

# Sustainability Working Group – December 2025

## Agenda

- Competition rules reminder
- FCE position paper on driving decarbonisation in CRT – outreach campaign
- Working Group on Monitoring Methodologies of CO<sub>2</sub> Neutral Fuels
- Discussion on the Sustainability WG 2026 roadmap
- Sustainable Transport Forum plenary meeting
- Information points
- AOB



# 1. Competition and compliance rules



## DO'S:

- Ensure business contacts with competitors have a legitimate purpose and are supervised by the FCE Secretariat.
- If discussions go off-topic or are anti-competitive: change the subject, leave, and report the incident.
- Review agendas, follow them, and keep approved meeting minutes.
- Keep social interactions with competitors non-business related.
- Discuss general industry issues, publicly available info, and non-sensitive topics.

## DON'TS:

- Do not discuss sensitive commercial strategies with competitors (pricing, marketing, target markets, etc.).
- Avoid sharing forward-looking, recent, or competitive data without FCE Secretariat's prior written consent.
- Do not use FCE premises for unofficial business activities outside of the official program.
- Do not engage in exclusionary practices or collective boycotts.

## 2. FCE position paper on driving decarbonisation in CRT – outreach campaign



### Endorsement

- Position paper finalised & presented to the Board (8 December) → **request group endorsement**
- Outreach campaign proposal → **request group endorsement**

### Outreach campaign proposal and timeline:

- **12 December:** publish position paper on FCE website & LinkedIn account
- **Week of 15 December:** reaction to the Automotive Package (press release)
- **January 2026:** broad dissemination to EU stakeholders (mailing)
- **28 January 2026, 12:30-14:30:** lunch-debate at the European Parliament - (*hosted by MEP Ondrej Krutílek, with support from Eurowag*)
- **January:** media campaign (op-ed in a Brussels-based publication and/or event summary article highlighting event's key takeaways)

# 3. Working Group on Monitoring Methodologies of CO<sub>2</sub> Neutral Fuels



- Cross-sector group working on tracking & certifying CO<sub>2</sub>-neutral fuels in road transport.
- FCE membership effective early 2026.

## 2026 objective:

- Get fleet cards recognised by WGMM as a methodology for carbon-neutral fuel tracking.
- Include fleet cards in the update of the 2024 report.

## Timeline

- **End of January:** submit technical abstract to WGMM Secretariat.
- **February:** legal review (competition compliance) before submission to WGMM Technical Subgroup (SG1).
- **March/April:** discussion and endorsement of technical abstract in SG 1.
- **H1:** further work on a use-case.

# 3. Working Group on Monitoring Methodologies of CO<sub>2</sub> Neutral Fuels



## Next steps:

- Call for member to **appoint experts by 18 December.**
- Launch technical abstract work early January
- Start attending SG 1 meetings (monthly, 1h-1h30, possible rotation among FCE members)

## Technical abstract – Key content

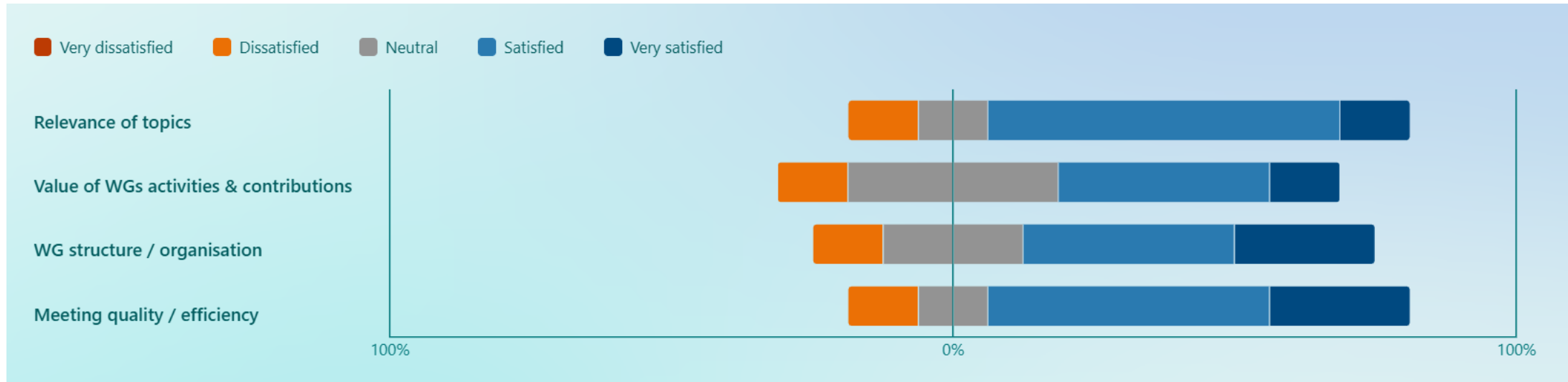
- **Description of technology**
- **Customer & retail perspectives**
  - Advantages and disadvantages
  - Implementation requirements
- **Regulatory assessment**
- Graphic summary

# 4. Discussion on the Sustainability WG 2026 roadmap (discussion kick-off)



## Sustainability Working Group : performance & priorities

8 responses submitted



## Future agenda priorities (qualitative feedback)

- Broaden the WG's scope to include **social and governance aspects of ESG**, including preparation for new reporting rules such as the CSRD.
- Prioritise establishing **consistent methodologies for assessing alternative fuels and EV charging impacts**, improve energy-source traceability, and raise sustainability data quality.
- Advocate for an EU-recognised mixed-energy strategy and a unified digital reporting system accepted by all card suppliers to simplify certification.

