



InfluenceMap

European Automotive Suppliers & EU Climate Policy

An InfluenceMap Briefing

January 2022

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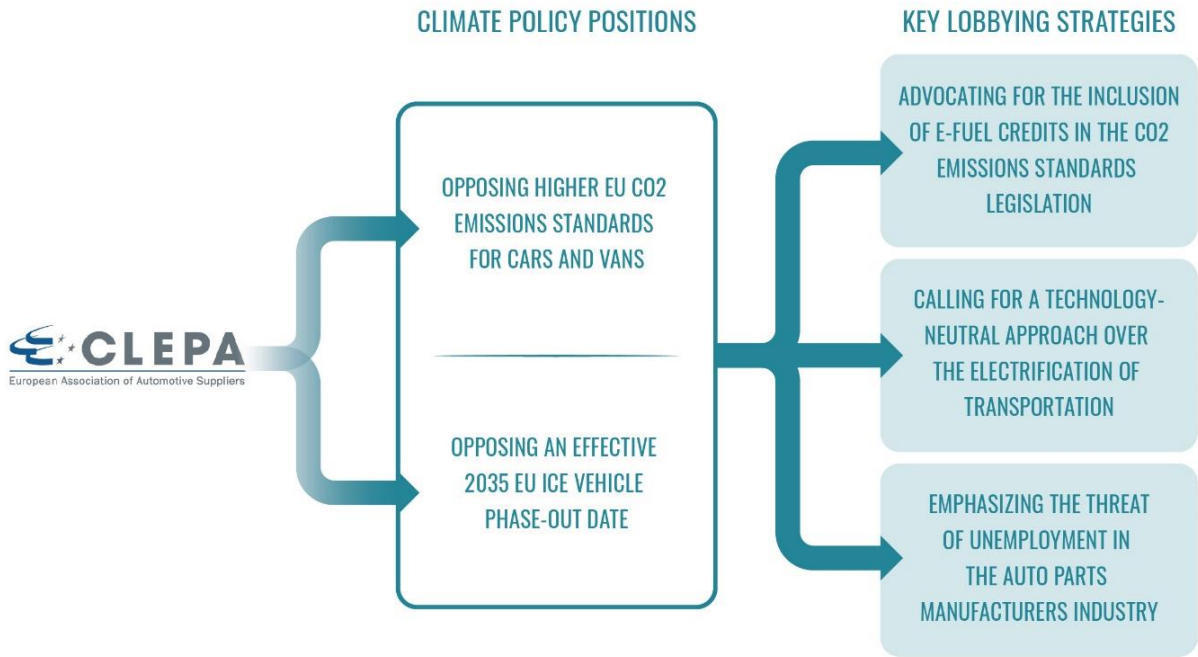
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***Correction (12/01/2022)** – The analysis in this briefing has been edited to recognize former Bosch CEO’s September 2021 speech at IAA Mobility Conference that indicated a shift in the company’s position towards the European Commission’s proposal on CO2 standards for cars and vans.*

Executive Summary

- InfluenceMap analysis shows how the auto parts manufacturing sector has deployed policy engagement strategies to undermine road transport emission regulations in Europe. The research underscores how the accelerating, regulatory-driven shift to electric mobility represents a major challenge for the sector.
- Focusing on Robert Bosch GmbH (Bosch), Europe's leading automotive supplier, and the European Association of Automotive Suppliers (CLEPA), the EU's primary industry association for auto parts manufacturers, InfluenceMap's analysis finds that both organizations strategically lobbied against the European Commission's proposal for an effective internal combustion engine (ICE) vehicle phase-out from 2035 in 2020- 2021. However, it also highlights a potential misalignment between the two organizations since September 2021 when former Bosch CEO, Volkmar Denner, appeared to communicate a partial shift in the company's position on the policy, while CLEPA has remained oppositional. Despite this, Bosch remains a member of CLEPA's board.
- The analysis of consultation responses, CEO messaging, social media, position papers, and other publicly available information shows how CLEPA and Bosch have sought to disrupt the European Commission's focus on electrification as the primary driver of EU road transport emission reductions by utilizing narratives pushing "technology-neutral" transport policies and advocating for a greater role for "e-fuels" in an attempt to slow a transition away from ICE vehicles.
- The briefing comes as the ENVI Committee in the European Parliament will host an exchange of views on the CO2 draft report on 13 January 2022. This will commence a year of negotiations around *CO2 emissions standards for cars and vans* following the European Commission's proposal on ICE vehicle phase-out from 2035 in the *Fit for 55 legislative package*, which mandates a 55% fleetwide CO2 emissions cut from 2030, and a 100% target five years later.
- EU transparency records show that both CLEPA and Bosch had frequent, direct policy engagement with key EU policymakers in 2021. CLEPA met a total of *seven times* with the European Commission and twice with European Parliament officials to discuss CO2 standards for vehicles, while Bosch met *three times* with the Commission and once with European Parliament officials.
- While the auto parts sector has significantly less economic clout than the automaker sector (*employing* 0.9 million in Europe as compared to 2.6 million), its influence over EU Parliament and Council could still be highly significant. CLEPA and Bosch appear to have linked the EU's 2035 zero-emissions CO2 target to high future unemployment rates in the auto parts manufacturing industry.

