

The “Automotive Package” from a consumer perspective

The ADAC supports the legal requirement for climate neutrality in transport. Climate protection is non-negotiable for us. This requires a regulatory framework that is technology-neutral and consumer-friendly. The “Automotive Package” provides important impetus, but needs to be refined in key areas to ensure freedom of choice, practicality and affordability.

Further liberalisation is needed to ensure consumers retain genuine choice. Technological openness must be reflected in the regulations by incorporating alternative fuels earlier and more effectively. Crediting towards CO₂ fleet targets should be consistent with RED and ETS2. The existing vehicle fleet can also benefit from earlier crediting. Last but not least, to provide further market impetus, the reform of the Energy Taxation Directive (ETD) should be implemented promptly so that alternative fuels can be granted tax incentives with legal certainty.

Furthermore, the assessment methodology of the fleet regulation needs to be further developed. To realistically reflect climate impacts, the current tailpipe measurement should be gradually replaced by a well-to-wheel approach, which will transition to a comprehensive life-cycle analysis in the medium term.

Plug-in Hybrid Electric Vehicle (PHEVs) and Range-Extended Electric Vehicles (REEVs) make it easier for many consumers to make the switch to electric mobility. They should therefore be taken into account in fleet regulation under realistic CO₂ targets. Tax incentives should boost the share of electric driving.

For ETS2, socially acceptable implementation is essential. The CO₂ price must be accompanied by sufficient financial relief for consumers. At the same time, the supply of renewable energy in road transport must increase so that sufficient alternatives to fossil fuels are available.

Rigid electrification quotas for corporate fleets from 2030 onwards do not make sense due to heterogeneous usage profiles. Instead, targeted incentives should be provided for charging infrastructure, grid connection and the tax framework to facilitate the transition.

For electric mobility to be widely accepted, a faster expansion of the charging infrastructure, transparent and fair prices, and reliable service quality are essential. The AFIR review should be brought forward to allow for early course correction.

People are sensitive to restrictions on their mobility, which is why the transition can only succeed with practical, consumer-oriented and technology-neutral solutions.



ADAC's key demands regarding the "Automotive Package"

1. Embed technology neutrality

- Alternative fuels (e-fuels, biofuels) must be given greater consideration in the regulation of new vehicles at an earlier stage.
- Counting towards CO₂ fleet targets can secure investments – provided that fleet targets, RED, ETD and ETS2 are consistently interlinked.
- Alternative fuels are also crucial for existing vehicles.

2. Assess CO₂ holistically

- Transition from tailpipe measurements to well-to-wheel and, in the long term, life cycle assessment.
- Regulations should reflect the full potential for CO₂ reduction.

3. Provide incentives for PHEVs and REEVs

- Inclusion in fleet regulations where minimum range and CO₂ benefits are met.
- Incentives rather than penalties: create better incentives for electric vehicle use.

4. Implement ETS2 in an affordable manner

- More room for national measures to help consumers.
- Acceptance of the carbon price depends on adequate relief for consumers and the availability of renewable energy.

5. Electrify corporate fleets in a practical manner

- Different usage profiles (e.g. workshop, rental and trailer vehicles) require flexible solutions.
- Instead of coercion: create positive incentives for charging infrastructure, grid connection and the tax framework.

6. Review AFIR swiftly – strengthen consumer protection

- Expand charging infrastructure rapidly, comprehensively and competitively.
- Avoid monopoly-like structures, non-transparent prices and inadequate services.
- Accelerate the AFIR review – focus on user-friendliness and consumer protection.

7. Prerequisites for acceptance and effectiveness

- Mobility restrictions affect consumers particularly acutely.
- Transformation will only succeed if it is consumer-oriented, practically feasible and technology-neutral.
- The European Commission should launch initiatives in the near future to accelerate the expansion of charging infrastructure and increase the use of renewable energy.
- RED and AFIR require more ambitious and consumer-friendly requirements.

