





Are EV Mandates and Market Reality on a Collision Course?

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About the Energy Futures Institute

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Executive Summary

This report examines the mandates of the British Columbia and Canadian federal governments aimed at accelerating electric vehicle (EV) adoption through stringent zero-emission vehicle sales targets. It assesses the intended environmental benefits of these mandates in the context of evolving market, economic, and technological realities.

The analysis reveals that while EVs offer higher energy efficiency and reduced maintenance costs compared to internal combustion engines, consumer demand remains extremely sensitive to price and purchase incentive levels. Reductions or eliminations of purchase incentives in Canada at the federal level and in provinces like Quebec, Ontario, and British Columbia, as well as internationally, have led to steep declines in EV sales, underscoring a heavy reliance on government support. For example, statistics reveal EV sales in British Columbia dropping to 18% of new vehicle sales in February 2025 from 22.5% in the 4th quarter of 2024 and 24.9% in the 3rd quarter.

Economic pressures and policy uncertainties, notably shifts in US environmental and recent tariff policies, have further complicated the feasibility of rigid EV mandates. Automakers face significant compliance challenges, including steep penalties or paying their competitors like Tesla for compliance credits, constrained profit margins, and difficult trade-offs between EV and higher-margin conventional vehicles, that risk distorting market behaviour and destabilizing the automotive sector.

Additional challenges include inadequate charging infrastructure, particularly in rural areas, performance issues in cold-weather regions, and supply chain vulnerabilities that have already prompted several high-profile project cancellations. These factors contribute to heightened investment risks and potential market distortions, such as excess inventory and reduced conventional vehicle availability.

Equity concerns are also prominent. The high upfront cost of EVs, coupled with disparities in charging accessibility, disproportionately impacts lower-income households and renters, exacerbating social inequities in the transition to electric mobility.

In response, the report recommends replacing inflexible sales mandates with a more adaptable, goals-based regulatory framework. Such an approach would set progressive emissions targets while allowing manufacturers the flexibility to innovate and optimize their vehicle mix, thereby balancing environmental objectives with economic realities and ensuring a more equitable transition.

1. Introduction

The transition from gas-powered to electric vehicles (EVs) is a major economic shift with broad implications for industries, supply chains, energy systems, and consumers. It also requires significant investments in charging and grid infrastructure. To speed up this transition, governments have mandated that a growing share of new vehicle sales be zero-emission. While intended to reduce greenhouse gas (GHG) emissions, these mandates also raise economic and social challenges, affecting affordability, industry stability, and government finances. Given deteriorating economic conditions, including market volatility, high tariffs, and shifting policy priorities, it is necessary to reassess whether these mandates remain the most effective approach (Reuters, 2025a) (Reuters, 2025b).

This report does not oppose EVs or question their environmental benefits, such as higher energy efficiency (77 per cent vs. 12-30 per cent for internal combustion engines) and lower maintenance (U.S. Dept. of Energy, nd). Instead, it solely evaluates the effectiveness and consequences of government mandates that attempt to accelerate EV adoption rates.

Several jurisdictions have implemented ambitious zero-emission vehicle (ZEV) sales mandates, setting strict targets for automakers(1). British Columbia, Quebec, Canada, and California have each established phased-in requirements leading to 100 per cent EV sales by 2035. However, as shown in figure 1, their interim targets vary:

Figure 1: Minimum required new ZEV sales				
Jurisdiction	2026 Target	2030 Target	2035 Target	
British Columbia	26%	90%	100%	
Quebec	17.5%	77.5%	100%	
Canada	20%	60%	100%	
California	35%	68%	100%	

^{(1).} The government legislation refers to Zero-emission vehicles, which includes fuel-cell electric vehicles that use hydrogen to power the electric motor. Since there are negligible FCEVs in Canada, the mandate is on electric vehicles. As such this report will use the terms EVs and ZEVs interchangeably.

Under these mandates, ZEVs include battery-electric, plug-in hybrid, and fuel-cell electric vehicles, all of which produce no tailpipe emissions at least some of the time. While intended to accelerate the transition away from internal combustion engines (ICE), the mandates put significant regulatory and economic pressures on automakers, consumers, and government budgets.

