Comments from the Spanish Office for Climate Change to the "***Impact Assessment of the Revision of the CO2 emission standards for cars and vans"***:

Comments

Issue 1: Flexibility, simplification and reduction of administrative burden

Regarding the use of potential revenues from excess emissions premiums (available from 2027 onwards), the OECC/Spain considers that these revenues should be specifically directed towards BEVs (Battery Electric Vehicles), without adhering to the principle of technological neutrality. This is because, within the light vehicle segment, BEVs represent the most mature and cost-efficient technology, effectively accelerating the transition process and constituting the most effective solution for reducing CO_2 emissions.

Issue 2: 2035 CO2 emission targets

Spain's position has consistently been that the 2035 target must remain unchanged, in order to ensure long-term security and predictability throughout the entire value chain of a key sector for the EU, which is also the largest emitter of greenhouse gases. Maintaining this target is essential to achieving the long-term goal of climate neutrality by 2050.

Strengthening electric technology is essential. Regarding PHEVs (Plug-in Hybrid Electric Vehicles), their contribution should be limited, as several studies have shown that real-world fossil fuel consumption—and therefore emissions—is higher than theoretical values, since it depends on consumer behaviour patterns. Consequently, this discrepancy could hinder genuine progress towards achieving climate neutrality. PHEVs may play a limited role in the medium term; however, given their dependence on user behaviour, they should not be considered as a long-term solution.

Issue 3: Role of fuels

We consider that BEVs are the most mature, cost-efficient technology and the one that most effectively accelerates the transition process, being the most effective option for reducing CO_2 emissions. Nonetheless, 100% renewable fuels of non-biological origin (RFNBOs) have a relevant role to play in the transport sector, particularly in applications that are difficult to electrify, or as a complementary tool to accelerate decarbonization objectives.

These new fuels should be used exclusively in internal combustion engines specifically designed or adapted for such fuels. Other approaches, such as blending different fuels within the same engine, would blur the results of transport decarbonization, as it is not possible to ensure the actual carbon footprint of the mix due to dependence on the final consumer's choices — as has occurred in the case of PHEVs.