

EUROPEAN MARKET MONITOR

CARS AND VANS: OCTOBER 2025

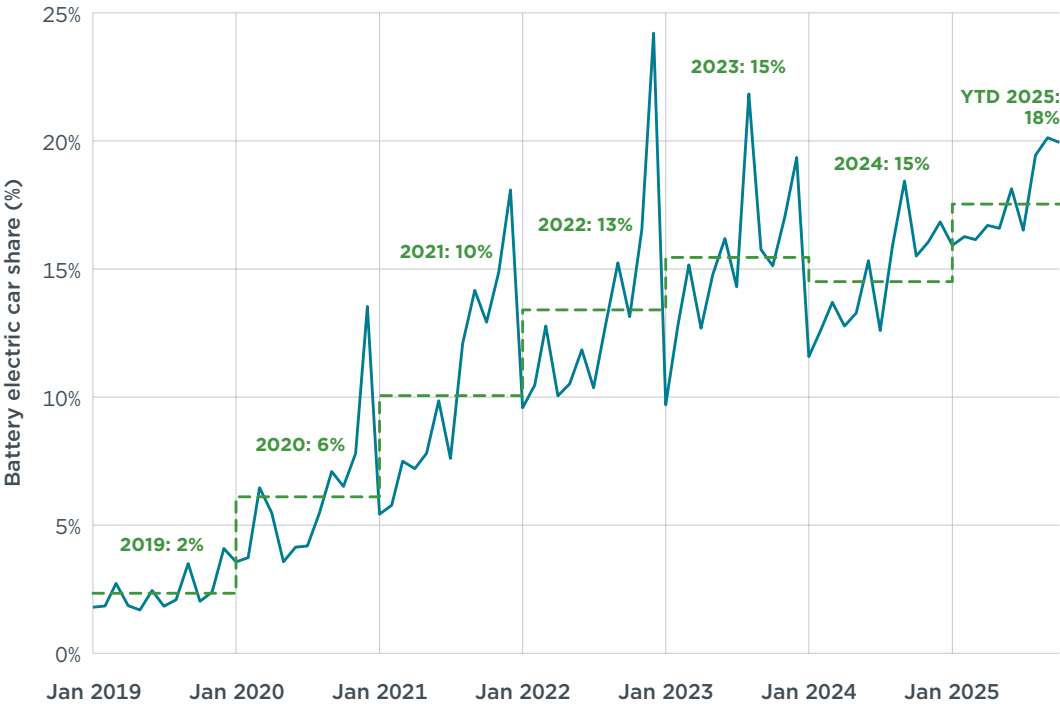
PASSENGER CAR REGISTRATIONS

The share of battery electric vehicles (BEVs) among total new registrations in Europe averaged 20% in October 2025, the same as in September. After forming a new manufacturing pool with BYD, the Nissan pool again led in BEV sales shares in October with 29%, followed by the BMW and Mercedes-Volvo-Polestar-Smart pools at 28% each. The Volkswagen, Hyundai, and Kia pools all averaged 21% while the Tesla and Renault pools (16%) and SAIC (15%) were below the European average.

For 2025 year-to-date (YTD), the BEV share increased to 18%, which represents an increase of 4 percentage points compared with the same period in 2024. Several manufacturing pools had significant increases in BEV shares in 2025 YTD versus the same period in 2024. Kia (20%) and the Volkswagen pool (19%) each recorded an 8 percentage-point increase, while BEV shares for the Hyundai pool (18%) increased 7 percentage points. By contrast, SAIC stood out with a drop in BEV share from 35% in January-October 2024 to 14% in 2025 YTD. Plug-in hybrid electric vehicles (PHEVs) had an average market share among new registrations in Europe of 9% in 2025 YTD (up 2 percentage points over the same period in 2024), led by the Mercedes-Volvo-Polestar-Smart pool (24% share). For full hybrid electric vehicles (HEVs), SAIC (43%), the Renault pool (29%), and the Nissan pool (25%) recorded the largest shares in 2025 YTD. In the mild hybrid electric vehicle (MHEV) segment, the BMW and Mercedes-Volvo-Polestar-Smart pools led in registration shares in 2025 YTD, at 37% and 36%, respectively.

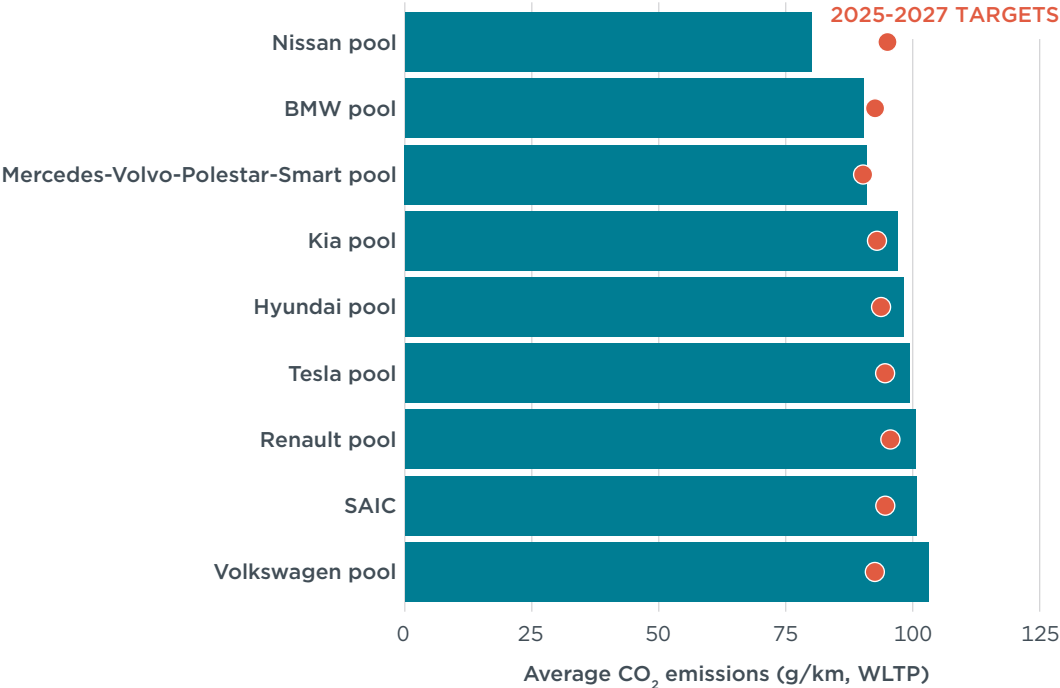
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Figure 1
Share of battery electric vehicles in new passenger car registrations in Europe



