Whitepaper

2021 Electric Vehicle (EV) Tax Guide

The double-edged sword of EV government incentives

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Autovista Group

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Introduction

Some governments have further extended EV incentive schemes; some have modified or even ended them. ***Autovista Group's chief economist Dr Christof Engelskirchen*** *ponders the pros and cons of electric-vehicle (EV) incentive programmes and summarises the latest status on government activities.*

High up-front discounts granted on the purchase of new cars and their negative impact on residual values (RVs) is a phenomenon well described and frequently observed in the automotive industry. We covered it in more detail in our publication on the impact of sales planning on residual values. Lower residual values do not only represent a direct economic loss for those with vehicles on their balance sheets; they also prevent profitable new car sales, as they make it almost impossible to offer competitive and sustainable leasing rates.

Many governments are determined to support the particularly battered automotive industry, which is confronting several expensive fights. It is battling with new technologies, new competitors, the shift to zero-emissions and depressed margins. The pandemic and the associated lockdowns have intensified the pressure. Recovery will take some time. Many jobs are still at risk, and it is sensible for governments to continue to soften the blow by supporting the transition financially.

There is one caveat: too often, the government-funded stimulus programmes focus solely on stimulating demand for new cars. Governments should avoid this and other common mistakes such as:

1. Up-front, transparent and long-term incentives send the signal that new cars are overpriced without them. Lower transaction prices of new cars will lower transaction prices of used cars. A good example of this can be seen in France, where many years of a bonus/malus system have depressed the used car price of battery-electric vehicles (BEVs);
2. Governments risk creating an oversupply of used cars. The German government has reduced company-car taxes for many plug-in hybrid electric vehicles (PHEVs) by 50% (and by 75% for BEVs). That makes them highly attractive as company cars, in particular PHEVs due to their versatility. There is a substantial risk that the rise in the supply of used PHEVs will not meet the same demand on used car markets, as there is no similar relative benefit for a used car buyer to choose PHEV over petrol;

3. Although governments mostly stimulate alternative powertrain types, the incentives – easily 10%-20% of the list price – deliver negative spillovers on all used car prices, even those of internal combustion engine (ICE) vehicles;
4. Reducing VAT for used cars is risky, as it may directly lower the signalled retail used car price. Germany had implemented such a measure for the period July to December 2020: VAT rates were reduced from 19% to 16% for used cars. Stimulating used car purchases can be RV-supportive, if done this way: ex-post refund of part of the VAT or simply a purchase incentive for used cars – as seen in France and the Netherlands, works better; and

Strong stimulating effect from high purchase incentives for EVs

5. Incentives are like a drug, and an exhausted incentive scheme creates a bigger demand gap. Many push the purchase of their vehicle forward because of a scheme, as we observed in France in 2020 where used car prices were rising because their purchase was incentivised. The original used car purchase incentive scheme ran out by the end of July 2020. Now there is a used car incentive scheme in place, which focuses solely on BEVs.

European incentives: more pressure

The existing government incentive schemes in Europe are diverse and show how differently countries approach the topic. We compare them in Table 1. We see that 17 of the 19 countries we analyse have an incentive scheme for electric vehicles (BEV/ PHEV) in place. It is the first time that Norway is featured in this overview. The Czech Republic and Switzerland have no incentive schemes in place. We have evaluated the relative strength of the stimulating effects for each dimension of the schemes.

Most governments offer purchase incentives as part of the scheme. France, Germany, Italy, Austria, Norway, Romania and Sweden are particularly generous. Company car tax benefits exist in ten out of the 17 schemes, and they act as impactful stimuli.

Acquisition-tax and ownership-tax benefits are frequent as well, but usually have less of a stimulating effect. The exception is Finland, where lower acquisition taxes bring the prices of BEVs down to ICE-vehicle levels. In Norway, the ownership tax benefits are highly impactful: 0% are due for BEVs and the weight component in the PHEV taxation is reduced by 23% if the battery offers 50km or more range.

In Italy and Sweden, our editors moved the indicative impact score one box to the right, indicating an expected higher negative impact on RVs than previously anticipated in our last update from November 2020. Norway, due to the very substantial and continued government support, sees a medium-high negative impact on used EV RVs as well.

