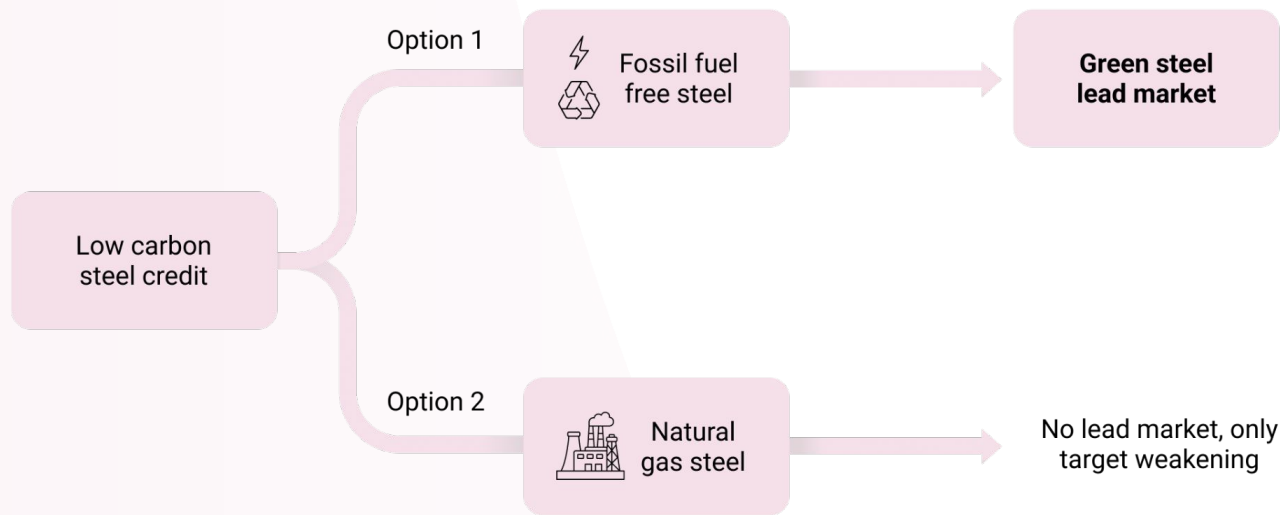
Flexibilities:

2. Green steel credits

Green steel credits: potential for lead markets

Uncertain impact, yet a well-designed scheme could create a lead market for automotive green steel

What classifies for a low carbon steel credit?



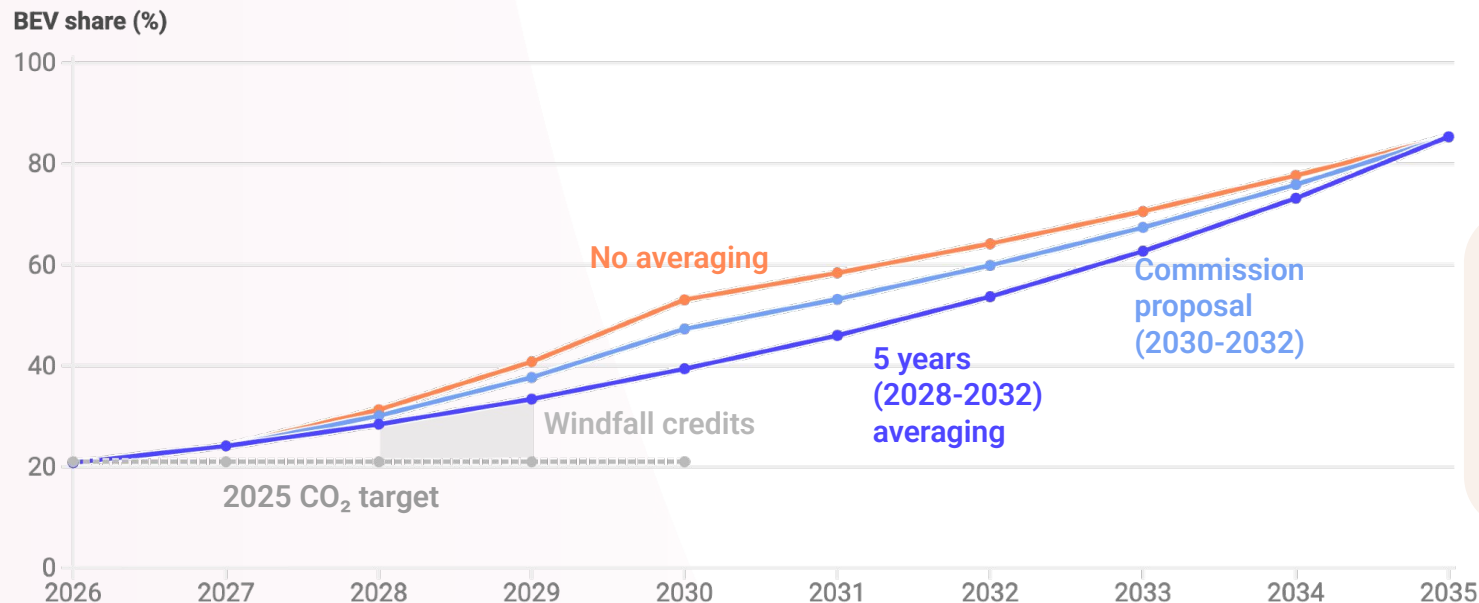
T&E recommendation:
Ensure focus on
(fossil fuel free)
green steel

