



# AUTOMOTIVE SECTOR NET-ZERO STANDARD

First Public Consultation Feedback  
Summary Report

February 2026

# ABOUT THE SBTi

The Science Based Targets initiative (SBTi) is a corporate climate action organization that enables companies and financial institutions worldwide to play their part in combating the climate crisis.

We develop standards, tools and guidance which allow companies to set greenhouse gas (GHG) emissions reductions targets in line with what is needed to keep global heating below catastrophic levels and reach net-zero by 2050 at latest.

The SBTi is incorporated as a UK charity, with a subsidiary SBTi Services Limited, which hosts our target validation services. Partner organizations who facilitated SBTi's growth and development are CDP, the United Nations Global Compact, the We Mean Business Coalition, the World Resources Institute (WRI), and the World Wide Fund for Nature (WWF).

## PARTNERS



United Nations  
Global Compact



## About this document

This document presents a summary of the feedback received during the first round of public consultation on the SBTi Automotive Sector Net-Zero Standard.

This document outlines an overview of the feedback received and how this feedback will inform the final draft of the Automotive Sector Net-Zero Standard. You can refer to the full [Consultation Feedback Log](#) to access all comments received.

Thank you to all stakeholders that submitted feedback in response to the public consultation, or engaged in any way during the public consultation.

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# BACKGROUND INFORMATION



## About the SBTi Automotive Sector Net-Zero Standard

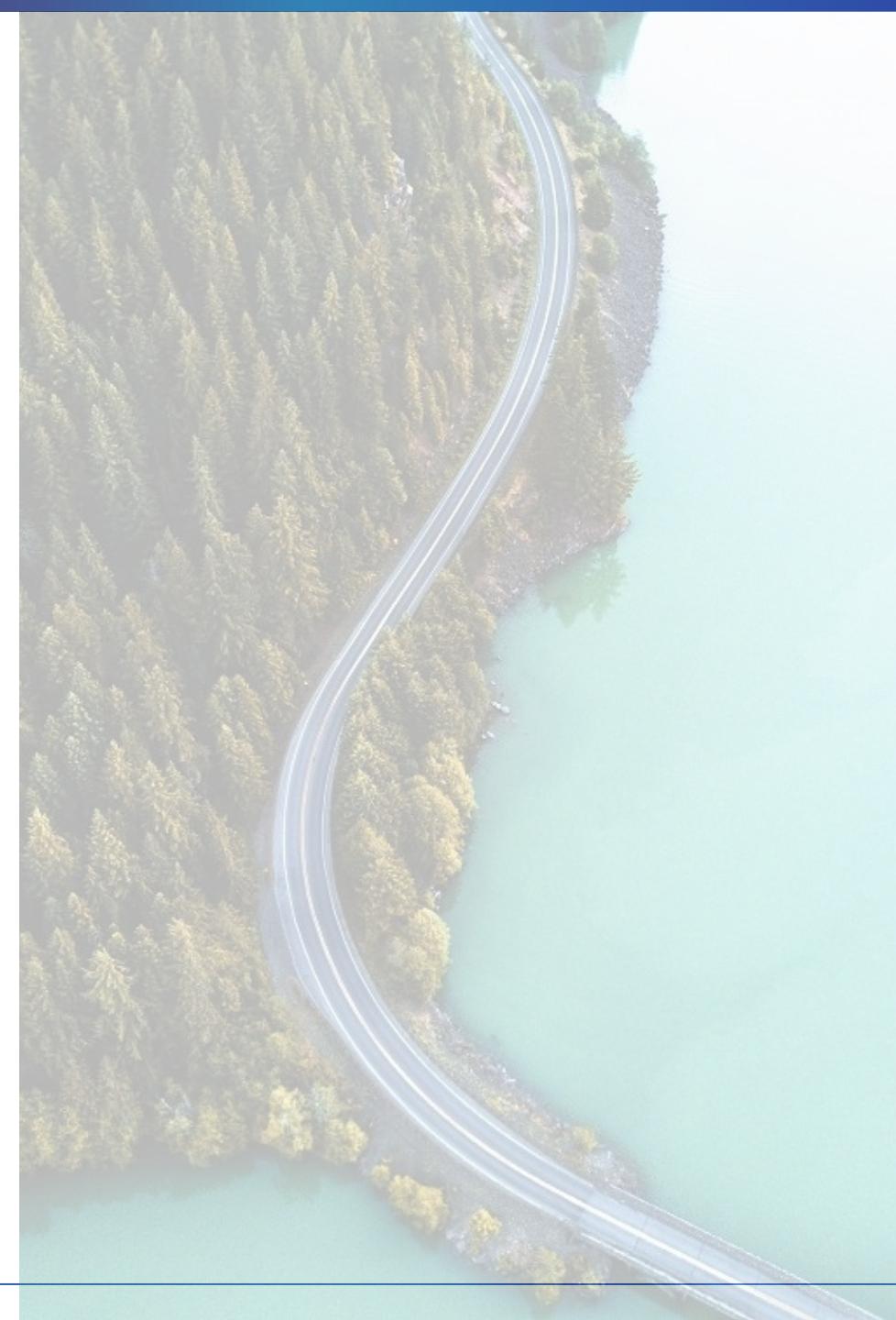
- The SBTi Automotive Sector Net-Zero Standard is designed to help automotive manufacturers and auto parts suppliers set science-based net-zero targets that address the sector's unique challenges, such as vehicle-use emissions and materials impacts, while staying aligned with the ambition needed to limit global warming to 1.5°C.
- [SBTi Automotive Sector Net-Zero Standard Draft](#)
- For questions related to this feedback report and the Automotive Sector Net-Zero Standard in general, please contact: [transport@sciencebasedtargets.org](mailto:transport@sciencebasedtargets.org)

## Automotive Sector Net-Zero Standard Development Process

- The first round of public consultation was **open for 60 days**, from June 12, 2025 until August 11, 2025.
- Feedback was sought primarily through an **open survey** which consisted of questions on technical content and several questions on general feedback. Respondents were able to add written comments for all technical survey questions. Feedback was also accepted via direct email.
- The objective of the consultation was to gather feedback on the Automotive Sector Net-Zero Standard, ensuring the criteria, methods, and targets are practical, scientifically robust, and address the real-world challenges of automakers and auto parts suppliers in aligning with a 1.5°C pathway.

Please visit the [Automotive Sector webpage](#) to see the public consultation materials:

- [Automotive Sector Net-Zero Standard first public consultation draft](#)



# Automotive Sector Net-Zero Standard Development Process

## How feedback will be addressed



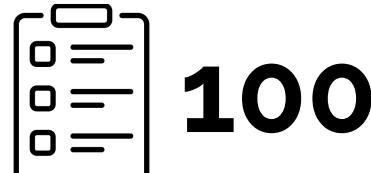
In this report, the SBTi provides a **summary of the responses to the consultation questions**, organized by stakeholder group.

Also included are the main themes of the written comments from respondents. The SBTi's project team reviewed the feedback and incorporated the changes it deemed necessary into the next version of the Automotive Sector Net-Zero Standard. These changes are documented in the [Main Changes Document](#) for the first public consultation.

Revisions to the draft are made by the SBTi project team and approved by the SBTi's Chief Technical Officer.

For the second consultation draft, the final draft was approved by the Technical Council before publication.

