

IIGCC RESPONSE TO EUROPEAN COMMISSION CONSULTATION ON EU EMISSIONS TRADING SYSTEM

The Institutional Investors Group on Climate Change (IIGCC) is the European membership body for investor collaboration on climate change and the voice of investors taking action for a prosperous, low-carbon future. IIGCC has more than 270 members, mainly pension funds and asset managers, across 16 countries, with over €35 trillion in assets under management.

Our mission is to mobilise capital for the low-carbon transition and to ensure resilience to the impacts of a changing climate by collaborating with business, policy makers and fellow investors. IIGCC works to support and help define the public policies, investment practices and corporate behaviors that address the long-term risks and opportunities associated with climate change. Members consider it a fiduciary duty to ensure stranded asset risk or other losses from climate change are minimised and that opportunities presented by the transition to a low-carbon economy – such as renewable energy, new technologies and energy efficiency – are maximised. For more information visit www.iigcc.org and @iigccnews.

Section 1 of the consultation questionnaire: Objectives

CO2 standards drive innovations in low and zero emission automotive technologies, which are of key importance for Europe’s future industrial leadership. They make more low and zero emission vehicles and models available to consumers, which could have a positive impact on the price for such vehicles. Therefore, the Commission is working to revise the CO2 standards for cars and vans set out in Regulation (EU) 2019/631, together with other relevant legislative measures to deliver on the increased climate ambition.

Question 1: In your view, how important are the following objectives for the future cars and vans CO2 legislation? On a scale from 1-5, with 5 representing the highest importance and 1 no importance.

	1	2	3	4	5
<i>Reducing CO2 emissions from cars and vans to implement the overall emissions reduction target of at least 55% by 2030 and the climate neutrality objective by 2050</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Promoting the market uptake of zero-emission vehicles and boosting their supply so that they become more affordable</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Strengthening the competitiveness, industrial leadership, innovation and stimulate employment in the EU automotive value chain</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Reducing total costs of ownership for consumers</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Contributing to reducing air pollution</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Reducing EU’s energy consumption and import dependence</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IIGCC’s overall position is to seek increase the uptake of zero emission vehicles and hence our responses to the above relate specifically to addressing the affordability for zero emission vehicles and not internal combustion engine (ICE) vehicles.

Hence, IIGCC’s response above regarding “reducing total costs of ownership for consumers” relates only to zero emission vehicles and not internal combustion engine (ICE) vehicles. It is noted that

affordability will be improved by “boosting supply of these vehicles” by leveraging economies of scale, which is limited at the moment given the low production volumes of electric vehicles compared to ICE vehicles.

Section 2 of the consultation questionnaire: Future CO2 emissions targets for cars and vans

Regulation (EU) 2019/631 currently sets the following new vehicle fleet average CO2 targets compared to 2021 levels: 15% reduction for both new cars and vans from 2025 on and 37.5% and 31% reduction for new cars and vans respectively from 2030 onwards. However, in light of the proposed increased ambition of the EU’s greenhouse gas emission targets for 2030 and the objective of achieving climate neutrality by 2050, the Commission will revisit and strengthen the CO2 emission standards for cars and vans for 2030 as underlined in the Communication on stepping up the EU’s 2030 climate ambition.

Question 2.1: In your view, how important are the following actions related to the future CO2 emission target levels for cars and vans to be presented in June 2021? On a scale from 1-5, with 5 representing the highest importance and 1 no importance.

	1	2	3	4	5
<i>Strengthening the 2025 CO2 emission targets for cars</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Strengthening the 2025 CO2 emission targets for vans</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Strengthening the 2030 CO2 emission targets for cars</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Strengthening the 2030 CO2 emission targets for vans</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Setting stricter CO2 emission targets for new cars and vans for 2035</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Setting stricter CO2 emission targets for new cars and vans for 2040</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IIGCC supports the strengthening of CO2 emission targets for both cars and vans in the period before 2030. The reason for this is to promote early action in the development of electric vehicles and to avoid the extension of intermediation solutions like hybrid vehicles (48V, HEV, PHEV).

The Communication on stepping up the EU’s 2030 climate ambition highlights that to achieve climate neutrality and ensure that sectors with emissions that are more difficult to abate have access to sufficient quantities of renewable and low carbon fuels, conventional cars will need to gradually be displaced by zero emissions vehicles.