Flexibilities:

3. 2030 averaging

2030 average target slows BEV momentum

Averaging slows BEV uptake and should be tightly limited to avoid undermining market momentum



T&E recommendation:
Remove the average, or at the minimum introduce a limit to borrowing

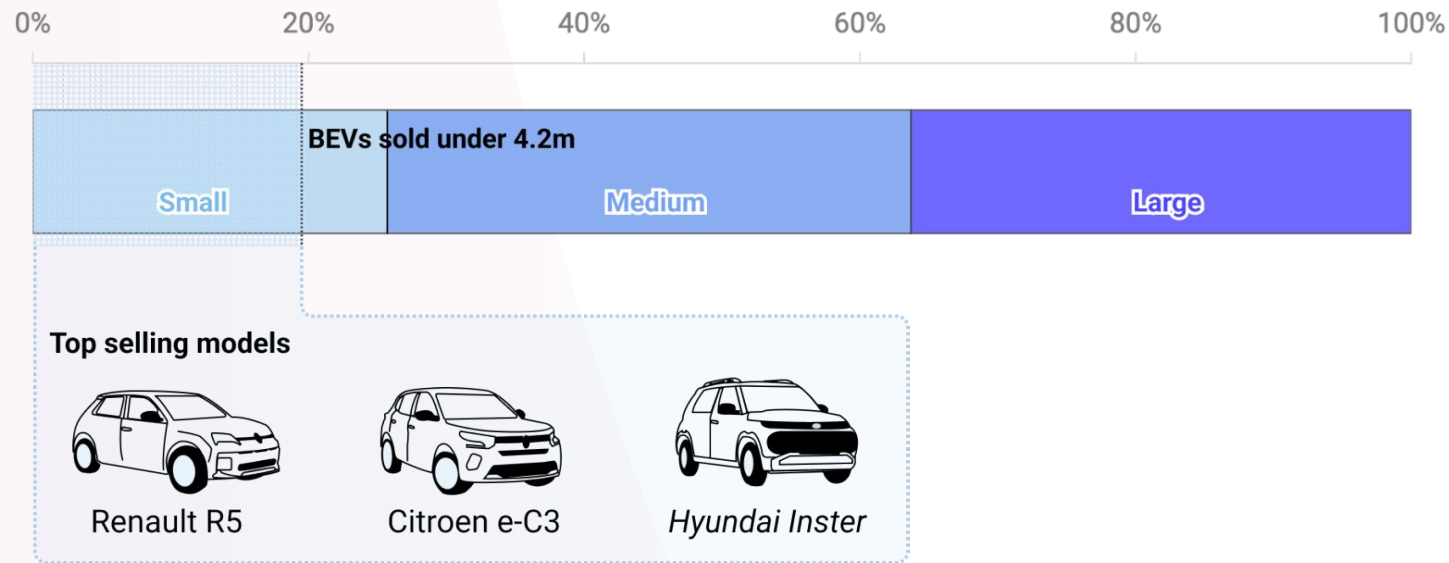
Flexibilities:

4. Small electric car supercredit

Small BEV supercredit: free lunch or market boost?

