

Draft Legislation

of the Federal Ministry for the Environment, Climate Protection, Nature Conservation and Nuclear Safety

Second Ordinance amending the Ordinance on the labelling of motor vehicles with pollutant emissions

A. Problem and objective

Under the first sentence of § 1(1) of the Road Traffic Act (Straßenverkehrsgesetz, StVG), motor vehicles intended to be used on public roads must be approved for circulation by the registration authority. Under the second sentence of § 1(1) of the StVG, registration is effected, at the request of the person authorised to dispose of the vehicle, on the basis of a type-approval, individual approval or EC type-approval, by means of the issue of a registration number. Electrically powered vehicles within the meaning of § 2(1) of the Electric Mobility Act (Elektromobilitätsgesetz) shall be assigned a registration number for electrically powered vehicles upon application in accordance with § 11(1) sentence 1 of the German Vehicle Registration Ordinance ([Fahrzeug-Zulassungsverordnung, FZV](#)). Vehicles authorised to participate in road traffic abroad must be marked with a blue sticker in accordance with § 11(4) sentence 1 in conjunction with Annex 3 FZV. Pursuant to § 11(5) FZV, registration plates issued abroad for electrically powered vehicles or badges issued for electrically powered vehicles are the same as registration plates or stickers for electrically powered vehicles issued in the Federal Republic of Germany.

In order to enter a low emission zone, these electrically powered vehicles also currently have to display a sticker as required under the Ordinance on the Marking of Vehicles with a Low Contribution to Pollutant Pollution (35th Federal Immission Control Ordinance, BImSchV) (§ 2(1) in conjunction with Annex 1 of the 35th BImSchV). They are determined in accordance with § 2(2) in conjunction with Annex 2(3) and § 3(1) in conjunction with Annex 1 of the 35th BImSchV marked with a green sticker. However, even without a green sticker, the fact that the vehicle has an E-licence plate or other corresponding identification in accordance with § 11 of the German Vehicle Registration Ordinance (FZV) indicates that the vehicle is authorised to enter an environmental zone.

B. Solution

In order to simplify administration, Annex 3 to the 35th Federal Immission Control Ordinance pursuant to § 11 FZV for electric vehicles marked as such on the basis of § 2(3) of the 35th BImSchV are exempted from the requirement to display a sticker. This relieves both the corresponding vehicle owners and the administration of bureaucratic tasks and costs. The environmental standards regarding air quality remain unchanged.

C. Alternatives

Refraining from adaptation, which would, however, be contrary to the aim of reducing bureaucracy.

D. Budgetary expenditure exclusive of compliance costs

The costs of producing and issuing the stickers will be offset by fees paid by vehicle owners, meaning that the proposed measure will not result in any additional revenue or expenditure for the administration or public finances.

E. Compliance costs

Based on the number of new registrations for 2024, total annual savings of over EUR 6 million can be achieved. From 2025 to 2030, these savings are expected to increase by a factor of 14.

E.1 Compliance costs for citizens

For citizens, with annual savings of 852 thousand euros and time saving of over 22 thousand. Hours calculated based on the number of new registrations for the year 2024.

E.2 Compliance costs for businesses

For businesses, an annual reduction of over EUR 3 million is expected in relation to the number of new registrations for 2024. Of which, around EUR 349 000 is attributable to administrative costs arising from obligations to provide information.

E.3 Administrative compliance costs

There are no compliance costs for citizens. For municipalities, an annual reduction of over EUR 2 million in relation to the number of new registrations for 2024 is expected.

F. Additional costs

No further costs are expected.

Draft bill of the Federal Ministry for the Environment, Climate Protection, Nature Conservation and Nuclear Safety

Second Ordinance amending the Ordinance on the labelling of motor vehicles with low pollutant emissions¹

of ...

The Federal Government decrees on the basis of § 40(3) sentence 1 of the Federal Immission Control Act in the version published on 17 May 2013 (Federal Law Gazette I p. 1274, 2021; I p. 123), as last amended by Article 2 of the Act of 22 December 2025 (Federal Law Gazette 2025 I No. 348) has been amended, after consulting the parties concerned,

