When the automotive industry misleads Canadians: The case of CVMA's recent publication

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Introduction

While debate about policy design is legitimate, CVMA's recent document goes beyond advocacy and repeatedly misstates how the EVAS operates.

For most Canadians, electric vehicles (EVs) are still unfamiliar. Despite rapid growth in recent years, more than 96% of registered light-duty vehicles in Canada are not zero-emission vehicles, and many households are only beginning to encounter EVs in dealerships, workplaces, and communities.

In this context, clear and accurate information is essential. Unfortunately, public discussion about electric vehicles and Canada's Electric Vehicle Availability Standard has become increasingly distorted and politicized. While misinformation about EVs is common on social media, it is far more concerning when misleading claims originate from industry associations representing regulated companies.

In January 2026, the Canadian Vehicle Manufacturers' Association published a "Myth vs Fact" document that mischaracterizes the design, operation, and impacts of the EV Availability Standard. These claims, if left unchallenged, risk confusing Canadians, policymakers, and stakeholders about how the regulation works and what it is intended to achieve.

This document responds directly to CVMA's claims. It reproduces each major assertion and assesses it against the regulatory text, publicly available data, and Electric Mobility Canada's previously published analyses and submissions. The purpose is not to relitigate the rationale for electrification, but to correct factual inaccuracies and clarify how EVAS functions in practice.

EVAS is a Supply Side regulation designed to ensure Canadians have access to the vehicles already being developed and sold globally, while supporting affordability, emissions reductions, and investment predictability. As the following sections demonstrate, many of CVMA's criticisms rely on selective data, incorrect assumptions, or a fundamental misunderstanding of the regulation's built-in flexibilities.

Accurate policy debate requires starting from the facts. This response aims to re-establish that baseline.

38 place du Commerce
11-530 Ile des Sœurs, QC H3E 1T8

www.emc-mec.ca
info@emc-mec.ca

The EVAS is needed to increase the supply of clean, zero-emission vehicles available to Canadians across the country (Environment and Climate Change Canada)

This is TRUE. Sales regulation fixes the problem of delivery volumes and prices Canadians actually see.

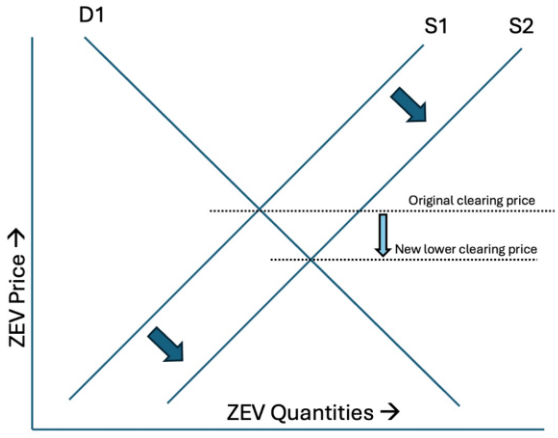
EVAS is a national supply rule. Its purpose is simple: Ensure automakers deliver enough EVs so more Canadians see vehicles in stock, trims they want, and more competitive prices. Counting the number of models "available" in Canada is not evidence of adequate supply at the dealer level. The EVAS converts model lists into real deliveries by setting a **compliance ratio** that interacts with credits, banking, and multi-year compliance windows — a market-enabling framework that increases supply.

Counting nameplates does not equal deliverable supply. Before the EVAS, automakers prioritized allocations to mandate provinces (Quebec, B.C.), leaving other regions with fewer trims, longer wait times, and higher prices — exactly the market failure the EVAS corrects by creating a national supply obligation.

Growth in choice emerged in Canada before the EVAS was implemented because provincial sales regulations in B.C. and Quebec proved that similar programs drive success. A national program would spread these benefits to the rest of Canada. CVMA is claiming the EVAS was not required, but countless product releases in Canada have been directed only to QC and B.C. when first introduced, demonstrating that vehicle offerings go to markets with EVAS-like programs.

CVMA claims that supply at dealers is not an issue for Canadians. This looks too narrowly at the dynamics of supply and demand. By mandating increases in supply, market clearing prices diminish and more quantities are demanded due to lower prices. The most powerful tool for affordability in Canada is the EVAS. The poll reference used is not presented in the context of the broader program's objectives.

- **Model counts ≠ real supply.** A large number of nameplates listed in Canada says little about delivery volumes by province, trim mix, or wait times. Automakers currently have prioritized allocations to mandate provinces — which is precisely why a **national** EVAS is needed to normalize supply across the country.
- **Affordability follows supply.** The EVAS pushes the supply curve to the right: More vehicles on dealership lots reduces scarcity premiums and dealer markups and accelerates the emergence of a **used-EV market**, improving affordability over time for both new and used buyers.



The Economics of a ZEV Standard
In this basic example, demand for ZEVs (D1) is unchanging while OEMs are required, by the Availability Standard, to deliver more vehicles to the market. S1 represents the base level of ZEV supply in any given year. S2 is the required increase in supply directed on OEMs by the ZEV Availability Standard regulation. ZEV Standards move the supply curve to the right.

The result is lower market clearing prices for consumers:
ZEVs become more affordable relative to the status quo. ZEV quantities sold increase due to that lower price.

Canadians do not just need models listed online, they need vehicles **delivered** where they live, at prices that reflect normal inventory and competition. That is what EVAS achieves and why model count arguments miss the point.