Norway's EV policy is the most substantial one in Europe and offers benefits for buying a BEV over an ICE in the area of €11,000 and above. Strictly speaking, the scheme does not include a purchase incentive in the narrow sense of a government-funded discount for buying a BEV. However, we put a + under purchase incentives new and used cars to account for the magnitude of the tax benefits for buying an EV, in particular a BEV.

Other changes shown in the table are for the UK, reflecting a reduction of government grants from £3000 to £2500 for BEVs and the reduced the upper price limit for eligible vehicles, resulting in a (+) under purchase incentives. In Belgium, on the other hand, the company car tax benefits proved to be more stimulating, which is why we upped the evaluation from ++ to +++. In the Netherlands, the budget for purchase incentives on new EVs has been exhausted for 2021. Therefore we took the +++ rating out and replaced with a 'no stimulation' rating. The French scheme does not have a scrappage element anymore, and the used car purchase incentives are now only applying to buying a used BEV and reduced to €1,000. Purchase incentives have also been slightly reduced, but we kept the +++ rating intact for the time being. Spain introduced a more generous EV incentive with 'Plan MOVES III' and we moved the RV impact risk to medium in this update.

Our description and evaluation of the schemes (Tables 2 to 18) include schemes in place prior to Covid-19 as well.

Table 1: Government incentive schemes, their potency and risk of building up RV pressure

	Incentive Scheme for Electric Vehicles (BEV & PHEV) (how much demand is stimulated: + = mildly; ++ = moderately; +++ = strongly)						Incentive Scheme-induced Pressure on RVs for Electric Vehicles in 2021/2022				
	Acqui-sition Tax Benefit	Owner-ship Tax Benefit	Company Car Tax Benefit	Purchase Incen-tive ...	... incl. used cars ...	... and (optional) scrappage	Low	-----	Med	-----	High
FR	+		++	+++	+				X		
DE	+	+	+++	+++	(+)					X	
IT		+		+++		++			X		
ES	+	+		+++	+	+			X		
UK		+	+++	(+)			X				
AT	++	++	++	+++					X		
BE		+	+++				X				
FI	+++	+		+			X				
HU	+	+	++				X				
NL		+	+++		++		X				
NO	+++	++	++	+	+					X	
PL	+						X				
PT	+	+	+	+			X				
RO				+++		+				X	
SE		++	++	+++						X	
SI	+			++				X			
SK	+						X				

= changes vs. November 2020

Source: Autovista Group

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Europe's EV subsidies by country

Table 2: France – significant EV incentives; stimuli for used cars helped to ease RV pressure

Description of scheme	Verdict for EVs
▪ Acquisition-tax exemption for all alternatively powered vehicles (total or 50%, depending on region). ▪ No ownership-tax benefits. ▪ Exemption from CO_2-based company-car tax component, if less than 20g CO_2/km; two year exemption for PHEVs and HEVs with more than 20g CO_2/km. ▪ Purchase incentive now up to €7,000 for private buyers for cars if <20g CO_2/km. This will be reduced by €1,000 for all categories in July 2021 and by another €1,000 in January 2022. PHEVs (less than 50g CO_2/km; minimum 50km autonomy; maximum list price of €50,000) have a purchase incentive of €2,000 until the end of June 2021. It will be reduced to €1,000 thereafter and stop as of January 2022. ▪ No scrappage scheme for new and used BEVs/PHEVs anymore, it ended in 2020. ▪ Used car purchases are incentivised, but to a lower extend than in 2020. Now you can receive €1,000 for buying a used BEV.	**Medium pressure for 2021/2022** The French bonus/malus scheme has been in place for a long time and has already put EVs under pressure. The enhanced scheme increases pressure on used car prices due to increased up-front discount on new cars (easily beyond €10,000). Used-car sales are stimulated as well, and the incentive is income-dependant. This moderates the risk of negative impacts on used car prices, although not enough for a better score.

