

Madrid's Low-Emission Zone (LEZ) represents a significant shift in the city's approach to air quality management. In 2021, when Spain's Supreme Court annulled Madrid Central, the city's original LEZ, on procedural grounds, the municipality responded by embedding emissions regulation within the Madrid 360 Strategy for Environmental Sustainability, a broader mobility and infrastructure policy. This strategy addressed the legal, political and operational shortcomings of Madrid Central by situating the LEZ within a citywide strategic framework rather than as a standalone measure.

The results validate this integrated framework. Through the Madrid 360 Strategy for Environmental Sustainability, the city attained compliance with the European Union (EU) air quality norms after a decade of violations, with nitrogen dioxide levels falling 40-45%

city-wide, and achieved its cleanest air on record in 2024. The new LEZ has provided documented health benefits and has increased the use of public and active transport in the city. It has also endured through changes in municipal government and multiple court challenges, underscoring its durability.

Madrid's experience offers an example for other cities – demonstrating that anchoring LEZs within a comprehensive, infrastructure-led policy enhances political durability, public communication and administrative robustness and can deliver significant and lasting air-quality improvements. Madrid's experience also demonstrates that early setbacks can inform progress on climate action by providing a roadmap for resilience and reinvention, helping cities to achieve ambitious policy goals.



Policy snapshot

Madrid's unique geography – it is nestled in a basin and prone to temperature inversions – traps air pollutants, intensifying the city's chronic air quality issues.¹ This environmental vulnerability, combined with growing concerns over public health, made regulatory action not just necessary, but urgent.² Moreover, Spain's repeated failure to meet EU air quality standards placed

the country at risk of serious sanctions, underscoring the critical need for meaningful and lasting policy reform.³

The Low-Emission Zone (LEZ) Madrid (or Zona Baja de Emisiones), was launched in 2021 as a central part of the city's Madrid 360 environmental strategy to address the above challenges.⁴ The strategy is built on three pillars:



Urban transformation:

Advancing energy efficiency, electrification, circular economy practices and green space expansion.



Mobility:

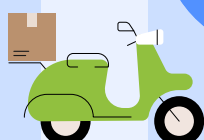
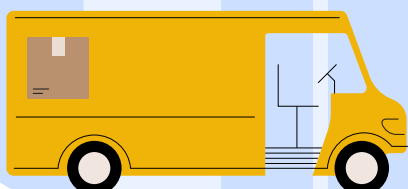
Promoting sustainable, multimodal transport and reducing the number of polluting vehicles.



Administration:

Modernizing regulations and building digital capabilities to support climate goals.

In 2018, Madrid's pollution levels had exceeded EU limits for nearly a decade. Only meaningful and long-lasting reform could improve the city's air quality.



The LEZ was implemented in 2021 to restrict the most polluting vehicles from entering the city.





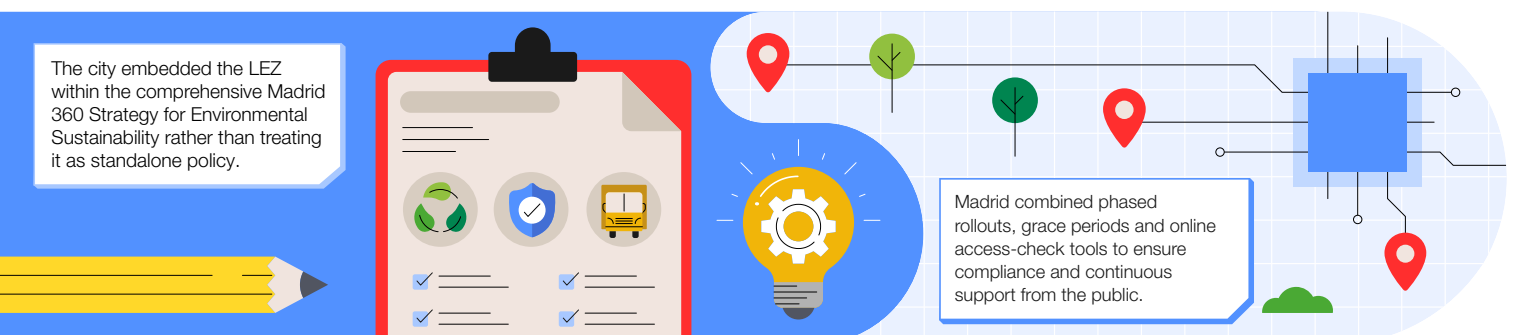
As part of this strategy, the LEZ restricts access for high-emission vehicles to improve air quality, addresses chronic pollution issues and aims to enable Madrid to meet EU air quality standards. The LEZ also supports broader economic, social and environmental objectives:⁵