Since their introduction, economic and political conditions have changed, raising doubts about their feasibility. This report examines current automotive statistics and sales targets in the context of economic, infrastructure, and political uncertainties. It assesses whether federal and provincial EV mandates remain in the public interest or if a more flexible approach that gradually tightens emissions standards rather than imposing sales quotas, would better balance environmental goals with economic and industry realities.

2. Current Market Realities

2.1 Price Sensitivity and Purchase incentive Dependence

Consumer demand for EVs remains highly sensitive to price and government subsidies. Even modest reductions in incentives have notably impacted EV sales. Figure 2 summarizes key examples from various jurisdictions.

These examples raise fundamental questions regarding the sustainability of EV adoption in the absence of robust government subsidies. As the federal government recently halted Canada's national EV purchase incentive of up to \$5,000 in January 2025, the observed price sensitivity further threatens the feasibility of meeting ambitious mandated sales targets.

2.2 Economic Pressures and Policy Uncertainty

The viability of EV mandates is increasingly uncertain due to changing economic conditions and evolving climate policies, particularly in the United States. The Trump administration announced in January 2025 its intention to repeal the Environmental Protection Agency's emissions standards, reducing regulatory pressure on US automakers to expand EV production (The White House, 2025). Additionally, the administration has halted funding for new charging stations, is considering eliminating the \$7,500 federal EV purchase incentive, and is initiating action to revoke California's waiver to set its own EV and emissions policies (AP, 2025). This latter policy shift will also affect the 11 other states that have adopted California's standards. As described in more detail in section 3.3 below, tariffs targeting the automotive sector are likely to create additional hurdles and could result in significant cost increases.

Figure 2, Impact of purchase incentives on EV purchases				
Region/ Jurisdiction	Incentive Program Changes	Impact on Sales	Comments	
Quebec	Purchase incentive dropped from \$7,000 to \$4,000 in January 2025	Accelerated purchases followed by a 65% decline in EV sales	Highlights strong reliance on government incentives	
Ontario	Ended EV purchase incentive program	Approximately 50% drop in EV sales	Indicates significant sensitivity to purchase incentive availability	
Germany	Purchase incentive of \$4,900 cancelled in 2024	EV sales declined by 27% in the following 10 months	Demonstrates international price sensitivity	
United States	Removal of federal EV purchase incentive (projected)	Estimated 27% decline in EV sales (per NBER study)	Similar magnitude of impact as observed in Germany	
British Columbia	Lowered MSRP car cap from \$55,000 to \$50,000 and moved SUVs from truck cap (\$70,000) to car cap	New EV sales market share fell from 24.9% to 22.5%, and to 18% in Feb 2025	S&P Mobility noted that "the province may need to enhance incentives or address consumer barriers to purchase"	
Canada	\$5,000 rebate for EVs ran out of funds in January 2025	New EV sales market share dropping in early 2025	Indicates sensitivity to decreased purchase incentives	

Sources: Data compiled from National Bureau of Economic Research (Allcott & et al., 2024), (Kelley Blue Book, 2024), (Global News, 2019), (S&P Global Mobility, 2024) and (S&P Global Mobility, personal communications, 2025).

These reversals create uncertainty for North American automakers. Given the sector's integrated nature, Canada's aggressive EV mandates may create competitive disadvantages if US automakers face far weaker regulatory pressures.

2.3 Automaker Compliance Challenges

The financial penalties for non-compliance with BC's EV mandate are stiff. Automakers failing to meet required EV sales thresholds face fines of \$5,000 per vehicle in 2025, rising to \$20,000 per vehicle in 2026, with further increases tied to inflation. Federal enforcement follows a progressive penalty structure under the Canadian Environmental Protection Act, which could result in legal action against automakers that do not comply.

