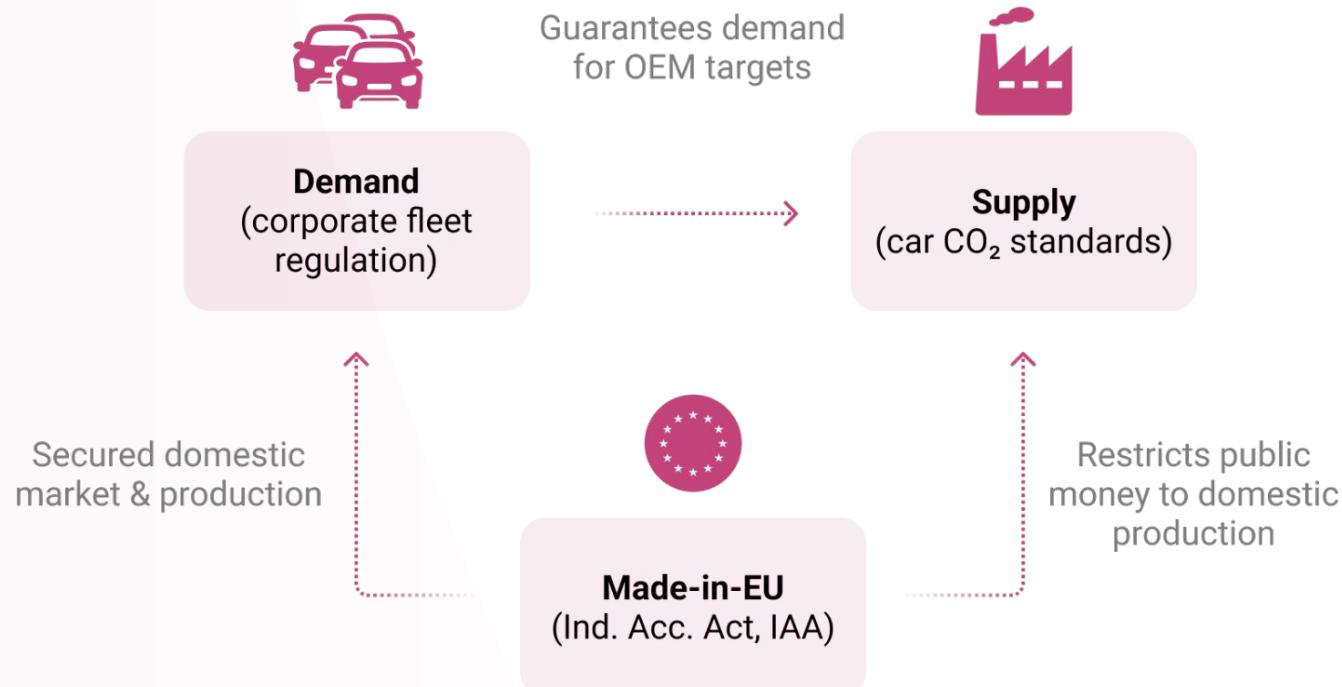


The EU Automotive package - T&E's analysis

Lucien Mathieu, Cars Director
03/02/2026

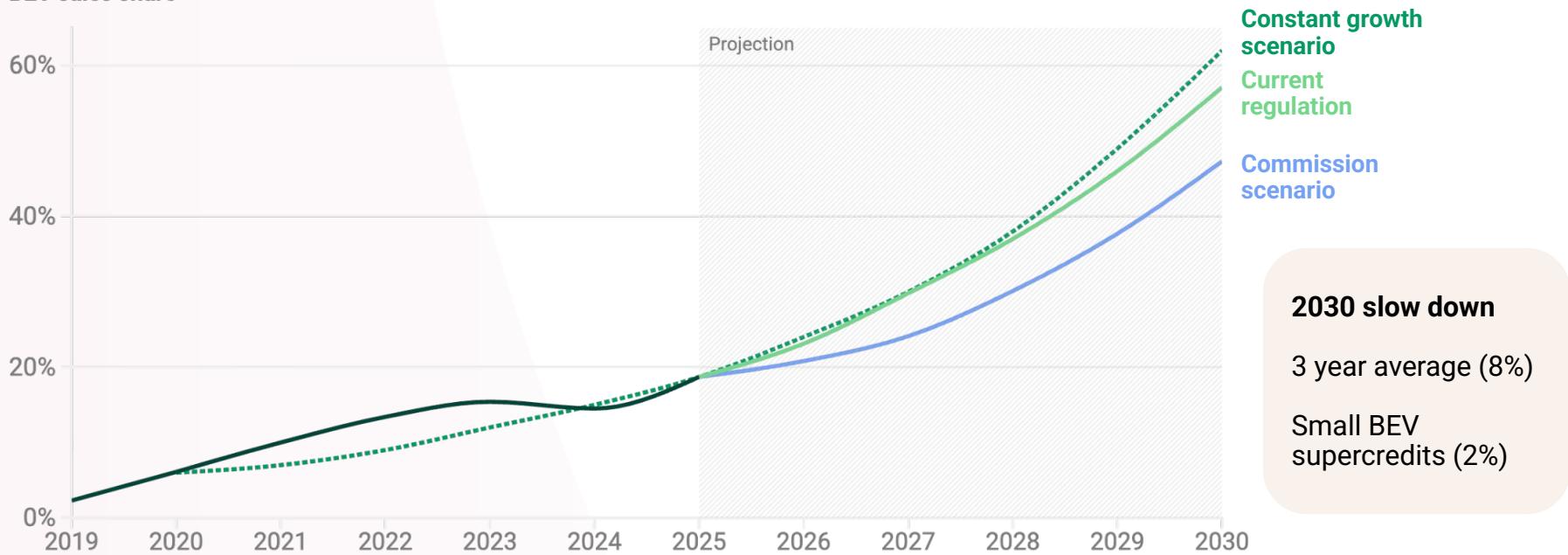
The EU's automotive package



2030: Commission proposal locks in an EV slowdown

Based on average annual BEV share growth 2020 to 2025