- The analysis further highlights the fragmentation across the automotive industry on the EU climate policy agenda. It follows a November 2021 *InfluenceMap report* on major German automakers that found that while *Volkswagen* has shown growing support for the EU’s 2035 zero-emissions CO2 target, *BMW* is leading negative German automaker lobbying against the policy.



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Decarbonizing road transport in the EU

In 2021, Europe hit a record level of electric vehicle (EV) adoption, with sales *climbing by 43%* since the previous year to represent *10%* of total European sales. This surge in demand reflects the accelerating global trend towards the electrification of transportation. Yet, despite promising projections around the transition to electric mobility, most countries are still *not on track* to bring road transport emissions to zero by mid-century. While most European sectors, particularly energy supply and industry, have *decreased* their overall greenhouse gas (GHG) emissions since 1990, emissions from the EU's transport sector have been *increasing steadily* between 2013 and 2019.

Although preliminary estimates for 2020 indicate a *substantial drop* in transport emissions due to decreased activity during the Covid-19 pandemic, it is anticipated that transport emissions will likely rebound in subsequent years. Additionally, despite the measures currently planned in EU member states, domestic transport emissions are only expected to *drop* below their 1990 level in 2029. Transport currently accounts for *over 25%* of the EU's GHG emissions, with road transport alone responsible for *72% of transport sector emissions* in 2019. The autos industry is therefore a major contributor to climate change, and cutting emissions from road transport is pivotal to achieving the EU target of *climate neutrality by 2050*.

The EU 2035 zero-emissions CO2 target for cars and vans

To meet its climate targets, in July 2021, the EU Commission unveiled its *Fit for 55 climate package*, with one of its key policies being a zero-emissions CO2 target for cars and vans by 2035. This target would effectively phase out new internal combustion engine (ICE)-powered vehicle sales, including plug-in hybrids, in the EU by 2035, with only zero-emission vehicles available for sale. At present, EU-produced cars are allowed to emit 95 grams of carbon per kilometer. Under the *new regulations*, this would be scaled back by 55% in 2030, before moving to 0 grams in 2035. Vans, which are currently permitted 147 grams of carbon per kilometer, would face a 50% reduction by 2030, and would also be required to have zero emissions by 2035.

Support for the zero-emissions 2035 EU CO2 standards has been growing among EU member states. Germany and Italy have expressed their *support* for higher EU CO2 standards, while a group of countries (including Austria, Belgium, Denmark, Greece, Ireland, Lithuania, Luxembourg, Malta and the Netherlands) are *urging* faster progress, with some pushing for an earlier 2030 zero-emissions date. Yet reports suggest that the French government, which holds the 2022 European Council presidency, is *pushing* for the continued sale of plug-in hybrid vehicles and may attempt to extend the phase-out date for hybrids beyond 2035.

InfluenceMap's analysis has shown differing approaches to tightening EU climate policy amongst large automakers. A recent *InfluenceMap report* illustrates this fragmentation within the German autos industry. It found that German automakers remain key members of regressive industry associations, including the European Automobile Manufacturers' Association (ACEA) and the German Association of the Automotive Industry (VDA), despite taking varied positions in their engagement. While Volkswagen has shown growing

support for the EU's 2035 zero-emissions CO2 target, BMW is leading negative German automaker lobbying against the policy.