Table 3: Germany – risk of higher pressure on EV RVs than in other markets

Description of scheme	Verdict for EVs
▪ VAT reduction from July - December 2020 from 19% to 16%, but little stimulating effect observed. ▪ 10-year exemption for BEVs registered until end of 2025, but small economic impact compared to petrol taxes. ▪ Benefit-in-kind taxation: reduction of taxable amount (from 1% to as far down as 0.5% for PHEV and 0.25% for BEV). This is very stimulating for the demand for new PHEVs or BEVs as company cars. ▪ Further enhanced-purchase incentive scheme: until 2021, further incentive of up to €9,000 for cars under €40,000 net list price. Mostly targeted at new cars. Only BEVs and PHEVs benefit. Very strong expected stimulation of new PHEV demand, in particular.	**Medium-high pressure for 2021/22** Germany has the biggest stimulus package across Europe, besides Norway. The substantial increase in top-down incentives on new EVs adds pressure on used-car values. There is very little emphasis on stimulating demand for used EVs, so there is no moderating effect. The lower company-car taxation will stimulate many new-car transactions. There is a risk that used-car markets will not absorb these cars, in particular PHEVs, which adds further pressure towards 2022/2023. Albeit small, the VAT reduction directly lowered new car prices while used car prices were kept stable by dealers. The switch back to 19 beginning of 2021 caused a temporary peak in prices, but are back to normal now.

Table 4: Italy – among the largest purchase incentives for EVs

Description of scheme	Verdict for EVs
▪ No reduced acquisition taxes. ▪ Ownership tax benefits: five-year exemption for EV from first date of registration. Then 25% of equivalent petrol vehicle tax applies. ▪ No company-car tax benefits. ▪ Purchase incentives until end of 2021: (1) €4,000 (without scrappage) and €6,000 (with scrappage of Euro 0-4) for cars emitting <=20g Co_2/km; price less than €50,000, excl. VAT; (2) €1,500-€2,500 for emissions between 21g and 60g CO_2/km; (3) malus of up to €2,500 for cars emitting more than 250g CO_2/km. ▪ Additional purchase incentive until end of 2021: with scrappage of a car older 10 years and as long as the new car emits below 135g CO_2/km, €1,500 (€2,000 if below 61g CO_2/km). On top, dealers must add another €2,000 for this scheme to apply; price of new car to be below €40,000, excl. VAT. ▪ Without scrappage, the government contributes with €1,000 with dealers having to add another €1,000. ▪ Purchase incentives between 01/2021 and 06/2021 added for commercial vehicles with a weight below 3.5 tons. The scheme is up to €8,000 (with scrappage) and €6,400 (without scrappage) for BEV, but there are lower incentives for Hybrid and ICE, too.	**Medium pressure for 2021/22** The long-term tax reduction for EVs delivers small but positive momentum not only on the new- but also on the used-car market. It makes buying a used BEV attractive. The lack of company-car benefits reduces risks of oversupply of PHEVs or BEVs as used cars. Nevertheless, the growth of new sales of electrified vehicles could lead to an increase of offers in used market faster than the demand. The moderately long bonus/ malus scheme (until the end of 2021) and the additional purchase incentives (until end of 2021) grants a substantial discount on new EVs. This puts pressure on used-EV prices.

Table 5: Spain – sizeable ownership tax cut & enhanced EV incentives

Description of scheme	Verdict for EVs

▪ Acquisition-tax exemption from 'special tax' for vehicles emitting up to 120g CO2/km; VAT exemption for alternative powertrain types, incl. HEVs, emitting up to 110g CO2/km on Canary Islands.
▪ Ownership-tax reduction already in place for longer time: reduction of 70-75% for BEVs and PHEVs in main cities (e.g. Madrid, Barcelona, Zaragoza, Valencia); more schemes should follow.
▪ No company-car tax benefits.
▪ Plan MOVES III, specific for new and young used BEVs, PHEVs, FCVs, FCHVs
    ○ BEVs (<45K or <53K if 8-9 seats) and PHEVs (<45K). Incentives from €2,500 to €7,000 depending on the range and whether or not a car is delivered for scrapping.
    ○ FCVs and FCHVs. Incentives from €4,500 to €7,000 if a car is delivered for scrapping.
    ○ In both cases above, an additional €1,000 discount will be granted by OEM or dealer.
	Medium pressure for 2021/22
	
	The biggest potential risk for pressure on RVs stems from the purchase incentives, which cover BEVs and PHEVs up to €45,000 list price. A positive and moderating effect comes from the longer-term ownership tax reduction and a lack of company car tax benefit.