# 4. Sustainability Working Group 2026 Roadmap (discussion kick-off)



## What's already planned:

- Early 2026: launch of the **new intranet workspace**
- Central hub where all documentation, meeting materials, and WG resources will be accessible.
- Yearly **in-person meeting in Brussels** with external guests – **28 January 2026**

## Objective of today's discussion

1. **Identify the topics** you want included in the 2026 Roadmap
2. **Clarify the type of actions** we should apply to each topic

# 4. Sustainability Working Group 2026 Roadmap (discussion kick-off)



## Suggested topics for 2026

- Greening Corporate fleet
- CO<sub>2</sub> Neutral Fuels use tracking
- CO<sub>2</sub> Emission standards
- ETS2 implementation
- EV tax incentives
- Tolling – Eurovignette implementation
- AFIR review
- Energy taxation
- CountEmissions implementation
- Access to in-vehicle data
- Social and governance aspects of ESG
- (...)

## Types of actions we can apply

- **Stage 1 - Monitoring**  
Low involvement  
Regular tracking of legislative, regulatory, and policy developments.
- **Stage 2 – Knowledge-building**  
Medium involvement  
Internal exchange of information among members  
Targeted capacity-building activities (with the support of external experts when relevant)
- **Stage 3 – Influence/Advocacy**  
High involvement  
Coordinated actions with clear, pre-agreed objective  
Position papers, outreach, and structured engagement with policymakers

Topics may move between stages during the year as needed

**Which topics should we prioritised for 2026, and what type of action should we target for each?**

# 5. Sustainable Transport Forum



## Plenary meeting - 21 November 2025

- Updates on deliverables from two sub-groups:
  - Zero-emission heavy-duty vehicles
  - Hydrogen refuelling infrastructure for road transport vehicles

## Looking ahead - 2026:

- Launch of new Task Forces (topics to be defined)
- Topics will be shared with FCE members to gauge interest in participating in one or more Task Forces

## 6. Information points



### Automotive Package – to be published on 16 December

Will include:

- Revision of CO2 standards for cars and vans
- Greening corporate fleet
- Battery Booster Strategy
- Automotive omnibus

## 6. Information points



### Greening Corporate Fleets

- Strong call from **France** to propose binding targets for corporate fleet greening, covering both for LDVs and HDVs:
  - A minimum percentage of electric HDVs could thus be imposed on contracting authorities,
  - Support for the purchase of electric vehicles with a high European content for large corporate fleets.
- Six Member States urged the Commission to maintain its commitment to ambitious legislation: **France, Spain, the Netherlands, Sweden, Ireland, and Luxembourg.**
- **Industry pushback:** [5,400 EU transport operators and shippers](#) have signed a petition opposing a potential Commission proposal that would require freight companies — or their clients — to purchase a fixed share of zero-emissions trucks.

## 6. Information points



### Revision of CO<sub>2</sub> standards for cars and vans

- **Pro ICE ban revision or scrap:** Austria (only Industry Ministry?), Bulgaria, Czechia, Germany, Italy, Poland, Slovakia and Romania
  - German coalition calling for the approval beyond 2035 of 'high-efficiency' combustion engines, electric cars equipped with a range extender (a thermal device), and plug-in hybrid
- **Member States urging to uphold the ban:** France, Ireland, the Netherlands, Spain, Sweden
  - Recent opening from France to allow flexibilities if tied to local content requirements obligations for carmakers
- 30 EU associations [called for renewable fuels in CO<sub>2</sub> standards](#)

# 6. Information points



## ETS 2 implementation

- **Implementation delayed to 2028** following trilogue agreement on the 2040 climate targets.
  - ACEA criticizes delay, fearing it weakens incentives to zero-emission vehicles.
- **Market Stability Reserve (MSR) [proposal](#)** published on 27 November.
  - Top-up mechanism: double annual allowance injections up to 80 million if carbon prices exceed €45/t CO<sub>2</sub>, exceeding the ETS2 annual reduction target of 60 million tCO<sub>2</sub>.
  - Extends ETS2 allowance validity beyond 2030, making all 600 million allowances available to stabilise the market if needed.
  - Introduce an early intervention mechanism to smooth and stabilize ETS2 allowance supply before price pressures escalate.
  - Proposal to be adopted by Council and European Parliament.
- Poland and Czech Republic both claimed victory.

## 6. Information points



### CountEmissions EU

- **Political agreement between Council and Parliament on 4 November**
- **Voluntary framework but standardised:** companies choosing to report emissions must use the EU methodology.
- **WTW principles:** covers all emissions from fuel production to use for consistent, comparable reporting across the EU.
- **Future flexibility:** potential inclusion of lifecycle analysis of transport services in future revisions.
- **Next steps:** formal adoption by Council and European Parliament

# 6. Information points



## Charging infrastructure

- [Directive proposal](#) on 10 December
- **Streamlined permitting for small stations:** no administrative permits required for charging stations  $\leq 100\text{kW}$ , except grid connection, environmental impact assessments waived (except Natura 2000 / protected sites).
- **Faster approval for larger stations:** stations  $> 100\text{ kW}$  must receive all permits, including grid connection and environmental approvals, within six months.

AOB : Any other question you would like to raise with the group?

Sustainability working group calendar :

**January 28 as from 12:30 CET (to be jointly organized with EP lunch debate)**

March 19<sup>th</sup> at 10:00 CET

April 21<sup>st</sup> at 10:00 CET

June 11<sup>th</sup> at 10:00 CET

July 23<sup>rd</sup> at 10:00 CET