Question 2.2: In your view, in order to contribute to the climate neutrality by 2050 objective, by when should CO2 standards become so strict that all new cars/vans are zero- emission vehicles?

	By 2035	By 2040	After 2040	The CO2 standards should not become so strict that all new vehicles are zero-emission
For cars	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
For vans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In order to contribute to the climate neutrality by 2050 objective, by 2035, CO2 standards will need to become so strict that all new cars/vans are zero-emission vehicles as this would imply that the entire vehicle fleet would be zero emissions by 2050 given the average vehicle is on the road for 12 years. IIGCC members have also expressed support for a more stringent date than the options

provided, so that well before 2035 CO2 standards are so strict that all new cars/vans are zero-emission vehicles.

Question 2.3: Please indicate to what extent you agree with the following statements: On a scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
<i>The same targets should remain applicable for 5 years before being strengthened, as in the current legislative framework</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>The targets should be strengthened every year.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>In case targets become stricter more frequently, additional flexibility should be provided as regards annual compliance. For instance with banking and/or borrowing, so that overachievement in a given year can be carried over to subsequent years and/or underachievement in a given year can be compensated by overachievement in subsequent years.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Some IIGCC members expressed support for any target that remains applicable for 5 years before being strengthened to be net zero aligned. There is some uncertainty over whether a 50% reduction in vehicle emissions by 2030 (compared to 2021 levels) is sufficient enough for net zero.

Some IIGCC members have expressed support for the strengthening of annual targets which could help to minimise any last-minute approaches to compliance and reduce a pollution legacy from high emitting vehicles. However any strengthening of annual targets should consider whether automakers have sufficient time to organise their R&D and capital expenditure and any renegotiation of annual targets should be avoided, as this could provide uncertainty to original equipment manufacturers.

Some members have voiced concerns about changing the 2025 target at this stage, because it is too soon for the industry to make changes to the plans they have in place for the existing target.

In addition, a banking and/or borrowing approach could also create a gaming style environment, which may be counterproductive.

Section 3 of the questionnaire: Incentivizing zero-and low-emissions vehicles

The following questions relate to specific elements aimed to enhance the uptake of zero- and low-emission vehicles (ZLEV) such as plug-in hybrid vehicles, battery electric vehicles and fuel cell electric vehicles. In order for the CO2 emission targets legislation for cars and vans to contribute to the 2030 - 55% target and the 2050 climate neutrality objective, it has to provide a strong incentive for the deployment of ZLEV.

Question 3.1: In your view, what are the main barriers for market uptake of zero-emission vehicles?

- Price of zero-emission vehicles
- Price-quality of ratio of key components like batteries
- Availability of recharging/refueling infrastructure
- Limited range

Availability of vehicles models

Question 3.2: For the period up to 2030, please indicate to what extent you agree with the following statements on the incentive system for cars and vans: Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
Overall:					
<i>In addition to the CO2 targets, a mechanism incentivising zero- and low- emission vehicles should be maintained</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicles eligible for the incentive system:					
<i>Only zero emission vehicles</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>All vehicles with emission below 50 g CO2 /km (as in the current Regulation)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Only vehicles with emissions below a lower threshold than 50 g CO2/km</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incentive type:					
<i>The one-way crediting system¹ should be maintained in its current form</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>The one-way crediting system¹ should be replaced with an obligation for each manufacturer to register a certain share of ZLEV (i.e. mandate)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Link with the CO2 target					
<i>The ZLEV benchmark/mandate levels should be adapted to the new targets. In particular, the benchmark levels should increase when targets levels are increased</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IIGCC would like to highlight that auto manufacturers will need to focus on the production of electric vehicles in order to support the achievement of a high level of emissions reductions. Incentives for other vehicles, including hybrids, would likely compromise progress made towards net zero.