# Participants | 104 responses received from stakeholders

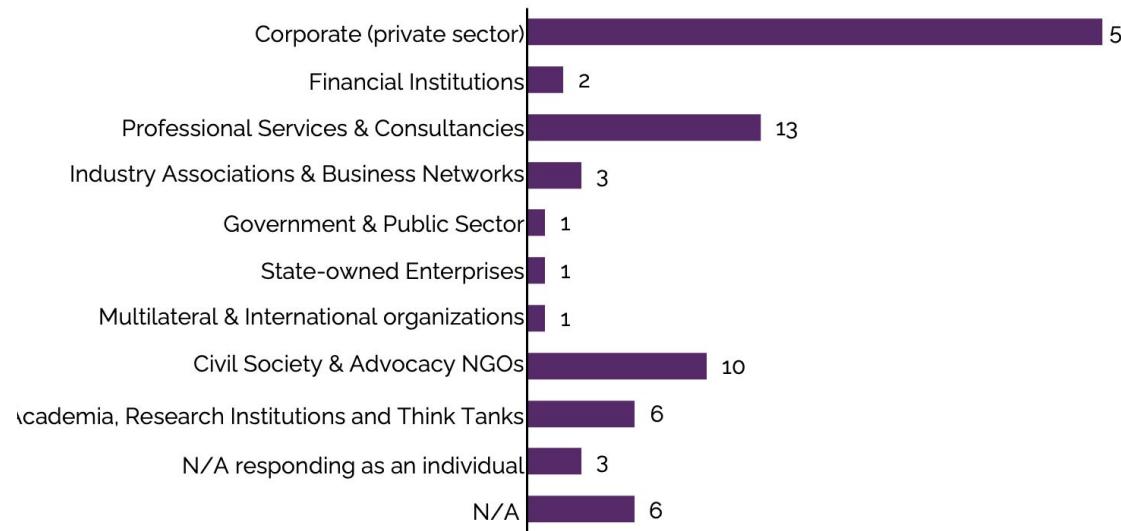


Responses to the survey



Responses through email and one-on-ones

## Organizations



■ Number of organizations

Note: More than 120 responses were received; however, some were marked as 'incomplete' or identified as duplicates.

## Geographies

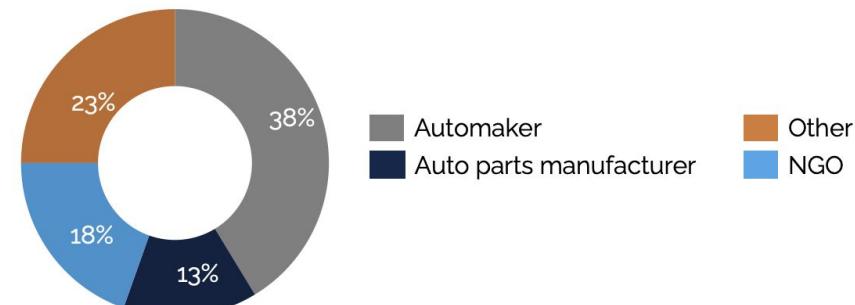
**21**

Countries



Regions with significant operations or value chain activity

## Sector



# Participants | Gaps in participation

The majority of respondents were from the automotive sector, however feedback was received from all relevant stakeholder groups, including consultancies, NGOs, and researchers.

In future consultations, the SBTi will continue to seek feedback from a balanced set of stakeholders, with a focus on non-industry perspectives.





# SUMMARY OF CONSULTATION FEEDBACK

# Structure of the Automotive Standard Consultation



The Automotive Sector Net-Zero Standard consultation was structured around the following key consultation questions:

## 1. Automotive Sector Net-Zero Standard Consultation Draft

The Automotive Standard aims to support GHG emissions reduction by providing a sector-specific set of criteria for companies with activities related to the automotive sector to use to set science-aligned emissions reduction targets.

## 2. SBTi Automotive Target-Setting Tool Consultation draft

This tool is intended to enable companies to develop appropriate science-based emissions reduction targets, as well as assist companies and interested third parties in assessing and evaluating companies' targets.

### Survey questions

1. Contact information
2. In what sector does your organization operate?
3. Type of organization?
4. What country is your organization headquartered in, or if you are responding in a personal capacity please select the country where you are based?
5. In which regions does your organization have significant operations or value chain activities?
6. Are you a current or previous SBTi advisory or working group member?

# Structure of the Automotive Standard Consultation

## Survey questions continued

7. To what extent do you agree or disagree with the following statements?
  - o The Automotive Sector Net-Zero Standard is easy to understand
  - o The Automotive Sector Net-Zero Standard is ambitious enough to meaningfully take science-based climate action
  - o The Automotive Sector Net-Zero Standard is possible to implement
  - o The Automotive Sector Net-Zero Standard will assure the credibility of companies' climate action
  - o The Automotive Sector Net-Zero Standard strives for equity and does not compromise environmental sustainability
8. Do you agree with the proposed thresholds for determining which companies should apply this standard? If not, please explain why and suggest alternative thresholds. Feel free to include examples of companies types/structures that you believe should or should not be in scope based on these criteria.
9. Do you agree with the exemption from applying SBTi's financial institutions target-setting and validation route for automotive sector companies?
10. Do you think the way the draft Corporate Net-Zero StandardS V2.0's criteria applicability is explained is clear enough to enable an efficient applicability of both standards in parallel? If not, do you have any suggestions to improve on this aspect?
11. Do you agree with having the China region (including China and Hong Kong) as a third separate regional grouping?

# Structure of the Automotive Standard Consultation



## Survey questions continued

12. Do you agree that automakers must also cover the aggregated emissions of their subsidiaries even when these fall outside of operational control? What do you think is the appropriate threshold (in terms of financial stake in the company) above which this is required? (15% is proposed).
13. Do you agree with including the end-of-life component (scope 3, category 12) in the aggregate indicator in criteria AMSS-C1 and APSS-C1?
14. The aggregated emission intensity indicator is currently proposed as a mandatory target in the standard. Do you think this approach should remain, or would it be more appropriate for companies to only disclose base year performance, or for the indicator to be an optional target?
15. Do you feel the low-emission vehicle definition is sufficiently aligned to existing sectoral regulations and requirements to enhance interoperability and reduce reporting burden? If not, what changes would you suggest, aligning to which other regulations/requirements?
16. It is proposed in APSS-C2 that Category B companies may not be required to assess and disclose the sales share of parts for low-emission vehicles. Do you agree with this exemption?
17. Do you agree there is value in the inclusion of an additional requirement to assess performance separately for scope 3 category 1 (purchased goods and services) for automakers?
18. Do you agree with the methodological approach to define benchmarks and compliance trajectories?
19. Were any questions missing from the survey that you expected to answer?

# Summary of Consultation Feedback



This feedback summary report is structured according to the consultation questions outlined in the preceding slides. For each technical consultation question, the following information is provided:

- A summary of the responses to each multiple-choice question.
- An AI-assisted overview of the main themes from the written comments, highlighting common topics raised by multiple respondents.

**In addition to this report, the SBTi has published a [Feedback Log](#) containing all written comments received.**

The SBTi reviewed all feedback and incorporated the changes it deemed necessary into the next version of the Automotive Sector Net-Zero Standard, which will be used for the pilot rest and the second public consultation. These changes have been documented in the [Main Changes Document](#).

All feedback, including multiple-choice responses and written comments, has been anonymized.