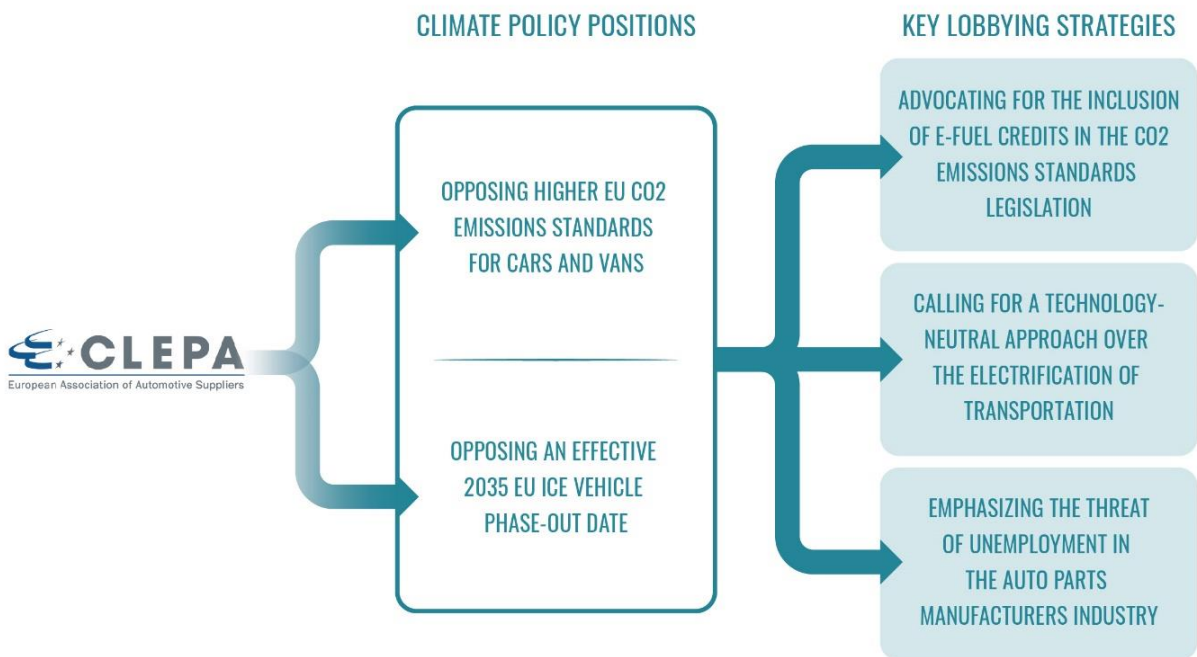
The efforts of large automakers to align themselves with increasing policymaker ambition on EVs dominates press and investor attention, but tightening EU rules and a shift to electric mobility will also have a significant impact on other parts of the auto sector. This includes the auto parts manufacturing subsector, which produces automotive parts for carmakers, and is a key component of the EU autos supply chain. With around 12,000 components in an ICE powertrain, compared to only a few hundred in an electric vehicle, traditional parts manufacturers anticipate considerable *changes* in the value creation structure of automotive supply chains. In contrast to large automakers, which arguably have greater capacity to innovate, the auto parts sector is comprised of smaller companies (the largest globally, *Bosch*, earned EUR 71.5 billion revenue in 2020, compared with *Volkswagen's* EUR 223 billion), which risk losing ground to new companies specializing in power electronics if they are unable to swiftly transition to higher growth segments. While the auto parts sector has less economic clout than the automaker sector (*employing* 0.9 million in Europe as compared to 2.6 million), its influence over EU Parliament and Council could still be significant as key climate and transport policy issues are negotiated in the first quarter of 2022.

The remainder of this briefing overviews how two key organizations within the auto parts sector, Bosch (Europe's leading automotive supplier), and CLEPA (the EU's primary industry association for auto parts manufacturers) have sought to use policy engagement strategies to slow the transition towards EVs in Europe and weaken regulatory stringency on vehicle CO2 standards in 2020-21. However, it also highlights a potential misalignment between the two organizations since September 2021, when Bosch's former CEO, Volkmar Denner, communicated a shift in position from the company and potentially increased support for ambitious EU CO2 targets, while CLEPA has remained oppositional to the standards. It thus further reflects the growing fragmentation across the automotive sector on the EU's climate agenda.

The EU climate policy engagement of CLEPA & Bosch

This briefing focuses on the European Association of Automotive Suppliers (*CLEPA*), and Europe’s leading automotive supplier, Robert Bosch GmbH (*Bosch*), overviewing the organizations’ positions towards EU road transport climate policy, along with the key narratives used to influence these policies. CLEPA and Bosch both disclosed a total annual lobbying spend (covering all policy areas) of EUR 1,000,000- 1,249,999 for the financial years *2019* and *2020* respectively.

