Nordic public transport associations call for workable "Buy European" rules for electric buses

The Industrial Accelerator Act (IAA) aims to strengthen the EU's industrial capacity and accelerate the transition in strategic sectors. Among other measures, it proposes requirements concerning low carbon intensity and EU origin in the public procurement of electric, hybrid and fuel-cell vehicles, as well as key components.

A particularly problematic element for public transport is the proposed **2035 clause** in Annex III. Under the proposal, vehicles already registered in the EU would be considered eligible for use in public transport procurement only until 31 December 2035.

This risks creating an artificial cut-off date for fully operational buses that were lawfully purchased and registered in good faith under the rules applicable at the time. Buses often have a technical and economic lifespan of 10–15 years or more, while public transport contracts commonly run for 10–14 years. A bus that meets all applicable requirements when purchased could therefore become ineligible for use under a new or extended public transport contract after 2035, despite remaining safe, zero-emission and having substantial residual value. It´s not in line with a circular economy!

The position reflected in Swedish, Danish and Finnish industry submissions and supported by the International Road Transport Union (IRU) and the European Metropolitan Transport Authorities (EMTA), is that vehicles lawfully procured and registered before the new rules enter into force should be permitted to remain in operation throughout their full technical and economic lifespan. This should also apply where such vehicles are used under new or extended public transport contracts after 2035. The public transport sector is already struggling, partly to get back to the same market share as before the pandemic in order to be the tool for achieving the green transition for the transport sector as pointed out by the EU.

In September 2026, IRU and EMTA raised this issue with the Irish Presidency and Members of the European Parliament, urging them to address key provisions in the proposed "Buy European" rules for electric vehicles under the Industrial Accelerator Act. Their joint letter is available here: IRU and EMTA call for workable Buy European rules for electric buses.

Such an approach would strengthen investment certainty, reduce the risk of stranded assets and prevent fully operational zero-emission vehicles from being withdrawn prematurely.

A lifecycle-based approach would also be more consistent with the EU's climate and circular-economy objectives. Replacing operational vehicles before the end of their useful life risks increasing the cost of public transport, limiting vehicle availability and

undermining the practical delivery of the transition. The regulatory framework should therefore distinguish clearly between requirements applicable to new procurement and the right to continue using vehicles that have already been acquired.

Proposed position

The 2035 clause should be deleted or replaced with a clear transitional provision guaranteeing that vehicles which complied with the applicable rules at the time of purchase and registration may continue to be used throughout their full technical and economic lifespan, including under new or extended public transport contracts.

Requirements relating to EU origin should apply prospectively to new investments. They must not have retroactive effects, lead to the premature retirement of vehicles or restrict the use of existing zero-emission buses.

We are looking forward to your answer.

Please contact Ms Anna Grönlund Deputy Managing Director in The Swedish Bus & Coach Federation, in this matter.

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