# Structural Transformation of Urban Mobility: A Holistic Review of the Delhi Electric Vehicle Policy 2026–2030

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The Draft Delhi Electric Vehicle Policy 2026–2030 represents the Government of NCT of Delhi's continuing attempt to address the capital's air quality crisis through a structured clean mobility framework. It builds on the Delhi EV Policy 2020 but moves well beyond it in scope, introducing purchase incentives, road tax and registration fee exemptions, charging and battery swapping infrastructure, battery recycling measures, digital administration, and, significantly, phased electrification mandates across key vehicle segments. What distinguishes the 2026–2030 iteration from its predecessor is its attempt to treat electric mobility as an ecosystem rather than a standalone vehicle-purchase programme.

The draft is anchored in the recognition that vehicular emissions remain a material contributor to poor air quality in Delhi. Drawing on the latest report of the Commission for Air Quality Management, it records that vehicular emissions account for a significant share of pollution in the National Capital Territory, particularly during winter. Two-wheelers dominate Delhi's vehicle stock, while three-wheelers, commercial cars and N1 goods vehicles represent high-utilisation segments whose electrification is central to any durable improvement in air quality. The Policy's targeting of these segments, rather than private four-wheelers alone, reflects a more honest engagement with the sources of pollution than earlier frameworks.

## Constitutional Framing and Policy Objectives

The draft expressly invokes Article 21 of the Constitution, which it associates with the right to clean air and a pollution-free environment, and draws on the Supreme Court's reasoning in M.C. Mehta v. Union of India & Ors. It further grounds itself in the Environment (Protection) Act, 1986 and the Motor Vehicles Act, 1988. This is not mere prefatory language. By placing the Policy within a constitutional and statutory lineage, the drafters appear to be pre-empting anticipated legal challenges to the more intrusive mandates that follow, particularly those affecting livelihood-dependent vehicle categories.

The stated objectives are familiar but coherently articulated: accelerating EV adoption across major vehicle segments, supporting public and private charging infrastructure, enabling battery recycling and related services, improving air quality, and ensuring fiscal efficiency and transparent implementation. Taken together, they indicate an attempt to balance environmental imperatives with an administrable implementation structure, though, as discussed below, the balance is weighted more heavily on the environmental side than on industry protection.

## Incentives, Infrastructure, and OEM Obligations

At the consumer-facing end, the draft offers year-wise purchase incentives for electric two-wheelers, electric three-wheeler auto-rickshaws, and electric four-wheeler goods vehicles in the N1 category. For two-wheelers, the incentive is linked to battery capacity and is subject to both a price cap and a maximum incentive. For three-wheelers and N1 goods vehicles, it is

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structured as a fixed amount that declines over successive years from the date of notification. Eligibility of EV models is tied to the Government of India's PM E-DRIVE scheme and its successors, which is sensible from an alignment standpoint but does concentrate approval power at the Union level.

Scrapping incentives for electric two-wheelers, three-wheelers, cars, and N1 goods carriers are made available subject to the purchase of a new EV within six months of a Certificate of Deposit from an authorized scrapping facility, and are linked to the scrapping of older Delhi-registered BS-IV and below vehicles. Road tax and registration fee exemptions are extended to EVs registered in Delhi during the policy period, with differentiated treatment for electric cars by ex-showroom price and for Strong Hybrid EVs. The architecture is coherent: direct incentives at the top, scrapping-linked support to accelerate replacement of legacy stock, and registration-level relief to narrow the cost differential with ICE vehicles.

On infrastructure, the Policy designates Delhi Transco Limited as the nodal agency for planning, coordination, and implementation of public EV charging and battery swapping infrastructure. DTL is tasked with demand aggregation, location and load identification, and system-level planning for siting, grid readiness, and phased deployment. It is further required to develop and periodically update Standard Operating Procedures covering technical standards, approvals, timelines, service level benchmarks, and monitoring mechanisms, and to operate a dedicated digital portal for end-to-end management of charging and swapping infrastructure. A High-Powered Committee under the Chairpersonship of the Chief Secretary, GNCTD, and a single-window clearance mechanism for charge point and battery swapping operators complete the institutional design. The centralization of planning under DTL marks a notable shift from the more distributed approach of the 2020 Policy and should, in principle, reduce the siting and approval delays that slowed earlier rollout.

Original Equipment Manufacturers are assigned responsibilities that go beyond vehicle supply. All OEMs operating in Delhi are required to ensure deployment of at least one public EV charging station per dealer, with minimum charging points prescribed for two and three-wheelers and four-wheelers. The Policy further states that OEMs shall aim to stabilise EV costs to improve affordability for Delhi residents. The latter is aspirational and unlikely to be enforceable in its current form, but the former represents a concrete shift of infrastructure burden onto manufacturers, a design choice that will likely attract industry representations during the consultation window.

