CALL FOR TENDERS

Research on the impact of ETS2 on mobility costs

The Fédération Internationale de l'Automobile Region I invites proposals for a comprehensive study examining the projected impact of the EU Emissions Trading System for buildings and road transport (ETS2) on mobility costs across EU Member States. The objective of this research is to assess the implications of ETS2 implementation for consumers and mobility services, and to provide evidence-based recommendations to support a fair, effective and socially equitable transition. In doing so, the study should situate ETS2 within the wider EU policy framework shaping road transport, including the Automotive Package, the revision of the CO_2 emission standards for cars and vans, and obligations related to charging infrastructure deployment. The analysis should explicitly consider the risk of cumulative and overlapping cost pressures for consumers and mobility service providers arising from these regulatory files, and assess how their combined effects may influence affordability, mobility choices and public acceptance of the transition.

Context of the study:

ETS2 is expected to play an important role in the EU's long-term decarbonisation strategy for road transport and buildings. Following the decision to postpone its entry into force to 2028, ETS2 now sits within a more uncertain and evolving policy landscape, particularly with regard to the timing, scale and financing of accompanying social measures, notably the Social Climate Fund. At the same time, ETS2 will interact closely with other major policy initiatives shaping the future of mobility, including the Automotive Package published in December and the ongoing revision of the CO_2 emission standards for cars and vans.

Once operational, ETS2 is expected to have direct and indirect impacts on fuel and energy prices, household mobility costs, and the affordability of transport services. While the system is designed to incentivise emissions reductions, its effects are likely to vary significantly across Member States, especially between those with existing national CO_2 pricing mechanisms and those where carbon pricing for road transport will effectively be introduced for the first time. In these latter cases, ETS2 may result in more pronounced price impacts, raising concerns around affordability, public acceptance and social fairness.

Fuel pricing is only one element of ETS2's potential impact. Member States will have access to a range of policy tools, including the use of ETS2 revenues and complementary national measures, to mitigate adverse effects on consumers while supporting emissions reductions. However, the postponement of ETS2 and the uncertainty surrounding the implementation of the Social Climate Fund underline the importance of understanding not only how such tools could be used in principle, but also the legal, fiscal and institutional constraints affecting their use in practice. This is particularly relevant for end users and vulnerable groups who may face higher mobility costs without sufficient or timely compensatory measures.

At the same time, recent developments in EU vehicle regulation, notably the Automotive Package and the revision of the CO_2 emission standards for cars and vans, introduce additional layers of interaction with ETS2. Regulatory flexibilities, technology-neutral approaches, lifecycle emissions perspectives and measures aimed at supporting affordability and industrial competitiveness may influence fleet composition, emissions trajectories and, ultimately, consumer exposure to carbon pricing once ETS2 enters into force. Understanding these interactions is essential to assess the real-world implications of ETS2 for road users and the cumulative cost impacts of the transition.

This study aims to provide a mobility-focused analysis of the expected impacts of ETS2 on consumer costs, taking into account the delayed implementation timeline, uncertainties around accompanying social measures, and the broader regulatory context for road transport. It will place particular emphasis on the end-user perspective, policy interactions, and the role of mobility organisations and services in supporting consumers through the transition. The research should build on and critically engage with existing analyses, notably the study conducted by Ricardo on supporting measures promoting decarbonisation in the sectors covered by ETS2, commissioned by the European Commission. The proposed work must not duplicate this study but should instead complement it by offering additional insights from a consumer and mobility perspective, and by further examining policy interactions, mitigation measures and distributional effects relevant to road users.

This work aligns with FIA Region I's mission to represent the interests of road users and to promote sustainable, affordable, fair and technologically open mobility across Europe.

Scope of work

The selected contractor will be responsible for conducting research in the following key areas:

1. Expected energy and fuel price impacts in a delayed ETS2 context

Analyse the projected impact of ETS2 on fuel and energy prices relevant to road transport across EU Member States, taking into account the postponed entry into force in 2028. The analysis should reflect different implementation and price scenarios. The analysis should consider potential national policy responses aimed at mitigating price impacts, including adjustments to fuel excise duties. This aspect should be examined from both an economic and legal perspective, including an assessment of the scope and constraints for such measures under the current and future Energy Taxation Directive. Particular attention should be paid to Member States without existing CO_2 pricing mechanisms, where ETS2 may lead to sharper price increases once operational, as well as to consumer exposure and distributional impacts across income groups, territories and mobility profiles.