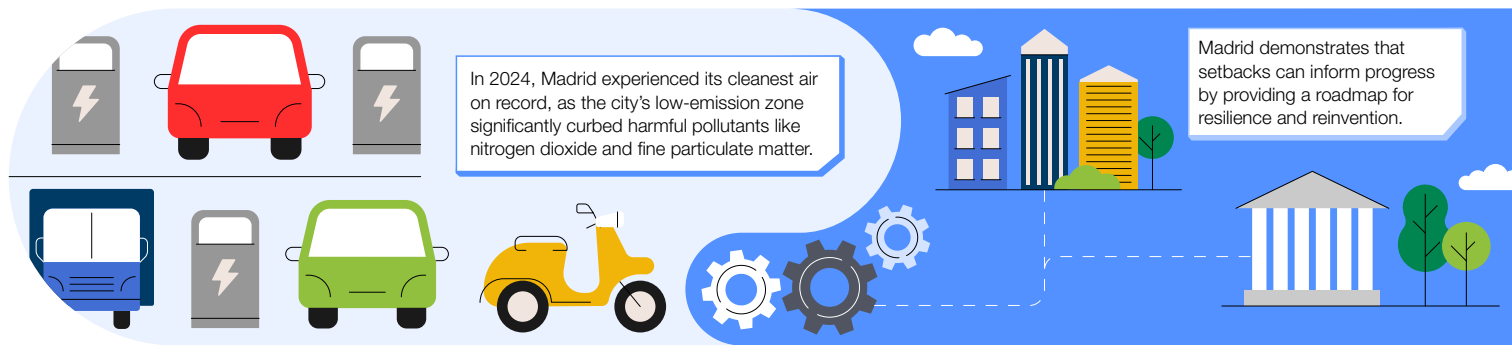
- 1 Improving public health by reducing pollution-related illnesses and premature deaths.
- 2 Minimizing economic losses from health-related absenteeism and reduced tourism.
- 3 Encouraging sustainable transport, including public transit, walking, cycling and electric vehicles.
- 4 Aligning with EU Green Deal goals and national mandates, such as Spain's Law 7/2021, requiring LEZs in cities with over 50,000 inhabitants.⁶

Madrid's first LEZ, Madrid Central, came into effect in late 2018 under the city's Air Quality and Climate Change Plan, with the goal of reducing nitrogen dioxide (NO₂) levels in line with EU air quality standards. While early data suggested emissions reductions, exceedances of the hourly NO₂ limit were still recorded in early 2019, notably at Plaza Elíptica. In July 2020, Madrid's Superior Court of Justice (TSJM) annulled the measure on procedural grounds, citing deficiencies in its regulatory approval process.⁷

Today, Madrid's LEZ policy is embedded in the Madrid 360 Strategy for Environmental Sustainability and backed by a more robust legal framework through the Sustainable Mobility Ordinance (Ordenanza 10/2021), which mandates the creation and expansion of low-emission zones across the city.

Since January 2025, the LEZ strategy encompasses the entire municipality of Madrid, prohibiting the most polluting vehicles (Label A) from circulating within the municipality. Moreover, special protected LEZs, in areas that have experienced significant amounts of pollution, impose even stricter requirements.





Implementation in detail

Implementation required a comprehensive strategy encompassing key regulatory frameworks and policies, clear spatial coverage and zone delineation, enforcement and compliance mechanisms, and regulatory and financial incentives.