To meet these mandates, automakers have limited options:

- 1. Offer steep discounts on EVs to increase sales. This would be financially unsustainable, as most automakers already lose money on EVs at their current price levels. Moreover, rising mandatory EV sales means relatively fewer conventional vehicle sales, which are their most profitable products.
- 2. Reduce conventional vehicle sales, to make the EV sales ratio easier to meet. This action would hurt both automakers and consumers. Automakers would sell fewer of their highest-margin products, while consumers would face a supply shortage and therefore higher prices on the sale of conventional vehicles. These price hikes would ripple through to the used car market as buyers, unable to purchase new conventional vehicles, turn to used alternatives.
- 3. Purchase compliance credits from other manufacturers. Under both BC's and the federal government's EV mandate legislation, if a manufacturer doesn't meet its minimum EV sales requirement, it can purchase "compliance credits" from other manufacturers who have excess EV sales (like Tesla). However, as regulations become more stringent, the demand for such credits will likely rise, making this option increasingly expensive (Gov't of BC, 2025a) (Mcmillan LLP, 2024).

2.4 Consumer Hesitancy and Regional Disparities

Consumer sentiment toward EV adoption remains mixed, particularly in regions where infrastructure, affordability, and vehicle performance in cold climates are concerns. As discussed in section 2.1, consumers are very sensitive to EV prices with significant sales declines associated with reduction in government purchase subsidies.

Additionally, cold weather performance remains a key concern for Canadian consumers, particularly in northern and rural regions. Studies indicate that EV battery range drops significantly in cold temperatures, increasing range anxiety and reducing the appeal of EVs in winter climates (Gessaroli, 2024a).

3. Infrastructure, Supply Chain, and Technical Challenges

The accelerated transition to EVs in Canada presents non-trivial infrastructure and technical challenges that could impede the effectiveness of government-mandated EV sales targets. These challenges encompass charging infrastructure deficiencies, supply chain vulnerabilities, and technical limitations affecting consumer adoption.

3.1 Charging Infrastructure Deficiencies

A robust and accessible charging network is crucial for widespread EV adoption. However, both BC and Canada currently face several challenges in this area.

In many rural and northern communities, the lack of charging infrastructure creates disparities in EV adoption rates, hindering an accelerated transition to electric mobility (Community Energy Association, nd).

Expanding charging infrastructure is costly. A report for Natural Resources Canada (NRCan) estimates a Level 2 public charger costs approximately \$8,000, while a fast charger costs \$150,000 (Dunsky, 2022). Based on a projected ratio of 43 EVs per public charger, the estimated investment required for Canada is up to \$17.7 billion by 2040, with British Columbia's share at \$1.8 billion by 2040 (Gessaroli, 2024b).(2)

However, a Metro Vancouver study suggests far higher costs. For Metro alone, projections suggest the need for 4,600 to 7,700 fast public charging ports and 54,700 to 97,600 Level 2 public ports. Estimated costs range from \$2.1 billion to \$2.9 billion by 2050, already exceeding BC's entire projected budget. (Metro Vancouver, 2023)

⁽²⁾ Public electric vehicle charging stations are facilities available to all EV drivers, located in public areas such as shopping centers, parking lots, and along highways. Municipalities, provincial and federal governments, governmental agencies, as well as public charging business operators. Other entities such as hotels, multi-unit residential buildings, universities, airports, and public lands may also provide public charging stations.

Reliability issues also exacerbate these challenges, with EV owners expressing dissatisfaction with the availability and functionality of public charging stations. A recent Canadian Automobile Association survey revealed that 70 per cent of respondents were less than satisfied with the number of public fast chargers available (CAA, 2024).

3.2 Supply Chain Vulnerabilities

Recent developments have led to a slowdown in the anticipated growth of Canada's EV supply chain, reflecting a re-evaluation of electric vehicle demand projections by industry.

Figure 3, Selected pauses/cancellations in the Canadian EV sector			
Company	Development		
Britishvolt	Cancelled plans for a battery manufacturing plant and R&D center in Becancour, Quebec.		
Umicore	Paused construction of battery materials plant in Loyalist, Ontario, as part of a strategic review of its operations.		
Northvolt	Filed for Chapter 11 bankruptcy in the US but has stated the \$7 billion Quebec battery plant investment will proceed.		
Ford	Cancelled \$1.8 billion plan to retool the Oakville, Ontario factory for EV production.		
Stellantis	Paused work on the next-generation Jeep EV and Brampton plant retooling.		