BEV sales share

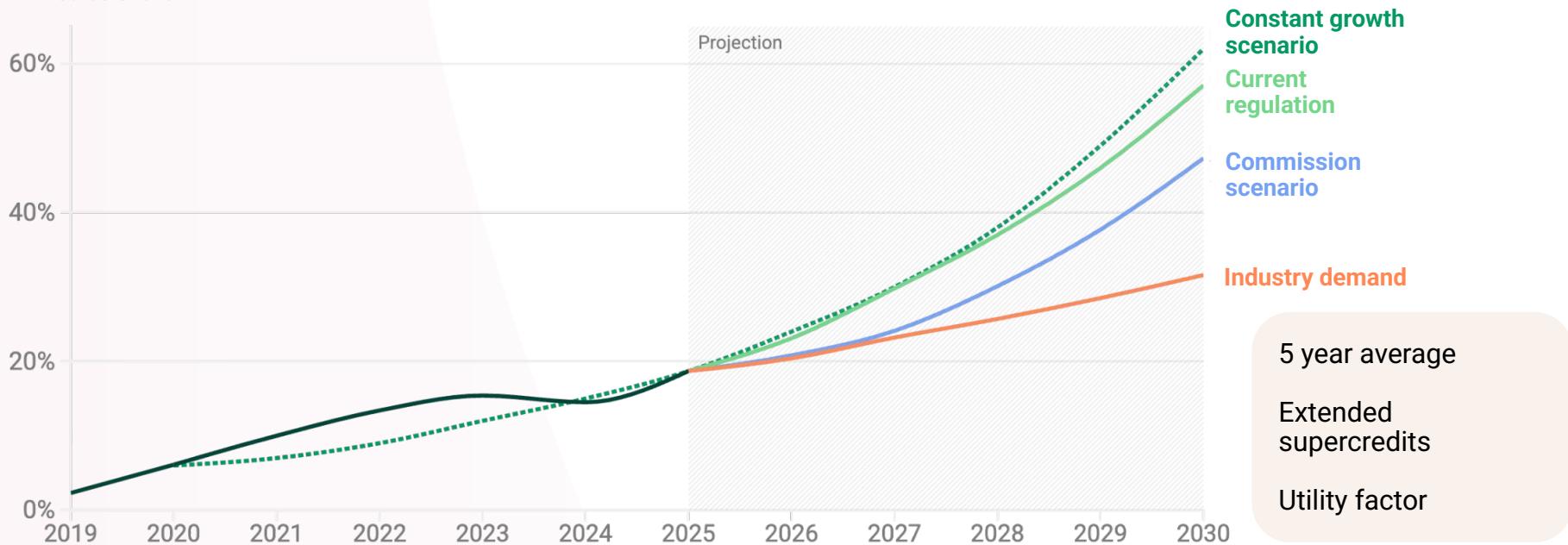


Source: ACEA (2025) and T&E projection • Scope: EU27+NO

More flexibilities leads to EV stagnation

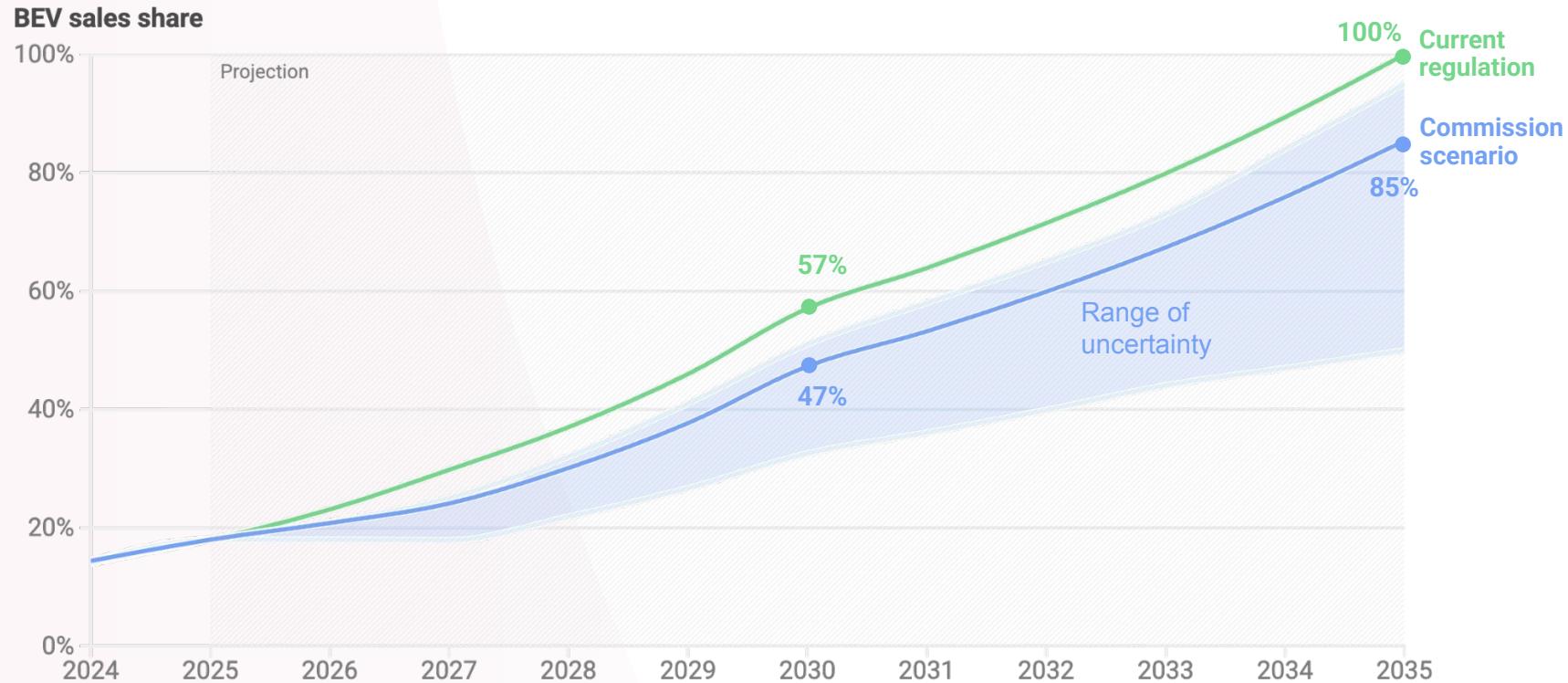
Based on average annual BEV share growth 2020 to 2025