the Federal Ministry of Transport and the Federal Ministry for the Environment, Climate Protection, Nature Conservation and Nuclear Safety prescribe on the basis of § 6(1) first sentence point 8, § 6(4) first sentence point 2 and second sentence point 1, § 6(6) first sentence of the Road Traffic Act, as amended by the notice of 5 March 2003 (Federal Law Gazette I p. 310, 919), as last amended by Article 70 of the Act of 23 October 2024 (Federal Law Gazette 2024 I No 323) in conjunction with § 1(2) of the Jurisdictional Adjustment Law of 16 August 2002 (Federal Law Gazette I, p. 3165), as amended by Article 7 of the Ordinance of 31 August 2015 (Federal Law Gazette I p. 1474) and the Organisational Order of 6 May 2025 (Federal Law Gazette I No. 131) and

the Federal Ministry of Transport decrees on the basis of § 6(1), first sentence, point 11 of the Road Traffic Act in the version published on 5 March 2003 (Federal Law Gazette I p. 310, 919), as last amended by Article 70 of the Act of 23 October 2024 (Federal Law Gazette 2024 I No 323) in conjunction with § 1(2) of the Jurisdictional Adjustment Law of 16 August 2002 (Federal Law Gazette I, p. 3165), as amended by Article 7 of the Ordinance of 31 August 2015 (Federal Law Gazette I p. 1474) and the Organisational Order of 6 May 2025 (Federal Law Gazette 2025 I No 131):

Artikel 1

Amendment of the Ordinance on the labelling of vehicles with low pollution emissions

The Ordinance on the Labelling of Motor Vehicles with Low Pollutant emissions of 10 October 2006 (Federal Law Gazette I p. 2218), last amended by Article 85 of the Ordinance of 31 August 2015 (Federal Law Gazette I p. 1474) is amended as follows:

In Annex 3, point 10, the full stop is replaced by a comma and the following point 11 is inserted:

1. 'Motor vehicles labelled as electrically powered vehicles in accordance with § 11 of the Vehicle Registration Ordinance.'

¹ Notified in accordance with Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services (OJ L 241, 17/9/2015, p. 1).

Artikel 2

Entry into force

This Ordinance shall enter into force on the first day of the month following the announcement.

Approved by the Bundesrat.

Justification

A. General part

I. Objective and need for the regulations

Under the first sentence of § 1(1) of the Road Traffic Act (Straßenverkehrsgesetz, StVG), motor vehicles intended to be used on public roads must be approved for circulation by the registration authority. Under the second sentence of § 1(1) of the StVG, registration is effected at the request of the holder of the right of disposal of the vehicle in the case of type-approval, individual approval or EC type-approval by means of the issue of a registration number. Electrically powered vehicles within the meaning of § 2(1) of the Electric Mobility Act (Elektromobilitätsgesetz) shall be assigned a registration number for electrically powered vehicles upon application in accordance with § 11(1) sentence 1 of the German Vehicle Registration Ordinance ([Fahrzeug-Zulassungsverordnung, FZV](#)) . Vehicles authorised to participate in road traffic abroad must be marked with a blue sticker in accordance with § 11(4) sentence 1 in conjunction with Annex 3 FZV. Pursuant to § 11(5) FZV, registration plates issued abroad for electrically powered vehicles or badges issued for electrically powered vehicles are the same as registration plates or stickers for electrically powered vehicles issued in the Federal Republic of Germany.

In order to enter a low emission zone, these electrically powered vehicles also currently have to display a sticker as required under the Ordinance on the Marking of Vehicles with a Low Contribution to Pollutant Pollution (35th Federal Immission Control Ordinance, BImSchV) (§ 2(1) in conjunction with Annex 1 of the 35th BImSchV). They are determined in accordance with § 2(2) in conjunction with Annex 2(3) and § 3(1) in conjunction with Annex 1 of the 35th BImSchV marked with a green sticker. However, even without a green sticker, the fact that the vehicle has an E-licence plate or other corresponding identification in accordance with § 11 of the German Vehicle Registration Ordinance (FZV) indicates that the vehicle is authorised to enter an environmental zone.

II. Main content of the draft

In order to simplify administration, Annex 3 to the 35th Federal Immission Control Ordinance pursuant to § 11 FZV for electric vehicles marked as such on the basis of § 2(3) of the 35th BImSchV are exempted from the requirement to display a sticker. This relieves both the corresponding vehicle owners and the administration of bureaucratic tasks and costs. The environmental standards regarding air quality remain unchanged.

III. Executive footprint

No stakeholders or authorised third parties contributed to the draft regulation.

IV. Alternatives

There are no alternatives to adapting existing national law.