# [Q7] - Detailed survey responses

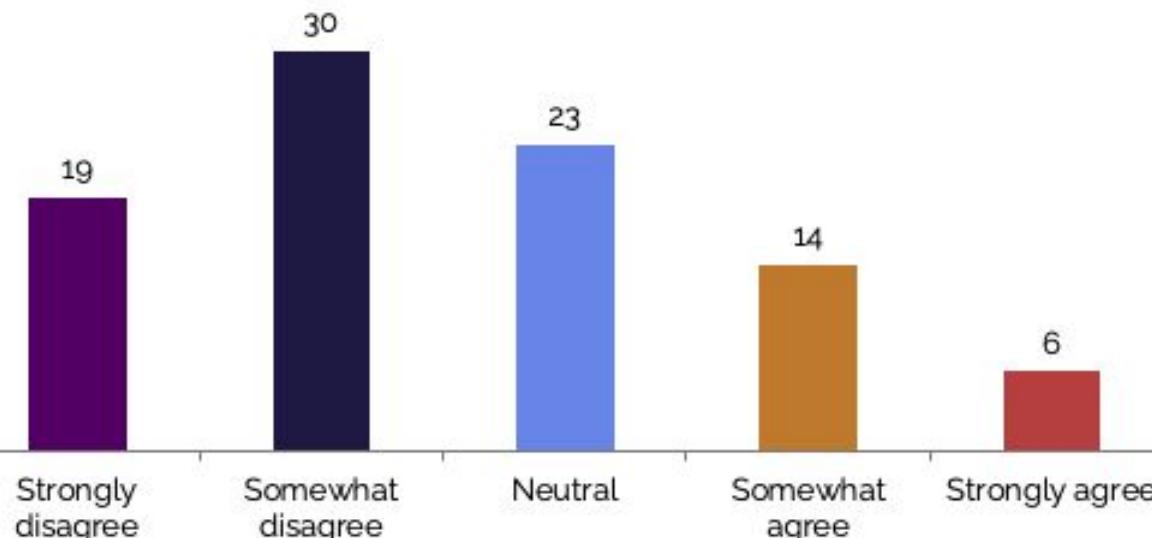
## Feedback received



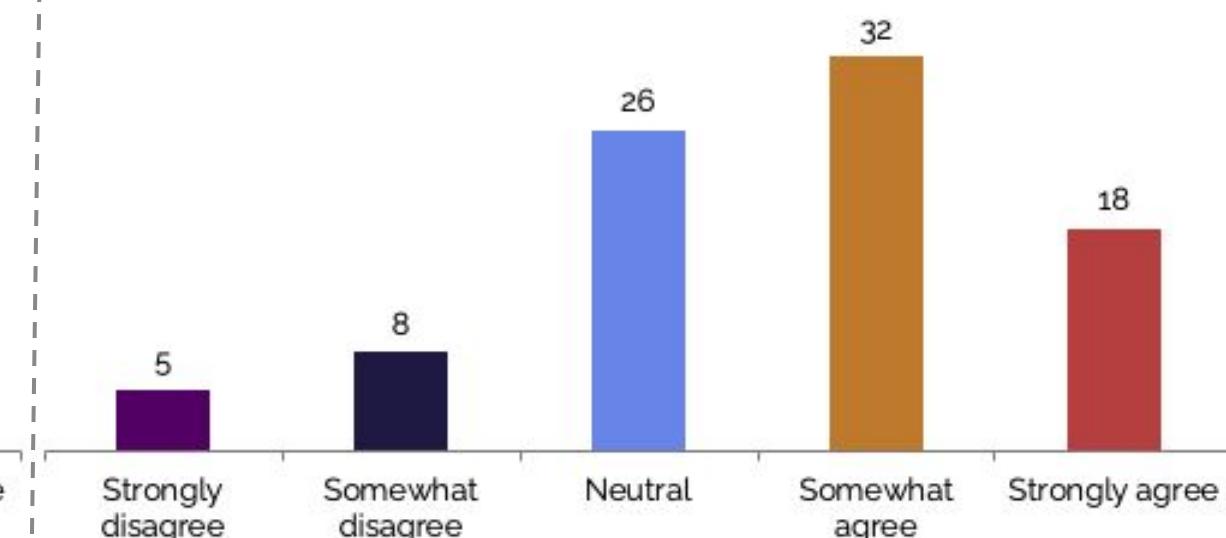
*Most respondents disagreed that the Automotive Sector Net-Zero Standard is easy to understand, while they agreed that it is ambitious enough to drive meaningful climate action. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.*

### **Q7. To what extent do you agree or disagree with the following statements?**

The Automotive Sector Net-Zero Standard is easy to understand



The Automotive Sector Net-Zero Standard is ambitious enough to meaningfully take science-based climate action



# [Q7] - Detailed survey responses

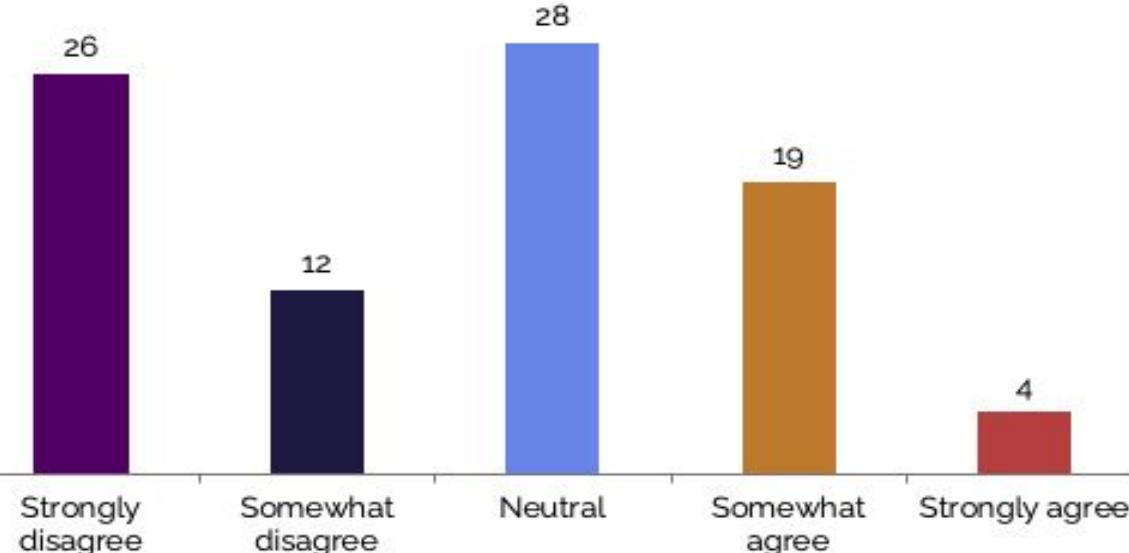
## Feedback received



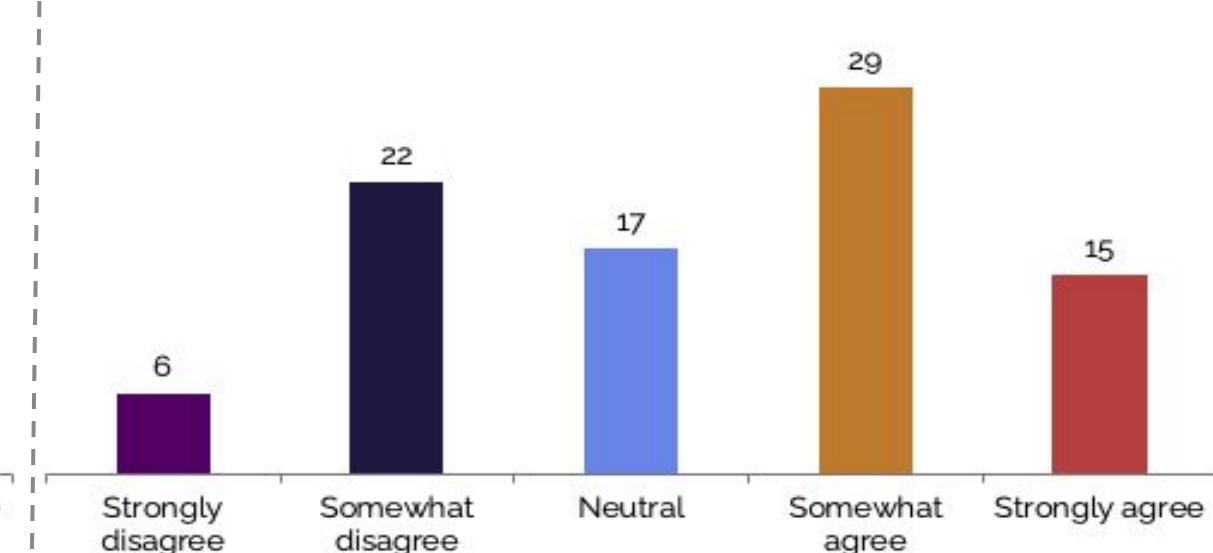
Respondents were divided on whether the Automotive Sector Net-Zero Standard is possible to implement, but most agreed that it will help assure the credibility of companies' climate action. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