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Figure 2
Average CO₂ emissions of manufacturer pools and individual manufacturers compared with estimated 2025–2027 targets, 2025 YTD



Note: Includes compliance credits. All CO₂ values are estimates according to the Worldwide harmonized Light vehicles Test Procedure (WLTP). Only manufacturer pools and individual manufacturers with at least 1% market share YTD are shown. See the section on definitions, data sources, methodology, and assumptions for more information.

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Carbon dioxide (CO₂) emissions among manufacturer pools averaged 99 g CO₂/km in 2025 YTD. Manufacturing pools thus remain 6 g CO₂/km from the average target of 92 g CO₂/km for the 2025–2027 period. Compared with the previous month, nearly all of the manufacturer pools reduced their target gap by 1 g CO₂/km. The newly formed Nissan pool and the BMW pool are currently in compliance with their 2025–2027 targets (15 and 2 g CO₂/km below the target, respectively), while the Mercedes-Volvo-Polestar-Smart pool is 1 g CO₂/km short of meeting its target. The Volkswagen pool remains the furthest behind, exceeding its target by 11 g CO₂/km.

Looking at individual car brands with market shares of 1% or greater, Tesla and BYD had the greatest over-compliance at 91 and 82 g CO₂/km below their projected brand-level average targets for 2025–2027, respectively, followed by Volvo (30 g CO₂/km below), Mini (17 g CO₂/km below) and Cupra (16 g CO₂/km below). Nissan (30 g CO₂/km above), SEAT (25 g CO₂/km above), Mazda (22 g CO₂/km above), and Audi (22 g CO₂/km above) currently have the largest target gaps. Mazda reduced its target gap by 3 g CO₂/km and Ford and MG reduced their target gaps by 2 g CO₂/km each compared with the previous month.

Table 1

Share of battery electric, plug-in hybrid, full hybrid, and mild hybrid passenger cars by manufacturer pool or manufacturer

Manufacturer or manufacturer pool	Oct 2025				Jan–Oct 2025				Jan–Oct 2024				2024			
	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV
Nissan pool	29%	24%	21%	15%	26%	16%	25%	20%	21%	1%	34%	27%	21%	2%	33%	26%
BMW pool	28%	16%	0%	38%	26%	15%	0%	37%	22%	14%	0%	32%	22%	14%	0%	33%
Mercedes-Volvo-Polestar-Smart pool	28%	25%	0%	34%	24%	24%	0%	36%	26%	24%	0%	33%	26%	24%	0%	33%
Volkswagen pool	21%	12%	0%	13%	19%	10%	0%	14%	11%	6%	0%	13%	12%	6%	0%	13%
Hyundai pool	21%	6%	23%	11%	18%	6%	21%	13%	11%	4%	19%	19%	11%	4%	20%	18%
Kia pool	21%	4%	20%	12%	20%	6%	16%	14%	12%	9%	16%	18%	12%	9%	16%	17%
AVERAGE	20%	11%	13%	22%	18%	9%	13%	23%	14%	7%	12%	19%	15%	7%	12%	20%
All other brands	16%	27%	5%	9%	13%	23%	3%	11%	10%	19%	2%	16%	10%	21%	2%	16%
Tesla pool	16%	6%	21%	36%	14%	5%	20%	33%	13%	4%	21%	23%	14%	4%	21%	23%
Renault pool	16%	1%	29%	8%	12%	1%	29%	9%	7%	0%	21%	7%	8%	0%	21%	8%
SAIC	15%	11%	53%	0%	14%	9%	43%	0%	35%	3%	10%	0%	31%	3%	17%	0%

Note: Only manufacturer pools and individual manufacturers with at least 1% market share YTD are shown.

Table 2

Fleet-average CO₂ emissions of new passenger cars and market share by manufacturer pool or manufacturer

Manufacturer or manufacturer pool	Target gap	New car fleet-average CO ₂ (in g/km)								Market share YTD 2025
		Oct 2025	2025 YTD	Compliance credits	Adj. YTD 2025	Reference target 2025–2027	Compliance credits	Target 2025–2027	Target gap	
		WLTP	WLTP	Eco-innovations	WLTP	WLTP	ZLEV factor	WLTP	WLTP	
Nissan pool	–16%	66	81	0.6	80	90	1.05	95	–15	3%
BMW pool	–2%	87	91	1	90	88	1.05	93	–2	7%
Mercedes-Volvo-Polestar-Smart pool	1%	85	91	0.2	91	86	1.05	90	1	8%
Kia pool	4%	99	97	0.3	97	93	1	93	4	4%
Hyundai pool	5%	96	99	0.3	98	94	1	94	4	4%
Tesla pool	5%	97	100	1	99	95	1	95	5	31%
Renault pool	5%	96	102	1.2	101	96	1	96	5	11%
SAIC	7%	93	101	0	101	95	1	95	6	2%
AVERAGE	7%	94	99	0.7	99	92	1	92	6	
Volkswagen pool	11%	98	104	0.6	103	92	1.01	93	11	27%

Note: All CO₂ values are estimates according to the WLTP. Only manufacturer pools and individual manufacturers with at least 1% market share YTD are shown. See the section on definitions, data sources, methodology, and assumptions for details.