Question 3.3: For the period after 2030, please indicate to what extent you agree with the following statements on the incentive system for cars and vans. Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
Overall:					
<i>In addition to the CO2 targets, a mechanism incentivising zero- and low- emission vehicles should be maintained</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicles eligible for the incentive system:					
<i>Only zero emission vehicles</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>All vehicles with emission below 50 g CO2 /km (as in the current Regulation)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Only vehicles with emissions below a lower threshold than 50 g CO2/km</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incentive type:					
<i>The one-way crediting system¹ should be maintained in its current form</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹ In addition to the binding CO2 emission targets for manufacturers, Regulation (EU) 2019/631 contains a mechanism to incentivise the deployment of ZLEV, which are defined as vehicles with tailpipe CO2 emissions between 0 and 50 g/km. A

<i>The one-way crediting system¹ should be replaced with an obligation for each manufacturer to register a certain share of ZLEV (i.e. mandate)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Link with the CO2 target:					
<i>The ZLEV benchmark/mandate levels should be adapted to the new targets. In particular, the benchmark levels should increase when targets levels are increased</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 3.4: Do you have any additional comment on the ZLEV incentive system?

IIGCC would like to highlight caution regarding any incentive system promoting the sale of intermediate solutions such as hybrids (48V, HEV) or plug-in hybrids (PHEV). This could delay ambitious action since this would bring focus on temporary solutions that are unlikely to comply with emissions limits in the period after 2030.

Section 4 of questionnaire: Contribution of renewable and low carbon fuels

Under Regulation (EU) 2019/631, compliance of a manufacturer with its specific emission target is assessed against the average CO2 emissions of its fleet as measured under the Worldwide Harmonised Light Vehicle Test Procedure (WLTP).

Other EU policies incentivise the deployment of renewable and low carbon fuels in transport, as detailed in the Communication on stepping up the EU's 2030 climate ambition. They include for instance the Renewable Energy Directive, the Energy Taxation Directive, to be revised in June 2021, the upcoming specific initiatives promoting sustainable aviation and maritime fuels, a possible expanded emissions trading system.

Question 4.1: To what extent do you agree with the following statements? Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
<i>A mechanism should be introduced in the CO2 emission standards for cars and vans so that compliance assessment for each manufacturer takes into account the contribution of renewable and low carbon fuels</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>The policies to decarbonize fuels and reduce emissions from cars and vans must remain in separate legal instruments</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IIGCC would like to highlight that some members are concerned that an assessment or system that considers the manufacturer's contribution of renewable and low carbon fuels would likely create

"one-way" crediting system is introduced from 2025 on. This means that the specific CO2 emission target of a manufacturer will be relaxed if its share of ZLEV, expressed as a percentage of its total number of vehicles registered in a given year, exceeds the benchmarks set out in the Regulation. Exceeding the benchmark level by one percentage point will decrease the manufacturer's CO2 target (in g CO2/km) by one percent, and this target relaxation is capped at a maximum of 5%. Manufacturers who do not meet the ZLEV benchmark face no consequences.

For calculating the share of ZLEV in a manufacturer's fleet to be compared against the benchmark levels, an accounting rule applies, which gives a greater weight to ZLEV with lower emissions. In addition, during the period 2025 to 2030 and for cars only, a multiplier of 1.85 is applied for counting ZLEV registered in those Member States which had the lowest ZLEV share in 2017

overcomplexity and send the wrong or confusing signals to car manufacturers. Car manufacturers need clear signals from policymakers that are focussed on incentivising auto manufacturers to produce electric vehicles.

Question 4.2: If a system to account for renewable and low carbon fuels is introduced when assessing compliance, please indicate to what extent you agree with the following statements: Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement.

	1	2	3	4	5
With regards to the effects:					
<i>Such system will ensure a holistic approach to road transport decarbonisation</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>More renewable and low-carbon fuels will be made available for road transport</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>More renewable and low-carbon fuels in road transport will come at the expense of the availability of those fuels for other sectors/transport modes which face steeper challenges to decarbonize (e.g. aviation/ maritime)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>This will be incompatible with EU efforts to increase efficiency and reduce energy consumption</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Such system will no longer ensure clear and distinct responsibilities and accountability for vehicles manufacturers and fuels suppliers</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>This could weaken the signal for innovations that are needed to make vehicles on the road zero-emission in time for the EU's 2050 climate neutrality</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The CO2 emission standards for cars and vans should be tightened more rapidly in order to maintain the overall level of ambition</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Air pollution co-benefits would not be achieved in the same degree</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
With regards to the design of the mechanism:					
<i>Only renewable and low-carbon fuels actually used in cars and vans in a particular year should be taken into account to assess compliance with CO2 emission standards for these types of vehicles</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>To avoid double counting, renewable and low-carbon fuels should be counted either towards the targets set in fuels related legislation or to assess compliance under the CO2 emission standards for cars and vans</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Renewable and low-carbon fuels should be counted according to their actual greenhouse gas emission savings over the whole lifecycle</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>All renewable and low-carbon fuels (such as sustainable biogas, biomethane and biofuels, renewable and low-carbon hydrogen or synthetic fuels) should be taken into account, as long as they meet the minimum sustainability criteria set under the Renewable Energy Directive</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Only the renewable and low-carbon fuels with the highest greenhouse gas emission savings should be taken into account</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IIGCC would like to highlight that members would not support such a mechanism however designed, and also to highlight some of the negative impacts that such a mechanism could have.