### Q7. To what extent do you agree or disagree with the following statements?

The Automotive Sector Net-Zero Standard is possible to implement



The Automotive Sector Net-Zero Standard will assure the credibility of companies' climate action



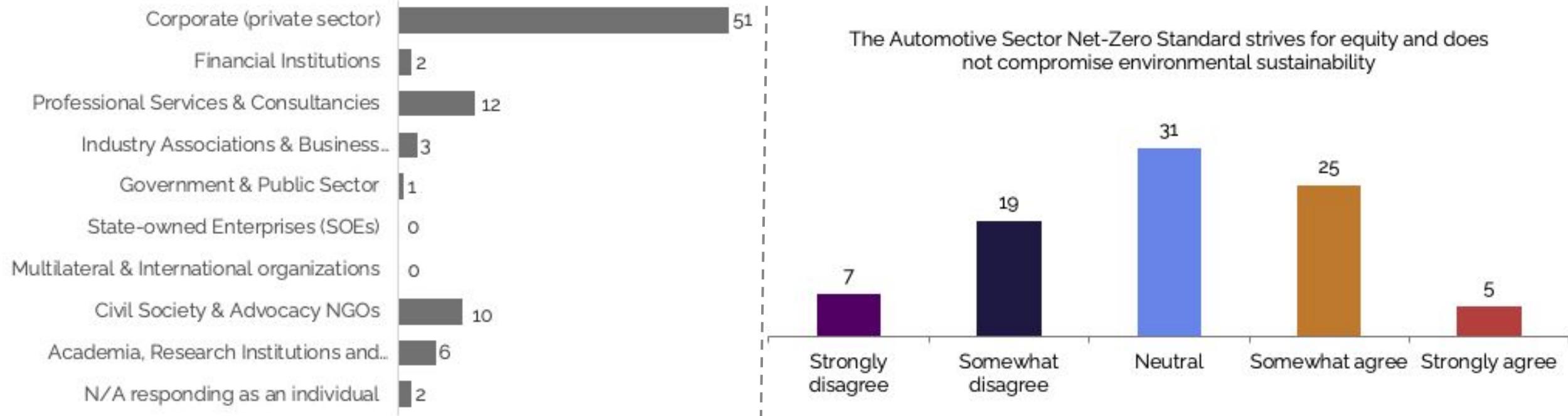
# [Q7] - Detailed survey responses

## Feedback received



Most respondents agreed that the Automotive Sector Net-Zero Standard strives for equity and does not compromise environmental sustainability. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

### Q7. To what extent do you agree or disagree with the following statements?



Total responses to this question

# Summary of Consultation Feedback by Consultation Question

## Consultation Question 7

To what extent do you agree or disagree with the following statements?

- The Automotive Sector Net-Zero Standard is easy to understand
- The Automotive Sector Net-Zero Standard is ambitious enough to meaningfully take science-based climate action
- The Automotive Sector Net-Zero Standard is possible to implement
- The Automotive Sector Net-Zero Standard will assure the credibility of companies' climate action
- The Automotive Sector Net-Zero Standard strives for equity and does not compromise environmental sustainability

**The main themes of written feedback are presented below:**

- **Clarity remains a challenge:** Most respondents disagreed that the Automotive Sector Net-Zero Standard is easy to understand, pointing to the need for clearer explanations and simplification.
- **High ambition recognized:** Stakeholders strongly agreed that the Standard is ambitious enough to drive meaningful climate action, reflecting support for its alignment with 1.5°C pathways.
- **Feasibility mixed:** Views were divided on whether the Standard is possible to implement, with some recognizing its potential while others highlighted challenges in practical application.
- **Credibility strengthened:** A majority agreed the Standard will help assure the credibility of companies' climate action, reinforcing its role in setting science-based targets.
- **Equity supported:** Most respondents agreed the Standard strives for equity and does not compromise environmental sustainability.

# [Q8] - Detailed survey responses

## Feedback received

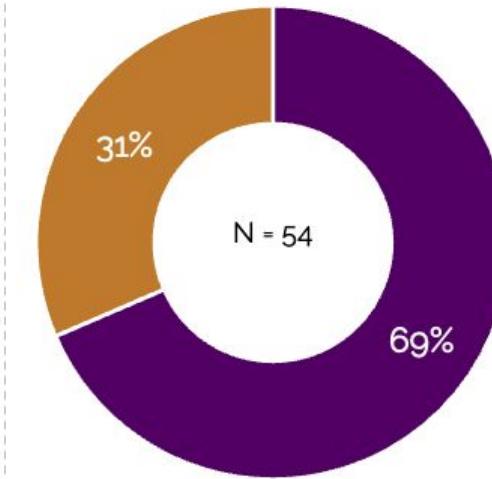


Most stakeholders agreed with the proposed thresholds, while a significant minority called for more ambitious or updated criteria to ensure all relevant companies are covered. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

**Q8. Do you agree with the proposed thresholds for determining which companies should apply this standard? If not, please explain why and suggest alternative thresholds. Feel free to include examples of companies types/structures that you believe should or should not be in scope based on these criteria.**



Percentage split of responses



# Summary of Consultation Feedback by Consultation Question

## Consultation Question 8

Do you agree with the proposed thresholds for determining which companies should apply this standard? If not, please explain why and suggest alternative thresholds. Feel free to include examples of companies types/structures that you believe should or should not be in scope based on these criteria.

**The main themes of written feedback are presented below:**

- **Broad support for thresholds:** Many stakeholders agreed with the proposed thresholds, noting they provide a workable baseline for determining which companies fall under the standard.
- **Calls for more ambition:** Some respondents argued the thresholds are not ambitious enough and risk excluding significant actors, particularly regional players and vertically integrated suppliers that contribute materially to emissions but may fall below the 20% revenue threshold. They suggested including qualitative factors such as overall emissions impact or market influence.
- **Alternative thresholds:** Some suggested higher revenue shares (33–66%) or updating limits to better reflect market realities.
- **Scope and applicability concerns:** A few comments raised questions about whether certain types of businesses (e.g., engine manufacturers, leasing companies) should be included, stressing the need for clarity on company structures and sector boundaries.