Supercredits typically rewards business-as-usual, delivering windfall gains

Total BEV registrations 2025

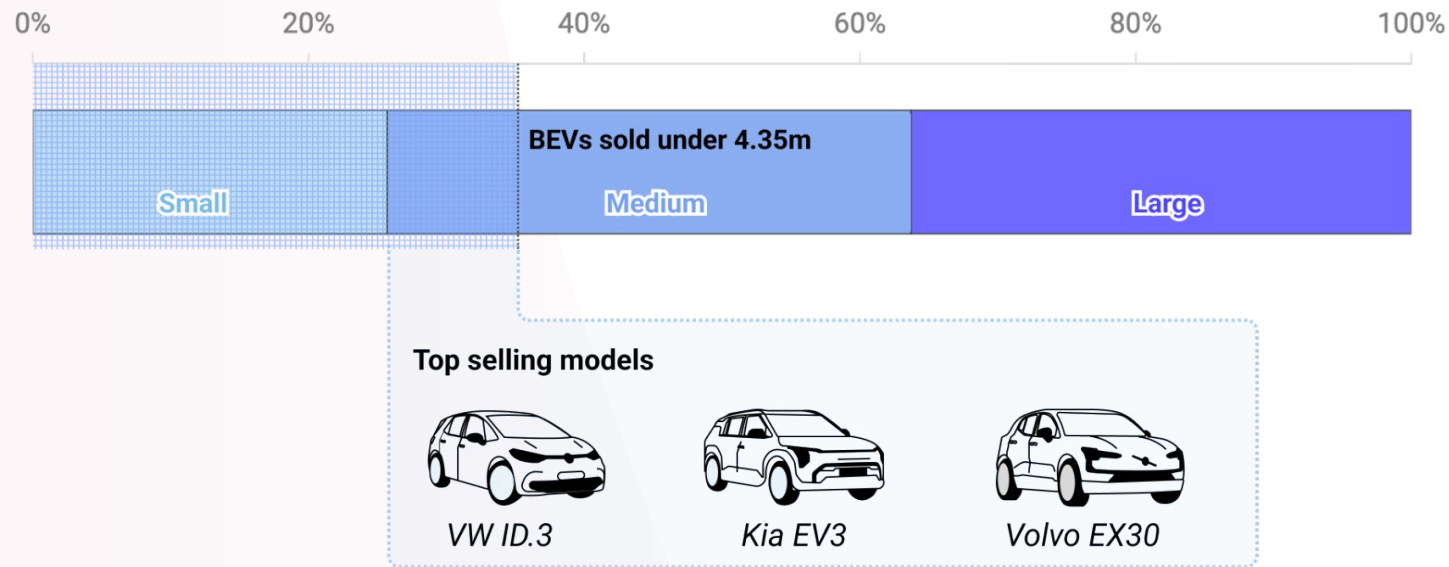


Source: Dataforce, T&E analysis

Small BEV supercredit: free lunch or market boost?