Sources: Data compiled from (Electric Autonomy Canada, 2022), (Electric Autonomy Canada, 2024), (CTV News, 2024), and (CBC News, 2025). See References for full citations.

3.3 Trade Policies and Tariffs

The prospect of new US tariffs on imports from Canada and Mexico present significant challenges to building an integrated North American EV production sector. These tariffs expect to increase production costs, leading to higher vehicle prices for consumers. For instance, vehicles assembled in the US may use components produced in Canada or Mexico. With the new tariffs, they become more expensive, raising vehicle production costs. According to the Anderson Economic Group, the tariffs on imports from Canada and Mexico is projected to increase crossover utility vehicles by at least \$4,000, while electric vehicles may see cost increases of up to \$12,000 (The Verge, 2025).

Furthermore, the threatened US tariffs could trigger a recession in Canada, reducing tax revenues just as more funds are needed to support unemployed Canadians and struggling industries. This financial strain comes at a time when accelerating EV adoption requires billions of dollars in government spending, an increasingly unrealistic burden in today's economic environment (Gov't of Canada, 2025).

4. Investment Risks and Market Distortions

When mandated targets exceed actual market demand, several broad challenges can emerge:

External investments, such as retooled factories, specialized supply contracts, and capital expenditures risk becoming stranded if market demand falls short of mandated targets. This misalignment results in wasted capital and contractual liabilities that affect the broader supply chain.

Internal production processes may operate inefficiently when resources are allocated based on unrealistic targets. Underutilized capacity and misallocated resources drive up manufacturing costs, making day-to-day operations less efficient and increasing financial strain on automakers.

An over supply of EVs, caused by mandates, forces automakers to lower prices to clear excess inventory. This lowers profit margins and reduces resale values. Conversely, reducing ICE production to meet EV targets can tighten supply, raise conventional vehicle prices, pushing more consumers toward the used car market, further raising prices.

Industry representatives have warned that the accelerated targets are inconsistent with market realities, destabilizing production and pricing frameworks (Yahoo Finance, 2025). This reinforces the need for mandates to align with actual market demand to avoid long-term operational and financial uncertainty.

As noted earlier, EV demand will likely fall short of mandated minimum sales, especially as government incentives decline. The resulting gap could cause significant economic disruption. Adjusting or removing the mandate earlier rather than later may help minimize the impact on automakers and the broader market.

5. Equity Implications

Accelerated EV mandates introduce equity concerns, particularly for lower-income households and those without access to home charging. Policies that accelerate the transition to EVs often benefit wealthier consumers, while imposing higher costs on those least able to afford them. These disparities stem from three factors: vehicle affordability, charging access, and electricity pricing.

5.1 Vehicle Affordability and Income Disparities

The high upfront cost of EVs remains a major barrier to widespread adoption, even with available subsidies. On average, EVs cost \$8,000 more than equivalent ICE vehicles, creating a substantial financial hurdle for many consumers (Driving, 2024)(3). As noted earlier, EV sales in Quebec and Ontario saw steep declines after reductions in purchase incentives, showing how price-sensitive EV demand remains. BC has recently removed the provincial sales tax exemption on the purchase of used EVs, which will further disadvantage lower-income households (Gov't of BC, 2025b).

Moreover, BC's EV purchase incentive structure disproportionately benefits middle- and upper-income households. Figure 4 outlines the maximum purchase incentive available based on income level.

Since purchase incentives are sourced from government revenue, lower-income taxpayers contribute to the incentives that assist individuals earning up to \$100,000 in purchasing an EV. This raises concerns about fairness, as government funds are being used to help relatively affluent consumers buy new vehicles, while many lower-income households cannot access these incentives due to the higher upfront EV costs.

(3) The \$5,000 federal purchase incentive is included in the \$8,000.