Despite communicating high-level support for *EU climate neutrality by 2050* and the goals of the *Paris Agreement*, CLEPA and Bosch's positive top-line messaging on climate policy does not appear to have aligned with their detailed lobbying positions in 2020-21, with both companies historically taking an oppositional stance on higher 2035 zero-emissions CO2 standards in the EU that would effectively phase out ICE-powered vehicles. Since September 2021, however, communications from Bosch appear to indicate a softening of its position and potentially *increased support* for more ambitious CO2 standards. CLEPA, on the other hand, has continued to oppose the standards, suggesting increasing misalignment between Bosch and the industry body on the issue.



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CLEPA is the primary EU industry association for auto parts manufacturers. It *represents* over 100 global suppliers of car parts, systems, and modules, and over 20 national and European sector associations. According to InfluenceMap's methodology (see *Appendix 1*), **CLEPA** scores a D in its climate policy engagement, indicating misalignment with the Paris Agreement. According to available EU transparency disclosures, in 2021 **CLEPA** met *seven times* with the European Commission to discuss climate policy and mobility, including in October 2021 with a cabinet member of Frans Timmermans, who leads the Commission's work on the European Green Deal. Shortly before the release of the *Fit for 55 climate package* in July 2021, **CLEPA** met *twice* with the European Commission in June – once to discuss CO2 standards for cars and vans, and to discuss renewable fuels with the Director-General of Mobility and Transport (MOVE). **CLEPA** also had two meetings both with the *rapporteur* and a *shadow rapporteur* for CO2 emissions standards in the European Parliament in October 2021, indicating frequent policy engagement.

Bosch is the world's *largest* car parts manufacturer, and has been a key member of **CLEPA** since *1995*. The company produces components for vehicles powered by internal combustion engines, including electric fuel pumps and injection valves, as well as manufacturing parts for *hybrids and electric vehicles*. **Bosch** scores a D+ in its climate policy engagement according to InfluenceMap's methodology (see *Appendix 1* for full details), with this higher score compared to **CLEPA** stemming from its more positive top-line statements on climate policy, and positions on emissions trading and carbon taxes. However, **Bosch's** score has declined due to negative lobbying on EU policies to decarbonize road transport. In January 2022, former **Bosch** CEO, Volkmar Denner, *stepped down* from his position after running the company for almost a decade. Stefan Hartung, who was previously the chairman of Mobility Solutions at **Bosch**, and sat on **CLEPA's** board of directors until January 2022, succeeds him. **Bosch** retains its role on **CLEPA's** board of directors, with Hartung replaced by another senior executive in January 2022. According to available EU transparency disclosures, **Bosch** met with the European Commission *three* times in 2021 to discuss climate policy in the mobility sector. Shortly before the publication of the *Fit for 55 climate package* in July 2021, **Bosch** attended a meeting in June on EU CO2 standards for cars and vans. It also met with the Director-General of Climate Action (CLIMA) in Brussels in *April 2021*, and with a shadow rapporteur for CO2 emissions standards in the European Parliament in *October 2021*.

The bullet points below summarize some of the key aspects of CLEPA and Bosch's engagement with the European Commission's proposal for enhanced vehicle CO2 standards and a shift towards electric mobility.