Table 3

Fleet-average CO₂ emissions of new passenger cars and market share by manufacturer group and brand

Manufacturer group/ brand	New car fleet-average CO ₂ (in g/km)								Market share YTD 2025
	Oct 2025	2025 YTD	Compliance credits	Adj. YTD 2025	Reference target 2025–2027*	Compliance credits	Target 2025–2027*	Target gap*	
	WLTP	WLTP	Eco- innovations	WLTP	WLTP	ZLEV factor	WLTP	WLTP	
Tesla	0	0	0	0	87	1.05	91	–91	2%
Tesla	0	0	0	0	87	1.05	91	–91	2%
BYD	12	9	0	9	87	1.05	91	–82	1%
BYD	12	9	0	9	87	1.05	91	–82	1%
Volvo Cars	48	54	0.1	54	86	1.05	90	–36	3%
Volvo	54	61	0.1	60	87	1.05	91	–30	2%
BMW Group	87	91	1	90	88	1.05	93	–2	7%
BMW	90	93	1	92	87	1.05	92	0	6%
Mini	74	81	1	80	92	1.05	97	–17	1%
Ford	92	111	1	110	91	1	91	18	3%
Ford	92	111	1	110	91	1	91	18	3%
Mazda	93	116	0.5	115	93	1	93	22	1%
Mazda	93	116	0.5	115	93	1	93	22	1%
SAIC Motor	93	101	0	101	95	1	95	6	2%
MG	93	101	0	101	95	1	95	6	2%
Renault Group	96	102	1.2	101	96	1	96	5	11%
Renault	82	93	1.1	92	94	1	94	–3	6%
Dacia	116	114	1.4	113	97	1	97	16	5%
Hyundai Group	98	98	0.3	98	93	1	93	4	8%
Hyundai	97	98	0.3	98	94	1	94	4	4%
Kia	99	97	0.3	97	93	1	93	4	4%
Volkswagen Group	98	104	0.6	103	92	1.01	92	11	27%
VW	95	102	0.4	101	92	1.02	93	8	11%
Škoda	98	103	0.4	102	93	1	93	10	7%
Audi	103	112	0.7	111	89	1.01	90	22	5%
Cupra	78	81	0.8	80	91	1.05	96	–16	2%
SEAT	122	123	1.7	121	97	1	97	25	2%
Toyota Group	99	97	0.5	96	95	1	95	1	7%
Toyota	99	97	0.5	96	95	1	95	1	7%
Stellantis	101	108	1.3	107	96	1	96	11	16%
Peugeot	93	103	1.2	102	95	1	95	7	5%
Citroën	101	108	1.6	106	96	1	96	10	3%
Opel/Vauxhall	103	107	1.6	106	96	1	96	10	3%
Fiat	111	120	0.9	119	99	1	99	20	3%
Jeep	108	108	1.4	107	94	1	94	13	1%
Mercedes-Benz Group	102	109	0.2	108	86	1.05	90	18	6%
Mercedes-Benz	104	110	0.2	110	86	1.05	90	20	5%
Suzuki	121	115	1.5	114	99	1	99	15	1%
Suzuki	121	115	1.5	114	99	1	99	15	1%
Nissan	121	123	0.9	122	93	1	93	30	2%
Nissan	121	123	0.9	122	93	1	93	30	2%

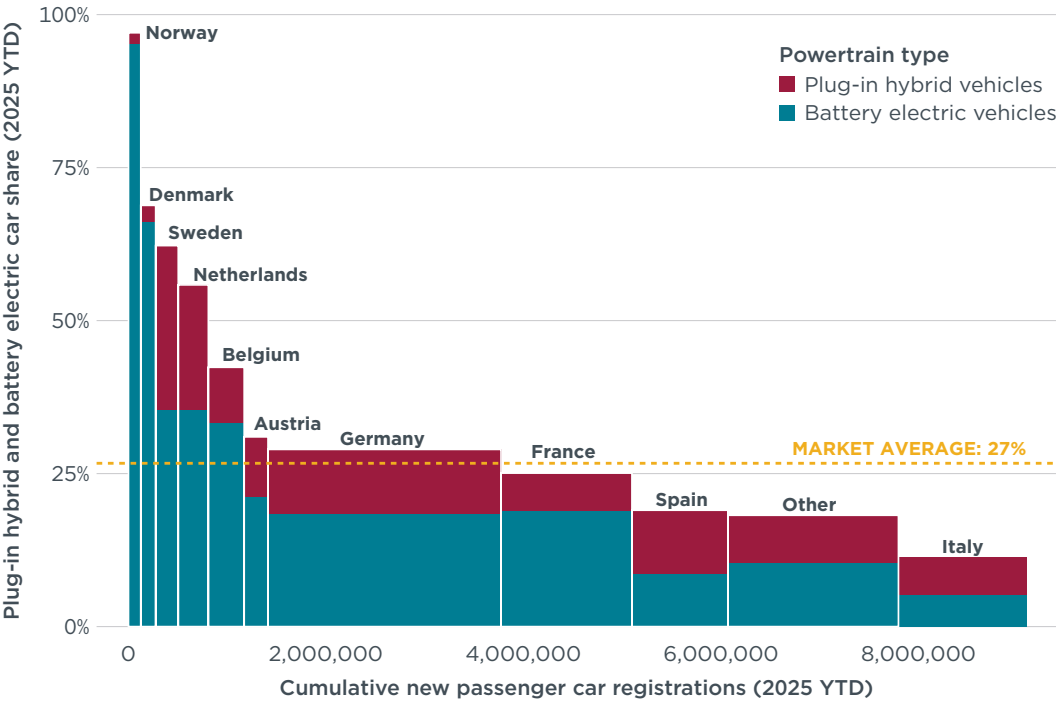
Note: Brand shares may not add up to manufacturer group totals, because only brands with at least 1% market share YTD are displayed in the table. Manufacturers are sorted by ascending fleet-average CO₂ emissions. All CO₂ values are estimates according to the WLTP. See the section on definitions, data sources, methodology, and assumptions for details.