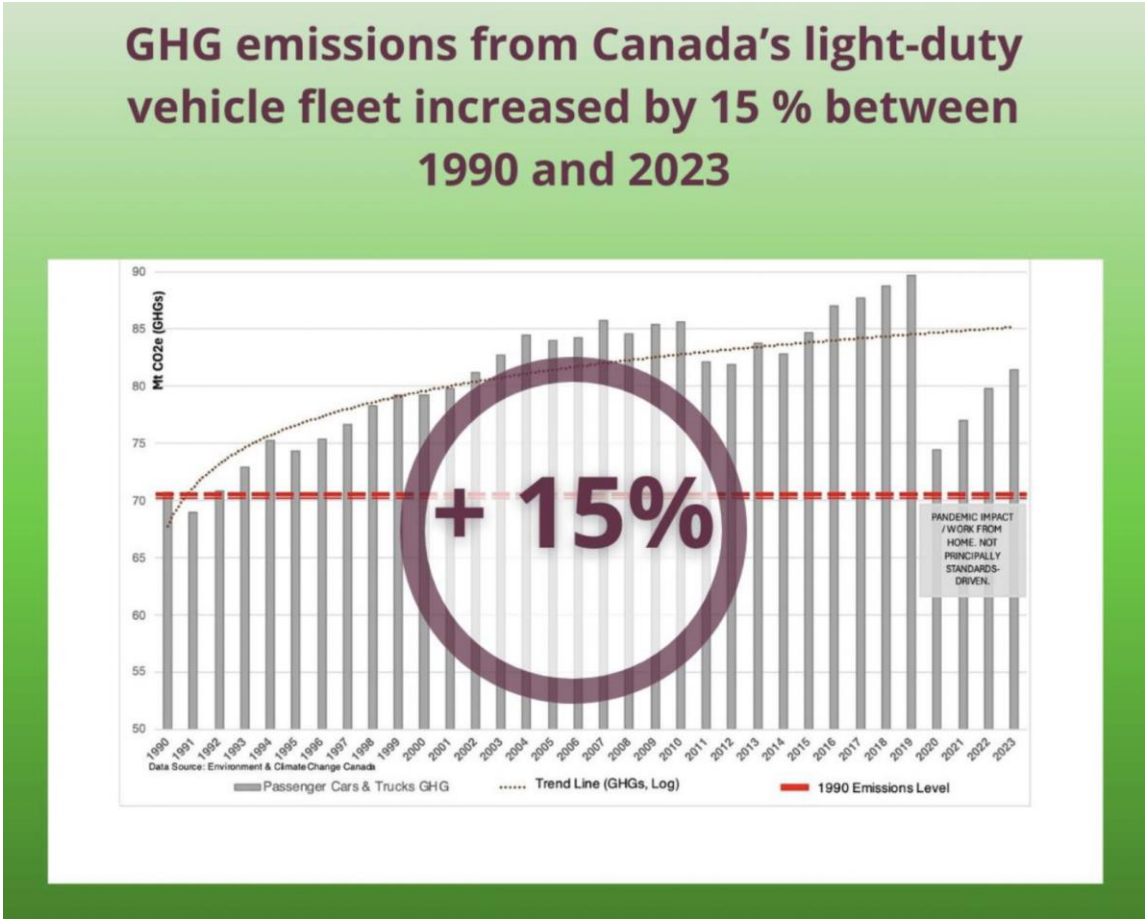
The EVAS is required for Canada to achieve net-zero emissions by 2050 (Environment and Climate Change Canada)

This is TRUE. GHG standards alone have failed to reduce absolute emissions; the EVAS is the only federal rule that directly replaces emitting vehicles with zero-emission vehicles at the scale required to meet climate targets.

Greenhouse gas emission standards are vital, but they are performance standards – this means that while incremental improvements can be made to reduce per vehicle emissions, if the total fleet continues growing then emissions will not track down to zero. This is why a **supply standard**, such as the EVAS, is critical to achieving a zero-emission fleet. Performance-based standards may improve efficiency per vehicle, but they do not guarantee that zero-emission vehicles replace combustion vehicles in sufficient numbers to drive down total emissions.

Between 1990 and 2023, GHG emissions from Canada's light-duty vehicle fleet increased by **15%**, despite years of GHG emissions regulation.

As for the twelve-year period of 2011 to 2023, GHG emission reduction is only a mere 1%.



This increase has occurred under Canada's current GHG emissions regulation for light-duty vehicles, highlighting the limits of such regulations.

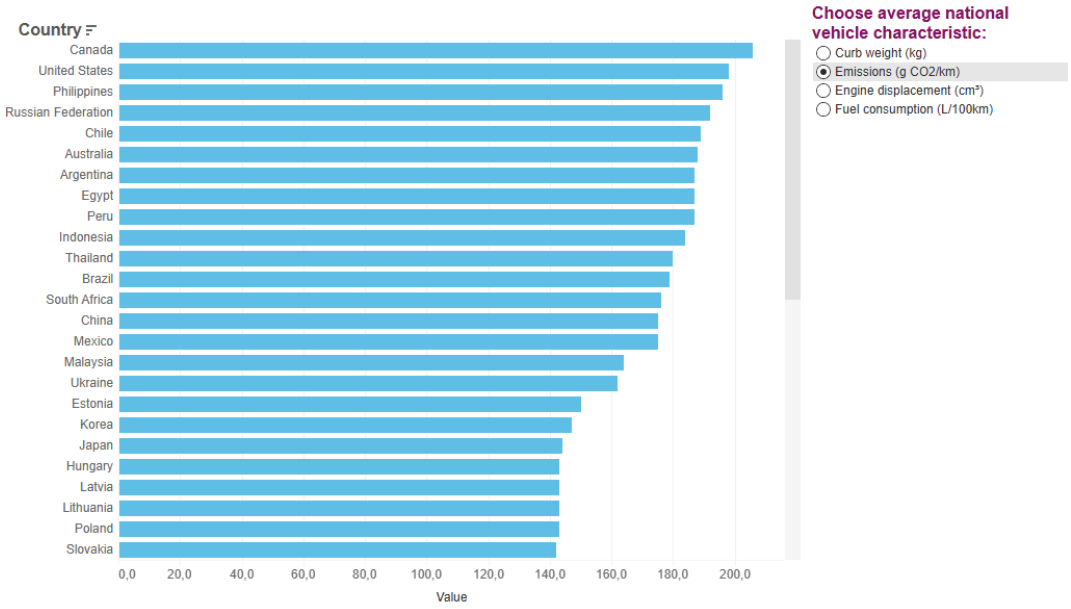
The overall trend is driven by structural changes in the fleet:

- Automakers offer far fewer passenger cars and far more light-duty trucks and SUVs, which emit more GHGs.
- The total number of light-duty vehicles on Canadian roads has grown by roughly **35% since 2005**, amplifying emissions even as per-vehicle efficiency improves.

Despite the evidence that shows that this approach has not delivered the emissions reductions Canada needs, many automakers are still urging the federal government to abandon the EVAS and rely solely on existing GHG emissions regulations.

The federal government has committed to reducing national greenhouse gas emissions by **40% to 45% below 2005 levels by 2030**. Yet, in 2019, the International Energy Agency ranked Canada **dead last in the world** for GHG emissions per kilometer driven by its light-duty vehicle fleet.

Figure 1: Average personal vehicle characteristics, by country (2017)



Rising emissions from light-duty vehicles, driven by the growing dominance of light-duty trucks, make clear that traditional emissions regulations are not sufficient on their own. To reverse this trend and align transportation with Canada's climate commitments, the EV Availability Standard is absolutely necessary to drive investment, innovation, and the widespread adoption of zero-emission vehicles.

The EVAS addresses the failure of intensity-based regulation by ensuring that zero-emission vehicles actually displace emitting vehicles in the fleet. Without this replacement effect, efficiency gains alone are insufficient to meet Canada's net-zero commitments. The EVAS is the only federal rule that ensures vehicles get cleaner after 2026, even if U.S.

standards are weakened, by requiring zero-emission vehicles to **replace** combustion vehicles rather than relying solely on per-vehicle efficiency.

The EVAS will create 600,000 jobs by 2035 (Electric Mobility Canada)

CVMA's statement on this MISREPRESENTS EY's conclusions. Canada already has more than 130,000 EV ecosystem jobs; the EVAS will help scale that to between 360,000 (low scenario) and 600,000 (medium scenario) by 2035. Weakening the EVAS risks stalling investments and forfeiting those job gains.