Regulatory framework and policies

At the national level,⁸ Law 7/2021 (20 May 2021) mandates municipalities with over 50,000 inhabitants to implement LEZs

as part of their sustainable urban mobility plans. Madrid's City Mobility Ordinance (Ordenanza 10/2021)⁹ establishes Madrid 360's LEZ strategy in accordance with national law.

Madrid's Dirección General de Tráfico (DGT) uses the Distintivo¹⁰ to classify vehicles into the following categories:

ZERO label:

Applies to zero- or near-zero emission vehicles, including battery electric vehicles (BEVs), plug-in hybrids (PHEVs) with ≥ 40 km electric range, extended-range electric vehicles (REEVs) and hydrogen fuel cell vehicles (FCEVs).

ECO label:

For low-emission vehicles using alternative fuels: PHEVs with < 40 km electric range, non-plug-in hybrids (HEVs), mild hybrids (MHEVs) and natural gas (compressed natural gas (CNG) or liquefied natural gas (LNG)) or liquefied petroleum gas (LPG) vehicles.

Label C:

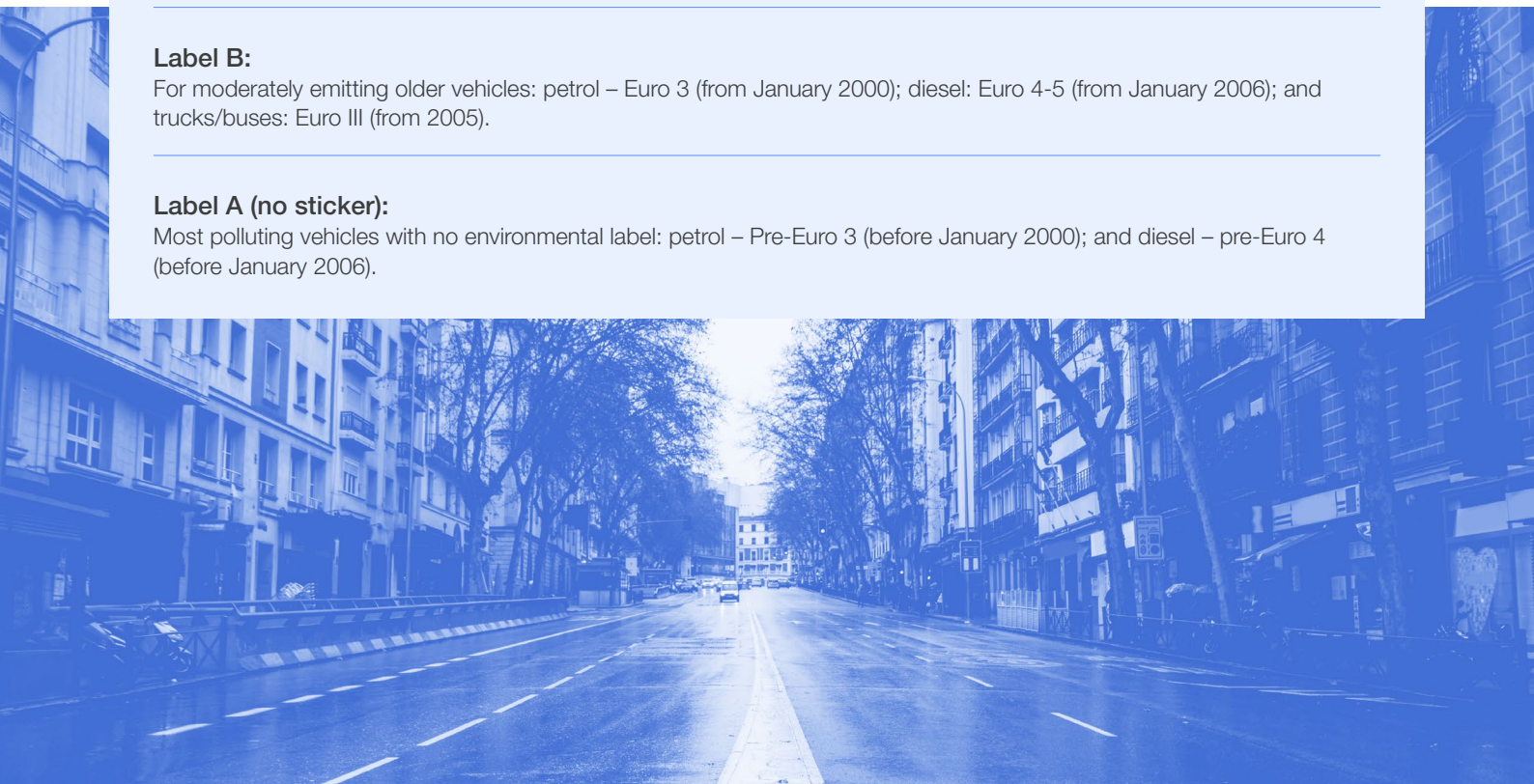
Covers newer, lower-emission combustion vehicles: petrol – Euro 4, 5, 6 (registered from January 2006 onwards); diesel – Euro 6 (from September 2015); and trucks/buses – Euro IV-VI (from 2006).