BEV sales share



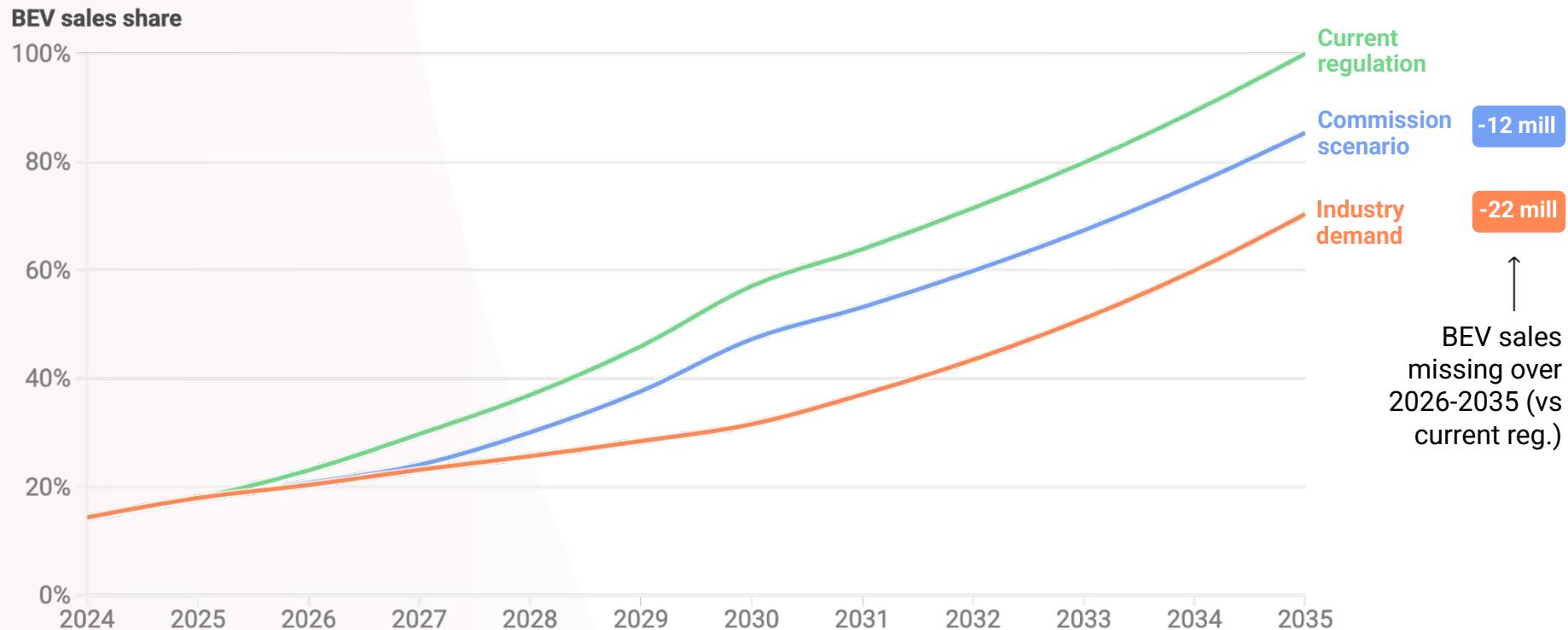
Source: ACEA (2025) and T&E projection • Scope: EU27+NO