Question 4.3: Do you have any additional comments, views, information on the possible introduction of a system to account for renewable and low carbon fuels when assessing compliance with the vehicle CO2 standard?

IIGCC did not respond to this question given the lack of support voiced by members for the introduction of such a system.

Section 5 of the consultation questionnaire: Allocation of the excess emissions premiums

Under Regulation (EU) 2019/631, manufacturers whose average specific emissions of CO2 exceed their specific targets should pay excess emission premiums, whose amounts is considered as revenue for the general budget of the Union, without a specific destination for the spending of the recovered money.

Question 5.1: In your view, how should these excess emission premiums be allocated?

- They should continue to be considered as revenue for the general budget of the Union
- They should be allocated to a new or existing specific fund or a relevant programme, with the objective to ensure a just transition towards a climate- neutral economy, in particular to support re-skilling, up-skilling and other skills training and reallocation of workers in the automotive sector
- Other (please briefly specify)

The lower ‘job density’ of electric vehicles compared to internal combustion engine vehicle could present a barrier for action on electric vehicles by governments. IIGCC members have suggested that this could be partly funded through the emission premiums that are considered as revenue for the general budget of the Union, from manufacturers paying excess premiums.

Section 6 of the consultation questionnaire: Other elements of the regulatory approach

Regulation (EU) 2019/631 includes a monitoring and reporting system and flexibilities allowing a more cost- effective implementation, such as the possibility for pooling, credits for the uptake of eco-innovations, an exemption for very small manufacturers, and a derogation possibility for small volume manufacturers.

Question 6.1: In your opinion, do any of the following provisions need to be changed?

	Yes	No	Neutral
Monitoring and reporting provisions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Eco innovation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pooling	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exemption for manufacturers registering less than 1,000 vehicles per year	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Small Volume derogations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IIGCC would like to highlight support for the phase out provisions for pooling, the exemption for manufacturers registering less than 1,000 vehicles per year and small volume derogations. Whilst some IIGCC members would support the continuation of provisions for eco innovation, this should not be a subordinate agenda to incentivising the deployment of electric vehicles.

Section 7 of the consultation questionnaire: Impacts

Question 7.1: Do you agree with the following statements on the likely impacts of strengthened CO2 standards for cars and vans? Scale from 1 to 5 where 5 is highest agreement and 1 is no agreement. Not all statements need to be rated.

	1	2	3	4	5
<i>The EU automotive industry will increase investments in zero- emission technologies</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The competitiveness of the EU automotive industry on the global market will be increased</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Lower income social groups will benefit from an economic perspective thanks to lower cost of ownership of a car (for example reduced upfront cost of EVs, reduced energy/fuel costs)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Macroeconomic benefits can be expected, on both GDP and jobs</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Job losses in the automotive value chain can be expected as a result of decreasing production of conventional powertrains</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>New skills and qualifications for workers in the automotive value chain will be needed</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Co-benefits in terms of better air quality, especially in urban areas, can be expected</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Co-benefits in terms of energy dependency can be expected</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 7.2: Which other impacts are relevant in your opinion?

IIGCC did not respond to this question in the consultation.

Question 7.3: What additional measures should be set up to ensure a socially acceptable and just transition towards zero-emission mobility, taking into account its social effects throughout the whole automotive value chain in particular in those regions particularly dependent on automotive jobs?

IIGCC would like to highlight that as there may be potential job losses in certain regions dependent on automotive jobs for employment and so the Commission should consider how they can retrain workers.