Supercredits typically rewards business-as-usual, delivering windfall gains

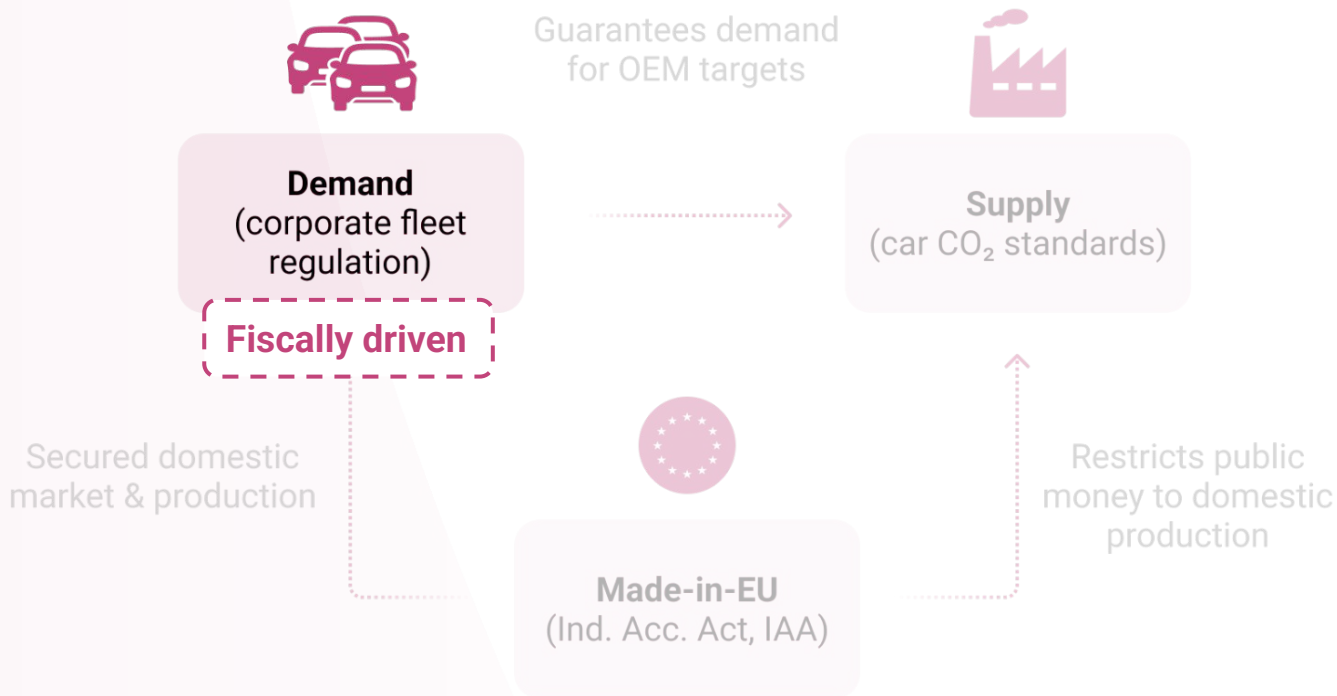
Total BEV registrations 2025



T&E recommendation:
Strictly limited to
small Made-in-EU
BEVs (max 4.1m)

Source: Dataforce, T&E analysis

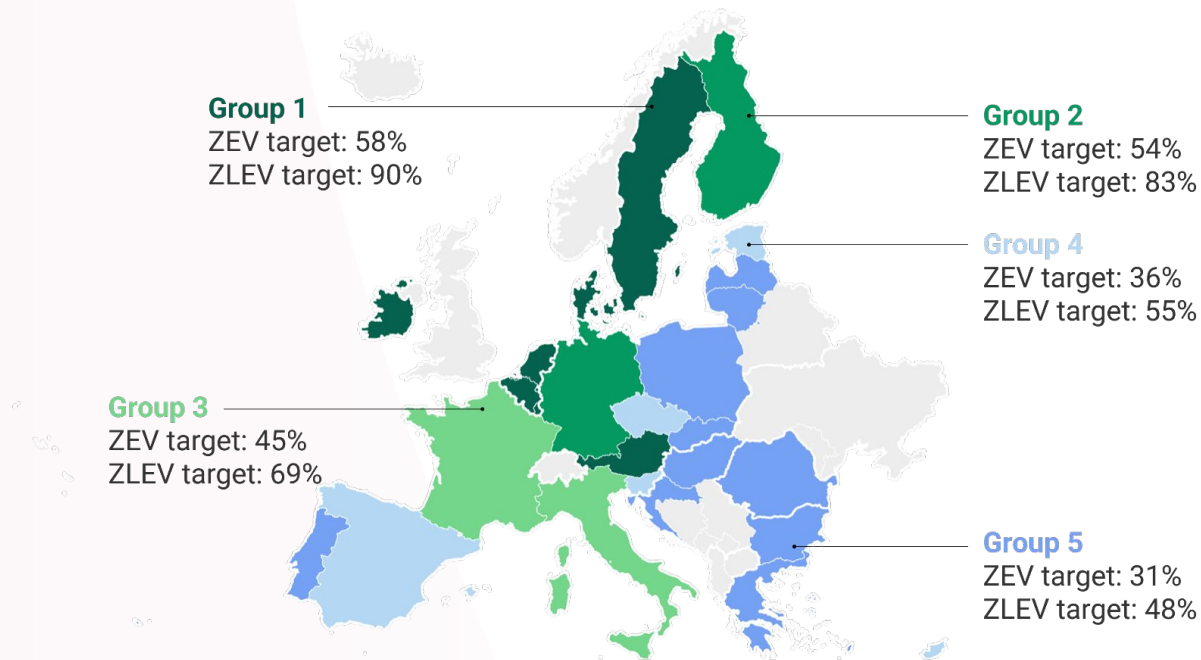
The EU's automotive package: corporate fleets