2035: The proposal creates market uncertainty



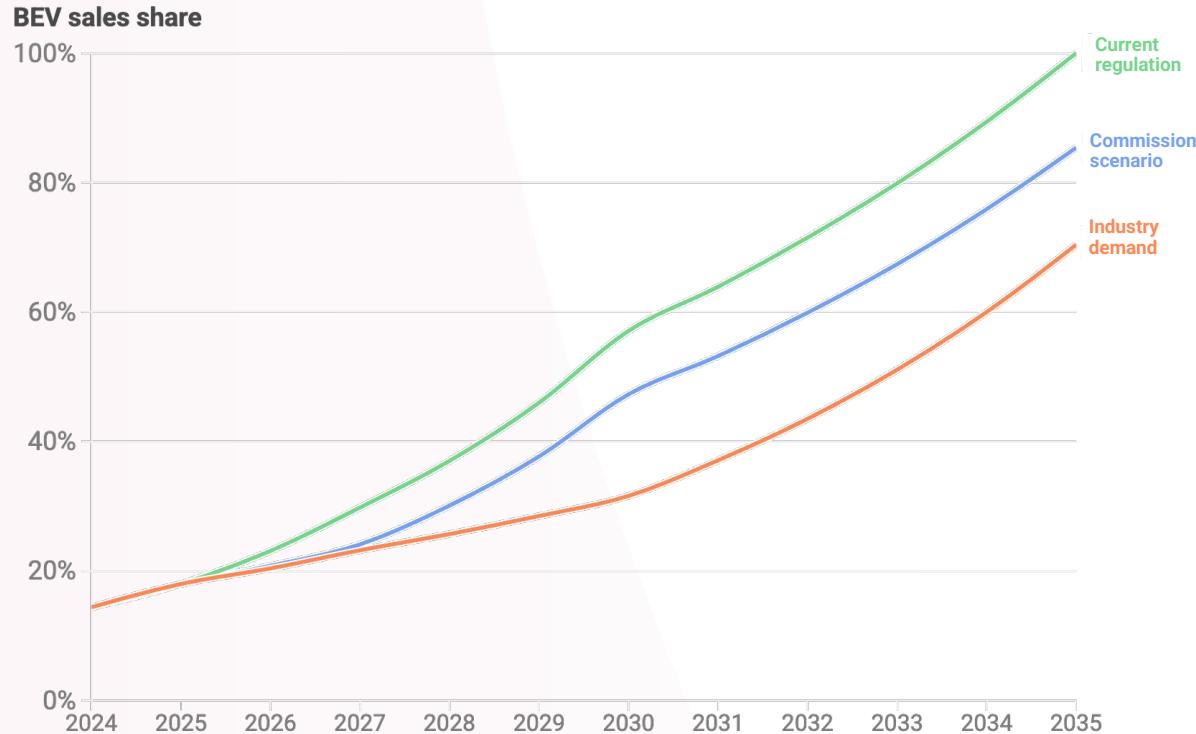
Source: T&E modelling

Impact: Up to 22 million BEVs missing

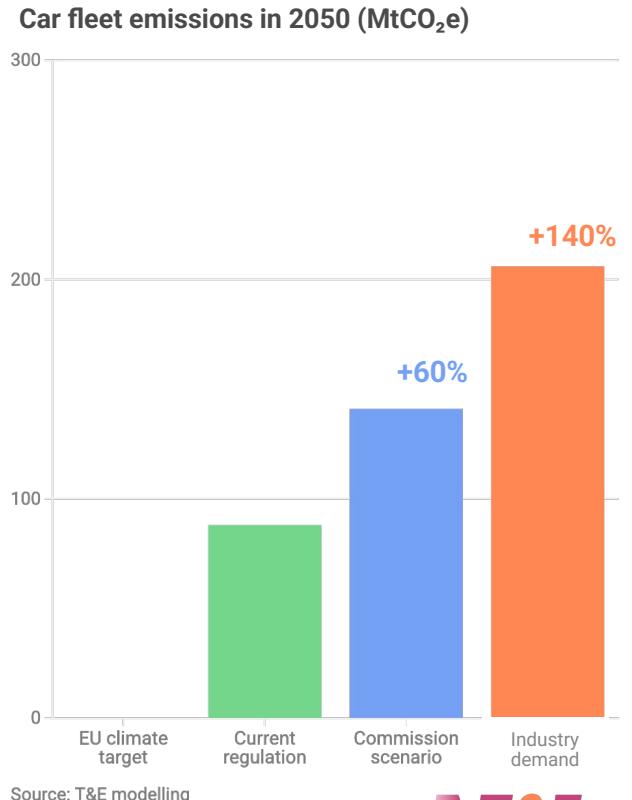


Source: T&E modelling

Impact: extra 720 million tonnes of CO₂



Source: T&E modelling



Source: T&E modelling

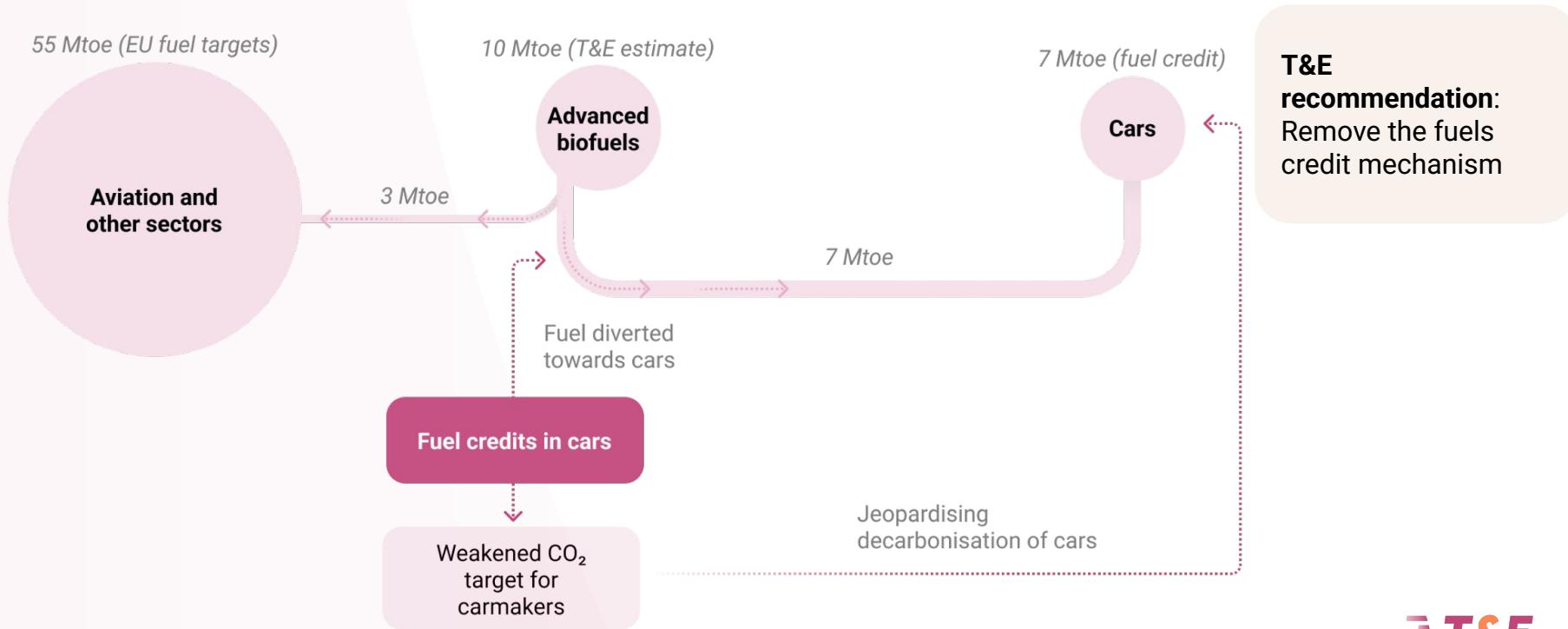
Flexibilities: a closer look

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