On the ecosystem side, the Environment Department is to ensure strict adherence by OEMs and other obligated entities to the Battery Waste Management Rules, 2022, including Extended Producer Responsibility, reporting, and environmentally sound management of waste batteries. The Delhi Pollution Control Committee is to facilitate deployment of battery collection centres across Delhi through a Public-Private Partnership model and notify Standard Operating Procedures for safe collection, storage, transportation, and transfer of waste batteries to authorized recyclers or Producer Responsibility Organizations. A battery traceability-enabled ecosystem based on unique battery identifiers is contemplated to support refurbishment, second-life use, and environmentally sound recycling. The degree of attention given to battery lifecycle management is one of the more distinctive features of this draft, going beyond the approach taken in the Delhi EV Policy 2020.

**Phased Electrification and Institutional Governance**

The most consequential, and legally most contestable, provisions lie in the phased electrification mandates. From 1 January 2027, only electric three-wheelers (L5) are to be permitted for new registration in Delhi; from 1 April 2028, the same applies to two-wheelers. Minimum electrification targets are prescribed for school buses, with increasing electric share requirements up to 31 March 2030. For fleet aggregators and delivery service providers, no conventional ICE vehicles running purely on petrol or diesel may be inducted into the existing fleet of specified categories from 1 January 2026, though BS-VI two-wheelers may continue to be inducted until 31 December 2026. Government fleets, new intra-state buses, and new N1 trucks procured, leased or hired by GNCTD departments and public bodies are required to be electric, subject to limited exceptions.

The institutional architecture supporting these mandates is comparatively robust. Applications, approvals, verifications, disbursements, reporting, and grievance redressal are to be fully paperless through digital systems. The Transport Department is the nodal department for implementation, with an EV Cell under a Special or Additional or Joint Commissioner (EV) supported by a dedicated Project Management Consultant. Responsibilities are separately allocated to DTL through the Power Department, the Environment Department, DPCC, urban local bodies and land-owning agencies, the Education Department, and District Magistrates through the Revenue Department. A dedicated EV Fund under the Transport Department is provided for, drawing on budgetary allocations, Central and State schemes, the Air Ambience Fund, the Environment Compensation Charge, PM E-DRIVE, cess, taxes, and other approved sources, and a Delhi EV Apex Committee under the Hon'ble Minister (Transport) is to oversee both Policy implementation and EV Fund management.

**Legal Questions and the Road Ahead**

Four sets of questions are likely to dominate the consultation process and, if the draft is notified substantially as proposed, any subsequent litigation.

First, the phased bans on new ICE two-wheeler and three-wheeler registrations will be tested for reasonableness under Articles 14 and 19(1)(g) of the Constitution. While the Supreme Court's environmental jurisprudence, beginning with M.C. Mehta, provides significant headroom for pollution-control measures, the timelines here are aggressive. Whether charging and swapping infrastructure will in fact be in place by 2027 for three-wheelers, and by 2028 for two-wheelers, will be central to any reasonableness assessment. Policy ambition without infrastructure readiness is a familiar ground for judicial intervention.

Second, the obligations imposed on OEMs, particularly the dealer-level charging station requirement and the exhortation to stabilise prices, raise questions about the source and scope of State-level authority over manufacturers who are otherwise regulated under Central legislation. The line between a legitimate condition of doing business in Delhi and an impermissible encroachment on the Union's domain under the Motor Vehicles Act is not always crisp, and is likely to attract close reading.

Third, the fleet aggregator and delivery service provider obligations sit at the intersection of the Motor Vehicle Aggregator Guidelines, state excise and

labour regulation, and the Policy itself. Operators with pan-India fleets will need to assess how Delhi-specific induction restrictions interact with their broader operational commitments and existing contractual arrangements.

Fourth, on comparative perspective, the draft is meaningfully more ambitious than the Delhi EV Policy 2020 that it is set to replace. The 2020 Policy was built primarily on financial incentives and was extended multiple times pending the formulation of a successor. The 2026–2030 draft shifts the centre of gravity from incentives alone to mandates, institutional design, and battery lifecycle governance. That shift is where most of the legal and operational questions will be concentrated.

Taken as a whole, the Draft Delhi Electric Vehicle Policy 2026–2030 is a serious document. It approaches EV adoption as part of a regulatory and administrative ecosystem involving infrastructure, waste management, inter-departmental coordination, and dedicated funding support. Its distinctive contribution lies in the insistence on institutional design and battery lifecycle management, and in the willingness to impose hard segment-specific deadlines rather than rely on incentives alone. Whether it succeeds will depend less on the quality of the drafting and more on three practical variables: whether DTL can deliver charging infrastructure at the pace the mandates require, whether the High-Powered Committee and single-window clearance actually compress approval timelines, and whether the industry and consumer response to the phased bans produces acceptance or litigation. For stakeholders in the EV value chain, the consultation window is the moment to shape those outcomes. For the Government, it is the last opportunity to close the gap between ambition and enforceability before the Policy is tested in the field and, in all likelihood, in the courts.