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UFE's position on the automotive package

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UFE, the association representing the French Electricity industry, takes note of the publication by the European Commission of the **Automotive Package**. While UFE had expressed concerns regarding the reopening of the CO<sub>2</sub> standards framework, we note positively that **the overall ambition of the CO<sub>2</sub> Standards for cars and vans** has been preserved. The introduction of a Regulation on **the electrification of corporate fleets** could also represent an **important lever to accelerate the deployment of zero-emission vehicles and to support affordability** through the development of a strong second-hand market for EVs<sup>[1]</sup>.

However, this package introduces new uncertainties for the electromobility industry, at a time when electrification needs to accelerate the most. **Backtracking on the 2035 zero-emission target** will cause lasting damage to the EU's long-term competitiveness in the global automotive market, notably in the context of increasingly offensive strategies from Asian manufacturers. It will also undermine the confidence of industry actors to invest in electromobility and ultimately jeopardise the achievement of the Union's climate targets.

Furthermore, while necessary, the **proposed Regulation on corporate fleets lacks sufficient ambition**, especially with regards to the proposed targets, to trigger a genuine electrification dynamic across Member States.

UFE therefore considers that **adjustments to the framework are needed**, to strike a better balance between guaranteeing the climate ambition of the Automotive Package and providing flexibility to support the automotive sector.

**On the revision of the CO<sub>2</sub> Standards for cars and vans**, it is essential to **strengthen the 2035 objective** and maintain a **zero-emission target beyond 2035**. The credit system for sustainable renewable fuel should be removed, while extending the credit mechanism for low-carbon steel to batteries made in the EU. Furthermore:

- The **definition of low-carbon steel and batteries made in the EU should be clear and sufficiently ambitious**, to ensure that the credit mechanism delivers effective and measurable emissions reductions.

- The **definition of “small electric vehicle” should be supplemented by additional criteria**, such as maximum weight and energy consumption, to ensure that only small, low-carbon and low-cost electric vehicles are eligible under the super credit mechanism. **This mechanism should not be extended to all types of EVs**, as it is intended to provide targeted support specifically to the small EV segment.

**On the corporate fleets Regulation**, it is essential to:

- **Strengthen the proposed targets;**
- Set up an **exemption from the targets for corporate vehicles used in emergency response operations**, including those used for the urgent restoration and maintenance of critical energy, electricity, gas, water or telecommunications networks. This is because these vehicles operate in areas without electricity during extreme weather events or other outages, where it is not possible to recharge electric vehicles;
- Introduce a **penalty system** to ensure compliance;
- Set national **zero-emission freight transport targets** for large shippers and **narrow the role granted to low-emission vehicles**.

Last but not least, **UFE calls for the review of the Regulation on CO<sub>2</sub> Standards for heavy-duty vehicles, foreseen for 2027, not to be anticipated**. There is no pressing reason to anticipate this review, as the current framework is only starting to deliver its effects and requires regulatory stability to ensure effective implementation and secure investments in the e-truck value chain. The zero-emission heavy-duty vehicle segment is progressively becoming more competitive and mature, and would benefit from policy predictability rather than renewed uncertainty at this stage.

[1] In parallel, UFE welcomes the following elements:

- The introduction of a credit system designed to incentivise the production of low-carbon steel in Europe;
- Made in EU requirements, notably super credits for small electric vehicles, which have the potential to incentivise the deployment of more affordable, EU-made EVs;
- The European Commission’s intention to not revisit its decision to revise the utility factor for PHEVs;
- The proposals on vehicle labelling.