Label B:

For moderately emitting older vehicles: petrol – Euro 3 (from January 2000); diesel: Euro 4-5 (from January 2006); and trucks/buses: Euro III (from 2005).

Label A (no sticker):

Most polluting vehicles with no environmental label: petrol – Pre-Euro 3 (before January 2000); and diesel – pre-Euro 4 (before January 2006).





Spatial coverage and zone delineation¹¹

Pursuant to Madrid 360, there are three official LEZs operating in the city, each with its own specific rules and requirements.

TABLE 1 Coverage, access rules and exemptions

LEZ	Coverage	Vehicle restrictions	Exemptions
City-wide LEZ	Entire municipality of Madrid.	<ul style="list-style-type: none"> – Label A: Prohibited from entering. – Label B, C, ECO and Zero: Free circulation allowed. 	<p>Exceptions apply for vehicles used by persons with reduced mobility, antique or emergency vehicles, and others exceptionally authorized under the Mobility Ordinance (e.g. hospital care or mandatory technical inspection vehicles).</p> <p>Currently, a notice period is valid and allows the transit of certain label A vehicles until 31 December 2025.</p>
ZBEDEP	Madrid's central district.	<ul style="list-style-type: none"> – Label A: Prohibited from entering. – Label B and C: Access allowed only if the vehicle is to be parked in an authorized parking facility. – Light- and heavy-duty vehicles with a B label are not allowed to enter or circulate. – Label ECO and Zero: Free circulation allowed. 	B and C vehicles belonging to people and companies registered in the Centro district, as well as people with reduced mobility. And Label A vehicles belonging to people with reduced mobility and antique vehicles.
ZBEDEP	Area surrounding Plaza Elíptica, known for high pollution levels.	<ul style="list-style-type: none"> – Label A: Prohibited from entering. – Label B, C, ECO and Zero: Free circulation allowed. 	Vehicles of people with reduced mobility, antique vehicles, firefighting and army vehicles.

Enforcement and compliance

To ensure LEZ compliance, fixed cameras at key points throughout the city capture licence plates and automatically check badges. Documented violations trigger fines or warnings.¹² Telematic enforcement started in late 2021 in Centro. Plaza Elíptica had a soft launch before fines began in February 2022, while the city-wide LEZ is currently undergoing a soft launch with warnings being issued until January 2026.

Unauthorized access is a traffic infraction with a €200 fine, while non-payment can lead to further penalties.¹³ To ensure clear communication with the public, outreach includes a web portal and app for checking access, plus informational campaigns. Street signs are labelled in all areas.¹⁴

Financial incentives and support

Madrid integrates municipal, regional and national subsidies to support and incentivize the transition to low-emission

transport. The city's Cambia 360 programme (€117 million since 2019) works in tandem with the regional Plan Mueve Madrid (€8.5 million through 2026) and the national MOVES III scheme. Together, these provide up to €7,000 for the purchase of a new electric vehicle (and up to €9,000 for commercial vans) when an old, high-emission vehicle is scrapped. ECO-labelled vehicles are also eligible for lower-tier incentives.¹⁵ Vehicle owners may also be able to claim certain tax deductions on purchase of a low-emissions vehicle. Private and commercial infrastructure is subsidized for up to 40% of installation costs, and taxis-owners transitioning to zero-emissions or hydrogen vehicles can access grants of up to €20,000.