2. Policy tools, revenue use and uncertainty around the Social Climate Fund

Examine the range of policy instruments available to Member States to address ETS2-related cost impacts, with a clear differentiation between revenues allocated to the EU-level Social Climate Fund and ETS2 revenues accruing at national level. For national revenues, the analysis should assess, from a legal and policy perspective, how these revenues can be used, including whether and to what extent they may be earmarked for new or existing expenditures (such as public transport or mobility-related investments), or whether their use primarily allows for redistribution within national budgets.

In particular, the research should analyse the provisions of Article 30d(6) of the ETS Directive, including the legal interpretation and practical implications of the priority clause governing the use of ETS2 revenues for social and climate-related purposes. The study should assess how strict this obligation is in practice, the degree of flexibility Member States have in meeting it through existing fiscal, financial or regulatory measures, and how compliance may be demonstrated.

The analysis should also address uncertainty related to the implementation of the Social Climate Fund, including the uneven progress of national Social Climate Plans. This should include consideration of the European Investment Bank's €3 billion financing made available ahead of ETS2 implementation for investments aligned with Social Climate Fund objectives, and the implications of delayed, incomplete or non-adopted national plans for consumer support, investment certainty and the effectiveness of mitigation measures.

3. Interaction with vehicle regulation and the Automotive Package

Assess how ETS2 is likely to interact with recent and ongoing regulatory developments, including the Automotive Package and the revision of the CO_2 emission standards for cars and vans. This should

include analysis of how technology-neutral approaches, regulatory flexibilities, lifecycle emissions perspectives and measures aimed at affordability may influence fleet composition, emissions outcomes and consumer costs. The research should explore whether and how these interactions could affect aggregate emissions and price signals once ETS2 becomes operational.

4. Implications for mobility services and FIA Member Clubs

Assess the implications of ETS2-related cost changes and regulatory interactions for mobility services, with particular attention to the operational impacts on FIA Member Clubs. This should include effects on cost structures, service demand and delivery for core activities such as roadside assistance and mobility advice, as well as impacts on fleet operations and service vehicles. The analysis should also examine the role of Clubs in informing and supporting consumers as trusted intermediaries, helping road users understand and manage changing mobility costs during the transition.

5. Consumer impact, equity considerations and end-user perspective

Analyse the expected impact of ETS2 on different consumer groups, with particular attention to vulnerable households, rural users and those with limited access to alternative mobility options. The research should reflect the end-user perspective and consider how affordability, choice and access to mobility may evolve in the context of delayed carbon pricing and parallel regulatory changes.

6. Recommendations for an equitable and consumer-oriented transition

Develop clear, actionable recommendations to support a fair and socially balanced transition under ETS2, explicitly taking into account the findings on revenue use, legal constraints and implementation uncertainty identified under point 2. These should address policy design, revenue use, coordination with vehicle regulation, consumer information and communication strategies, and the role of mobility organisations in cushioning cost impacts while supporting long-term decarbonisation objectives.

Proposal submission:

Interested parties are invited to submit detailed proposals outlining their approach, methodology, timeline, and budget for the research project. Proposals should include:

- Detailed approach and methodology
- Proposed timeline and budget breakdown
- Team profiles, credentials, and relevant experience
- Examples of previous research projects

Proposals should be sent to Inès Gauduchon, FIA RI Policy Officer, at igauduchon@fia.com by 6 March 2026.

Selection criteria:

The selection will be based on the following criteria:

1. Expertise and experience in climate, energy, and transport economics, particularly emissions trading systems and consumer impacts.
2. Feasibility and clarity of the proposed research methodology.
3. Budget competitiveness.
4. Feasibility of the proposed timeline.

Timeline:

- **Proposal Submission Deadline:** 06/03/2026
- **Contractor Selection:** 13/03/2026
- **Research Commencement:** 06/04/2026
- **Interim Progress Report:** 12/06/2026
- **Delivery of final report in English** (including executive summary and policy recommendations): 21/08/2026

Budget and payment:

A maximum budget of 50.000**€** (including VAT, if applicable) is available. 40% of the agreed costs will be paid once the candidate is appointed, and 60% will be paid once the research is concluded and the final report is approved. The budget should include all expenses, including potential travel costs.