* The CO₂ targets in the table are hypothetical only, as official targets are set at the manufacturer or manufacturer-pool level, not at the brand level.

PASSENGER CAR REGISTRATIONS BY COUNTRY

Between January and October 2025, total passenger car registrations among the major European markets grew the most in Spain (+15%) and Austria (+12%) compared with the same period in 2024, while registrations declined the most in Belgium (–9%) and France (–5%). In terms the largest markets by combined new BEV and PHEV registrations, Norway (97%), Denmark (69%), Sweden (62%), and the Netherlands (55%) all had combined shares above 50%. Belgium (42%), Austria (31%), and Germany (29%) also recorded combined BEV and PHEV market shares above the European average of 27%. Among the largest markets by total new passenger car registrations, BEV registration growth was strongest in Poland (+125%) and Spain (+89%) in 2025 YTD compared with the same period in 2024. Germany, the largest European passenger car market by new registrations, continued to see significant growth, with BEV registrations up 39% in 2025 YTD compared with the same period in 2024 and over 52,000 units registered in October alone. Similar to BEVs, registrations of PHEVs increased the most in Spain (+112%) and Poland (+96%) in 2025 YTD compared with 2024. Looking at the HEV market, shares of new registrations were the highest in France (23%) and Poland (22%) in 2025 YTD. Shares of MHEVs were highest in Italy (31%) and Poland (27%) in 2025 to date, and MHEVs gained popularity in France, where they made up 22% of new registrations, representing a 43% increase compared with the same period in 2024.

Figure 3
Share of plug-in hybrid and battery electric passenger cars by country, including market size (total new car registrations)



Note: The figure highlights the 10 largest markets by new BEV and PHEV registrations YTD. The “Other” category includes all remaining countries of the European Economic Area (EEA) not individually highlighted, except for Bulgaria, Liechtenstein, and Malta.

Table 4

New passenger car registrations by country

	Oct 2025	vs. Oct 2024	Jan-Oct 2025	vs. Jan-Oct 2024
Germany	250,133	8%	2,360,481	1%
France	139,514	3%	1,326,314	-5%
Italy	126,149	-1%	1,298,125	-3%
Spain	98,881	16%	971,637	15%
Poland	52,753	10%	481,080	8%
Netherlands	34,724	8%	304,626	-2%
Belgium	34,289	-7%	362,840	-9%
Austria	24,570	11%	241,424	12%
Sweden	24,292	-3%	229,059	5%
Czechia	23,298	11%	205,735	7%
Other	123,993	6%	1,357,642	5%
ALL	932,596	6%	9,138,963	2%

Table 5

New battery electric, plug-in hybrid, hybrid, and mild hybrid passenger car registrations by country

	Oct 2025				vs. Oct 2024				Jan-Oct 2025				vs. Jan-Oct 2024			
	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV
Germany	52,424	30,972	11,910	58,901	48%	60%	-10%	12%	434,547	248,949	114,746	559,247	39%	63%	7%	11%
France	34,109	9,428	30,054	28,735	63%	-13%	-3%	21%	250,428	82,239	302,907	286,781	5%	-25%	14%	43%
Netherlands	13,968	7,141	4,503	4,557	27%	43%	-1%	-6%	107,790	62,302	42,133	43,291	7%	41%	-2%	-9%
Belgium	12,365	3,528	4,047	6,811	-3%	-20%	14%	6%	120,717	33,034	40,704	76,702	11%	-46%	13%	22%
Spain	9,280	13,024	18,513	23,361	90%	151%	15%	23%	83,324	101,488	170,531	225,973	89%	112%	26%	28%
Sweden	8,743	7,133	2,152	3,118	0%	5%	3%	3%	81,052	61,554	19,048	30,590	8%	21%	-3%	17%
Italy	6,214	9,275	17,869	39,487	26%	115%	2%	8%	67,145	79,754	168,531	404,795	29%	77%	8%	9%
Austria	5,165	2,699	1,944	5,480	29%	51%	12%	13%	51,317	23,529	18,811	50,327	40%	65%	32%	31%
Poland	4,842	3,648	11,371	13,151	323%	120%	3%	11%	30,688	25,772	106,166	129,841	125%	96%	7%	20%
Czechia	1,263	1,005	2,184	3,274	-14%	89%	42%	34%	11,445	8,825	18,059	29,120	31%	80%	20%	26%
Other	36,624	10,098	13,607	20,939	19%	21%	14%	17%	356,780	105,542	154,062	227,300	30%	24%	8%	23%
ALL	184,997	97,951	118,154	207,814	36%	43%	3%	14%	1,595,233	832,988	1,155,698	2,063,967	26%	32%	12%	18%

Table 6

Share of new battery electric, plug-in hybrid, full hybrid, and mild hybrid passenger cars by country