Figure 4, BC Government EV purchase incentives				
Income Level	Maximum Purchase incentive			
Up to \$80,000	\$4,000			
\$80,001 to \$90,000	\$2,000			
\$90,001 to \$100,000	\$1,000			

Source: (Gov't of BC, 2024)

5.2 Charging Infrastructure and Housing Disparities

Charging access is another equity barrier that compounds affordability issues. Lower-income households are disproportionately affected by charging infrastructure limitations. Vancouver has the lowest proportion of single-detached houses among major Canadian cities, leaving many residents without private driveways or garages for home charging (Javed & et al., 2024). Instead, they must rely on public charging, which is not only less convenient but also significantly more expensive.

As shown in figure 5 (next page), utility provided public charging rates in BC are typically around \$0.29 per kWh for Level 2 charging and \$0.35 to \$0.39 per kWh for fast charging, far higher than home charging rates of \$0.13 or \$0.08 per kWh, the latter being overnight time-of-use (TOU) pricing. Only households with private charging have access to these lower TOU rates, leaving renters and residents in multi-unit buildings, reliant on costly public charging, which erodes the financial benefits of EV ownership.

Figure 5, Rates in BC for EV		
Provider	Charging Type	Rate per kWh(a)
DC Hudro	Level 2	\$0.29
BC Hydro	Fast Charging	\$0.34
FortisBC	Fast Charging	\$0.39
City of Vancouver	Level 2	\$0.29
City of Vancouver	Fast Charging	\$0.35
BC Hydro Residential (b)	Average Rate	\$0.13
BC Hydro Time-of-Use Pricing	Overnight (11 p.m. to 7 a.m.)	\$0.08 (average rate minus \$0.05)

a Rounded to the nearest cent.

Sources: Data compiled from (BC Hydro, 2024a), (FortisBC, 2024), (City of Vancouver, nd), (BC Hydro, nd), and (BC Hydro, 2024b). See References for full citations.

5.3 Unequal Cost Burdens from Electricity Pricing

EV owners without home charging pay a premium not just in terms of convenience but also in long-term operating costs. Public charging in BC costs up to five times the price of home charging, and there is no indication that this cost gap will narrow in the near future. Additionally, electricity pricing structures favour those who drive long distances. A UBC analysis found that none of the "typical households" studied across Canada drive enough for an EV to break even with an ICE vehicle in terms of net present value, meaning that consumers who cannot take full advantage of cost savings through frequent driving or cheap charging see a loss in wealth from EV ownership (Javed & et al., 2024).

The combination of higher upfront costs, limited charging access, and cost disparities between public and private charging makes EV adoption less economically viable for many Canadians, particularly lower-income households. Without addressing these disparities, EV mandates risk creating a system that disproportionately benefits wealthier consumers while increasing financial burdens on lower-income households.

b Average of residential two-tier rates. BC Hydro will be moving to flat-rate residential pricing later in

6. Recommendations

Electric vehicles can provide important environmental benefits, but current sales mandates are increasingly out of step with today's economic, political, and market realities. High vehicle prices, consumer price sensitivity, inadequate charging infrastructure, supply chain challenges, trade volatility, and recent US policy reversals all reduce the likelihood that these mandates can be met without significant economic cost.

As noted earlier, EV demand will likely fall short of mandated minimum sales, especially as government incentives decline. The resulting gap could cause significant economic disruption, creating financial strain on automakers and distorting vehicle markets. Moreover, the large government expenditures required to accelerate the EV transition conflict with declining fiscal revenues and shifting financial priorities.

Given these risks, the current EV sales mandates should be replaced with a flexible, goals-based regulatory framework (Sunstein, 1995). A goals-based approach sets emissions targets that gradually tighten, while allowing automakers the discretion to choose how best to meet those targets. This method has been shown to lower compliance costs and foster innovation compared to rigid, prescriptive rules (UK Government, 2018). It would enable manufacturers to optimize the mix of EVs, hybrids, and other technologies based on market demand, while still delivering gradual GHG emission reductions.

A more flexible approach would better align with economic conditions, supply chain challenges, and fiscal constraints while offering a more balanced transition to support both environmental and economic objectives.

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