- **EU CO2 targets for cars and vans, including a zero-emissions 2035 target** – CLEPA and Bosch have historically lobbied strongly against higher CO2 targets for cars and vans in the EU. In February 2021 consultation responses to the revision of performance standards on CO2 emissions for cars and vans, both *CLEPA* and *Bosch* stated that they did not support any date at which CO2 targets should become zero-emissions, effectively opposing any phase-out of ICE-powered vehicles in the EU. This followed similar *arguments* by CLEPA in a November 2020 consultation response. In a February 2021 position paper, CLEPA again strongly *cautioned* against tougher CO2 emission standards and Bosch further appeared *unsupportive* of stringent EU CO2 targets for light-duty vehicles in April 2021 meeting notes with EU DG CLIMA (obtained via freedom of information request (FOI)). However, evidence from September 2021 suggests a *potential shift in position* from the company, with former Bosch CEO, Volkmar Denner, stating in a speech that the company would “go along with” the targets set by the European Commission.
- **The inclusion of e-fuel credits in the CO2 emissions standards legislation** – A key concern for CLEPA and Bosch with regards to higher CO2 targets has been the resulting emphasis on electric vehicles. CLEPA and Bosch have consistently advocated for the inclusion of e-fuel credits in the CO2 emissions standards legislation to prolong the lifespan of ICE-powered vehicles in the EU, over a shift to EVs. E-fuels, or electrofuels, are synthetic fuels made by mixing hydrogen derived from renewable sources with CO2 to produce liquid fuel that can be similar to petrol or diesel used in conventional engines. In a February 2021 position paper, CLEPA *argued* that a ban on the internal combustion engine is “not necessary as climate-neutral internal combustion with renewable and low carbon fuels is a viable option for new vehicles and the existing fleet”. In April 2021 meeting notes with EU DG CLIMA obtained via FOI request, Bosch *proposed* options for the crediting of renewable fuels for compliance with CO2 emission standards, following similar *comments* in a November 2020 consultation response. Additionally, in November 2020, CLEPA *signed* a joint letter urging EU policymakers to include “sustainable renewable fuels” in the revision of CO2 standards for vehicles. In a February 2021 EU consultation response, Bosch *claimed* that “with [the use of] e-fuels [in road transport], the EU will reach its climate targets faster”, whereas, without them, the EU will exceed its limited CO2 budget”. Both Bosch CEO, *Stefan Hartung*, and Secretary-General of CLEPA, *Sigrid de Vries*, have also consistently promoted the role of e-fuels in achieving climate targets

Independent research has suggested that the inclusion of e-fuels in CO2 standards could delay the EU's transition towards zero-emission technologies and risk slowing the region's electrification plans. The International Energy Agency (IEA) has highlighted that the limited global supply of e-fuels should be *reserved* for sectors such as shipping or aviation, which unlike cars, cannot easily or economically meet their energy needs with electricity. August 2021 analysis from Transport & Environment suggests that the inclusion of e-fuels would *undermine* the credibility of CO2 standards, as it would open the possibility of double-counting emissions reductions with other existing regulations (including the EU Fuel Quality Directive (FQD) and Renewable Energy Directive (RED II)), delay necessary investments into electric mobility, and incur high costs for consumers. It would also *result* in an unenforceable regulation since carmakers have no control over what fuel is used in the cars they produce. Additionally, a December 2021 Transport & Environment study shows that running cars on e-fuels would *not alleviate* air pollution problems – in fact, e-fuels emit the same amount of NOx pollution as fossil fuels today.

- **Calling for a technology-neutral approach over the electrification of transportation** – CLEPA and Bosch have consistently advocated for a "technology-neutral" approach in the shift to low-emission vehicles over the electrification of transportation. In November 2020, Bosch was *involved* in publishing a report disputing the climate benefits of EVs in the wake of the UK's declaration to end the sale of ICE-powered vehicles by 2030. In a February 2020 EU consultation response, CLEPA *called for* regulations to be "adapted to remove any explicit or implicit bias towards specific technologies". Similarly, in a February 2021 position paper, the industry association *asserted* that "the exclusive focus on technologies that deliver zero tailpipe emissions is misguided". In a March 2021 press release, CLEPA Secretary-General, Sigrid de Vries, *argued* that "technology should be allowed to deliver on climate neutrality, rather than regulation prescribing or banning technology". In a September 2021 speech, former Bosch CEO, Volkmar Denner, *appeared to suggest* greater acceptance for the European Commission's "clear course toward electromobility". However, the company has continued to state a preference for a technology-neutral approach, for example in its 2021 CDP response, where it *argued* that "to reach the EU climate goals, all technologies that reduce CO2 emissions have to be leveraged [...] which enable the climate-neutral operation of combustion engines".
- **Emphasizing the threat of unemployment** – Both CLEPA and Bosch have highlighted the threat of job losses posed by the EU's 2035 zero-emissions CO2 target. In a November 2020 consultation response, CLEPA appeared unsupportive of higher EU CO2 emissions standards, *arguing* that "shifting to electric mobility faster will add to the substantial transformation pressure on industry" and lead to "job losses". Similarly, in April 2021 *meeting notes* between EU DG CLIMA and Bosch, obtained via FOI request, Bosch emphasized the "time needed for the transition to zero-emission mobility in order to avoid disruptive changes in the automotive suppliers industry and preserve employment". In an April 2021 Financial Times article, former Bosch CEO, Volkmar Denner, *accused* the EU of being focused on the "short-term

objective” of eradicating combustion engines, while “shying away from talking about the consequences this will have on employment”. However, in a subsequent speech in September 2021, Denner appeared to have partially changed tone, *explaining* that the company would “go along” with the European Commission’s targets, but continued to stress that “policymakers that set such strict technological standards also have a duty to preserve jobs in our industry”. In December 2021, CLEPA also *published* a report *highlighting* the threat posed by a 2035 zero-emissions CO2 target to “about 600,000 people” whose livelihoods “depend on internal combustion engine technology”.