# [Q9] - Detailed survey responses

## Feedback received

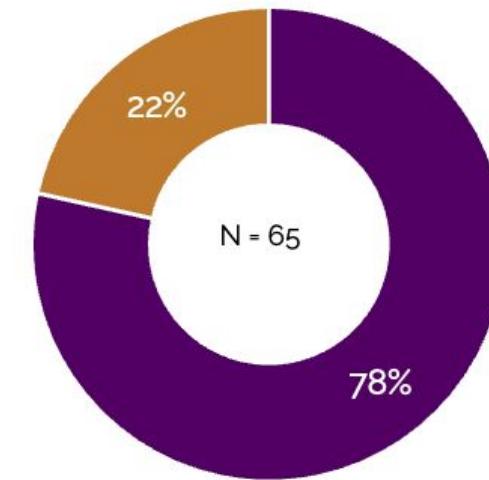


*Most stakeholders agreed with the exemption, while a minority opposed it, citing risks of loopholes for automakers with large financing divisions. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.*

**Q9. Do you agree with the exemption from applying SBTi's financial institutions target-setting and validation route for automotive sector companies?**



*Percentage split of responses*



# Summary of Consultation Feedback by Consultation Question



## Consultation Question 9

Do you agree with the exemption from applying SBT's financial institutions target-setting and validation route for automotive sector companies?

**The main themes of written feedback are presented below:**

- **Broad support for exemption:** Most respondents agreed, stressing that automotive financial services are integrated with OEM product sales (e.g., leasing) and not the main business activity. They see applying the FI route as unnecessary and overly complex.
- **Concerns about loopholes:** A strong minority opposed the exemption, warning it could create loopholes for automakers with large financing divisions. Respondents claim that these financial arms strongly influence EV adoption, fleet turnover, and climate-related financial risks, and therefore should not be exempt.
- **Need for disclosure and alignment:** Several comments recommended that companies with substantial finance operations be required to disclose and align those portfolios with net-zero goals, to ensure financing supports rather than hinders the EV transition.
- **Thresholds:** Some suggested introducing thresholds to determine when the FI route should apply, particularly for companies where financing operations represent a significant share of business activity.

## [Q10] - Detailed survey responses

### Feedback received

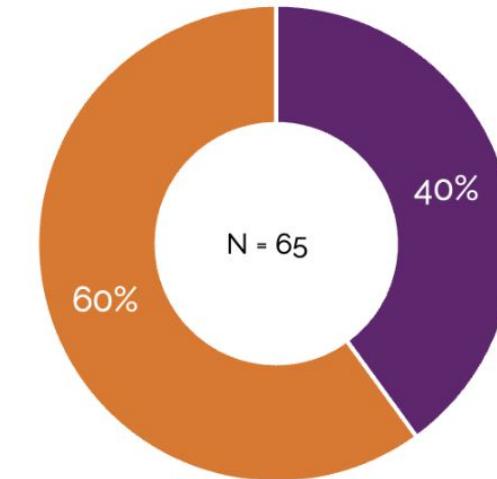


Most stakeholders indicated the applicability of CNZS V2.0 was not clear enough, citing confusion over how it should be applied alongside the Automotive Net-Zero Standard. Few comments suggested the explanation was clear. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

**Q18. Do you think the way the draft Corporate Net-Zero StandardS V2.0's criteria applicability is explained is clear enough to enable an efficient applicability of both standards in parallel? If not, do you have any suggestions to improve on this aspect?**



Percentage split of responses



- Yes, it's clear enough
- It's not clear enough

# Summary of Consultation Feedback by Consultation Question



## Consultation Question 10

Do you think the way the draft Corporate Net-Zero Standards V2.0's criteria applicability is explained is clear enough to enable an efficient applicability of both standards in parallel? If not, do you have any suggestions to improve on this aspect?

**The main themes of written feedback are presented below:**

- **Clarity of applicability:** Many respondents are unclear if Corporate Net-Zero Standard and Automotive Net-Zero Standard must be applied in parallel or if one can substitute the other. Feedback calls for a unified framework or a clear "single source of truth" document.
- **Complexity & burden:** Applying two standards creates duplicative targets, conflicting requirements, and heavy reporting obligations that are seen as impractical.
- **Ambiguity & guidance gaps:** Wording is often unclear, with confusion around Scope 3 treatment, definitions, and mandatory vs. optional requirements.
- **Need for integration & tools:** There is strong demand for either one consolidated standard or, at minimum, practical tools such as matrices, decision trees, and worked examples to help companies apply requirements effectively.

# [Q11] - Detailed survey responses

## Feedback received

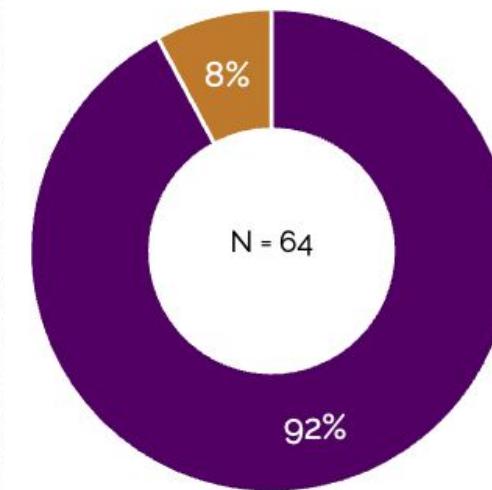


Most stakeholders agreed with China being a separate region, though a minority opposed it on grounds of complexity, inconsistency with existing frameworks, or fairness concerns. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

### Q11. Do you agree with having the China region (including China and Hong Kong) as a third separate regional grouping?



Percentage split of responses



# Summary of Consultation Feedback by Consultation Question

## Consultation Question 11

Do you agree with having the China region (including China and Hong Kong) as a third separate regional grouping?

**The main themes of written feedback are presented below:**

- **Broad support for China as a separate region:** Most respondents agreed, pointing to the size, growth, and distinct energy mix of the Chinese market. Many highlighted that separate treatment better reflects China's regulatory and decarbonization context.
- **Flexibility emphasized:** While supportive, several respondents stressed that regional differentiation should not result in rigid sub-targets for individual markets. They called for enough flexibility to optimize actions across regions in response to varying regulatory and market conditions.
- **Technical and feasibility concerns:** A few comments raised doubts about whether China can realistically meet the same electrification pathways as other regions, given its power sector and long-term carbon neutrality timeline. These stakeholders urged that targets for China align with its national energy trajectory.
- **Opposition to regional split:** A few opposed creating a separate China region, arguing that it adds complexity, doesn't align with internal reporting structures, or contradicts international frameworks such as the UNFCCC's. They suggested China be grouped with other emerging markets instead.

# [Q12] - Detailed survey responses

## Feedback received

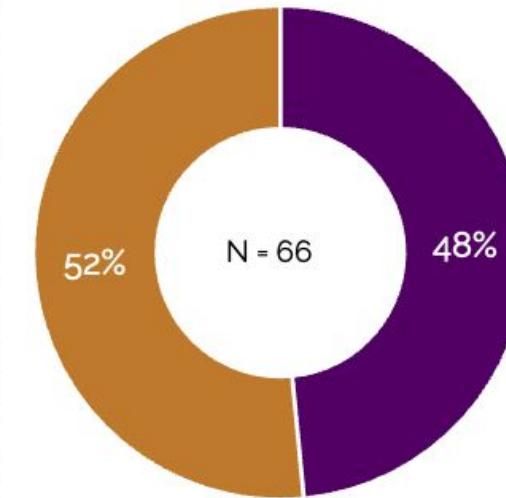


Stakeholders were divided: many supported including all subsidiaries (with differing views on the threshold), while many others opposed, arguing automakers cannot be accountable for entities outside operational control. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

**Q12. Do you agree that automakers must also cover the aggregated emissions of their subsidiaries even when these fall outside of operational control? What do you think is the appropriate threshold (in terms of financial stake in the company) above which this is required? (15% is proposed).**



Percentage split of responses



# Summary of Consultation Feedback by Consultation Question



## Consultation Question 12

Do you agree that automakers must also cover the aggregated emissions of their subsidiaries even when these fall outside of operational control? What do you think is the appropriate threshold (in terms of financial stake in the company) above which this is required? (15% is proposed).

