

Mr. Thierry Breton

Commissioner for the Internal Market
Rue de la Loi 200
B -1049 Brussels

8th November 2022

Open letter – joint response from the EV ecosystem to Commissioner Breton’s comments on e-mobility in POLITICO

Dear Commissioner Breton,

We, as stakeholders from the entire e-mobility ecosystem, are writing to you to express our concerns over your recent comments to Brussels media, in which you warned of a “gigantic disruption” to the automotive sector in the face of reinforced car and van CO2 standards.

This “gigantic disruption” is in fact a major transition to a cleaner, more sustainable Europe in line with the legally binding obligations of the EU Climate Law. The phase-out of internal combustion engine (ICE) cars and vans in 2035 – which was given a democratic mandate by the co-legislators just over one week ago and hailed as an example of European leadership ahead of COP27 - is crucial to provide certainty to investors, decision-makers and civil society.

Specifically, we would like to clarify the following points:

- **E-Mobility is necessary to reach EU climate and air quality targets:** Given that new vehicles frequently stay on EU roads for more than 15 years after their sale¹, a phase-out by 2035 at the latest is a clear precondition for readying the road transport sector to reach the EU’s legally binding objective of climate neutrality by 2050. Electromobility will also generate tangible improvements in air quality in Europe, in line with the new proposed ambient air quality directive.
- **The transition will create new high-skilled jobs for Europeans:** While it is true that not all jobs in the current supply chain will be maintained in the switch to e-mobility, the notion that 600,000 jobs will be “destroyed” is inaccurate and misleading. Taking into account energy production, infrastructure rollout, etc., recent studies predict the “clean industrial revolution” will create over 580,000 new jobs by 2030, offsetting job losses in the automotive supply chain². These jobs could easily be lost to third countries if Europe falls ahead in the global race to net zero.
- **Charging Infrastructure will not be a bottleneck if ambitious targets are set and implemented:** Ambitious infrastructure rollout targets in the AFIR and EPBD proposals have the potential to help significantly in addressing the problem of

¹ <https://www.acea.auto/files/ACEA-report-vehicles-in-use-europe-2022.pdf>

² <https://www.bcg.com/is-e-mobility-a-green-boost-for-european-automotive-jobs>

charging availability. On the one hand, as between 70%³ and 85%⁴ of all charging operations from now until 2030 will happen at home or the workplace, EPBD provisions aim at making sure that new European buildings, and those undergoing renovations, are EV-ready. The recently rejected TRAN opinion included many promising elements in this regard, which should be reconsidered by the co-legislators over the coming weeks. On the other hand, AFIR's fleet-based targets will guarantee that the roll-out of public charging infrastructure stays in line with EV uptake in each member state, whereas distance-based targets will guarantee convenient and reliable long-distance travel. Trilogues must result in an ambitious rollout trajectory, ideally in line with the ambition laid out by the European Parliament⁵.

- **Electricity production and the grid can keep up:** The build-out of renewable energy sources will be able to cover the - comparatively moderate - impact of EV demand in the coming years. In 2020, EVs only consumed ~0,3% of total electricity demand⁶, and even by 2030, the whole transport sector should account for less than 10%. Total electricity demand in Europe is expected to increase by around 1.8% per year by 2030 to around 3,500TWh, of which the electrification of the whole transport sector will account for only 200 TWh⁷. The concerns of the Commissioner also do not take into account the flexibility contributions that EVs can have in terms of demand-side response (DSR) through smart and bidirectional charging.
- **Raw Materials will be available - if DG GROW acts decisively:** The figures quoted in the interview seem only partly in line with estimates of the metal industry⁸ and exceed the Commission's own estimates⁹. They also seem to refer not just to the demand due to EVs, but to the combined needs of the European clean energy technology production, including renewable energy and hydrogen, electricity network build-out, and stationary batteries. E-Mobility will require additional resources, but Europe can in the coming years lay the foundation for a higher level of strategic autonomy for its strategic metals through optimised recycling, domestic value chain investment, and more active global sourcing. Decisive political action is needed in the form of a strong proposal for a European Raw Materials Act in the coming year.
- **EVs emit less CO2 than ICEs across the board:** Thanks to their superior energy efficiency, EVs are always emitting less CO2 than their ICE counterparts throughout their life cycle - even when run on fossil fuel-heavy energy mixes. An EV bought in Poland today, for example, is 40% cleaner than its Petrol equivalent¹⁰. It is worth

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https://www.transportenvironment.org/wp-content/uploads/2022/04/2022_04_charging_paper_final.pdf

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https://www.eurelectric.org/media/5704/power_sector_accelerating_e-mobility-2022_eyeelectric_report-2022-030-0059-01-e.pdf

⁵ https://www.europarl.europa.eu/doceo/document/TA-9-2022-0368_EN.pdf

⁶ <https://www.eea.europa.eu/publications/electric-vehicles-and-the-energy>

⁷ <https://www.eurelectric.org/media/6070/designed-slides-connecting-the-dots.pdf>

⁸ [metals-for-clean-energy.pdf \(eurometaux.eu\)](https://www.eurometaux.eu/metals-for-clean-energy.pdf)

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https://rmis.jrc.ec.europa.eu/uploads/CRMs_for_Strategic_Technologies_and_Sectors_in_the_EU_2020.pdf

¹⁰ https://www.transportenvironment.org/wp-content/uploads/2022/05/TE_LCA_Update-June.pdf

mentioning in this context that +80% of the power generation capacities in the EU-27 in 2030 will be represented by clean sources¹¹.

- **EVs emit less fine particulate matter than ICEs:** The assertion that EVs emit more particulate matter (PM) from brakes and tyres due to their higher weight is demonstrably false. In fact, EV drivers have to use the brakes much less due to their ability to rely on regenerative braking. And although heavier vehicles - regardless of their powertrain - tend to emit more PM from tyres, electric vehicles are often fitted with special tyres designed for their specific needs, including heavier weight¹². As a consequence, BEV passenger cars contribute less PM2.5 and PM10 than diesel or petrol cars. Overall, PM emissions are reduced by 6-42% on switching to a BEV from a conventional ICE car, depending on the size of the BEV¹³.

Dear Commissioner, there are undoubtedly challenges that remain to be addressed in making e-mobility the norm for new vehicles by 2035 - but let's not use these to open the door for reversing a historic decision. We count on you to instead deliver ambitious and evidence-based legislative proposals to address any remaining bottlenecks ahead of 2035, and stand ready to work with you and the Commission in creating the right enabling conditions for a successful ICE phase-out by 2035.

Yours sincerely,

The co-signatories:



¹¹ <https://powerbarometer.eurelectric.org/>

¹² <https://www.continental-tires.com/car/tire-knowledge/tire-basics/electric-vehicle-tires>

¹³

<https://www.transportenvironment.org/discover/electric-vehicles-are-far-better-combustion-engine-cars-when-it-comes-air-pollution/>