Emission Controls Manufacturers Association (ECMA)



16-04-2025

ECMA Note on:

<u>Delhi Government's Draft Policy EV 2.0 banning ICE 2- & 3-Wheelers</u> in Delhi region from August 2025 and 2026

The draft Policy EV 2.0 by Government of Delhi, proposes the ban on new registrations of all ICE-powered three- and two-wheelers in Delhi from August 2025 and August 2026 respectively, and also banning of renewal of registration of three-wheelers including CNG and petrol vehicles. However, the proposed blanket ban within such a short timeline poses serious challenges to end users, the automotive industry, and public infrastructure. It has triggered waves of concern across the mobility ecosystem. While the urgency to tackle air pollution in the capital is well-justified, the proposed approach may lead to more harm than good if not reassessed with a practical, inclusive, and affordable vision.

ICE-powered vehicles, including two and three-wheelers, meeting the current BS-VI emission norms are much cleaner than their predecessors and have been able to bring down the pollution substantially. CNG fuel has been hugely promoted in Delhi as a much cleaner alternative fuel and CNG vehicles have helped further reduce pollution in Delhi, specially the particulates. Therefore, proposal of banning CNG for these vehicles has come as a surprise. Scrapping these vehicles prematurely, despite their lower emissions, contradicts previous investments and policy efforts. ICE-powered vehicles are quite affordable and do not face the range anxiety and challenges of charging infrastructure. It is worthwhile to note that the emerging emission norms are supporting the principle of being fuel neutral and technology agnostic. Therefore, Delhi Government's proposal of banning ICE-powered two and three-wheelers seem to be one-sided and irrational decision at this stage.

Two-wheelers and three-wheelers form the backbone of urban and semi-urban mobility and are crucial for many people's livelihood in Delhi. Delivery agents, gig workers, street vendors, small traders, and auto-rickshaw drivers rely heavily on these affordable modes of transport. Switching to electric vehicles is higher upfront cost and uncertain resale value.



With barely a year left, the infrastructure, supply chain, and affordability of electric vehicles (EVs) in the two- and three-wheeler segment are not yet mature enough to absorb such a massive transition as proposed in the draft policy. A sudden removal of millions of vehicles from the road will not only disrupt livelihoods but also strain the inadequate electric mobility ecosystem.

The fight against air pollution is of high priority, however, it shall not be done at the cost of equity, affordability, and livelihoods. A fair transition to clean mobility needs collaboration, consultation, technology neutrality and realistic planning. Hand-in-hand working of all stake holders such as the industry, suppliers, users and policymakers would be a fair approach to design a roadmap that is not only green but also fair and achievable.

Instead of a blanket ban, a gradual phase-out of all old generation ICE vehicles with incentives and support for cleaner ICE vehicles would be better. It would be highly commendable to provide continued support for all BS6-compliant ICE-powered vehicles, CNG and ethanol blended fuel powered vehicles and hybrids during the transition; that would help achieve early control of air pollution to a greater extent and also ease pressure on infrastructure and industry. Considering the substantially reduced tail-pipe emissions from all categories of ICE vehicles with the adoption of BS-VI technologies and strict certification procedures; Government should look at the broader aspect of proven advancements in ICE powertrain solutions and emphasize priority on replacing older generation vehicles by BS-VI vehicles at the earliest. Alignment with future level of stricter emission regulations, such as BS7, will call for an exclusive combination of new and refined fuels, engine combustion improvements and advanced emission control technologies; that will sure demonstrate additional benefits from further improved ICE-powered vehicles.

The draft policy proposal carries risks of causing economic distress, public backlash, and implementation chaos. Recently, many countries have reconsidered their earlier plans to ban ICE vehicles, reflecting a shift towards more pragmatic approaches to sustainable solutions by balancing environmental goals with economic and industrial realities based on technology neutral limits. Learnings from the experiences of other countries can help solve the issues effectively.

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