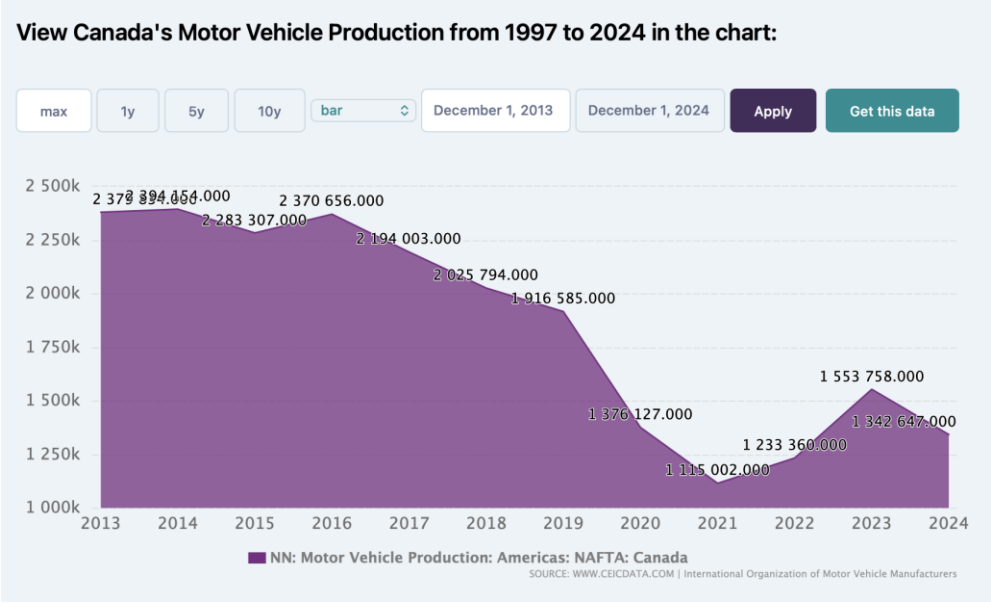
CVMA is wrong when it comes to the number of **non-ZEV** cars currently assembled in Canada. It is not 10 out of 12, but 11 out of 12. The only electric vehicle currently assembled in Canada is the Dodge Charger EV, a niche electric car with low volume.

According to CVMA's own website, 92% of Canadian car production is exported to the U.S. This means that the EVAS will have very little impact on car production in Canada since more than 9 light-duty vehicles out of 10 are built for the U.S. market.

What is far more concerning, however, is job losses in Canada are already occurring as U.S. automakers shift production south of the border, even prior to tariff issues. In fact, job losses from the *Big Three* in Canada has absolutely nothing to do with EVAS but rather those carmakers deciding to leave Canada.

And this decline has been going on for two decades.

According to driving.ca's David Booth: "Twenty years ago, the three together assembled more than 1.9 million vehicles in Canada. GM alone built 1,031,232 of them. Fast-forward to 2024, and that total for the Detroit Three was just under 420,000, of which The General accounted for just 172,901. [...] In other words, by the end of December, there will have been an **80% drop in Canadian auto production by the Detroit Three in just 20 years**, a pretty hasty retreat by any standard."



Source: https://www.ceicdata.com/en/indicator/canada/motor-vehicle-production

These numbers have worsened even further since driving.ca published that article as [GM laid off 1,000 workers at their Oshawa plant last week](#).

What is CVMA doing to prevent Canadian job losses from their 3 members (GM, Ford, and Stellantis) while they are transferring jobs to the U.S.?

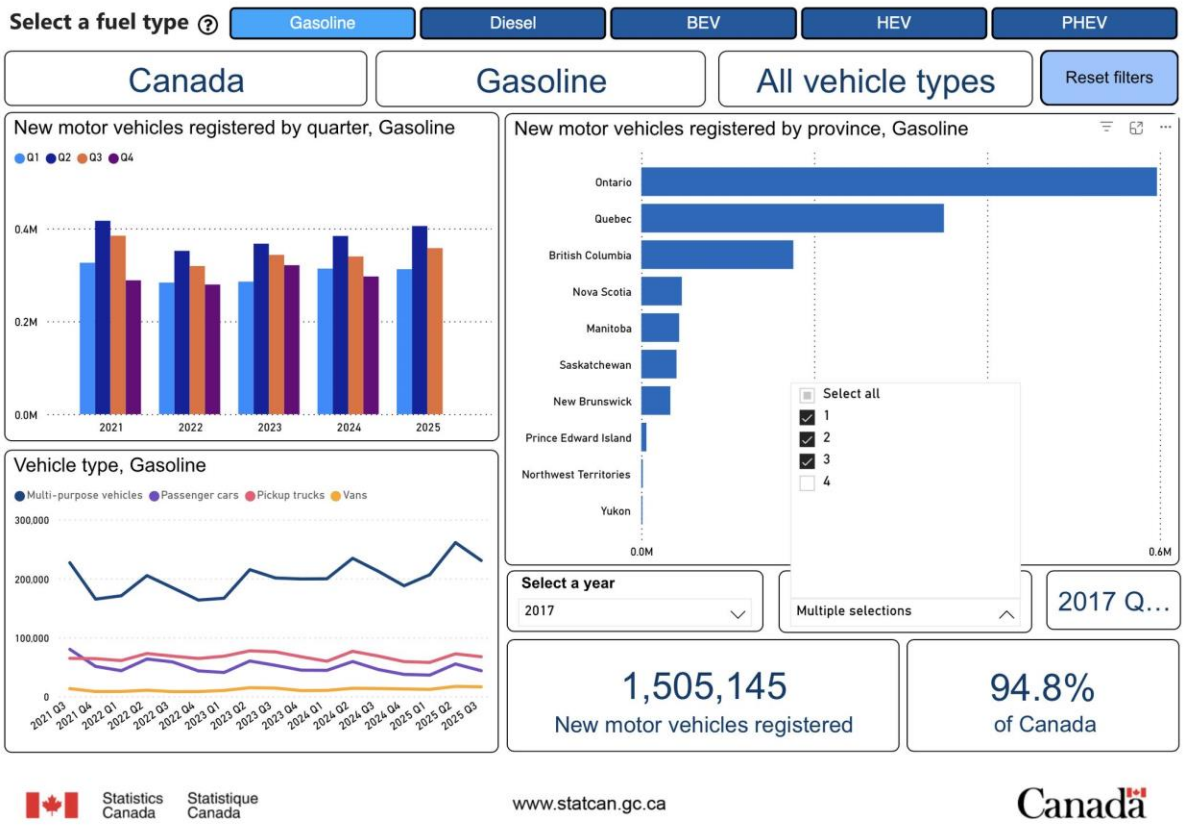
While the rest of the world moves forward with electric vehicle production, CVMA is urging Canada to continue building outdated, dirty technologies—risking further loss of innovation, competitiveness, and the clean-technology jobs of the future.

