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Position Paper on Car Labelling (Passenger Cars and Light Commercial Vehicles)

Perspective of Automotive Mobility Europe, representing European Car Dealers and Repairers.

Short summary: *AME welcomes, in principle, the European Commission's proposal for a Regulation to harmonise vehicle labelling and provide potential buyers with information on the CO₂ impact of passenger cars and light commercial vehicles. However, AME expresses strong reservations regarding the extension of the obligation for a visible label to individual second-hand vehicles. The administrative burden and related costs of hundreds of millions of euro's would outweigh the potential benefits. Moreover, customers purchasing second-hand vehicles have limited options, as their choice is restricted to the stock available at the time of purchase.*

Background

The European Commission proposal to revise the legislation on CO₂ emission performance standards for new light commercial vehicles (LCV's) and vehicle labelling aims to contribute to achieving climate neutrality by 2050.

The Commission's evaluation of the current Car Labelling Directive identified major shortcomings: Member States apply different labelling approaches, insufficient consumer information on zero- and low-emission vehicles (including LCV's and used cars), and outdated reliance on paper-based materials instead of digital tools.

While automotive dealers and repairers broadly support the objectives of harmonised and improved consumer information, the proposed measures raise serious concerns regarding the operational and economic impact on the automotive retail and service sector.

Opportunities

- Harmonised Car Labels will enhance the clarity and comparability of vehicle information across the European Union.
- The creation of a central EU database containing all relevant vehicle data will further improve the accessibility and reliability of information.
- Providing potential buyers of new light commercial vehicles with information on CO₂ emissions through labelling is a positive development that supports transparent decision-making.

Risks and concerns

Implementing labelling requirements for individual second-hand vehicles poses challenges that may not be feasible in practice:

- Access to reliable data for second-hand vehicles, particularly hybrids, is often incomplete or unavailable (e.g. WLTP figures) and can only be found if available on the Certificate of Conformity which must be requested (and paid for) at the vehicle manufacturer.
- The requirement for a physical, visible label near each vehicle prevents the use of digital-only solutions.

- The requirement to display the State of Health (SoH) of a battery on the label is not possible for all electrical vehicles. Retrieving the SoH requires a separate test, which is time-consuming and expensive, and the necessary test are not always made available by the vehicle manufacturer.
- The decision-making process for purchasing a second-hand vehicle, the availability of a specific vehicle outweighs the influence of its label. The buyer's choice is limited to the models available on the market, in contrast to the broader selection when purchasing a new vehicle.
- The label for a second-hand vehicle reflects the vehicle's status at the time it was new, rather than its current condition, and may therefore be considered misleading to customers.
- The cost of producing and attaching a label for each individual second-hand vehicle would significantly increase administrative and financial burdens. Overall, this would be more than 90 (!) times more expensive in total (See annex I - Costs effect calculation EU Car Labelling (NL))

These factors would significantly raise compliance costs while delivering only marginal benefits to consumers.

Recommendations & Solutions

AME recommends that car labelling:

- will only be required for new passenger cars and LCV's
- will include cars & LCV's with the goal of informing the consumer about the possibility to visit the website that is offered by the EU for energy labels: European Product Registry Energy Labelling (EPREL). This can be done via a QR-code (or similar technical solution) that can be shown nearby the vehicle
- include a more distinctive label for a greater differentiation for EV's (Full EV's and Hybrids)

Conclusion

AME supports the European Commission's initiative to harmonise vehicle labelling to enhance transparency and comparability of CO₂ information for new passenger cars and LCV's within the EU. However, we express strong reservations regarding the extension of mandatory physical labels to individual second-hand vehicles. This would introduce disproportionate administrative and financial burdens while offering limited consumer benefits. AME therefore recommends restricting the labelling obligation to new vehicles only and using digital tools, such as QR codes linked to the EPREL database, to inform new vehicle buyers. A digital-first approach would ensure cost-effective implementation, maintain accuracy, and align with EU objectives for efficient, harmonised, and modernised consumer information systems.

About AME

Automotive Mobility Europe (AME) is a European alliance uniting national associations and European dealer councils representing the automotive distribution and mobility services sector. Our members include both authorised dealership networks and independent repairers, together forming a vital part of Europe's mobility ecosystem.