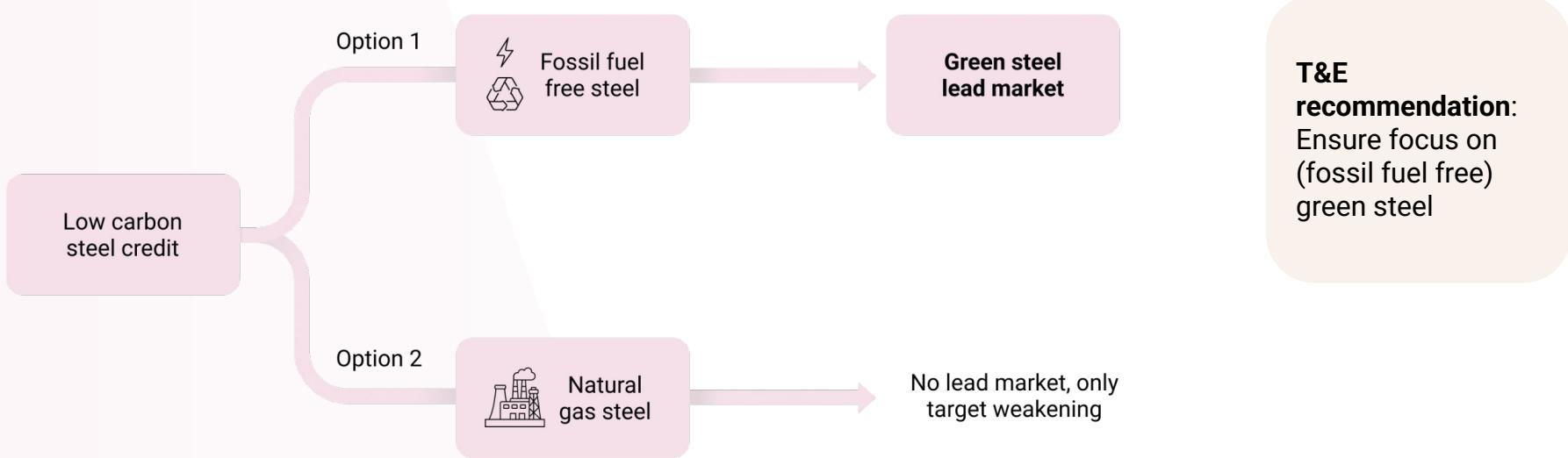
Flexibilities:

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?

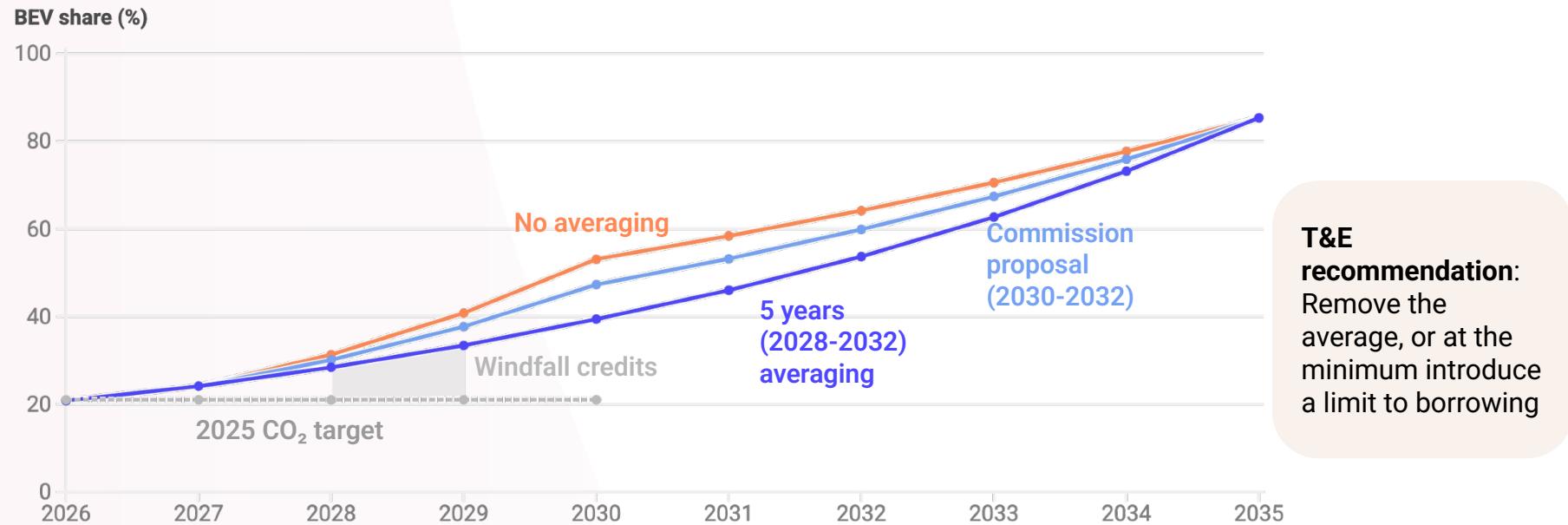


Flexibilities:

3. 2030 averaging

2030 average target slows BEV momentum

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



Source: T&E analysis

Flexibilities:

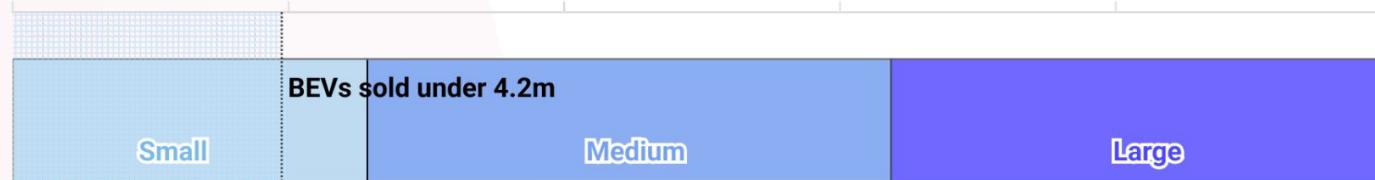
4. Small electric car supercredit

Small BEV supercredit: free lunch or market boost?