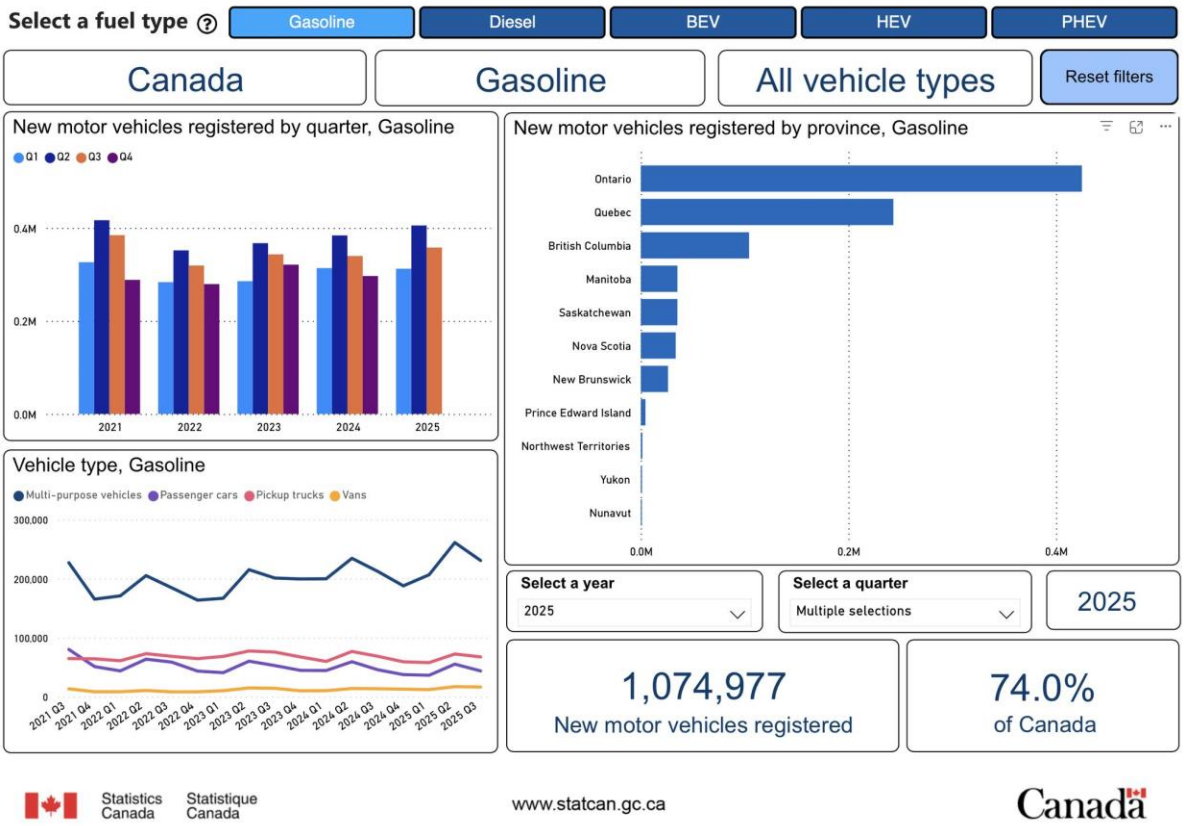
Gas vehicle sales in significant decline

According to Statistics Canada, light-duty gas vehicle registrations decreased by 29% between the first three quarters of 2017 and the first three quarters of 2025, going from 1,505,145 units in 2017 to 1,074,977 in 2025. (Since we do not yet have Q4 2025 registration numbers, we used the first three quarters as a point of comparison.)

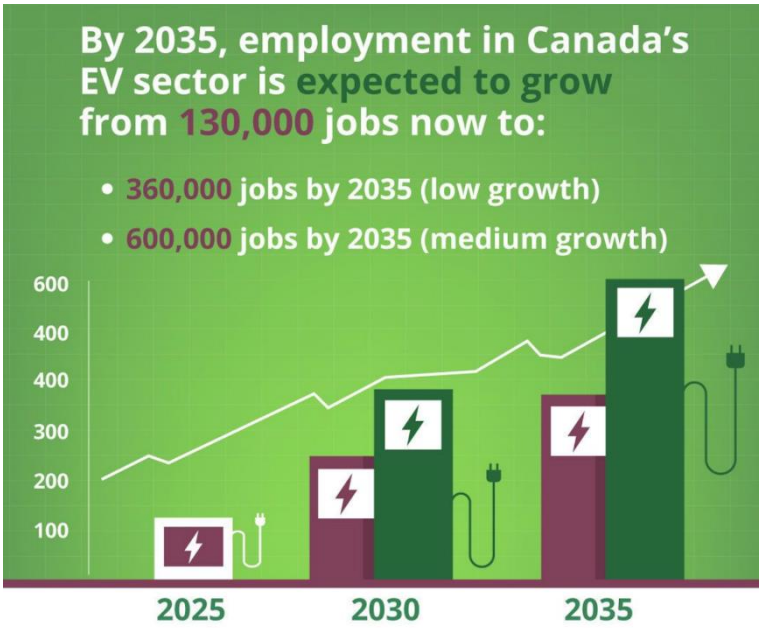
There are two reasons for this strong trend:
1- A slight decline in new vehicle sales in 2025 compared to 2017.
2- A significant increase in sales of partially and fully electric vehicles.

Despite the temporary slowdown in EV sales in 2025, the broader market trend remains firmly away from gasoline vehicles, not toward them.





The report cited by CVMA was produced by **EY, a globally recognized firm with extensive experience in economic analysis,** does conclude that **between 360,000 and 600,000 jobs could be created by 2035**. These findings are the result of a comprehensive modelling exercise that reflects current and projected developments across the electric vehicle ecosystem.



EMC has consistently noted that more than **130,000** Canadian jobs exist across the EV ecosystem (mining, infrastructure, electricity production and distribution, manufacturing, R&D, etc.) today, and that with a durable, credible EVAS in place, those jobs scale to **360,000–600,000 by 2035;** a range drawn from EY's analysis and repeated in EMC's formal submissions and letters. Weakening the EVAS would undermine planned EV and battery investments and put those job gains at risk.

The study by Ross McKitrick has, on the other hand, no credibility.

Before looking at McKitrick's article, it is worth understanding his background and affiliations. McKitrick has a track record of critiquing climate science and climate policy, from his affiliation with the Fraser Institute, known for its conservative orientation and skeptical stance on many climate policies, to writing books and reports that challenge the scientific consensus on climate change and climate-modelling frameworks. Most recently, he was recruited by the U.S. Department of Energy to be part of a working group and co-authored a report produced on an accelerated timeline that questioned key assumptions in standard climate modelling frameworks. The U.S. Secretary of Energy, Chris Wright, later acknowledged that the report contained errors.

That said, McKitrick's work should be read with care and prudence. This is precisely the issue with his conclusions and critiques of the EV mandate: They are built on very narrow assumptions that, while sound alarming at first glance, do not hold up once the underlying reasoning is examined more closely.

His model uses input-output data over 2014-2018, which doesn't capture the technological advances and market shifts of the last five years that resulted in an important penetration of EVs to the market (15.4% New ZEV registrations nationally in 2024 compared to 3.1 % in 2019, indicating a trend in consumer demand). Thus, the analysis produced exaggerated impacts due to the reliance on outdated interlinkage coefficients between sectors. At the time of the study, the regional input-output tables for 2020 and 2021 were published but for some reason, they were excluded.