As an alternative to straight vehicle replacement, support extends to micromobility, with grants of €600 to €1,500 available for electric bicycles, scooters and pedal-assisted cycles.¹⁶ Residents may also opt for a three-year public transport pass.¹⁷ Eligibility is conditioned on local residency, vehicle registration and tax compliance, with applications processed via authorized dealerships or regional digital platforms.¹⁸

Stakeholders involved

The stakeholder landscape for Madrid 360's LEZ encompasses a diverse and multi-sector array of organizations, each playing a critical role in driving the project's success. This includes public sector entities responsible for policy and regulation, private sector companies providing technological solutions and operational capabilities, non-

governmental organizations advocating for community and environmental interests and research institutions offering data-driven insights. Together, these stakeholders contribute complementary expertise, resources and perspectives, enabling a collaborative approach to implementing and managing ongoing LEZ operations.

TABLE 2 The stakeholder landscape

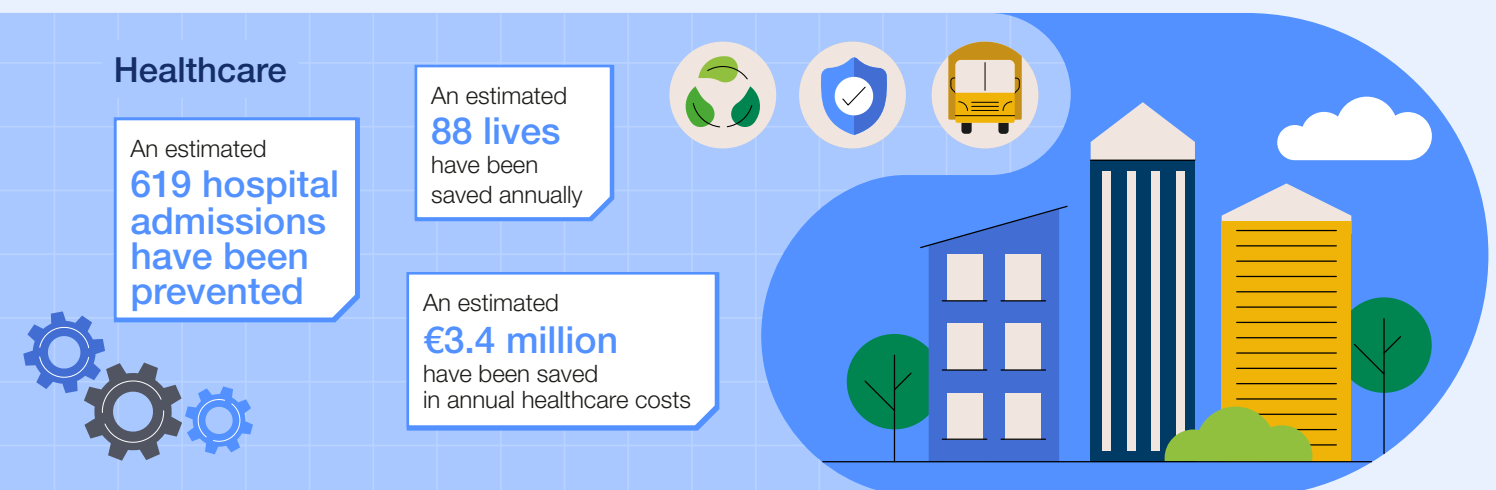
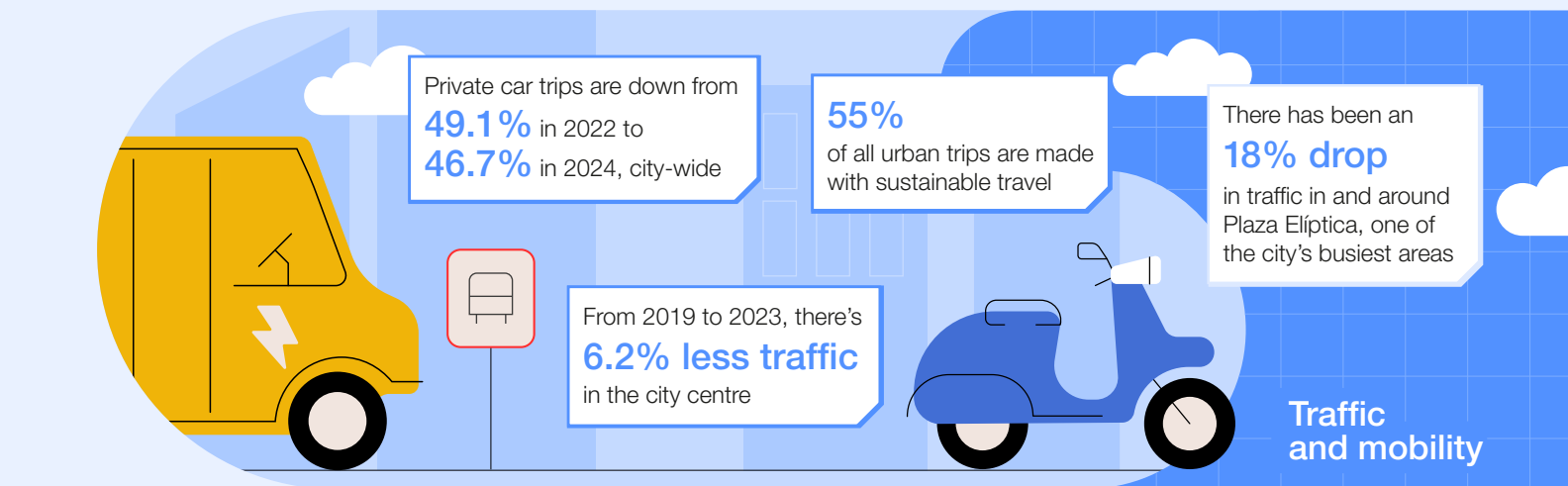