V. Regulatory competence

The regulatory competence of the Federal Government with regard to Article 1 (amendment to the Ordinance on the marking of motor vehicles with low pollutant emissions) results from § 40(3) of the Federal Pollution Control Act. The change in the 35th Federal Immission Control Ordinance (BImSchV) is also based on § 6(1) sentence 1 points 8 and 11 and § 6(4) sentence 1 no. 2 and sentence 2 point 1 of the Road Traffic Act (StVG), which authorise the Federal Ministry of Transport (BMV) and the Federal Ministry of Transport, Construction and Housing (BMUKN) jointly (§ 6(6) sentence 1 StVG) or the BMV to issue regulations.

The amendment of the Ordinance on the labelling of motor vehicles with low pollutant emissions is compatible with European Union law and international treaties concluded by the Federal Republic of Germany.

VI. Regulatory consequences

1. Legal and administrative simplification

By waiving the requirement to display an environmental badge for vehicles with E-licence plates, the administration will be relieved of a task that is expected to grow in the future.

2. Sustainability aspects

The measure relieves the burden on citizens, businesses and the administration, thereby strengthening the economic and social aspects of sustainability. At the same time, the current environmental protection standards will be maintained, as the vehicles concerned will in all cases comply with the green sticker requirements and electro-mobility will be supported as a climate- and environment-friendly technology. This is expected to increase the positive environmental impact of the measure in the future. Overall, the measure contributes to the fulfilment of the following sustainability indicator areas and indicators:

- 3.2 a Emissions from air pollutants
- 8.1 Resource conservation: Use resources sparingly and efficiently
- 9. Build resilient infrastructure, promote inclusive and sustainable industrialisation and support innovation
- 11.2.b Final energy consumption in passenger transport
- 12.1 Sustainable consumption: Shaping consumption in an environmentally and socially responsible manner
- 12.1.bc Global environmental impact of private household consumption – CO2 emissions
- 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

The promotion of low-emission and zero-emission electric mobility contributes to improving air quality and thus the state of the environment, climate protection and the protection of human health. In addition, the exemption reduces resource consumption for the production of environmental stickers, strengthens sustainable consumption patterns in favour of climate- and environmentally friendly vehicles and electromobility as an industrial and economic sector. The administrative burden-reducing effect of the measure on citizens, busi-

nesses and the administration strengthens trust in government policies and the accountability of administrative action at the level of society as a whole.

3. Budgetary expenditure exclusive of compliance costs

The costs of producing and issuing the stickers will be offset by fees paid by vehicle owners, meaning that the proposed measure will not result in any additional revenue for the administration or public finances.

4. Compliance costs

Framework conditions and data bases:

Motor vehicles with a registration plate pursuant to § 11 of the Vehicle Registration Ordinance and motor vehicles with a sticker pursuant to Annex 3 (to § 11(4)) of the Vehicle Registration Ordinance include pure battery electric vehicles as well as externally rechargeable hybrid electric vehicles and fuel cell vehicles. The following assessments are based on data from the Federal Motor Transport Authority (Kraftfahrt-Bundesamt) on [new registrations of motor vehicles according to environmental characteristics for the year 2024](#). These explicitly distinguish between the fuel types "electric (BEV – battery electric vehicle)" and "hybrid, including plug-in" (PHEV – plug-in electric vehicle), while the drive type "fuel cells" is not shown separately. In most cases, fuel cell vehicles have significantly higher total cost of ownership, meaning that they continue to play a negligible role in the drive system mix for passenger cars. In the following analyses, total new registrations of passenger cars with the fuel types 'electric (BEV)' and 'hybrid, including plug-in' were therefore taken into account.

The number of new registrations of motor vehicles that meet the requirements for registration with a licence plate in accordance with § 11 of the Vehicle Registration Ordinance and motor vehicles with a sticker in accordance with Appendix 3 (to § 11(4)) of the Vehicle Registration Ordinance is considered to be the case number. This is considered to be the minimum number of cases; in the case of transcriptions of vehicles with a change of registration number or each time the windscreen is replaced, the eco-sticker must be purchased again. However, no data are currently available on the number of transcriptions with changes to the registration number.

The cost of purchasing the labels is also calculated conservatively using the minimum price of EUR 5 when purchasing from a licensing authority or other competent bodies under federal state legislation. Other issuing offices include emissions testing centres such as TÜV, DEKRA, GTÜ, FSP, KÜS and car repair shops authorised to carry out emissions tests, which charge fees of up to approximately EUR 20.