**The main themes of written feedback are presented below:**

- **Split views on inclusion:** Some stakeholders supported requiring automakers to cover subsidiary emissions, arguing that meaningful net-zero commitments must reflect the whole group. Others strongly opposed, stressing that companies cannot manage emissions outside operational control.
- **Threshold debate:** Views varied widely on the proposed 15% threshold. Supporters saw it as reasonable, while opponents argued it was too low. Alternatives suggested included thresholds of 33% or 50%, aligned with common definitions of significant influence or financial consolidation.
- **Alignment with existing frameworks:** Many opposed voices referenced the GHG Protocol, CSRD, and IFRS, arguing that emissions boundaries should follow established operational or financial control rules. They warned that SBTi's proposal risks inconsistency and double counting.
- **Feasibility and data challenges:** Several commenters flagged practical difficulties in collecting reliable data from minority subsidiaries and stressed the lack of ability to influence product portfolios or implement decarbonization measures without control.

# [Q13] - Detailed survey responses

## Feedback received

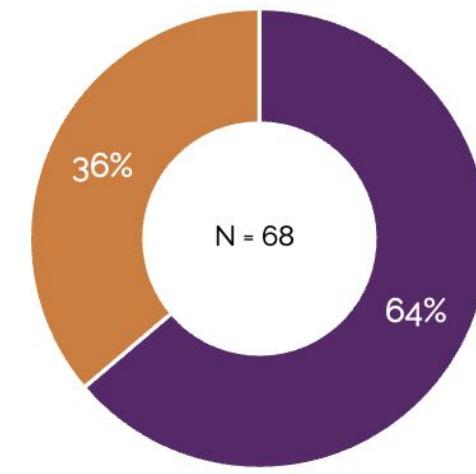


Stakeholders were split: many supported including end-of-life emissions for lifecycle completeness, while many others opposed, citing limited influence, low materiality, and added complexity. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

**Q13. Do you agree with including the end-of-life component (scope 3, category 12) in the aggregate indicator in criteria AMSS-C1 and APSS-C1?**



Percentage split of responses



■ Yes ■ No

# Summary of Consultation Feedback by Consultation Question



## Consultation Question 13

Do you agree with including the end-of-life component (scope 3, category 12) in the aggregate indicator in criteria AMSS-C1 and APSS-C1?

**The main themes of written feedback are presented below:**

- **Support for inclusion:** Many stakeholders favored including scope 3, category 12, stressing that full lifecycle coverage is important for credibility, consistency with ISO LCA standards, and circular economy principles. Several noted growing relevance with batteries and recycling.
- **Concerns about complexity & influence:** A significant group opposed inclusion, arguing category 12 adds complexity, relies on default values, and represents only a small share of emissions. They also stressed that automakers and suppliers have limited influence over end-of-life treatment.
- **Materiality debate:** Opponents highlighted that categories 1 and 11 dominate sector emissions, while category 12 is relatively minor. They argued focus should remain on the most material categories.
- **Conditional/optional inclusion:** Some comments suggested making category 12 optional or phased in gradually, given data gaps and limited influence today, while still acknowledging its growing importance for batteries.

# [Q14] - Detailed survey responses

## Feedback received



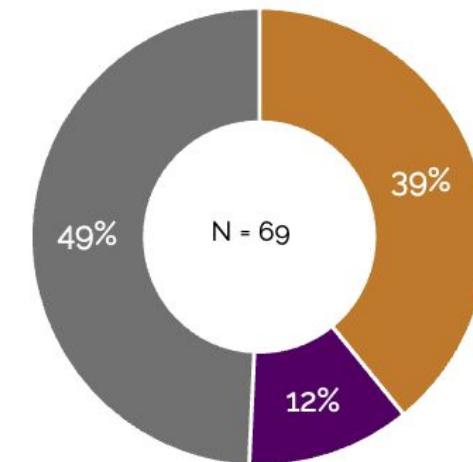
Overall, stakeholders were divided, with strong support for both mandatory and optional approaches, while fewer favored base year disclosure only. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

**Q14. The aggregated emission intensity indicator is currently proposed as a mandatory target in the standard. Do you think this approach should remain, or would it be more appropriate for companies to only disclose base year performance, or for the indicator to be an optional target?**



- The aggregated emission intensity indicator should be mandatory
- Companies should disclose only their base year performance
- The indicator should be an optional target

Percentage split of responses



- The aggregated emission intensity indicator should be mandatory
- Companies should disclose only their base year performance
- The indicator should be an optional target

# [Q15] - Detailed survey responses

## Feedback received

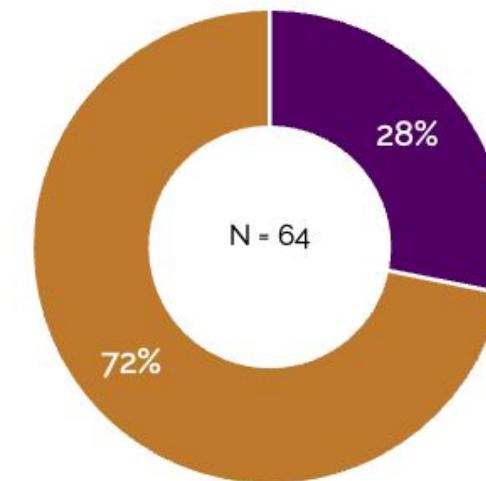


Most stakeholders did not find the LEV definition sufficiently aligned with existing regulations. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

**Q15. Do you feel the low-emission vehicle definition is sufficiently aligned to existing sectoral regulations and requirements to enhance interoperability and reduce reporting burden? If not, what changes would you suggest, aligning to which other regulations/requirements?**



Percentage split of responses



# Summary of Consultation Feedback by Consultation Question

## Consultation Question 15

Do you feel the low-emission vehicle definition is sufficiently aligned to existing sectoral regulations and requirements to enhance interoperability and reduce reporting burden? If not, what changes would you suggest, aligning to which other regulations/requirements?