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

Total BEV registrations 2025

0% 20% 40% 60% 80% 100%



Top selling models



Renault R5



Citroen e-C3



Hyundai Insta

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

0% 20% 40% 60% 80% 100%



Small

BEVs sold under 4.35m

Medium

Large

Top selling models



VW ID.3



Kia EV3

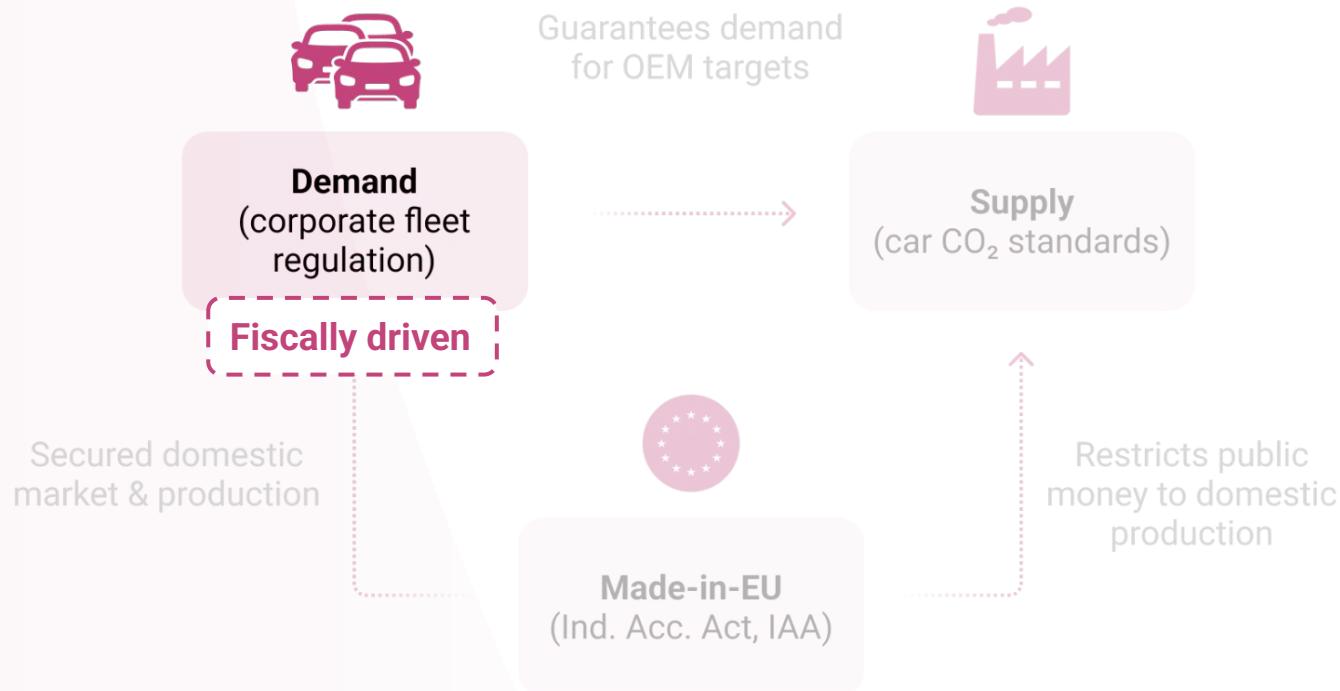


Volvo EX30

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

Source: Dataforce, T&E analysis

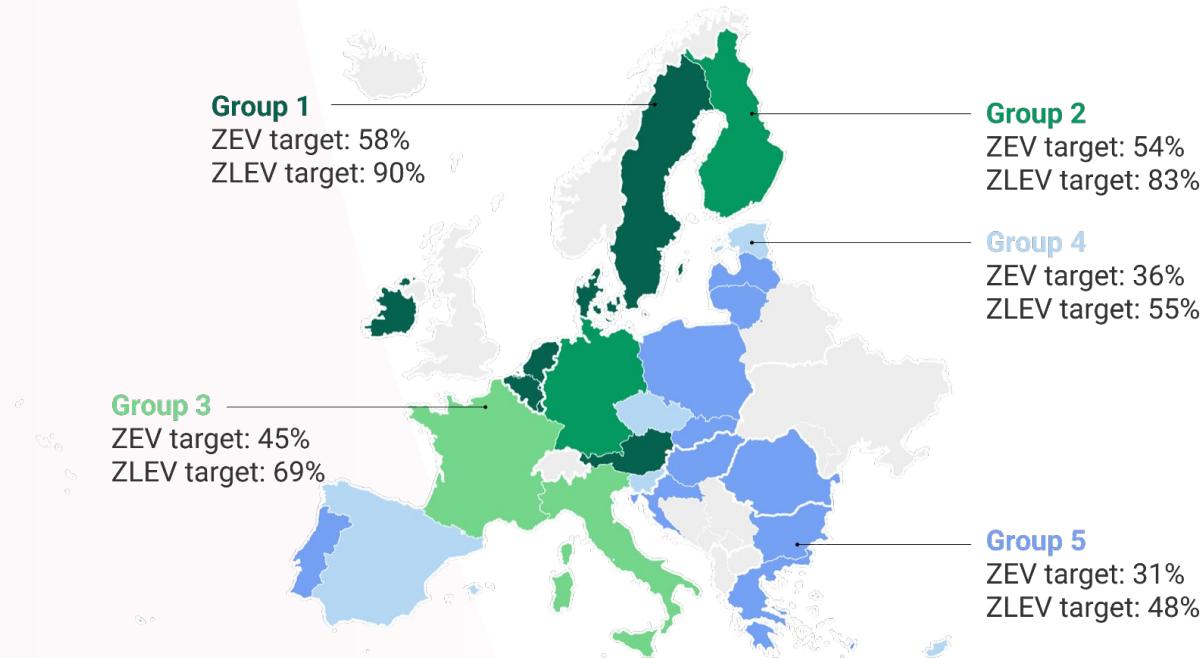
The EU's automotive package: corporate fleets