More than anything else, national employment change is misleadingly marketed as permanent losses to the economy (38,000 positions lost by 2031 if cost parity is attained by 2035), without looking at all EV industry related jobs created thanks to the transition. ***In fact, the paper indicates that employment will recover to baseline levels as of 2035 in his scenario.*** This is in line with EY's analysis, which shows a continuous transition of workers from traditional mobility to eMobility. Between 2026 and 2030, the share of total employment supported by the traditional mobility in the medium scenario is projected to shrink by 162,000 jobs (-16.4%) while those created by eMobility will rise by 200,000 (+51.8%). That is a net increase of 38,000 jobs created in the economy by 2030 (surprisingly, the same figure McKitrick projects as job losses in 2031).

Claims that the mandate will trigger widespread job losses or shut down the auto industry rely on unrealistic assumptions—such as ignoring EV operating-cost advantages, using ad-hoc production modelling, and even assuming an economy with zero unemployment.

In a nutshell, the paper is highly sensitive to the underlying assumptions and so provides limited independent information, as it gives an incomplete picture of what happens on the other side of the transition. The truth is workers in today's auto sector are well positioned to take on new roles in electrification. They already bring skills in mechanics and automotive systems, and with targeted training and upskilling support, they can transition seamlessly. Rather than killing the economy, the EVAS will help our auto sector catch up with markets that are ahead of us in transport electrification.

Carmaker claims about credit price and transactions are misleading (Clean Energy Canada)

This is TRUE. The EVAS includes multiple compliance flexibilities that significantly lower effective targets and costs. The "$20,000 per credit" number is a misrepresentation of an optional infrastructure pathway, not a market trading price, and credits are widely traded by several OEMs where allowed.

The EVAS was designed as a reasonable, flexible policy to reward automakers that take different approaches to supporting electrification. Some automakers have claimed that compliance is difficult, without recognizing that the real EVAS target they must reach is significantly lower than the headline target due to the number of compliance flexibilities available. For example, a 2028 target of 34% EV annual sales is effectively a 2031 target due to the 3-year credit deferral flexibility. The policy also effectively allowed all automakers four years to reach the sales targets in 2026 and 2027 due to early compliance credits.

Compliance flexibilities built into the policy include:

- Target grace period: If automakers fall short of their EVAS targets, they have three years to make up the deficit, effectively shifting all sales targets forward by three years. Overcompliance also results in credits that can be banked for up to five years or traded.
- Early Action Credits: Automakers could claim up to 20% of their annual EV sales in 2024 and 2025 for the first two years of the EVAS.
- Infrastructure Credits: Up to 10% of an automaker's ZEV target could be met with credits from investing in fast charging stations, at a regulatory accounting value of 1 credit per $20,000 invested. This is not a market trading price.
- Credits for different vehicle types: Credits are offered relative to a vehicle's electric range, from 0.15 credits for a PHEV offering as little as 35km of all-electric range, to provide all EVs a chance to earn credits.
- The **$20,000** figure is not a market trading price; it is the accounting value for an **optional** infrastructure pathway that EMC recommends removing to avoid misrepresentation. Actual credit prices in comparable markets are negotiated and **well below** this figure, and Canada's Early Compliance Credits are **non-transferable** (no sale by 100 per cent EV makers).

Industry associations have repeatedly cited the headline percentages (e.g., 20% in 2026, 60% in 2030) as hard mandates, ignoring the flexibilities built into the regulation. This has led to misleading public narratives, including claims that automakers will face punitive costs or that consumers will lose access to combustion vehicles. The regulation's mechanics do not support these narratives.

The Government of Canada has invested billions in manufacturing, EV purchase programs, and charging deployment. Within this context, the EVAS uses crediting and multi-year compliance to increase supply and competition at no ongoing fiscal cost, while allowing firms to choose the least-cost compliance pathway. Companies that invested early are positioned to over-comply and supply credits to others, a normal feature of ZEV markets that do not rely on a $20,000 trading price.

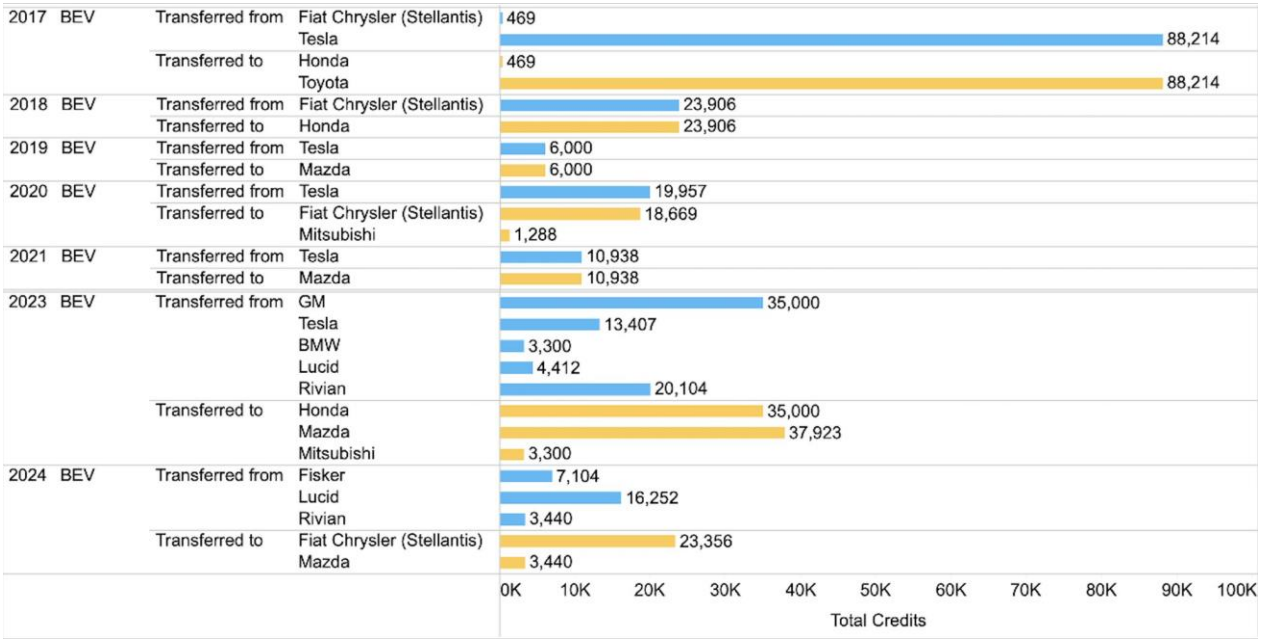
- ***There is no such thing as a $20,000 credit under the EVAS.*** The $20,000 figure is not a market price. It is the book value tied to the infrastructure pathway. Actual credit transactions occur at negotiated prices well below that in comparable programs, and Canada's Early Compliance Credits are non-transferable. Claims that the EVAS forces companies to pay $20,000 per credit conflate different mechanisms.
- Multiple OEMs trade credits where permitted. Public data in California show GM, Rivian, BMW, and others as active participants, underscoring that credit markets are functioning tools to reduce overall compliance cost.
- Policy integrity without overreliance on infrastructure credits. EMC recommends removing the infrastructure credit pathway precisely because it is being misrepresented as a consumer tax and does not reflect real compliance costs

In addition, between 2017 and 2024, the vast majority of carmakers selling vehicles in California met ZEV requirements WITHOUT purchasing credits from other manufacturers.