**The main themes of written feedback are presented below:**

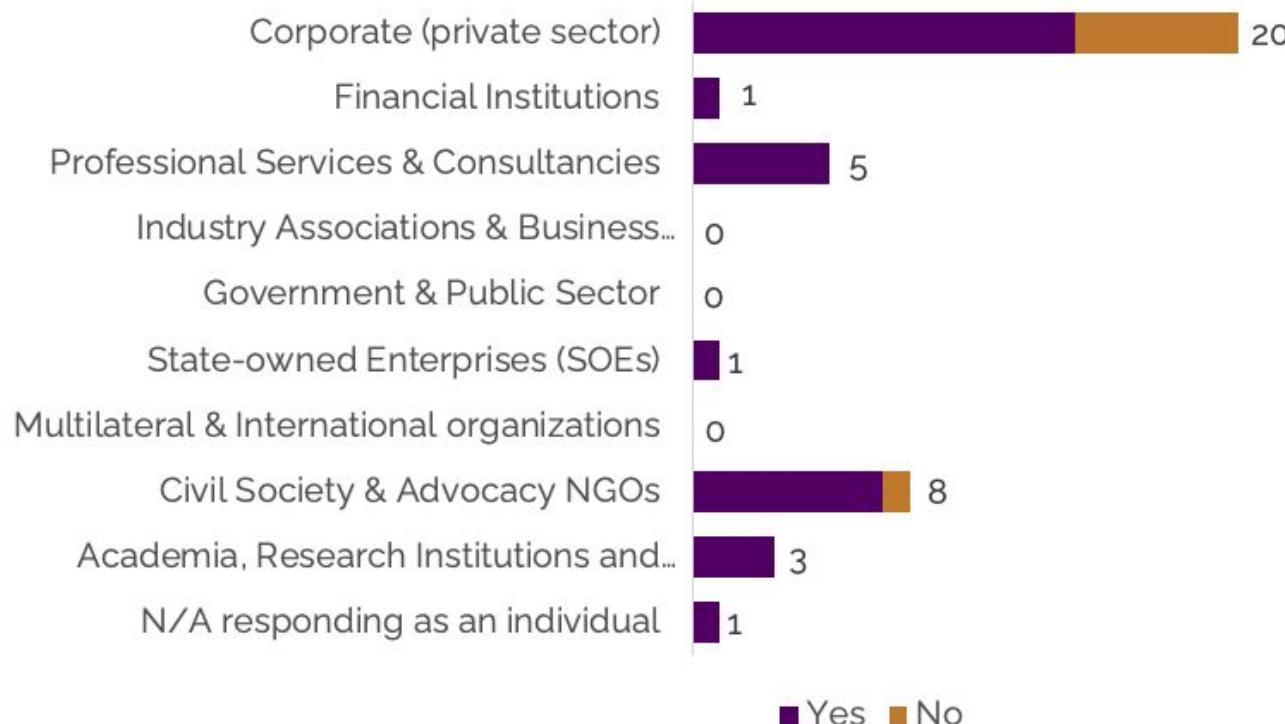
- **Concerns about alignment:** Many respondents felt the current LEV definition is not sufficiently aligned with major regulatory frameworks. They warned this creates complexity, inconsistent reporting, and extra burden for automakers.
- **65% GHG reduction threshold too rigid:** Seen as unrealistic and potentially excluding viable decarbonization options (e.g., CN fuels, biofuels, synthetic fuels). Calls for more flexible or regionally tailored thresholds.
- **Clean fuels methodology issues:** Several stakeholders criticized the proposed methodology for biofuels and clean fuels, particularly the use of ILUC factors and arbitrary caps. They argued this undermines scientific credibility and biases against liquid fuels.
- **Regional and practical challenges:** Many noted that existing definitions vary widely across regions, making a global LEV definition difficult to implement. Some warned the quota target adds unnecessary complexity and duplication with aggregated GHG targets.
- **Minority support:** A smaller group supported the definition as a useful foundation, but suggested refinements such as clear baselines, technology neutrality, or gradual refinement to reduce burden.

# [Q16] - Detailed survey responses

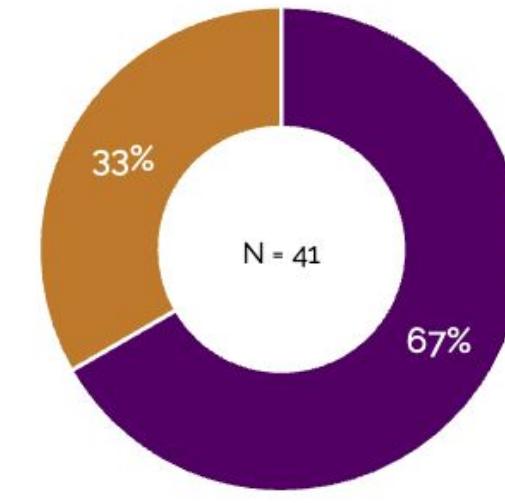
## Feedback received

*Most stakeholders agreed with the proposal, often highlighting reduced burden for smaller companies. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.*

**Q24. It is proposed in APSS-C2 that Category B companies may not be required to assess and disclose the sales share of parts for low-emission vehicles. Do you agree with this exemption?**



Percentage split of responses



# Summary of Consultation Feedback by Consultation Question



## Consultation Question 16

It is proposed in APSS-C2 that Category B companies may not be required to assess and disclose the sales share of parts for low-emission vehicles. Do you agree with this exemption?

**The main themes of written feedback are presented below:**

- **Broad agreement:** Most stakeholders supported the proposal, often noting it seemed reasonable and appropriate, especially to reduce burden for smaller companies.
- **Support for exemptions:** Several comments emphasized the need for flexibility or optional application for all categories, highlighting that full requirements could create a heavy practical burden for small or less impactful entities.

# [Q17] - Detailed survey responses

## Feedback received

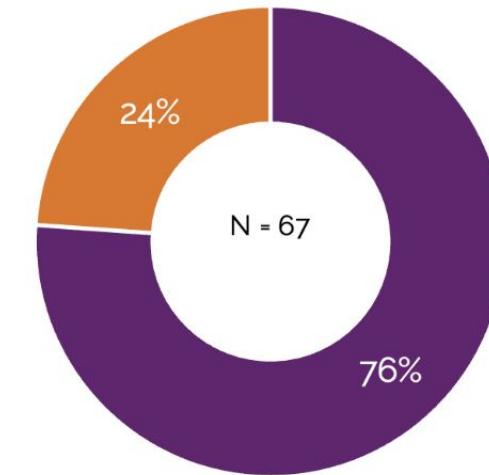


Most respondents supported a separate scope 3 cat 1 requirement, highlighting its importance for supply chain decarbonization. A smaller group opposed, arguing it duplicates the aggregated target and adds complexity. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.

**Q25. Do you agree there is value in the inclusion of an additional requirement to assess performance separately for scope 3 category 1 (purchased goods and services) for automakers?**



Percentage split of responses



■ Yes ■ No

# Summary of Consultation Feedback by Consultation Question

## Consultation Question 17

Do you agree there is value in the inclusion of an additional requirement to assess performance separately for scope 3 category 1 (purchased goods and services) for automakers?

**The main themes of written feedback are presented below:**

- **Strong support for inclusion:** Many stakeholders supported a separate scope 3 cat 1 requirement, stressing its importance as supply chain emissions (steel, aluminum, batteries, etc.) represent a growing share of vehicle lifecycle emissions, particularly for BEVs. They argued automakers are well-positioned to send demand signals that drive decarbonization of these industries.
- **Material-specific focus:** Several respondents called for material-specific targets (especially steel, aluminum, and batteries), noting these are the biggest contributors to embodied emissions and already the subject of emerging regulation.
- **Concerns about duplication & complexity:** Opponents argued a separate target would duplicate the aggregated indicator, add reporting burden, and create practical challenges (e.g., data gaps, supplier dependence, or increased complexity without proportional benefit).
- **Conditional support:** Some agreed in principle but emphasized the need to limit the number of individual targets (2-3 max) or suggested making scope 3 cat 1 optional. Others noted it could add value only if accompanied by flexibility in methodology.

# [Q18] - Detailed survey responses

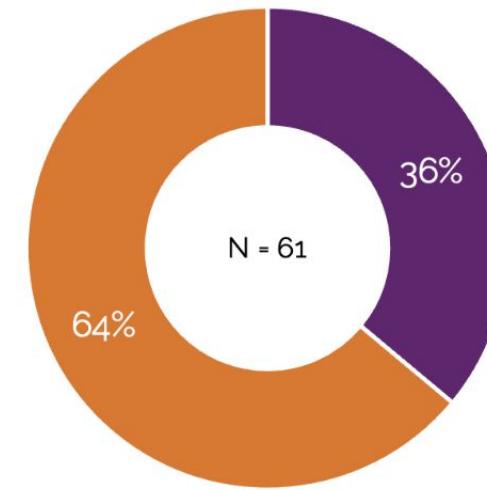
## Feedback received

*Most respondents did not agree with the methodological approach, citing issues with model choice, lack of interim targets, and overly rigid benchmarks. A minority supported the approach. Please see the SBTi's responses to the comments in the Main Changes Document for the 1st Public Consultation.*

### *Q18. Do you agree with the methodological approach to define benchmarks and compliance trajectories?*



*Percentage split of responses*



# Summary of Consultation Feedback by Consultation Question



## Consultation Question 18

Do you agree with the methodological approach to define benchmarks and compliance trajectories?