Table 6: UK – incentives have been reduced and still apply solely on zero-emission vehicles

Description of scheme	Verdict for EVs
▪ No ownership tax exemption. ▪ Exemption for excise duty – ownership tax – for zero-emission vehicles. ▪ Sizeable company-car tax benefits for zero-emission vehicles: 0% in 2020-2021, 1% in 2021-2022, and 2% in 2022-2025. ▪ Purchase incentive for zero-emission vehicles of £2,500 if the purchase price is below £35,000 (recommended retail price, incl. VAT and delivery fees). ▪ Ongoing discussions to enhance the scheme further, but no decision has been communicated, and previous suggestions have been rejected.	**Low pressure for 2021/22** The scheme still puts its entire emphasis on BEVs. The purchase incentive is sizeable but smaller than in other European countries. Moreover, it has been reduced. The company-car tax benefits are strong and will lead to more BEVs becoming company cars. However, there is an inherent supply shortage of new and used BEVs in the UK market, so no negative impact on RVs is expected.

Table 7: Austria – generous government purchase incentives, but slightly reduced for companies

Description of scheme	Verdict for EVs
▪ Purchase incentives: E-Mobility bonus in effect for passenger cars for private buyers: BEVs (and FCEVs) are subsidised by €5,000; Plug-In Hybrid (PHEVs) und Range Extender (REX, REEV) are subsidised by €2,500. ▪ As of 2021 subsidies for companies have been reduced compared to private buyers: BEVs (and FCEVs) are subsidised by €4,000. Plug-In Hybrid (PHEVs) are subsidised by €2,000. ▪ Some conditions apply for purchase incentives: List price of up to €60,000 (incl. VAT) of the base model; min. range of 50 km fully electric; only petrol hybrids eligible. ▪ LCV purchase incentives: between >2.0 and ≤2.5 tons max. load receive a subsidy of €7,500; over >2.5 tons max. load: €12,500.	**Medium pressure for 2021/22** There is less discounting on BEVs and PHEVs than on ICE models. However, the government subsidy schemes will have a negative impact on RVs as they work similar to discounts.

Table 8: Belgium – 100% focus on business registrations, rather than private purchases

Description of scheme	Verdict for EVs
▪ Bonus schemes and tax relief are regional and federal. ▪ No purchase incentive anymore: in recent years, a bonus was allocated for the purchase of EVs and the installation of charging stations, but this is no longer the case. ▪ Tax benefits: company (leasing cars) are granted 100% VAT deduction on expenses for BEVs and PHEVs (<50gr CO_2). From 1 January 2021, Flanders defines WLTP CO_2 as calculation base for annual Road Tax and First Registration Tax. ▪ Tax relief granted to CNG; PHEV is cancelled for new vehicles only (standard taxation scheme) but advantage maintained for already registered vehicles. ▪ EVs and fuel-cell vehicles are exempt from national annual road tax and registration tax (BIV). ▪ In Wallonia (Brussels), annual Road Tax is based on fiscal HP classes, and First Registration Tax based on kW (and or engine size) classes; there is a CO_2 malus on top.	**Low pressure for 2021/22** Lack of charging infrastructure is more impactful on RVs than incentive schemes. ICE engines to be banned from city centres and company cars have to become green/electric (CO_2-neutral) by 2026.

Table 9: Finland – high-impact CO_2-based acquisition tax benefits make BEV/PHEVs attractive

Description of scheme	Verdict for EVs
▪ CO_2-based acquisition tax brings purchase price for BEVs/PHEVs to comparable levels with ICE. ▪ €2,000 incentive for BEVs <€50,000. ▪ Lower yearly road tax for PHEVs petrol/BEVs against diesel/PHEV diesel.	**Low pressure for 2021/22** With the current incentives and regulations, we see no extra pressure on BEV/PHEV RVs.