According to the California Air Resources Board's ZEV Credits Disclosure Dashboard, only a handful of companies, such as Stellantis, Mazda, Honda, and Mitsubishi, needed credits in specific years, while all others complied independently, by supplying EVs to the market.

This trend demonstrates strong industry capability to adapt and meet ZEV standards without relying on credit trading, reinforcing the effectiveness of ZEV regulations and the progress toward electrification goals.

As stated on the CARB dashboard for 2024: "Manufacturers continue to over-comply with the ZEV Regulation and the extent of that over-compliance continues to grow as the technology matures and supportive ZEV policies in California expand."



Auto industry profits will rise under the EVAS by 24 per cent between 2023 and 2035 (Environmental Defence Canada, Équiterre, and the David Suzuki Foundation)

Claims regarding automaker profit impacts under the EVAS are based on third-party modelling by advocacy organizations and fall outside the scope of EMC's published analysis, which focuses on policy design, compliance mechanics, supply outcomes, and economy-wide impacts.

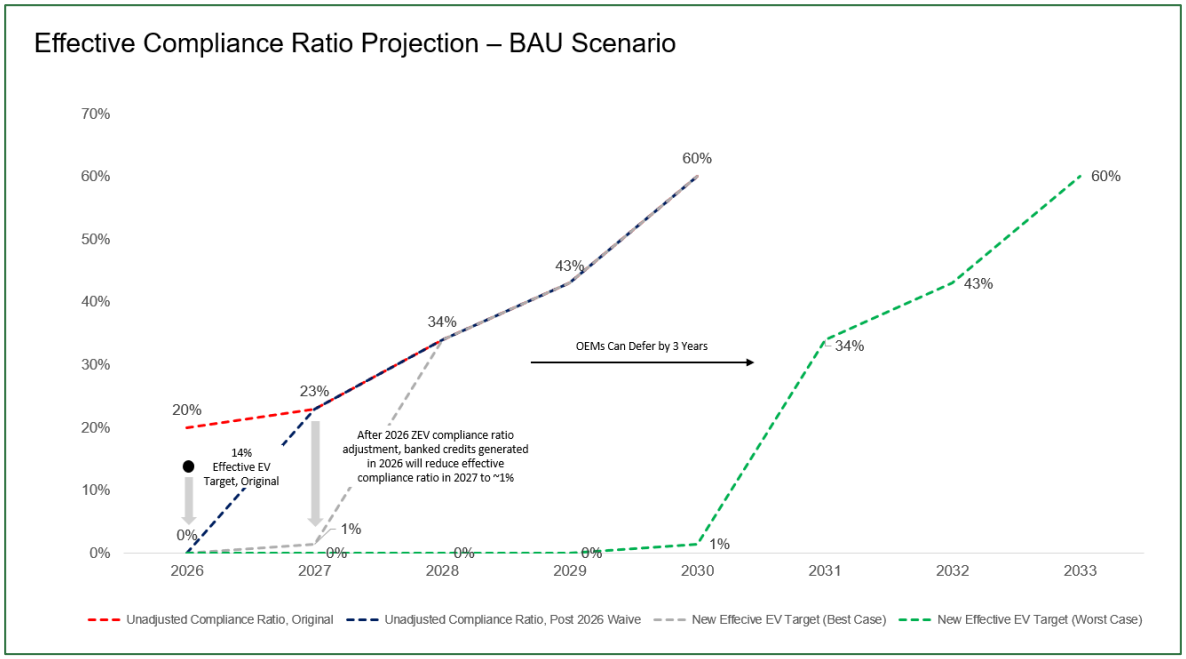
Existing ZEV sales targets are achievable (Electric Mobility Canada)

This is TRUE. When compliance flexibilities already built into EVAS are accounted for, the effective targets automakers must meet are materially lower and achievable within normal market cycles.

Prior to the ending of EV rebates and the announcement for a delayed EVAS, Canada reached an EV sales share of **18.7% in Q4 2024** and rose **50% year-over-year from 2020 to 2024.**

Claims that the EVAS targets are unachievable rest on a misunderstanding of how the regulation works in practice. The EVAS does **not** require automakers to meet the headline compliance ratio in the same model year it is listed. The regulation was explicitly designed with multiple, overlapping compliance flexibilities that lower effective near-term obligations.

For example, modelling submitted by EMC shows that once **Early Compliance Credits** from model years 2024 and 2025 are applied, and before accounting for deferral, the **effective industry-wide target for model year 2026 is approximately 14%**, not 20%. This is prior to the Prime Minister's commitment to set the 2026 compliance ratio to **0%**, which would allow all EV sales in 2026 to generate credits without triggering any obligation.



GRAPH: Effective EVAS compliance targets after built-in flexibilities
Early Compliance Credits, banking, and the three-year deferral significantly lower near-term obligations, demonstrating that existing targets are achievable when the regulation is applied as designed.
Source: Electric Mobility Canada, EVAS Review Submission (Nov 2025)

In addition, the EVAS allows **every automaker** to defer compliance for up to **three years without penalty**. This means that a manufacturer does not face a binding obligation until **model year 2030**, after accounting for the additional year already granted. As a result, short-term fluctuations in sales do not translate into immediate non-compliance or punitive costs.

EMC's analysis shows that EV sales growth in Canada is cyclical and highly sensitive to incentive timing, interest rates, and inventory timing. Temporary slowdowns, such as those observed following pauses in purchase incentives, do not invalidate a regulation designed with multi-year averaging, credit banking, and deferral explicitly to absorb such cycles.

When evaluated based on **effective compliance requirements**, rather than headline percentages taken in isolation, the existing EVAS trajectory is achievable without emergency amendments, provided the regulation's built-in flexibilities are respected and clearly communicated.

Automakers do not have to meet any compliance obligations in 2026 due to a 3-year compliance flexibility (Electric Mobility Canada)

This is TRUE. The EVAS deliberately includes a multi-year compliance window to avoid abrupt financial shocks. Deferral is a permitted compliance pathway, not non-compliance, and does not trigger automatic penalties or immediate cash costs.

By design, the regulation allows automakers to defer up to three years of unmet obligations, precisely to avoid sudden financial or market shocks. Treating this flexibility as a stringent requirement does not reflect how the system functions. Deferred compliance is not a regulatory failure but a permitted feature of the framework. The intent is to give companies time to adjust production, sales strategies, and investment decisions. As a result, claims that automakers face immediate financial penalties appearing on balance sheets today are based on an incorrect assumption that the regulation operates as a rigid annual quota rather than as a phased, multi-year compliance framework.