**The main themes of written feedback are presented below:**

- **Modeling approach:** Many respondents criticized the averaging of GREET and JEC models, arguing it undermines scientific rigor and disadvantages certain fuels/regions.
- **Need for near-term targets:** Several emphasized that interim benchmarks (2030, 2035, 2040) should be mandatory, not just long-term 2050 trajectories.
- **Flexibility and fairness:** Respondents said the convergence approach is too rigid, penalizing companies with higher baselines or faster BEV transitions. They recommended alternative approaches like relative contraction or commodity-specific pathways.
- **Benchmarks for scope 3 cat 1 unrealistic:** Several noted that material-related emissions (steel, aluminum, batteries) vary widely by source and region. They criticized the generic benchmarks and the conversion of emissions into vkm, urging allowance for company-specific LCAs and baseline models.

# Summary of Consultation Feedback by Consultation Question

## Consultation Question 19

Were any questions missing from the survey that you expected to answer?

**The main themes of written feedback are presented below:**

- **Technology neutrality and regional flexibility:** Suggestions that the standard should not lock into one pathway (e.g., fixed LEV quotas) but instead recognize multiple low-carbon solutions, regional energy mixes, and technology maturity.
- **Data quality and reporting feasibility:** Requests for clearer rules on acceptable use of default data, minimum quality standards, and realistic guidance for base year calculations.
- **Credibility of emissions accounting:** Concerns about chain-of-custody models and use of certificates (e.g., "low-emission" steel) that mask real emissions. Preference for physical emissions-based accounting.
- **Standard applicability and practicality:** Many argued the framework is overly complex and unrealistic under current market conditions, urging simpler, more practical targets (use-phase + supply chain) and flexibility for different company types or regions.

# Summary of Consultation Feedback by Consultation Question

## Consultation Question 19

Were any questions missing from the survey that you expected to answer?

**The main themes of written feedback are presented below:**

- **BEV charging and grid emissions:** Strong view that real-time grid impacts from BEV charging are missing. Companies want assessment of how charging demand may displace renewables or add fossil use.
- **Alternative ambition pathways:** Suggestions to allow “well-below 2°C” or Paris-aligned options, to avoid discouraging companies that cannot meet strict 1.5°C pathways.
- **Regional differentiation and fairness:** Several comments hinted at the need to tailor requirements to regional realities (e.g., slower grid decarbonization in China)
- **Applicability and role of the Automotive Sector Net-Zero Standard vs. Corporate Net-Zero Standard:** Some asked whether the new standard is meant to replace or complement the Corporate Net-Zero Standard. This was flagged as a missing clarification.
- **Practical feasibility/administrative burden:** Several noted that the standard risks becoming overly complex, requiring excessive administration, and not reflecting sectoral realities (e.g., product cycles, regional infrastructure).



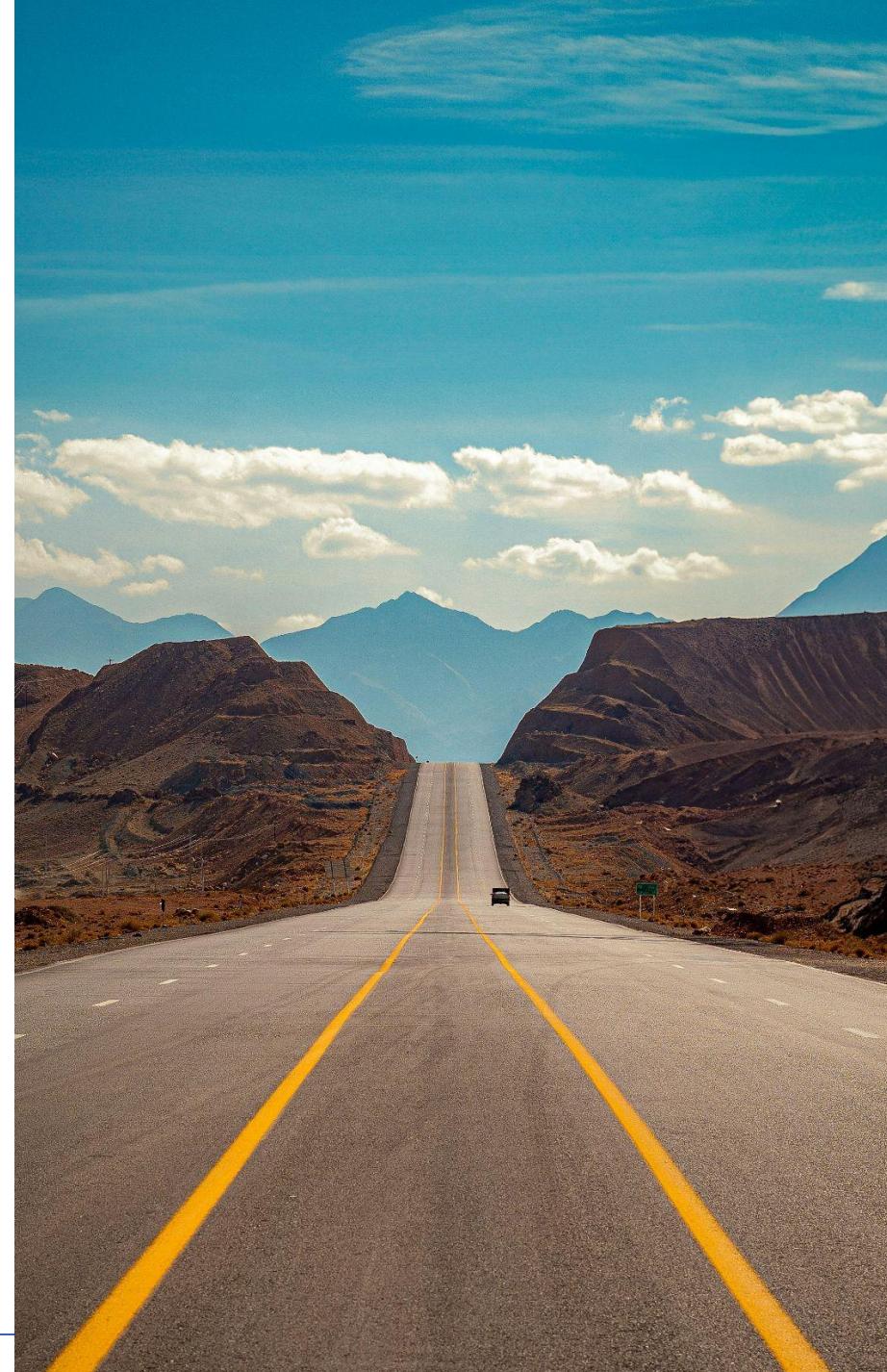
# NEXT STEPS

## NEXT STEPS FOR THE DEVELOPMENT PROCESS

The next steps in the development of the **Automotive Sector Net-Zero Standard** are:

- Draft a revised version of the standard that includes the changes deemed necessary by the Automotive Team;
- Start the second public consultation and the pilot test with the revised draft.

The [full log of feedback](#) received during the first consultation is available on the SBTi website.





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