What is the Commission proposing for fleets?

2030 targets for large companies' new corporate registrations

Group 1 Group 2 Group 3 Group 4 Group 5 No EU

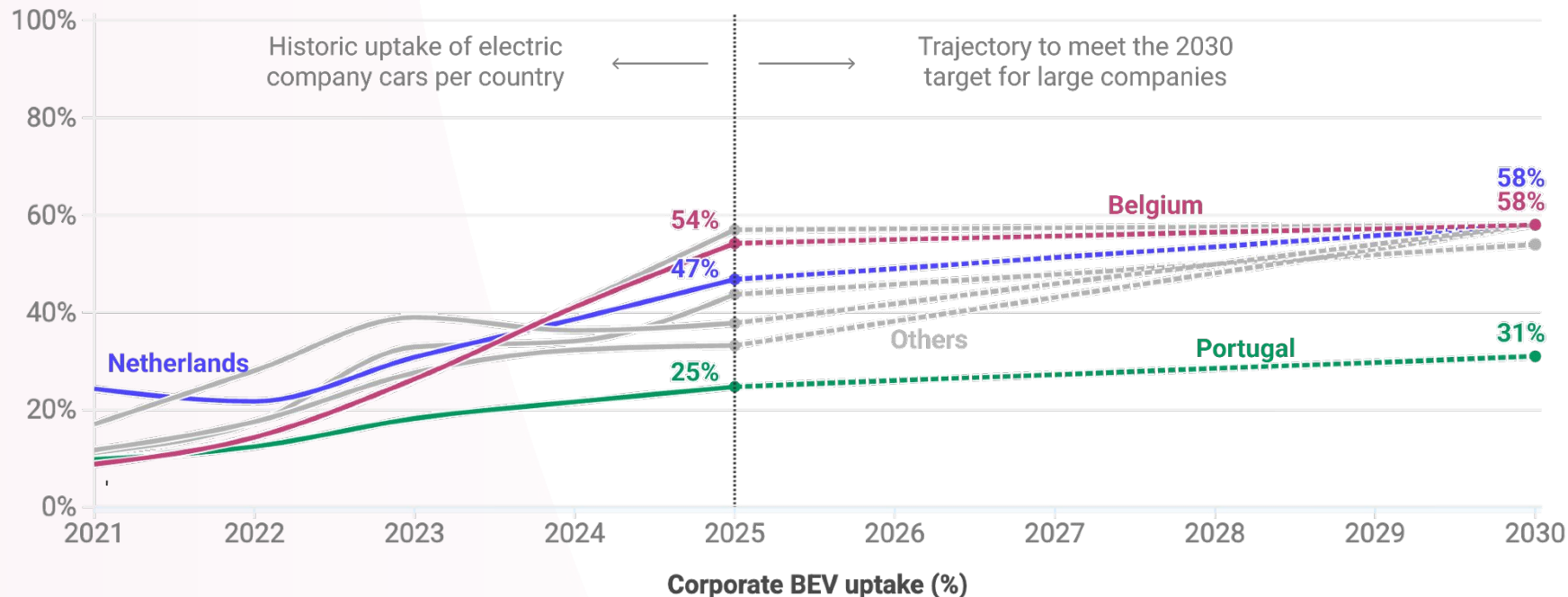


**Large companies
(0.16%): >250
employees**

**~ 30% of the overall
market covered**

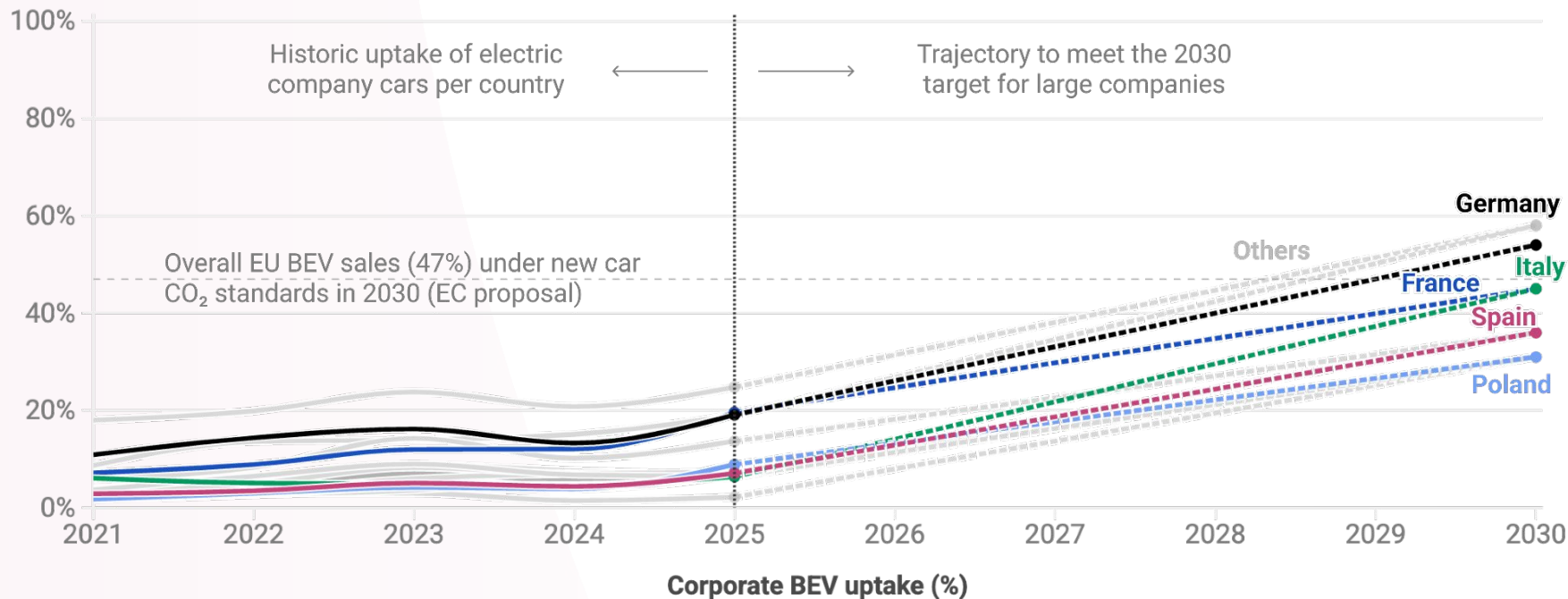
Source: 2030 targets from the Proposal for a Regulation of the European Parliament and of the Council on Clean Corporate Vehicles

The proposed targets mean stagnation in 7 markets



Source: T&E analysis based on the Proposal for a Regulation of the European Parliament and of the Council on Clean Corporate Vehicles • Note: Historic corporate BEV uptake (all company size) between 2020 and 2025