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

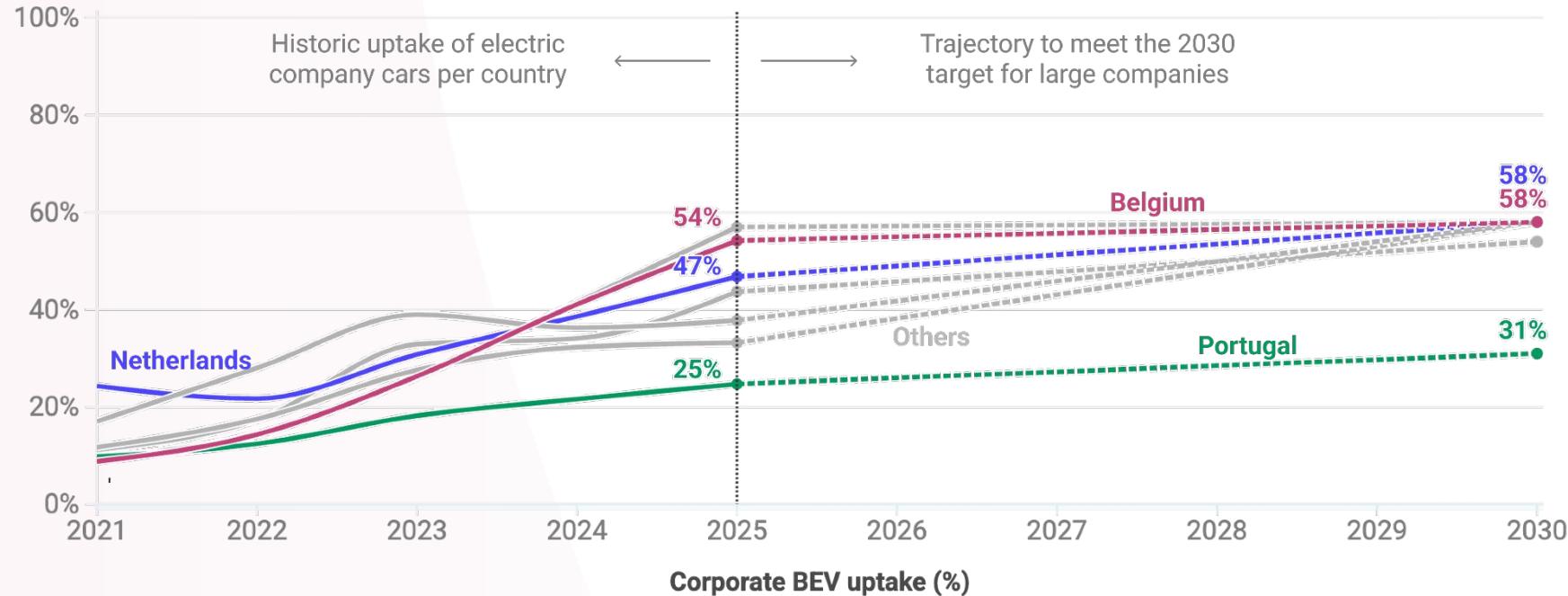


Large companies (0.16%): >250 employees

~ 30% of the overall market covered

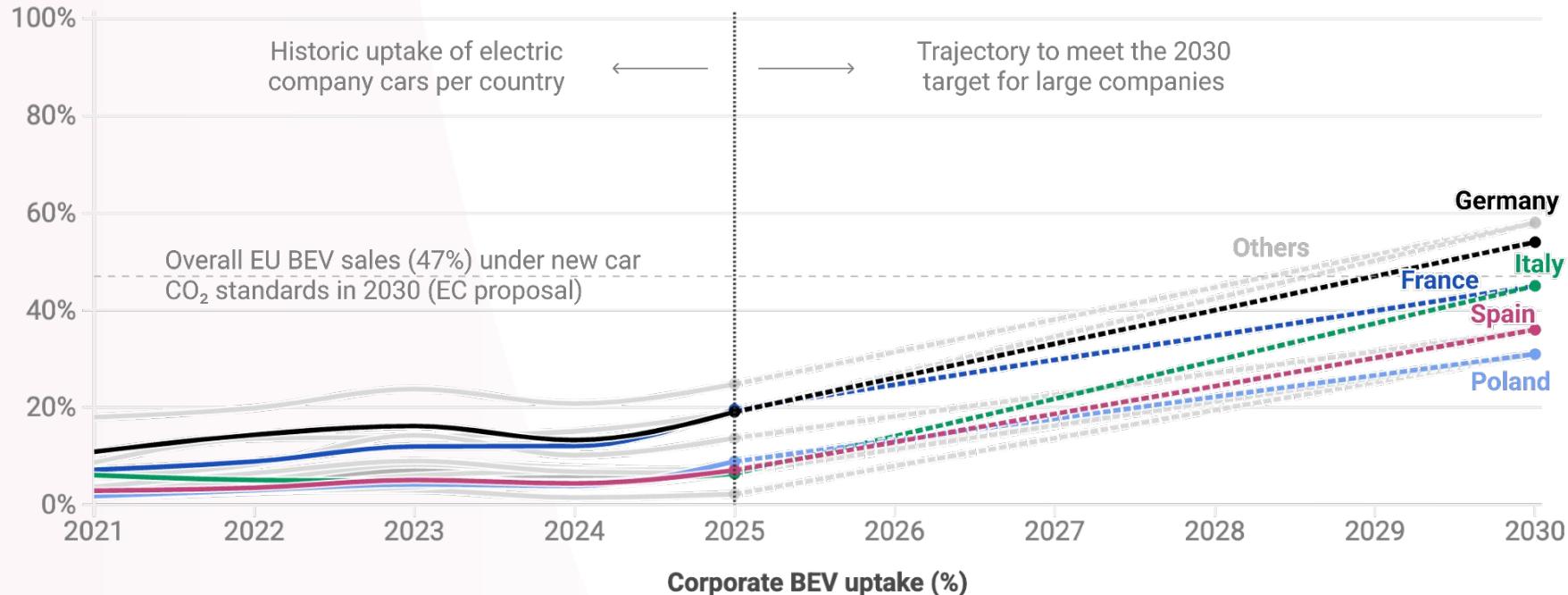
Source: 2030 targets from the Proposal for a Regulation of the European Parliament and of the Council on Clean Corporate Vehicles