Table 10: Hungary – no purchase incentives but free parking for BEVs and PHEVs

Description of scheme	Verdict for EVs
For all BEV and PHEV cars with green number plates (i.e. where range in EV mode is more than 25 km): ▪ No acquisition tax. ▪ Lower registration tax for PHEVs than ICE vehicles and zero for BEV (for example, petrol car with 1,600ccm pays c. €375). ▪ Exempt from company car taxes (c. €333 for a 110kW ICE) ▪ Another regional/ local scheme 'TAO' allows for deductions from taxable profit of companies if an EV is registered instead of an ICE (in Budapest, for small businesses this can represent c. €10,000 per vehicle in C-segment/ C-SUV-segment). ▪ No ownership taxes (e.g. ICE with 110 kW pays c. €105 annually). ▪ Free parking in the larger cities.	**Low pressure for 2020/21** No purchase incentives and some of the incentives extend to used car ownership and thus compensate for RV pressure.

Table 11: Netherlands – strong incentives for the purchase of used BEVs

Description of scheme	Verdict for EVs
▪ Since 1 July 2020, there is a subsidy of €4,000 for the private purchase/lease of a new BEV, but it is effectively now 0 as the budget has been exhausted. ▪ Purchasing a used BEV: subsidy is €2,000 and there is still around €11 million of budget available (March 2021). ▪ Conditions for obtaining the subsidies: 100% electric passenger car with a range of at least 120km; list price (original new price) not lower than €12,000 and no higher than €45,000; the car was produced as an electric passenger car and may not have been converted into an electric car. ▪ LCV: up to €5,000 purchase incentive. The scheme runs from March 15, 2021 to December 31, 2025. In 2021 the budget is €22 million. ▪ For BEVs: no bpm (tax on motor vehicles) must be paid and no road tax. In addition, the "bijtelling" (personal contribution for the private use of the company car) is 12% over the first € 40,000 (22% for the balance above that amount). ▪ PHEVs do pay bpm; the road tax is halved. The "bijtelling" is just like an ICE. With an ICE you always pay bpm and road tax and the "bijtelling" is always 22% over the full sum.	**Low pressure for 2021/22** 2021 budget for new cars has been exhausted. Therefore no pressure on RVs. In fact, these subsidies mean that there is currently a shortage of used BEVs. Frequently, used electric cars are imported.

Table 12: Norway – high incentives; very stimulating to buy new and used EVs, in particular BEVs

Description of scheme	Verdict for EVs
▪ Norway's EV policy is the most substantial one in Europe and covers a variety of angles – although it used to be even more generous. A comprehensive review will happen towards the end of 2021 and likely, a lighter scheme will apply in the years after that. ▪ Currently, BEVs are vehicle purchase tax-exempt, which is a substantial lever; they are also VAT-exempt (normal rate is 25%) and they pay zero road tax. Some further benefits may apply, e.g. free or discounted parking, free tolls, access to bus line, some discounts for ferries. ▪ For PHEV, a reduction of the weight component in the taxation scheme of 23% applies, if the electric range is 50 km or higher. ▪ Company car taxes are reduced for electric vehicles.	**Medium-high pressure for 2021/22** Pressure for BEV is increasing since there are currently still few new models, but the market is heating up due to the generous incentives, which are likely going to be reduced in 2022. This puts some pressures on current generation BEV residual values.

Table 13: Poland – no purchase incentives currently, but planned

Description of scheme	Verdict for EVs
▪ Poland postponed plans of a generous purchase incentive, but there are ongoing discussions around such a programme. ▪ Acquisition tax (excise tax) reduction based on engine size: hybrids pay 50% of acquisition taxes if engine size is below 3,500cc; PHEVs used to be exempt but are now paying 50% of ICE taxes between 2,001 and 3,500cc. BEVs are exempt.	**Low pressure for 2021/22** There is little demand for BEVs in Poland. It is amongst those markets in Europe with the lowest BEV adoption.