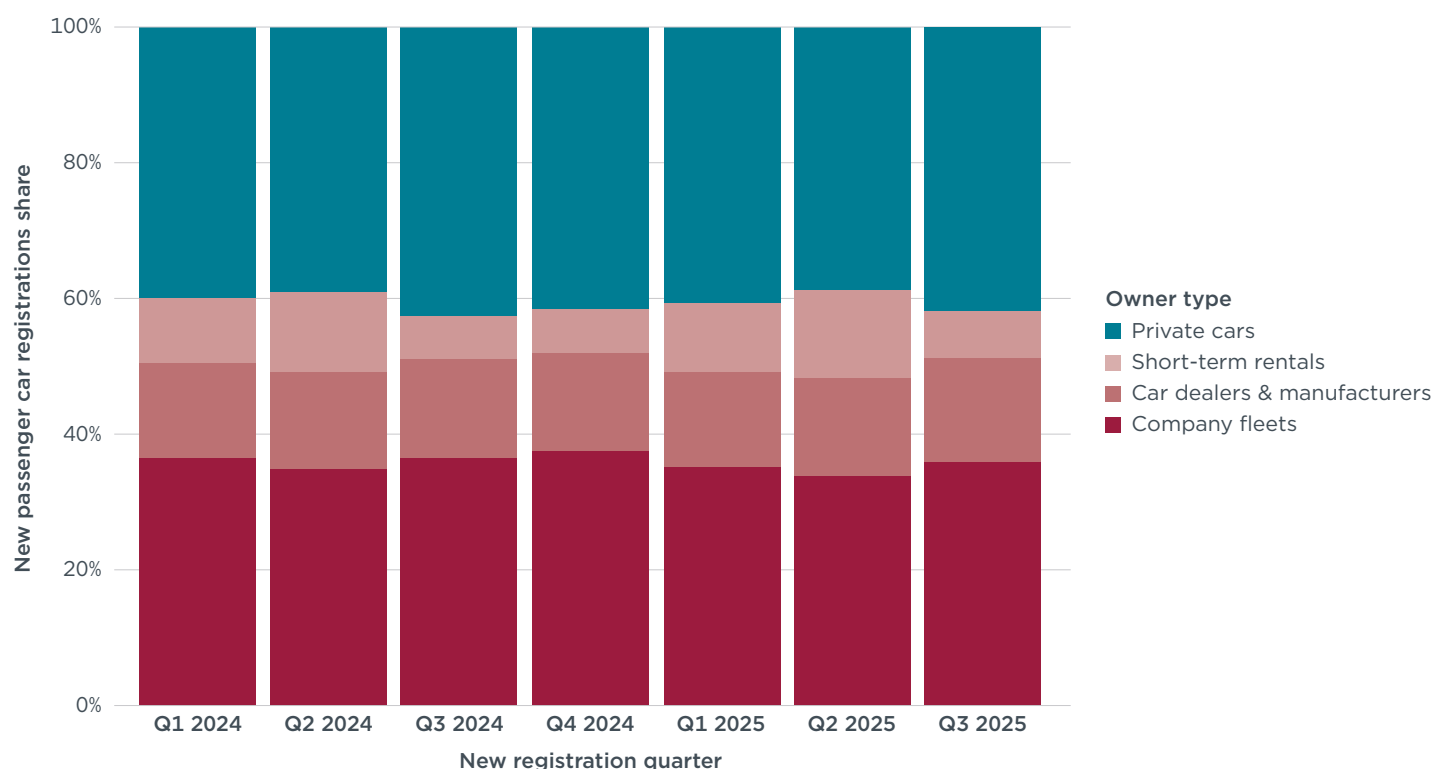
	Oct 2025				Jan-Oct 2025				Jan-Oct 2024				2024			
	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV	BEV	PHEV	HEV	MHEV
Netherlands	40%	21%	13%	13%	35%	20%	14%	14%	33%	14%	14%	15%	35%	14%	14%	14%
Belgium	36%	10%	12%	20%	33%	9%	11%	21%	27%	15%	9%	16%	28%	15%	9%	16%
Sweden	36%	29%	9%	13%	35%	27%	8%	13%	34%	23%	9%	12%	35%	23%	9%	12%
Other	31%	8%	11%	18%	27%	8%	12%	17%	22%	7%	11%	15%	23%	7%	11%	15%
France	24%	7%	22%	21%	19%	6%	23%	22%	17%	8%	19%	14%	17%	9%	19%	15%
Austria	21%	11%	8%	22%	21%	10%	8%	21%	17%	7%	7%	18%	17%	7%	7%	18%
Germany	21%	12%	5%	24%	18%	11%	5%	24%	13%	6%	5%	21%	14%	7%	5%	22%
AVERAGE	20%	11%	13%	22%	18%	9%	13%	23%	14%	7%	12%	19%	15%	7%	12%	20%
Spain	9%	13%	19%	24%	9%	10%	18%	23%	5%	6%	16%	21%	6%	6%	16%	21%
Poland	9%	7%	22%	25%	6%	5%	22%	27%	3%	3%	22%	24%	3%	3%	22%	24%
Czechia	5%	4%	9%	14%	6%	4%	9%	14%	5%	3%	8%	12%	5%	3%	8%	12%
Italy	5%	7%	14%	31%	5%	6%	13%	31%	4%	3%	12%	28%	4%	3%	12%	28%

PASSENGER CAR REGISTRATIONS BY OWNER

Company fleets (36%), car dealers and manufacturers (15%), and short-term rentals (7%)—all of which together are referred to as corporate fleets—made up 58% of the total new registrations in the third quarter of 2025, while private cars made up 42% of the market. Short-term rental registrations fluctuated more than other owner types, ranging from a 6% market share in Q3 2024 to nearly 13% of new registrations in Q2 2025.

Figure 4

New passenger car registrations by owner for 19 selected European countries



Note: Selected countries are listed in the “Definitions, data sources, methodology, and assumptions” section.