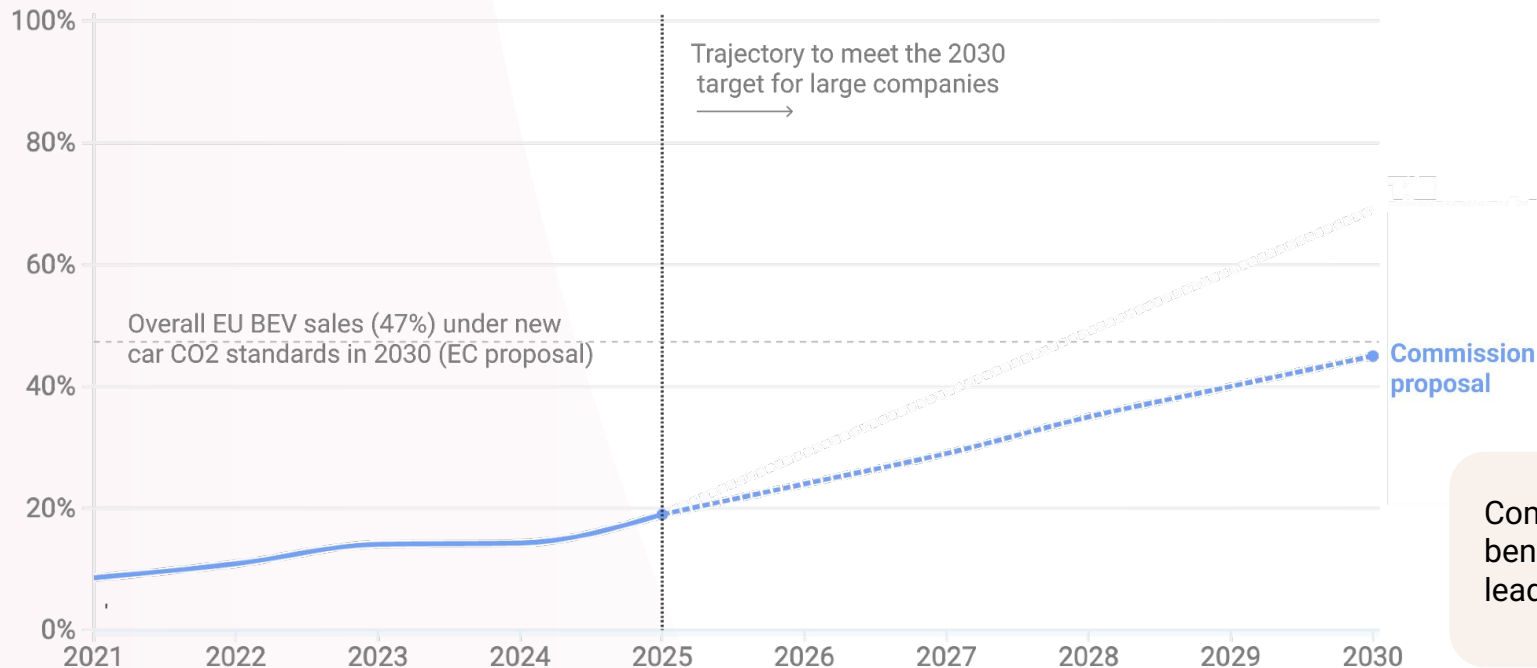
... and business as usual for the others



Source: T&E analysis based on the Proposal for a Regulation of the European Parliament and of the Council on Clean Corporate Vehicles • Note: Historic corporate BEV uptake (all company size) between 2020 and 2025

The proposed targets puts corporate fleets as EV market followers

Corporate BEV uptake (%)