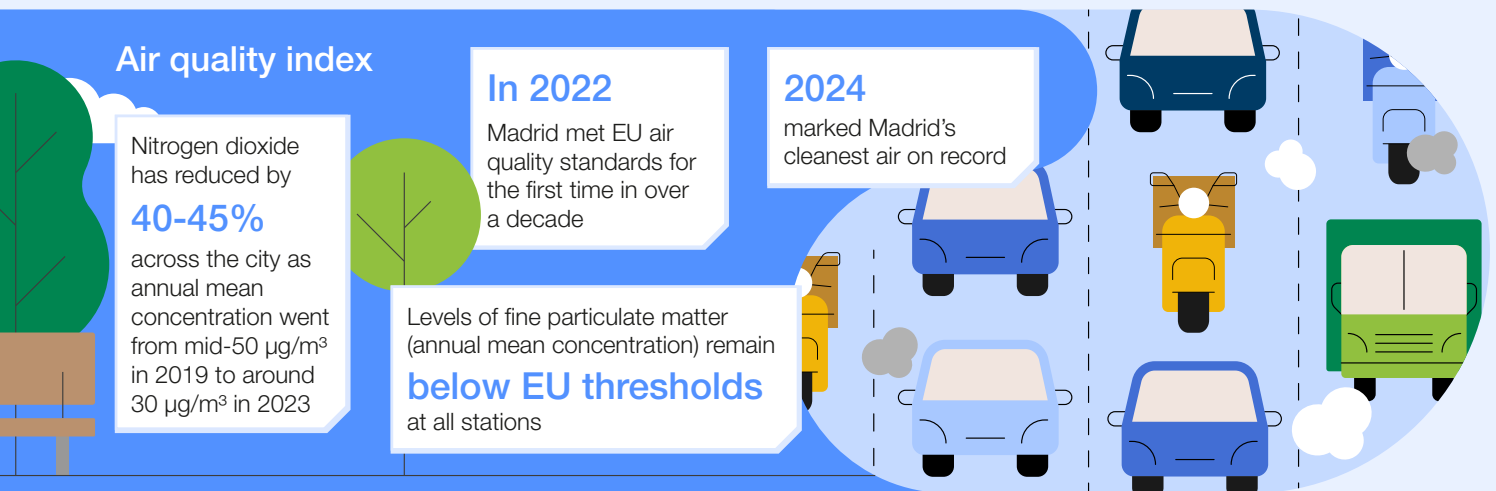
Public sector 	International	European Commission	<ul style="list-style-type: none"> – Sets EU-wide air quality targets – Provides framework through Air Quality Directive, European Green Deal
		United Nations	<ul style="list-style-type: none"> – Sets 2030 Sustainable Development Goals (SDG) agenda – Through the World Health Organization (WHO), issues health-related recommendations
	National	Ministry for the Ecological Transition	<ul style="list-style-type: none"> – Establishes national LEZ guidelines – Aligns with EU directives – Provides implementation framework for municipalities
		Internal Affairs Ministry (General Directorate for Traffic)	<ul style="list-style-type: none"> – Grants environmental labels to classify vehicles according to their emissions
	Regional	Community of Madrid	<ul style="list-style-type: none"> – Supports municipalities via grants (Public Investment Management Assessment Climate Change programme) – Funds LEZ planning and infrastructure – Promotes regional air quality improvement
Local	City of Madrid	<ul style="list-style-type: none"> – Implements LEZ at the city level – Introduced Sustainability Strategy Madrid 360, Sustainable Urban Mobility Plan and the Sustainable Mobility Ordinance – Designed control and signalling systems; drafts tenders and contracts for the execution, maintenance and operation of the system – Enforces vehicle restrictions 	
Private sector 		Technology firms	<ul style="list-style-type: none"> – Install and maintain traffic management systems at over 1,000 intersections – Enable real-time traffic monitoring and control
		Smart mobility providers	<ul style="list-style-type: none"> – Offer licence plate recognition and environmental sensors – Support vehicle access control and air quality monitoring – Supply industrial computing systems
		Strategic consultancies	<ul style="list-style-type: none"> – Organize workshops for digital solutions focusing on connected vehicles, big data, emission-based payments
		Local businesses	<ul style="list-style-type: none"> – Participate in LEZ planning and feedback
Community and civil society 		Citizens/residents via Decide Madrid and Sueña Madrid	<ul style="list-style-type: none"> – Engage through public consultation platform – Engaging in the Sueña Madrid initiative to design the new Urban Agenda Madrid 360 – Participate in LEZ planning and feedback – Ensure community voice in decision-making