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SPOTLIGHT: ELECTRIC VEHICLE UPTAKE IN POLAND

Poland, the fifth largest European market by new passenger car registrations, has seen a surge in electric vehicle (EV) uptake in 2025. Year to date, new BEV registrations more than doubled compared with the same period last year. In October 2025, BEVs accounted for 9% of new registrations, a historic high and 7 percentage points above October 2024. Year to date, the BEV market share stood at 6%, up 3 percentage points from the same period in 2024 (Figure 5). Although its BEV share remained below the European average, Poland has now surpassed other major markets—specifically Italy (the third largest) and Czechia (the 10th largest)—since the beginning of 2025.

In February 2025—later updated in October 2025—the Polish government launched “NaszEauto” (“Our E-car”), an incentive program supporting the purchase, rental, and lease of new battery electric cars, vans, and small buses (up to 5 tonnes).¹ Applications can be submitted until the end of April 2026 or until the budget of zł 1.18

¹ “PSNM on the New Subsidy Program ‘NaszEauto,’” PSNM New Mobility Association, accessed November 25, 2025, <https://psnm.org/2025/information/psnm-on-the-new-subsidy-program-naszeauto/?lang=en>.

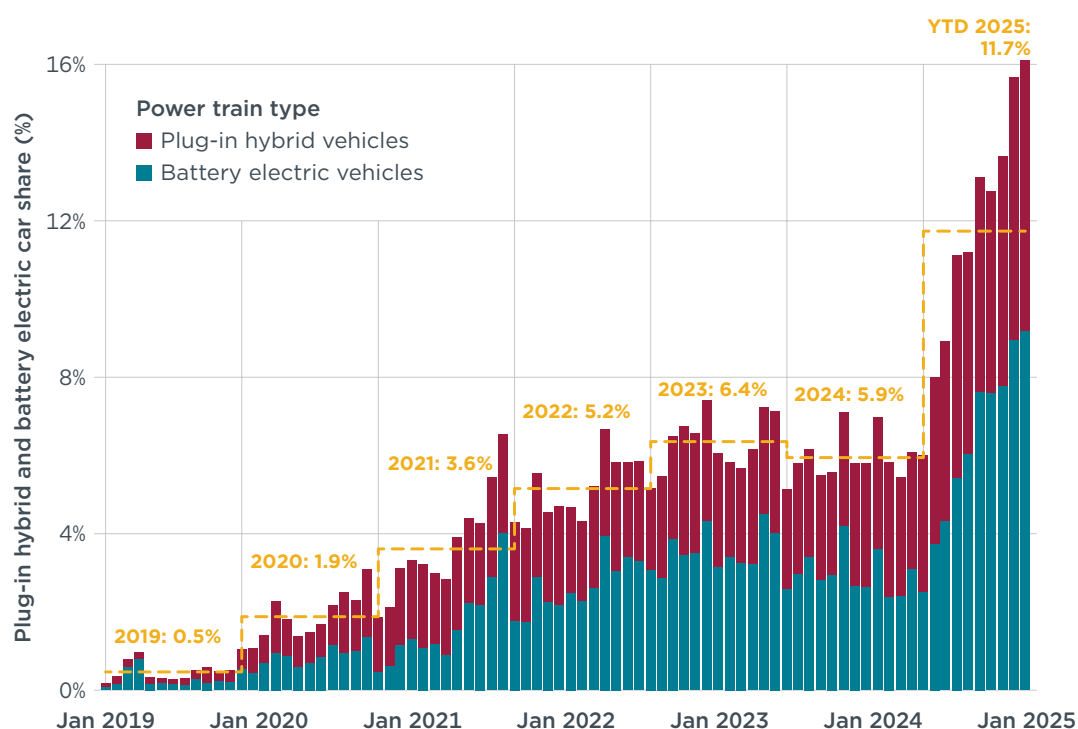
billion (approximately €0.28 billion) is exhausted. Eligible beneficiaries include private individuals, self-employed individuals, and select local government entities. The base incentive is zł 30,000 (about €7,000), with additional bonuses currently available to holders of the Large Family Card and to applicants who scrap an older internal combustion engine vehicle. In total, the subsidy can be as high as zł 40,000 (about €9,500) per car.² In the October revision, the bonus that was previously offered to lower income households was removed.³

Since its launch, monthly “NaszEauto” applications have trended upward, reaching a total of about 19,500 submitted applications by the end of October, with 72% for leasing and 28% for direct purchase.⁴ Complementing this momentum, a range of national and European programs are supporting the expansion of Poland’s public charging infrastructure, with a particular focus on fast charging stations along the TEN-T network.⁵ By October 1, 2025, there were about 6,500 fast public and semi-public chargers installed in Poland, marking an 83% increase compared with October 1, 2024 (Figure 6).

The authors thank Aleksander Rajch from the Polish New Mobility Association (PSNM), who provided key input on policy and market developments in Poland.

Figure 5

Share of plug-in hybrid and battery electric vehicles in new passenger car registrations in Poland



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² “O Programie” [About the program], NaszEauto, accessed November 25, 2025, <https://naszeauto.gov.pl/o-programie>.