In the following, the compliance costs are calculated on the basis of the data for 2024 for citizens, businesses and the administration respectively. In addition, on the basis of the [2024 greenhouse gas projections of the Federal Environment Agency](#), the future development of compliance costs is estimated, taking into account the projected increase in new registrations of electric vehicles by 2030. Since the greenhouse gas projection report 2024 does not distinguish between private and commercial holders, only an overall calculation can be carried out here.

The Federal Environment Agency's 2025 projection report ([Projektionsbericht 2025 des Umweltbundesamtes](#)) assumes that there will be over 8 million new registrations of electric cars (BEVs) and plug-in hybrid cars (PHEVs) between 2025 and 2030. Compared to new registrations in 2024, this means an increase by a factor of 14 in the number of new registrations of vehicles authorised to carry an E-plate in the period 2025 to 2030. This also increases the savings on compliance costs accordingly in this period compared to the savings shown above for the calendar year 2024. The proportion of new registrations of battery-electric passenger cars in the total number of new registrations is projected to in-

crease from 32 percent in 2025 to 65 percent in 2030. The share of plug-in hybrid passenger cars in new registrations is projected to rise from 3 per cent in 2024 to 6 per cent in 2030. For the period from 2035 onwards, it is projected that all new registrations will be for battery-electric cars. In this respect, it can be assumed that the compliance costs or the savings generated by the proposed measure will multiply accordingly in the long term, regardless of the future development of wage costs and possible conversions.

4.1. Compliance costs for citizens

Seq. No.	Article of draft legislation; provision (articles); designation of the requirement	Annual number of cases (units)	Annual expenditure per case (in minutes)	Annual expenditure per case (in minutes)	Annual compliance costs (in hours)	Annual compliance costs (in thousands of EUR)
1.1	1	170 512	- 8	- 5	- 22 734	- 852 560
	One-off time required (in hours)				- 22 734	
	Total material costs (in thousands of EUR)					- 852 560

4.2. Compliance costs for businesses

Seq. No.	Article Draft Legislation; Standard (§§); Designation of the requirement	IP	Annual number of cases (units)	Annual expenditure per case (minutes * labour costs per hour (overall economy, low qualification level] + material costs (in EUR)	Annual compliance costs (in thousands of EUR)
2.1	1	Procur- ing data	401 174	- 1 221 574 - 2 005 870	- 3 227
	Total (in thousands of EUR)				- 3 227
	of which from information obligations (IO)				- 349

4.3. Administrative compliance costs

Seq. No.	Article of draft legislation; provision (articles); designation of the requirement	Federal Government/ Federal State	Annual number of cases (units)	Annual expenditure per case (minutes * labour costs per hour (clerical grade, municipalities))	Annual compliance costs (in thousands of EUR)
3.1	1	country	571 686	- 2 186 698	- 2 186
Total (in thousands of EUR)			- 2 186		
of which federal government			0		
of which federal states (including municipalities)			- 2 186		

5. Other costs

No further costs are expected.

6. Further regulatory consequences

The proposed measure will relieve the burden on consumers and businesses. The measure contributes to supporting electromobility.

VII. Time limit; evaluation

Evaluation is not necessary, as it has already been established that vehicles with e-plates fulfil the requirements for the granting of the green sticker. There is no provision for a time limit.

B. Specific part

Article 1 (Amendment to the Ordinance on the labelling of low-pollution vehicles)

The addition of Annex 3 to the 35th BImSchV creates a further exemption from the labelling requirement with a sticker. Vehicles with an E-licence plate or other corresponding identification in accordance with § 11 of the German Vehicle Registration Ordinance (FZV) will be exempt from the sticker requirement in future. According to Annex 2, paragraph 3 of the 35th Federal Immission Control Ordinance (BImSchV), motor vehicles powered by non-combustion engines (e.g. electric motors, fuel cell vehicles) are classified in pollutant group 4. These vehicles are also entitled to carry an e-registration number under the Vehicle Registration Ordinance. Motor vehicles in emission class 4 are classified in accor-

dance with § 3(1) of the 35th BImSchV marked with a green sticker. However, the right to enter a restricted traffic zone associated with the green sticker can also be identified by the E-mark or other corresponding marking in accordance with § 11 of the German Motor Vehicle Registration Ordinance (FZV) on the motor vehicle in question. This amendment removes this ambiguity.

Re Article 2 (Entry into force)

Article 2 governs the entry into force of this Ordinance. This Ordinance shall enter into force on the first day of the month following its promulgation. This takes into account the decision of the 2018 Work Programme on Better Regulation and Reduction of Administrative Burdens, according to which the Federal Government proposes, as far as possible, entry into force on the first day of a quarter in its draft regulations.