Impact

Following years of non-compliance with EU air quality standards and legal setbacks, the Madrid 360 Strategy for Environmental Sustainability has achieved measurable environment and social improvements. The data reveals not only significant improvements in air quality and public health, but also important shifts in mobility patterns and urban living.

At the same time, opportunities for further business adaptation and for advancing social equity continue to be important areas of focus.

The following outcomes illustrate both the quantifiable benefits and the evolving impacts of the LEZ.



Takeaways

Madrid's implementation of its LEZ initiative under the Madrid 360 strategy offers valuable lessons for cities tackling urban pollution and climate challenges. The initiative's evolution – shaped by political shifts, public response and regulatory

pressures – highlights both the complexities and the opportunities for environmental policy-making and the clear role that collaboration and early consultation can play. The following takeaways distil key insights from Madrid's experience.



Governance and political continuity

Madrid's experience underscores the importance of strong legal frameworks and broad political consensus in sustaining urban climate action. Following a change in local government, the original Madrid Central zone, launched in 2018, was suspended and later annulled pursuant to a court ruling due in part to procedural errors. Spain's Supreme Court later upheld this ruling in May 2021.²⁵ In response, the city amended the Sustainable Mobility Ordinance by introducing two special-protection LEZs for the areas with the greatest environmental

problems, as well as an LEZ for the city under the Madrid 360 Strategy for Environmental Sustainability.

Takeaway: Durable urban climate policy requires broad political consensus, compliance with administrative law and integration into long-term mobility and sustainability strategies. Pilots can also play a critical role in helping inform city policies and providing valuable inputs from the public and local businesses before wider rollout.



Enforcement and compliance

Madrid's approach to enforcement has maximized the effectiveness of its LEZ. The city used automated licence-plate recognition and fines to deter non-compliance, and the experience has shown that clear communication is essential to avoid public confusion and minimize the number of fines. The city continues to improve information systems, launching

online access-check tools and adopting phased rollouts with grace periods.²⁶

Takeaway: Strong enforcement must be paired with an effective communications strategy and phased implementation, to ensure legitimacy and support behavioural change.



Equity and accessibility

LEZs often raise concerns about their impact on low-income residents and businesses reliant on older vehicles. To address this, Madrid implemented the *Cambia 360* subsidy programme – a key initiative that empowers citizens to lead the mobility transition. Since 2020, over €117.3 million has been allocated to renew private vehicles, logistics fleets, taxis, buses, micro-mobility options, electric charging stations and thermal systems. Further, to boost public transport, the city has introduced free travel days during peak demand periods, moving 64 million passengers, including 13 million occasional users.

Two free, zero-emission bus lines now cross the central district north to south and east to west. Bus services have been expanded with 223 km of new lanes, the city's first

rapid bus with signal priority, and an on-demand "smart bus" line. Night services have also grown: 39% more buses, 58 km of additional coverage and reduced wait times. The Bicimad public bike system now covers all 21 districts and is included in free travel days, making cycling more accessible. Electromobility is further encouraged through a 10-fold increase in fast-charging stations and the creation of five integrated mobility hubs.²⁷

Takeaway: Embedding subsidy access, ensuring geographical coverage of public transport alternatives and engaging vulnerable groups during policy design are critical to support social equity goals. Without these measures, LEZs risk exacerbating existing inequalities and reducing political support.



Public communication and acceptance

Madrid's evolving communication strategy illustrates the power of transparent, data-driven messaging in building public support for environmental policies.²⁸ Over time, the city is improving its strategy by linking the LEZ initiative to health outcomes, publishing air quality data and reframing the measure as part of a holistic Madrid 360 Strategy for Environmental Sustainability plan to improve public sentiment.²⁹

Takeaway: Public communication must be data-driven and oriented towards shared benefits. Transparent performance metrics and strong messaging can turn a controversial policy into a widely accepted public good.



Economic and business impact

Madrid's LEZ experience reveals the importance of adaptive policy design for maintaining commercial vitality. The initial Madrid Central Zone faced significant pushback from local merchants, with 82% of surveyed businesses reporting financial losses and an average sales decline of 13.2% in the early months.³⁰ In response, the Madrid 360 Strategy for Environmental Sustainability introduced more flexible access rules for commercial vehicles, easing delivery constraints and aligning business access rights with those of residents.³¹

These adjustments, alongside improvements in public transport and urban logistics, are helping to stabilize retail turnover in the central district.

Takeaway: Economic sustainability in low-emission zones requires balancing environmental goals with commercial functionality, engaging local business stakeholders and continuously refining policy tools to support urban economic resilience.

Summary

Madrid's experience with its low-emission zones underscores the challenges and rewards of pursuing ambitious urban sustainability goals. Political shifts, court rulings and public debate all shaped its path; but the evolution of Madrid 360 highlights the value of staying persistent, adapting to change and grounding decisions in both evidence and broader sustainability strategies. By connecting environmental goals with health, legal and transport concerns, the city built a foundation for a cleaner, more resilient future. For other cities facing similar challenges, Madrid's story offers both warnings and a roadmap for real progress.

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