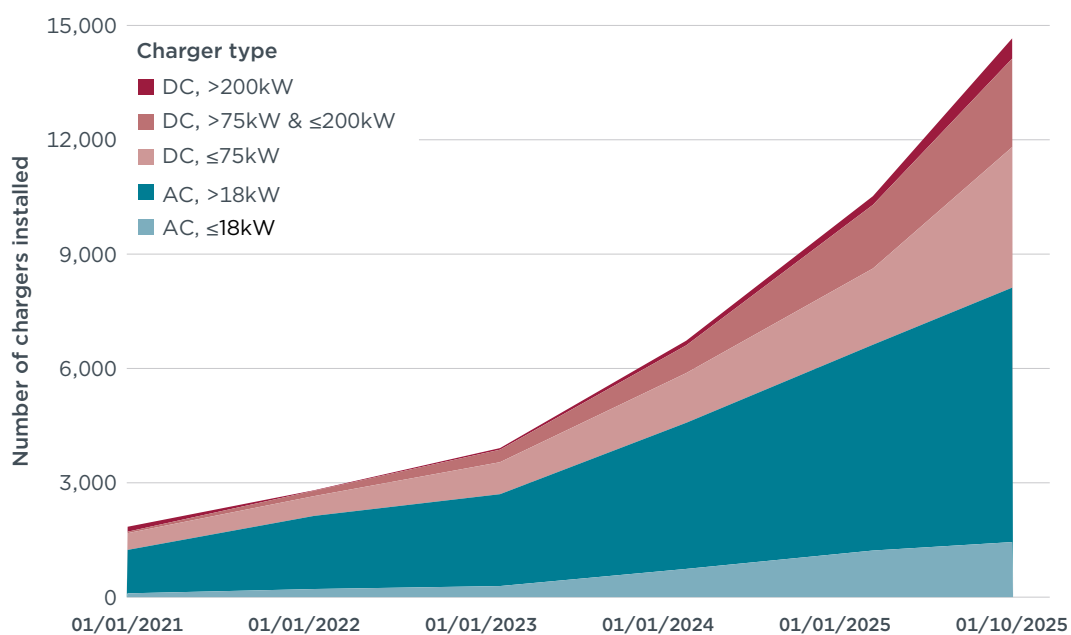
³ “NFOSiGW ‘NaszEauto’ Program” [National Fund for Environmental Protection and Water Management “NaszEauto” program], accessed November 25, 2025, <https://www.pzpm.org.pl/en/Electromobility/Appeal-on-My-Electrician-programme2/NFOSiGW-NaszEauto-program>.

⁴ “Program NaszEauto wyczerpuje budżet w ekspresowym tempie” [NaszEauto program exhausts budget at express pace], Elektromobilni.pl, accessed November 25, 2025, <https://elektromobilni.pl/program-naszeauto-wyczerpuje-budzet-w-ekspresowym-tempie/>.

⁵ “Rekordowy rok w historii e-mobility. 100 proc. więcej aut elektrycznych” [A record year in the history of e-mobility: 100 percent more electric cars], Elektromobilni.pl, accessed November 25, 2025, <https://elektromobilni.pl/rekordowy-rok-w-historii-e-mobility/>.

Figure 6

Number of public and semi-public chargers installed in Poland by power output type and power bin



Note: Semi-public chargers are chargers located on private property that typically have access restrictions, such as specific opening and closing times. By comparison, public chargers are accessible to all people 24 hours a day, 7 days a week. AC (alternating current) chargers, often referred to as normal chargers, are slow or semi-fast chargers that deliver up to 50 kW of power in the form of alternating current from the electrical grid. By contrast, DC (direct current) chargers, or fast chargers, supply power directly to the vehicle's battery, bypassing the onboard converter. These chargers typically supply power of 50 kW or greater, enabling faster charging.

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DEFINITIONS, DATA SOURCES, METHODOLOGY, AND ASSUMPTIONS

- » **Manufacturer pools:** Automakers are allowed to form pools to jointly comply with CO₂ targets. For this publication, the 2025 pools are defined according to the European Commission's "M1 pooling list" version from 30 October 2025 as well as the "Declaration of Intent to Form Open Pools" version from 27 October 2025. The 2024 closed pools from the M1 pooling list have been carried over into 2025, even in the absence of a formal declaration in 2025, as they typically remain stable due to ongoing commercial affiliations (e.g., the BMW and Kia pools). By contrast, only open pools that have been confirmed for 2025 are included, because their composition tends to change more frequently than closed pools. Additionally, it is assumed that the Renault Group forms a closed pool in 2025 with its affiliated manufacturers. The main brands are: BMW pool (BMW, Mini), Hyundai pool (Hyundai), Kia pool (Kia), Mercedes-Volvo-Polestar-Smart pool (Mercedes-Benz, Polestar, Smart, Volvo), Nissan pool (BYD, Nissan), Renault pool (Dacia, Renault), Tesla pool (Citroën, Fiat, Ford, Jeep, Mazda, Opel, Peugeot, Suzuki, Tesla, Toyota), and Volkswagen pool (Audi, Cupra, Porsche, SEAT, Škoda, VW). SAIC is a large passenger car manufacturer not part of a pool.
- » **Abbreviations:** CO₂ = carbon dioxide; g/km = grams per kilometer; YTD = year-to-date; ZLEV = zero- and low-emission vehicle.
- » **Technical scope:** This publication focuses on new **passenger car** registrations. **Battery electric vehicles** (BEVs) are powered exclusively by an electric motor, with no additional source of propulsion. **Plug-in hybrid electric vehicles** (PHEVs) combine a conventional combustion engine with an electric propulsion system that can be recharged via an external power source. **Hybrid electric vehicles** here include full hybrid electric vehicles (HEVs) and mild hybrid electric vehicles (MHEVs). HEVs and MHEVs integrate two propulsion systems, usually a combustion engine and an electric propulsion system that cannot be recharged via an external power source. Key differences between HEVs and MHEVs are the system voltage and system power. This enables HEVs to drive using only electric power for limited periods, while the electric propulsion system of MHEVs is typically only capable of assisting the combustion engine. For more on HEVs and MHEVs see: Jan Dornoff et al., *Mild-Hybrid Vehicles: A Near Term Technology Trend for CO₂ Emissions Reduction* (International Council on Clean Transportation, 2022), <https://theicct.org/publication/mild-hybrid-emissions-jul22/>.
- » **Geographic scope:** The European CO₂ regulation for vehicle manufacturers applies to all countries of the European Economic Area (EEA). This includes the 27 Member States of the European Union plus Iceland and Norway but excludes Liechtenstein. Data for new car registrations and shares of EVs in this publication cover all of these countries, with the exception of Liechtenstein and Malta. Data for CO₂ emission levels additionally omit Bulgaria, Hungary, Romania, and Slovenia.
- » **Data sources:** Dataforce (new vehicle registrations), Eco-Movement (charging points), and European Environment Agency (vehicle mass and eco-innovation credits). Historical values are regularly updated to reflect the latest data available.
- » **Results may change over time:** Registrations and/or CO₂ data may be retrospectively updated by some of the national type-approval authorities.
- » **Test procedures:** CO₂ values are provided according to the **Worldwide harmonized Light vehicles Test Procedure** (WLTP).
- » **Flexible compliance mechanisms:** To facilitate meeting the CO₂ targets, manufacturers can make use of a number of compliance mechanisms, including (1) **eco-innovation technologies** and (2) **ZLEV factors**. First, manufacturers can reduce their CO₂ level by up to 6 g/km by deploying eco-innovation technologies. As a conservative estimate, we applied the 2024 level of eco-innovation CO₂ emission reductions per brand. For more on the methodology used, see: Uwe Tietge et al., *Overview and Evaluation of Eco-Innovations in European Passenger Car CO₂ Standards* (International Council on Clean Transportation, 2018), <https://theicct.org/publications/eco-innovations-european-passenger-car-co2-standards>. Second, if a manufacturer's ZLEV share exceeds 25% (for cars) or 17% (for vans), its CO₂ target is increased by the same number of percentage points, up to a maximum of 5%. This adjustment is referred to as the ZLEV factor, while the target before adjustment is called the manufacturer reference target. The manufacturer target is calculated by