Independent research challenges the findings of CLEPA’s report. For example, while CLEPA estimates that only *200,000* new EV jobs will be available in Europe by 2040, a June 2021 Boston Consulting Group *report* found that an EV transition would in fact create 581,000 new jobs in the region by 2030, particularly in Central and Eastern European countries like Slovenia, Slovakia and the Czech Republic.

Appendices

Appendix 1: CLEPA & Bosch Overall Scorecards

InfluenceMap has developed a process for scoring and ranking companies and industry associations on their activities to influence climate change policy. Full details of the methodology can be found on this [page](#). Metrics describing each entity’s overall climate policy engagement - direct and indirect - are produced by analyzing a range of data sources that are publicly accessible and reliable representations of corporate policy engagement. InfluenceMap's system is updated continuously as new information becomes available. The results are freely available and in the public domain, along with all the primary evidence used in the analysis. InfluenceMap's metrics are explained below:

- **The Organization Score (0- 100)** expresses how supportive or obstructive the organization is toward climate policy aligned with the Paris Agreement. 100 is fully supportive and 0 is fully opposed.
- **The Engagement Intensity (0- 100)** expresses the intensity of this activity whether positive or negative.
- **The Performance Band (A+- F)** is a full measure of a company’s climate policy engagement, accounting for both its own engagement and that of its industry associations (A+ = support, F = opposition).

The table below shows the overall scores for CLEPA and Bosch. A more detailed analysis can be found on [CLEPA](#) and [Bosch's](#) profiles on InfluenceMap's online platform.

Table Key			
Negative positioning and engagement	Mixed positioning and engagement	Positive positioning and engagement	Undisclosed positioning and engagement

Organization	Engagement intensity	Organization Score	Performance Band	EU CO2 emissions standards for vehicles	ICE vehicle phase-out
European Association of Automotive Suppliers (CLEPA)	35%	49%	D		
Robert Bosch GmbH (Bosch)	18%	60%	D+		

Appendix 2: Industry Engagement on European Climate Regulations

Table Key			
Negative positioning and engagement	Mixed positioning and engagement	Positive positioning and engagement	Undisclosed positioning and engagement

EU CO2 standards for cars and vans		
Organization	Position	Evidence
CLEPA	Negative	<p>CLEPA appears strongly opposed to increased CO2 emissions standards for cars and vans in the EU. In a February 2021 EU consultation response, the industry association <i>opposed</i> higher 2035 zero-emissions CO2 standards that would effectively phase out ICE-powered vehicles. In a November 2020 consultation response, CLEPA <i>argued</i> that “just increasing the level of ambition of the current [CO2 emissions] regulations will not achieve climate neutrality”. It also appeared <i>not to support</i> a zero-emissions 2035 CO2 target for vehicles in a November 2021 EU consultation response, and in a February 2021 position paper strongly <i>cautioned</i> against tougher CO2 emission standards “without a more fundamental revision of the approach to regulating carbon emissions from transport”. CLEPA has consistently appeared to support weakening EU CO2 standards by <i>proposing</i> that manufacturers can comply with them by using renewable fuels, for example in a November 2021 press release. In November 2020, CLEPA <i>signed</i> a joint letter urging EU policymakers to recognize and include renewable fuels in the revision of CO2 standards for vehicles. It claimed that “without the contribution of sustainable renewable fuels, the CO2 emissions from the EU fleet will not be reduced fast enough to meet the target in 2030 and towards net-zero objective in 2050”. In May 2021, CLEPA <i>reiterated</i> its view in another joint letter to policy makers, though this time with an emphasis on heavy-duty vehicles (HDVs). CLEPA’s Secretary General, Sigrid de Vries, has been particularly vocal in opposing higher CO2 standards in the EU. In a July 2021 press release, de Vries appeared to <i>oppose</i> a zero-emission tailpipe CO2 target in 2035, asserting that it is “not the most effective or efficient way to climate neutral transport in the EU” and that “it may not even get us there”.</p>
Bosch	Mixed	<p>In September 2021, Bosch <i>appeared to take a new stance</i> on EU CO2 emissions standards, with former CEO, Volkmar Denner, announcing at the IAA Mobility press conference that the company supports a 2035 zero-emissions CO2 target proposed by the EU Commission. However, prior to this announcement, Bosch had been lobbying against increased CO2 emissions standards for cars and vans in the EU. In a February 2021 consultation response, Bosch directly <i>advocated</i> to policymakers to oppose a zero-emissions EU CO2 target for cars and vans, stating that “the CO2 standards should not become so strict that all new vehicles are zero-emission”. Additionally, April 2021 meeting notes between EU DG Clima and Bosch, obtained via FOI request, <i>suggest</i> that Bosch does not support stringent EU CO2 targets for light-duty vehicles. In the meeting, the company emphasized the “time needed for the transition to zero-emission mobility in order to avoid disruptive changes in the automotive suppliers industry and preserve employment”. In a November 2020 consultation response, Bosch further <i>appeared not to support</i> higher EU CO2 standards for cars and vans, instead proposing the inclusion of e-fuels for compliance and advocating to weaken the stringency of the targets.</p>