Table 14: Portugal – balanced scheme also supporting ICE; limited budget and short-term impact

Description of scheme	Verdict for EVs
▪ Acquisition taxes are based on CO_2 emission and engines size. BEVs are exempt. PHEVs pay 25% of total tax, if CO_2 emissions are below 50g and the range is at least 50km. The impact on demand is higher in PHEV than in BEV. ▪ Ownership taxes: BEVs are exempt. ▪ Company Tax for vehicles: this tax applies for cars registered by businesses. BEVs are exempt and PHEVs pay less depending on the new price. VAT is refunded for company diesel vehicles. ▪ Purchase incentives: for private purchases, €3,000 for BEVs, if final gross purchase costs do not exceed €62,500. Companies can get an incentive of €6,000 for light commercial vehicles, but not for passenger cars anymore. All these incentives have a limit of €4,000,000 (included EV motorcycles and EV bicycles). ▪ All of these incentives are pre-Covid-19 (no new incentives during the pandemic).	**Low pressure for 2021/22** Very balanced scheme, short-term only and with limited budget. No new incentive schemes expected for 2021.

Table 15: Romania – very generous scheme – BEV purchases incentivised with c. €10,000

Description of scheme	Verdict for EVs
▪ Incentives program 'Rabla' in place this year and is quite sizeable: 60,000 vouchers each worth RON 6,500 (c. €1,340), if you discard your old vehicle. The voucher is used to purchase a new car; the scope of the programme is to renew the national car park and at the same time to stimulate the economy. ▪ Eco bonus worth RON 1,000 (c. €206) if you purchase a new vehicle with less than 105g CO_2/km under WLTP regime. ▪ Eco bonus worth RON 2,500 (c. €515) for a new non-PHEV. ▪ Purchase incentive for PHEV: RON 20,000 (c. €4,123): 5,000 vouchers available in 2021. ▪ Purchase incentive for BEV: RON 45,000 (c. €9,278): 6000 vouchers available in 2021.	**Medium-high pressure for 2021/22** Since the BEVs purchase voucher is almost €10,000, this puts pressure on BEV RVs.

Table 16: Sweden – strong stimulating effect for new BEVs and PHEVs

Description of scheme	Verdict for EVs
▪ Incentive of up to €7,000 if CO_2 <60 g. ▪ CO_2-based on road tax, punishing cars >90g CO_2. ▪ Lower company car taxation for BEV/PHEV.	**Medium pressure for 2021/22** The further increased incentive from €6,000 to €7,000 pushes down the transaction price – at the same time list prices are reduced as new models are being launched.

Table 17: Slovenia – sizeable incentives, but limited to BEVs with a 3-year holding period

Description of scheme	Verdict for EVs
▪ Purchase incentive of maximum of €4,500 for BEV (condition: holding period of 3 years). ▪ Exemption form the payment of road taxes for BEVs. ▪ Motor vehicle tax at lowest rate of 0.5% for BEVs.	**Low-medium pressure for 2021/22** Limited to BEV. Some pressure on RVs because of the substantial size of the incentives. 3-year holding period manages risks down a bit.

Table 18: Slovakia – reduced acquisition taxes for hybrids, PHEVs and BEVs only

Description of scheme	Verdict for EVs
▪ 50% reduction of acquisition tax for hybrid cars (plug-ins too) – this represent c. €130 benefit for a car with 110 kW and €550 for a car with 155 kW ▪ BEV acquisition tax is minimal: €33.	**Low pressure for 2020/21** Only acquisition tax benefits for BEV and PHEV.

Conclusion

Incentive schemes are necessary to compensate for an expected loss of private purchasing power as part of the economic crisis that will follow Covid-19 lockdowns. Most European countries have enhanced their schemes, and they offer very sizeable purchase incentives. Schemes are largely targeted towards new electric vehicles (i.e. BEVs and PHEVs), which is why the expected negative impact on RVs is higher for electric vehicles. The schemes may create an oversupply of electric vehicles on used-car markets towards 2022.

We are less concerned about RV pressure building up for used ICE vehicles across Europe, as they receive less attention in government schemes.

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Smarter schemes make sure that demand is also stimulated on the used car market: France, the Netherlands and Spain are good examples of this. Here, governments have installed schemes that include purchase incentives for used vehicles.

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