multiplying the reference target by the ZLEV factor. ZLEVs include BEVs and vehicles with CO₂ emissions of 50 g/km or less (WLTP). For details on the ZLEV factor mechanism, see: Jan Dornoff, *CO₂ Emission Standards for New Passenger Cars and Vans in the European Union* (International Council on Clean Transportation, 2023), <https://theicct.org/publication/eu-co2-standards-cars-vans-may23/>.

- » **Mass-based targets:** For each manufacturer or manufacturer pool, a specific **2025 CO₂ target value** applies, depending on the average WLTP test mass of the new vehicles registered. For this publication, we assume the average WLTP test mass per manufacturer pool remains the same as in 2024; the average 2024 BEV and non-BEV test mass for each manufacturer was calculated based on data from the European Environment Agency and then weighted according to their year-to-date 2025 BEV market shares. For more on the methodology used, see: Uwe Tietge et al., *CO₂ Emissions from New Passenger Cars in Europe: Car Manufacturers' Performance in 2023* (International Council Clean Transportation, 2024), <https://theicct.org/publication/co2-emissions-new-pv-europe-car-manufacturers-performance-2023-sept24/>.
- » **2025-2027 averaging:** Rather than being required to meet the CO₂ target applying from 2025 onwards in each individual year, manufacturers were granted the flexibility to comply based on their average CO₂ emissions over the three-year period 2025-2027. This means that manufacturers may exceed their CO₂ targets in one or more years, provided that any excess emissions are balanced out by equivalent over-compliance in other years within the averaging period. For more details on the provision, see International Council on Clean Transportation, *Public Comments on the European Commission Proposal to Introduce a 3-Year "Averaging" Provision for the CO₂ Standards Regulation for New Cars and Vans*, 2025, <https://theicct.org/icct-comments-on-the-european-commission-proposal-to-introduce-a-3-year-averaging-provision-for-the-co2-standards-regulation-for-new-cars-and-vans/>.
- » **Charging point:** As defined in the Alternative Fuels Infrastructure Regulation, a charging point "means a fixed or mobile interface that allows for the transfer of electricity to an electric vehicle, which, whilst it may have one or several connectors to accommodate different connector types, is capable of recharging only one electric vehicle at a time, and excludes devices with a power output less than or equal to 3.7 kW the primary purpose of which is not recharging electric vehicles."⁶
- » **Owner types:** This publication considers four types of owners: private cars, company fleets, short-term rentals, and car dealers and manufacturers. The private car category includes all registrations under private individuals, including those of self-employed persons, provided the vehicles are not registered under a company name. Private leasing is also included. Company fleets encompass all vehicles registered to companies, excluding those intended for resale or rental. This category includes company and public administration fleets, commercial long-term rentals, commercial leases, taxis, driving schools, diplomats, etc. The size of the fleet and the extent to which the vehicles are used privately are not considered relevant. The short-term rentals type covers all registrations under large or small national and local rental companies. It also covers all vehicles flagged by authorities for self-drive rental purposes. The car dealers and manufacturers type includes all vehicles registered by car dealers and manufacturers. For automakers, this includes vehicles used for press purposes as well as those for their employees. New registrations data by owner type are aggregated for the following 19 European countries: Austria, Belgium, Czechia, Denmark, Finland, France, Germany, Iceland, Italy, Latvia, Lithuania, the Netherlands, Norway, Poland, Portugal, Spain, Sweden, Switzerland, and United Kingdom.

⁶ Regulation (EU) 2023/1804 of the European Parliament and of the Council of 13 September 2023 on the Deployment of Alternative Fuels Infrastructure, and Repealing Directive 2014/94/EU, OJ L 234 (September 22, 2023), <https://eur-lex.europa.eu/eli/reg/2023/1804/oj/eng>.



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