Internal-combustion engine (ICE) powered vehicle phase-out in the EU		
Industry Association	Position	Evidence
CLEPA	Negative	<p>CLEPA has consistently <i>lobbied against</i> an effective 2035 EU ICE phase-out date for cars and vans, most recently in a November 2021 EU consultation response. In a February 2021 consultation response, the industry association <i>stated</i> that it was “strongly against a mandate or a ban” on the internal combustion engine. In a February 2021 position paper, it <i>argued</i> that a ban on the internal combustion engine is “not necessary as climate-neutral internal combustion with renewable and low carbon fuels is a viable option for new vehicles and the existing fleet”. Furthermore, CLEPA has consistently called for a technology-neutral approach in the shift to low-emission vehicles, including ICE vehicles, over the electrification of transportation. In a February 2020 EU consultation response, it <i>called for</i> regulations to be “adapted to remove any explicit or implicit bias towards specific technologies”. Similarly, in a February 2021 position paper, CLEPA <i>asserted</i> that “the exclusive focus on technologies that deliver zero tailpipe emissions is misguided”. CLEPA Secretary General, Sigrid de Vries, has been particularly vocal in calling for a technology-neutral approach over the electrification of transportation. In a March 2021 press release, de Vries <i>argued</i> that “technology should be allowed to deliver on climate neutrality, rather than regulation prescribing or banning technology”. De Vries also <i>signed</i> a joint letter to EU policymakers in May 2021, which stated that “electrified vehicles should not gain a technology monopoly achieved through an abrupt ICE phase-out”.</p>
Bosch	Negative	<p>Bosch has consistently appeared to support a long-term role for ICE-powered vehicles in the EU. In an April 2021 Financial Times article, former Bosch CEO, Volkmar Denner, <i>asserted</i> that “climate action is not about the end of the internal-combustion engine” and accused the EU of being focused on the “short-term objective” of eradicating combustion engines, while “shying away from talking about the consequences this will have on employment”. In a February 2021 consultation response on the EU’s CO2 emissions standards for cars and vans, Bosch stated that it <i>did not support</i> any date at which CO2 targets should become zero-emissions, effectively opposing the phase-out of ICE-powered vehicles in the EU. In the same consultation response, the company <i>advocated</i> for the use of e-fuels over the electrification of transportation, claiming that according to its calculations, “with e-fuels, the EU will reach its climate targets faster”, whereas “without the use of e-fuels in road transport, the EU will exceed its limited CO2 budget”. In its 2020 Sustainability Report, Bosch further <i>stated</i> that “to reach the EU climate goals, all technologies that reduce CO2 emissions have to be leveraged, including [...] the use of e-fuels, which enable the climate-neutral operation of combustion engines”. Bosch has consistently <i>advocated</i> for a technology neutral approach to climate neutrality over policies promoting the electrification of transportation, for example in its 2021 CDP response. On its corporate website in 2021, the company <i>refers to</i> “the optimized gasoline engine” as “mobility for tomorrow”, and claims that “even in the future, two thirds of all new cars worldwide will still be driven by an internal-combustion engine”.</p>