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

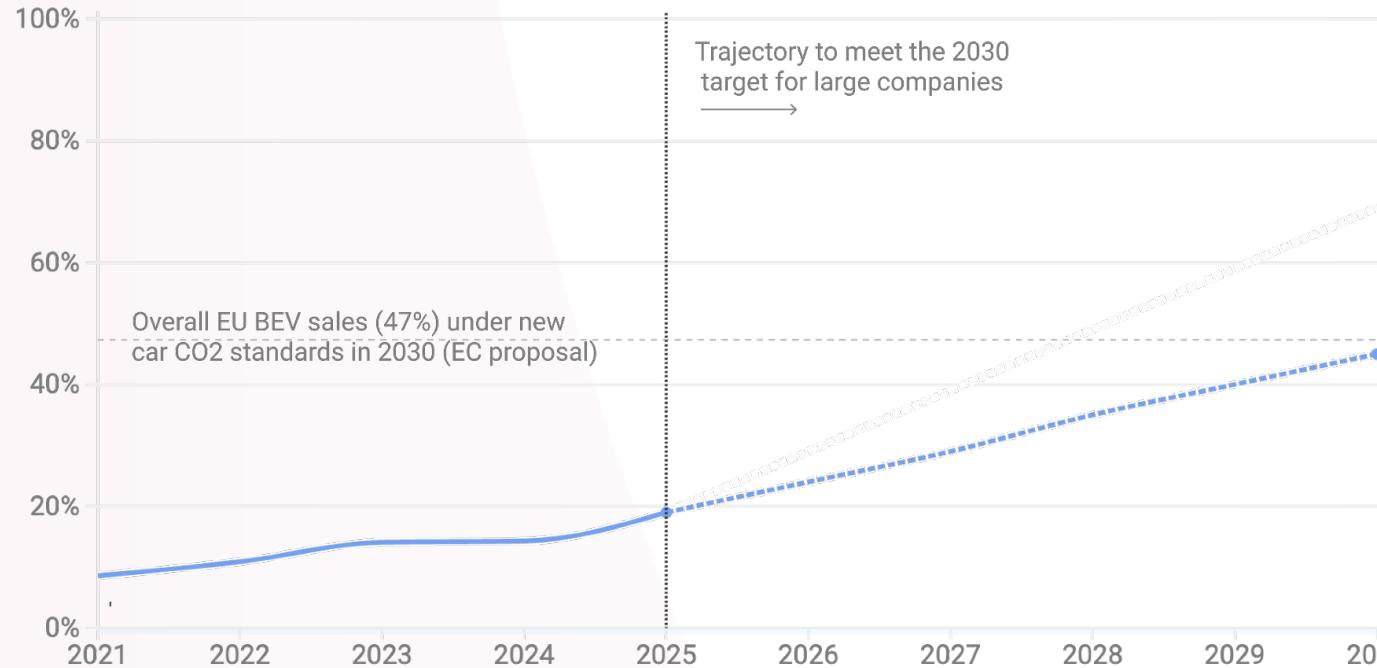
... and business as usual for the others



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 (%)

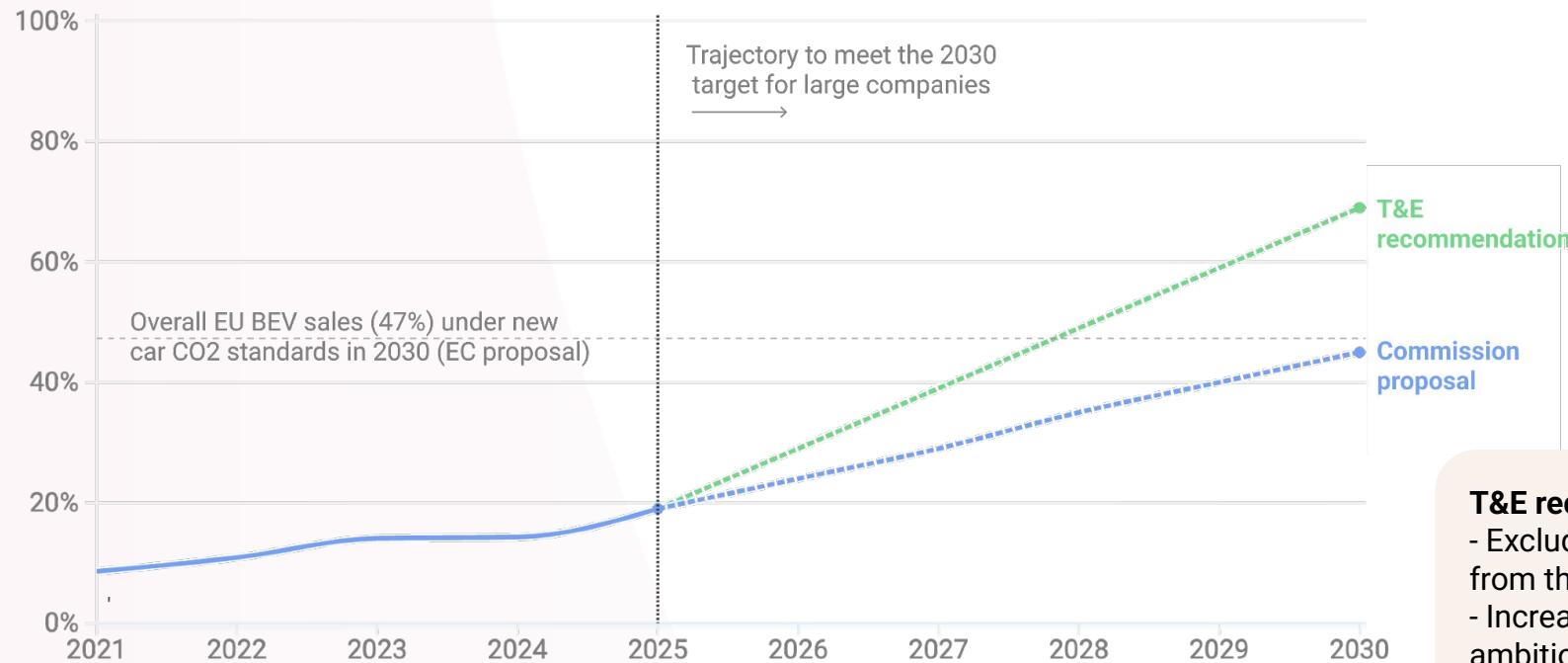


Company cars get tax benefits and should lead the market

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 (%)



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

T&E recommendation:
- Exclude PHEVs from the targets
- Increase the min. ambition for BEV

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

