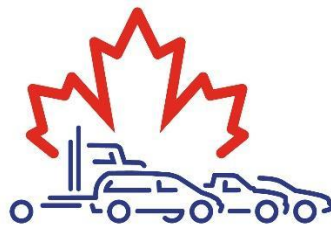


**Remarks to the Standing Committee on Environment
and Sustainable Development**

Electric Vehicle Availability Standard



Canadian Vehicle Manufacturers' Association (CVMA)

Brian Kingston, President & CEO

November 27, 2025

Mr. Chair, committee members, thank you for the invitation to appear today as part of the committee's study of the Electric Vehicle Availability Standard.

CVMA members are committed to electrification. In fact, they are leading the transition to electric in Canada. Ford and GM are the EV market leaders through Q2 this year. Stellantis is the only automaker currently manufacturing batteries and assembling a light-duty EV in Canada.

Over the past decade, the number of EVs available for sale to Canadians has increased by 400%. Today there are 115 models in the market in every size and segment to meet the transportation needs of all Canadians.

Despite these investments into electrification, ZEV sales have collapsed. There were 17,192 new ZEVs sold in September 2025, a decrease of 43.3% from the same month the previous year.

It should be clear to everyone now that federally mandated EV sales targets established in the EVAS are unrealistic and unachievable. To meet the 23% sales target by 2027, ZEV sales would need to increase by 256% almost immediately. Achieving 60% ZEV sales by the 2030 model year is even more unrealistic, as it would require a compound annual growth rate of over 48% year-over-year.

We recommend that the government fully repeal the EVAS and instead focus efforts on building out the supports Canadian need to go electric. This includes incentives for Canadians to purchase ZEVs and a rapid buildout of charging infrastructure.

According to the federal government, as of October 2025, there are only 37,000 public charging ports in operation, far short of the 100,500 needed in 2025 and the 410,500 required by 2035. To support this charging infrastructure Canada needs to invest in clean electricity generation and grid capacity. NRCan estimates that the grid upgrades required to meet ZEV demand—including generation, transmission and distribution—will cost up to \$294 billion over the 2025 to 2040 period.

Repealing EVAS does not jeopardize Canada's emissions reduction goals. EVAS duplicates existing Greenhouse Gas (GHG) emission standards,

adding unnecessary regulatory burden without additional environmental benefit.

Canada's GHG emission regulations have already driven significant reductions in vehicle emissions (49.8% reduction for passenger cars and 30.7% for light trucks since 2011). These outcome-based, technology-neutral standards are superior to EVAS, providing flexibility and supporting innovation without distorting the market.

Persisting with the expensive, duplicative, and ineffective EVAS risks inflicting lasting harm on automakers—at precisely the wrong moment. Automakers are under intense pressure due to tariffs and trade disruptions that put the sector, and the hundreds of thousands of jobs it supports, at risk.

To comply with the regulation automakers are forced to restrict internal combustion engine (ICE) vehicle sales and purchase credits from foreign manufacturers that don't build cars in Canada.

If the regulation is not repealed, automakers will need to remove between 700,000 to 900,000 gas-powered and fuel-efficient hybrid vehicle sales from the Canadian market starting this year and purchase over \$3 billion in compliance credits.

Of the 1.3 million vehicles built in Canada last year, 95% of them will be prohibited for sale in less than a decade under EVAS. This would be devastating for the auto industry, dealerships, and the Canadian economy.

Canadians will bear the brunt of the regulation in the form of jobs losses, higher vehicle prices, and less availability as vehicle restrictions limit inventories. According to Environment and Climate Change Canada, EVAS is expected to have a disproportionate impact in low income, rural, and northern communities that face higher vehicle prices and limited access to charging infrastructure.

As the Prime Minister has said - in the face of a changing global landscape we must focus on what we can control. Repealing EVAS now is the most effective way to protect this critical industry and ensure Canadians are spared from the damaging effects of the regulation.

Thank you.