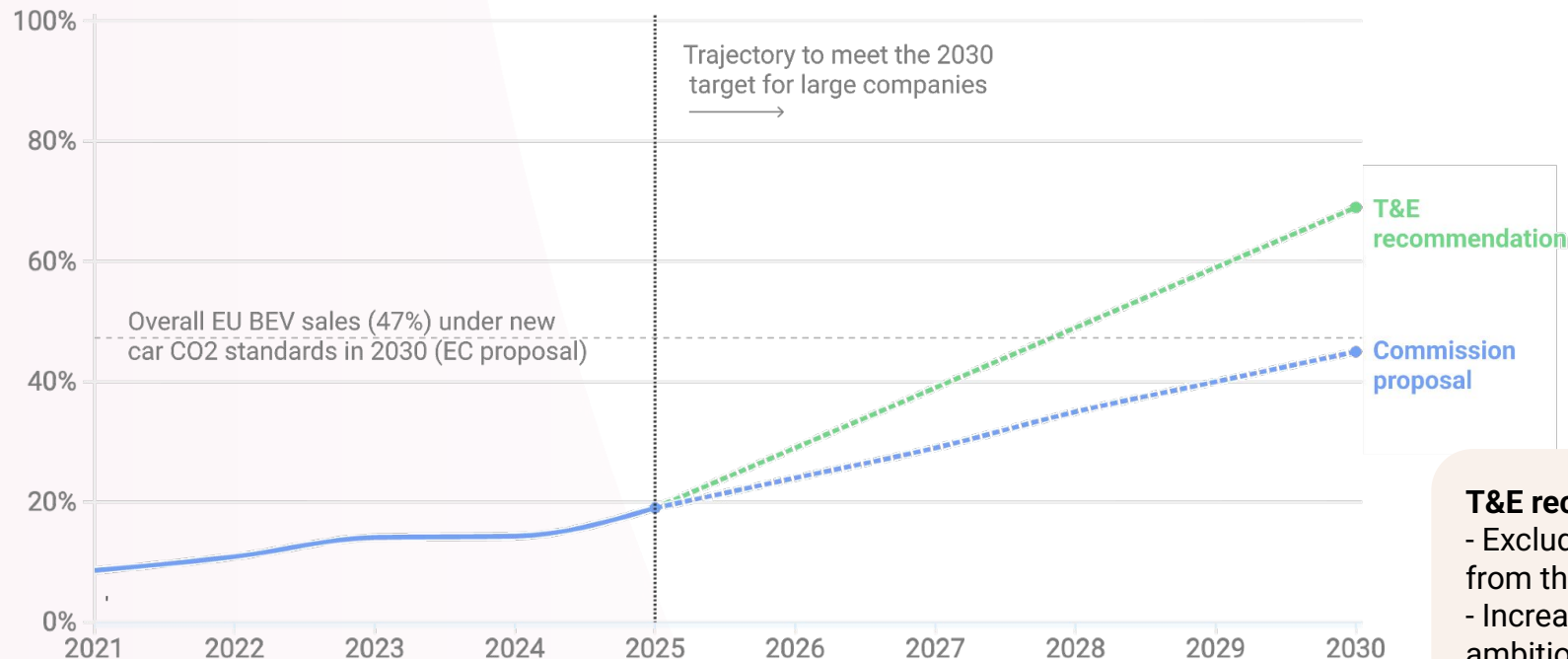


Company cars get tax benefits and should lead the market

Source: T&E analysis based on the Proposal for a Regulation of the European Parliament and of the Council on Clean Corporate Vehicles • Note: Historic corporate BEV uptake (all company size) between 2020 and 2025

While the corporate market should lead the EV transition

Corporate BEV uptake (%)



T&E recommendation:

- Exclude PHEVs from the targets
- Increase the min. ambition for BEV

Source: T&E analysis based on the Proposal for a Regulation of the European Parliament and of the Council on Clean Corporate Vehicles • Note: Historic corporate BEV uptake (all company size) between 2020 and 2025

Corporate fleet targets are a win-win for:

Carmakers



40%

Of the required BEV
production for the
2030 CO₂ targets

EU production



2,4 M

Secured BEVs
made-in-EU in
2030

T&E recommendation:
promote EU local
content preference via
fleets targets

Conclusion: Europe's EV transition at a crossroads