Under the Canadian Environmental Protection Act framework, enforcement is not automatic and prosecution for non-compliance is rare, lengthy, and preceded by multiple opportunities for corrective action, including credit purchases and deferred compliance within the rolling three-year window. Deferred compliance is therefore treated as a regulatory timing mechanism, not a violation.

While CVMA suggests that deferred compliance creates immediate financial liabilities under international accounting standards, EMC's analysis shows this impact is primarily a disclosure issue, not a charge to Profit and Loss. Deferred obligations may appear as contingent liabilities or risk disclosures, but they do not constitute cash penalties and do not affect reported earnings unless an automaker chooses to purchase credits or pay penalties instead of delivering vehicles.

Presenting permitted deferral as evidence that the EVAS is unworkable misrepresents how the regulation was designed. The three-year compliance window exists precisely to allow automakers to smooth deployment over market cycles. This flexibility is a core safeguard of the policy, not a justification for repeal.

EVAS increases vehicle affordability (Electric Mobility Canada)

This is TRUE: The EVAS improves affordability over time by increasing vehicle supply, reducing scarcity pricing, and expanding access to the used EV market. Claims of reduced choice and disproportionate impacts ignore how regulated supply works in real markets and how the policy was designed.

CVMA's characterization of the EVAS as a policy that raises prices and limits choice is false. In fact, without the EVAS, the choice of affordable vehicles (gas or electric) has been shrinking for years. The EVAS is explicitly designed as a supply-side regulation. Its primary economic effect is to normalize inventory levels, increase competition among manufacturers, and reduce scarcity premiums that drive up vehicle prices.

The EVAS does not reduce consumer choice. It ensures that Canadians have access to the EV models already being developed and sold globally but not yet in Canada. Without a binding supply rule, automakers consistently prioritize regulated jurisdictions, leaving other regions underserved with longer wait times, fewer models and trims, and less affordable vehicles. The EVAS expands real-world choice by ensuring vehicles are delivered where Canadians live, rather than limiting choice to paper availability.

Claims that the EVAS forces automakers to pass on high compliance costs through prices are based on a misrepresentation of the credit system. The oft-cited $20,000 figure is not a market price for credits. It is a regulatory accounting value tied to an optional infrastructure pathway that EMC has recommended removing. Actual compliance costs are driven by the marginal cost of producing and delivering vehicles, which is substantially lower and declines as volumes increase.

Concerns about impacts on low-income, rural, and Northern Canadians overlook the long-term cost structure of EV ownership. EVs offer significantly lower fuel and maintenance costs, savings that accrue most strongly to households facing high transportation expenditures. By increasing supply and accelerating the used EV market, the EVAS improves access to lower-cost options over time rather than locking households into permanently higher operating costs from combustion vehicles. Weakening the EVAS would delay used-market formation and prolong higher fuel and maintenance costs — outcomes that disproportionately affect lower-income, high-mileage households.

While charging availability varies by region, weakening EVAS would slow, not accelerate, infrastructure deployment by reducing vehicle volumes and undermining investment predictability. EMC's analysis shows that the EVAS supports coordinated planning by utilities and charging networks by providing a predictable adoption trajectory. Diluting the standard would exacerbate regional inequities rather than solve them.

EVAS is the most effective, fiscally neutral tool available to governments to improve vehicle affordability. It works by increasing supply, restoring competitive pricing, and accelerating the availability of affordable used vehicles. Framing the EVAS as a price-increasing or choice-limiting measure misrepresents both its design and its real-world economic effects.

Automakers want Canada to follow Trump's regulation "as if we were simply the 51st state" (Electric Mobility Canada)

Canada has its own GHG regulations which are aligned with the U.S., but the EVAS is the only policy that insulates Canada from U.S. regulatory backsliding by guaranteeing EV supply regardless of U.S. political decisions. GHG standards alone do not provide that protection.

CVMA's argument conflates two distinct questions: Does Canada have its own greenhouse gas regulations? ; Are those regulations sufficient on their own to protect Canada from U.S. regulatory volatility? Canada does have independently codified GHG performance standards for passenger automobiles and light trucks. However, those standards were designed to align with U.S. regulations and do not guarantee vehicle electrification or supply in the absence of a robust ZEV sales standard.

As written in the **Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations (SOR/2010-201)**, "The purpose of these Regulations is to reduce greenhouse gas emissions from passenger automobiles and light trucks by establishing emission standards and test procedures that are aligned with the federal requirements of the United States…"

Canada's Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations explicitly reference U.S. regulatory frameworks. As a result, prolonged weakening or repeal of U.S. vehicle standards introduces real uncertainty for Canada's own GHG trajectory. This is why EMC has consistently stated that the EVAS is the safest and most durable mechanism to ensure Canada continues progressing toward its emissions and sales objectives regardless of U.S. policy shifts.

CVMA's suggestion that fuel efficiency competition alone will deliver emissions reductions ignores the reality documented in Canada's own data. Despite years of technology neutral GHG standards and improvements in per vehicle efficiency, absolute emissions from Canada's light-duty vehicle fleet have barely declined over the last decade. Fuel efficiency improvements, while important, do not substitute for policies that ensure zero-emission vehicles actually replace combustion vehicles in the fleet.

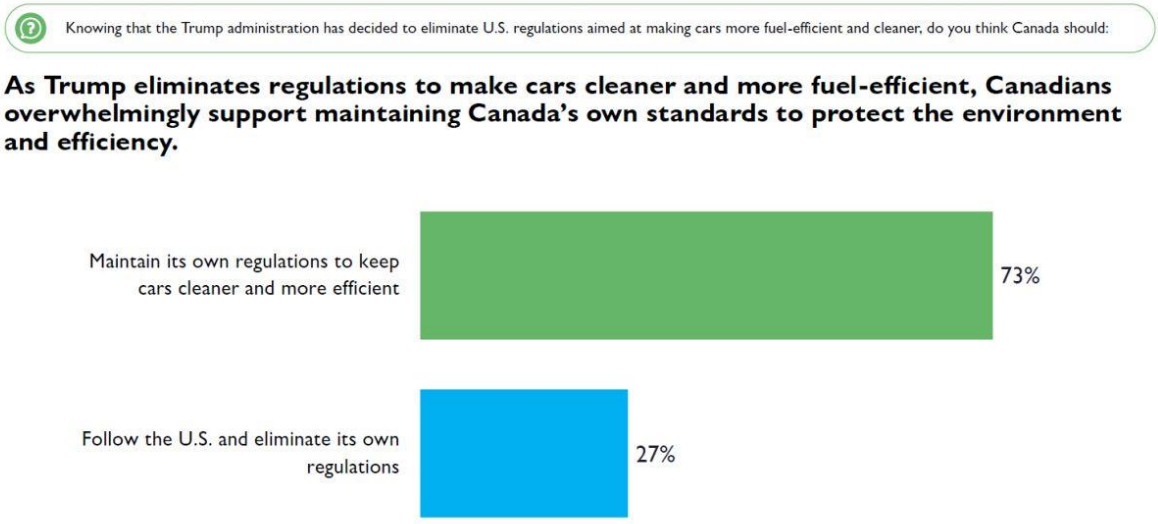
Rather than following the United States' regulation and their significant rollbacks on EV sales, GHG emissions and fuel consumption (as if Canada were merely the "51st state"), the EVAS allows Canada to assert control over its own vehicle market by ensuring EVs are delivered domestically even if U.S. standards are weakened. Without the EVAS, automakers have stronger incentives to prioritize markets with binding supply rules, leaving Canada exposed to U.S. political cycles and supply reallocations.

In September 2025, EMC commissioned Abacus Data to conduct a survey of 1,500 Canadians. We asked them if they believed that Canada should:

a) Maintain its own vehicle regulations
OR
b) Follow the U.S. by eliminating our vehicle regulations

The results speak for themselves…

73% of Canadians want Canada to maintain its own vehicle regulations.



Canada's GHG standards and EVAS serve different but complementary purposes. EVAS ensures full electrification actually happens. Framing EVAS as U.S. alignment reverses the reality. It is the policy that allows Canada to move forward independently when U.S. regulation becomes unpredictable.

The EVAS is required to attract large-scale private investment in electric vehicle charging infrastructure (Canadian Charging Infrastructure Council)

This is TRUE. The EVAS supports charging investment by providing policy certainty and a predictable vehicle adoption trajectory. Claims that the EVAS has failed to deliver charging build-out rely on static comparisons and ignore observed growth trends prior to policy uncertainty.

CVMA's argument assumes that charging infrastructure should immediately match long-term vehicle targets and treats recent policy uncertainty as evidence of structural failure. This overlooks documented growth rates and the critical role of policy certainty in private capital deployment.

Evidence from the Canadian Charging Infrastructure Council (CCIC) demonstrates that:

- The number of public fast charging ports has doubled over the last three years. Contrary to the perception that deployment of EV infrastructure is lagging, the number of public fast charging ports has grown 25-30% each year since 2020—and has more than doubled since the start of 2023.
- Even in a high adoption scenario, prior to pausing and uncertainty around the EVAS, public fast charging in Canada was on pace to meet the targets set by the EV Availability Standard, but the investment needed depends on policy certainty and growing EV sales.
- Based on the rate of growth that has occurred in prior years, Canada was on track to achieve the 22,000-23,300 public fast charger ports forecast to be required under NRCan and Dunsky's February 2024 analysis of public

charging in Canada. This analysis, shown in Table 2, assumes an average growth rate of ~25% per year (lower than any of the last five years).

– There is significant debate over the exact number of Level 2 charging stations required (the larger number discussed by CVMA), but few in the industry believe that prevalence of public L2 charging stations is a major factor in consumer sentiment regarding adoption of EVs.

Table 1: Growth of public fast-charging ports in Canada

Year	Total public fast-charging ports (end of year)	New ports added during year
2020	2,068	630 (+44%)
2021	2,826	758 (+37%)
2022	3,698	872 (+31%)
2023	4,932	1,234 (+33%)
2024	6,364	1,432 (+29%)
2025 (through Sept)	7,598	1,234 (+19% through Sept)

Source: Natural Resources Canada, Electric Station and Alternative Fueling Stations Locator; CCIC analysis

Number of Active DC Fast Charging Ports in Canada

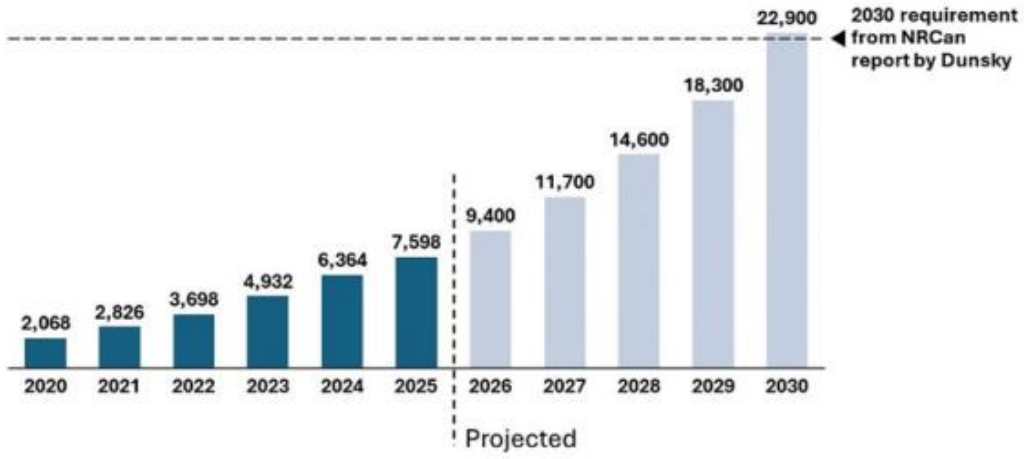


Table 2: Projected public fast-charging ports at current rate of growth

Year	Projected public fast ports	New ports required
2025 (current)	7,500	-
2026	9,400	1,900
2027	11,700	2,300
2028	14,600	2,900
2029	18,300	3,700
2030	22,900	4,600

Source: Canadian Charging Infrastructure Council modelling

Clarifying what the EVAS does — and does not — do

The EVAS does not directly mandate charging deployment, nor was it designed to do so. Its function is to provide a predictable demand signal that allows charging providers and utilities to plan capital-intensive investments with greater confidence. Weakening or delaying the EVAS undermines that signal and increases investor risk, particularly for fast-charging infrastructure that depends on utilization over time.

EMC has consistently noted that rural and remote charging gaps are best addressed with targeted public programs and complementary measures, not by weakening the vehicle supply standard. Reducing the EVAS ambition would slow vehicle uptake overall and further dilute the business case for private investment, including in underserved regions. Transitioning from the EVAS to GHG emission regulation only would add to the EV charging business model uncertainty.
The data cited by CCIC do not show a failure of the EVAS (which was not even in force before 2026 and still is not to date) to enable charging investment. They show that charging deployment was scaling rapidly until policy uncertainty intervened. The EVAS remains a necessary market signal for long-term infrastructure planning, while complementary tools are required to address regional equity.

CONCLUSION

Electric Mobility Canada supports rigorous, evidence-based debate on the future of Canada's automotive sector. What undermines that debate is the repeated mischaracterization of how existing regulations function and what their real-world impacts are.

As this response shows, the claims presented by CVMA rely on selective data, misleading assumptions, or a misunderstanding of the Electric Vehicle Availability Standard's built-in flexibilities. When assessed against the regulatory text and publicly available data, these claims do not hold.

The EVAS is a pragmatic, flexible supply-side regulation designed to ensure Canadians have access to vehicles that are already being produced globally, while supporting affordability, emissions reductions, and investment certainty. Weakening or repealing the standard would not solve the challenges cited by CVMA. It would instead delay market normalization, increase policy uncertainty, and leave Canada more exposed to external shocks and regulatory backsliding.

Canada's transition to zero-emission transportation is already underway. A credible policy discussion should focus on how to implement the EVAS effectively and transparently, not on perpetuating myths that distract from its core purpose and design.