

Sustainability Working Group – March 2026

Agenda

1. Competition rules reminder
2. Automotive Package
3. General Block Exemption Regulation
4. DG MOVE survey on administrative burden
5. WGMM – Fleet cards monitoring methodologies
6. AFIR review
7. Legislative tracker tool
8. AOB



2. 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. Automotive Package (1/6)



Revised CO2 standards

- **Cars & vans - CO₂ standards:** 90% reduction in tailpipe CO₂ emissions by 2035 (vs. 2021) instead of 100% [*in practice, the 90% target corresponds to 11g CO₂/km*].
- **Emission compensation (residual 10%):** automakers can offset residual emissions through :
 - **Low-carbon steel produced in the EU** (up to 7%)
 - **E-fuels and biofuels** (up to 3%; first-generation biofuels excluded; waste-based biofuels capped at 1%).
 - OEMs may use both credits, but not on the same vehicle.
- **Technology neutrality beyond 2035:** continued sales of **PHEVs, range extenders, mild hybrids and ICE vehicles**, alongside BEVs and hydrogen vehicles, subject to compliance with the 90% target and offsetting rules.
- **Emission pooling:** automakers may pool emissions, allowing underperformers to purchase credits from over-achievers.
- **Vans:** 2030 CO₂ reduction target is **lowered from 50% to 40%**.
- **Heavy-duty vehicles:** targeted [amendment](#) allowing OEMs to accumulate more credits before 2030, easing post-2030 compliance while maintaining targets. -

ADOPTED

European Parliament

ENVI (lead)	TRAN (opinion)	ITRE (opinion)
Massimiliano Salini (EPP, IT)	Jens Gieseke (EPP, DE)	
<i>Shadows</i>	<i>Shadows</i>	<i>Shadows</i>
Thomas Pellerin-Carlin (S&D – DK)	Vivien Costanzo (S&D, DE)	Daniel Attard (S&D, MT)
Sigrid Friis (Renew – DK) tbc	Jan Christoph Oetjen (Renew, DE)	
Michael Bloss (Greens – DE) tbc	Lena Schilling (Greens, AT)	
Alexandr Vondra (ECR, CZ)	Adrian-George Axinia, (ECR, RO)	Pietro Fiocchi (ECR, IT)
Silvia Sardone (Pfe, IT)	PfE	
Jonas Sjöstedt (Left, SE)	ESN	
ESN ?	Left	

Indicative timeline: draft report in April, vote before summer break, plenary vote after summer break

2. Automotive Package (2/6)



Revised CO2 standards

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ADOPTED

European Council

- **Member States pushing back on lowering targets:** Sweden, Spain, France, Malta, Lithuania and Luxembourg
- **Member States calling for a bigger role for biofuels and e-fuels:** Czech Republic, Hungary, Italy, Poland and Slovakia

2. Automotive Package (3/6)



Clean corporate vehicles

- **National targets approach:** binding Member State-level targets, calibrated to GDP per capita, with national authorities free to choose implementation measures.
- **Vehicles covered:**
 - applies to **passenger cars and vans only**;
 - **Heavy-duty vehicles are excluded** and will be addressed later through the revision of HDV CO₂ standards planned for 2027.
- **Scope limited to large companies:** defined as companies exceeding at least two of the following thresholds: **€20m balance sheet, €40m net turnover, 250 employees**. (SMEs are out of scope)
- **Timeline:** from 2030, Member States must ensure that a **minimum share of new company LDVs** are **low- or zero-emission**, including a **mandatory share of fully zero-emission vehicles**, with targets for 2030 and 2035.
- **Financial support rules:** from 1 January 2028, Member States may grant financial support **only to zero- or low-emission vehicles**; after 2028, support is limited to vehicles **“made in Europe”**, with details to be set by delegated act.

European Parliament

ENVI (co-lead)	TRAN (co-lead)
Tiemo Wölken (S&D, DE)	François Kalfon (S&D, FR)
<i>Shadows</i>	<i>Shadows</i>
Raul de la Hoz (EPP, ES)	Dariusz Jonski (EPP, PL)
Yvan Verougstraete (Renew – BE)	Jan Christoph Oetjen (Renew, DE)
Kai Tegethoff (Greens – DE)	Virginijus Sinkevičius (Greens, LT)
Jacek Ozdoba (ECR, PL)	ECR
Mathilde Androuët (Pfe, FR)	Roman Haider (Pfe, DE)
Jonas Sjöstedt (Left, SE)	Volker Schnurrbusch (ESN, DE)
ESN ?	Left

No clear timeline yet.

Divisions are expected not only along party lines.

EPP and ECR considering how to reject the proposal.

2. Automotive Package (4/6)



Clean corporate vehicles

- **National targets approach: binding Member State-level targets**, calibrated to **GDP per capita**, with national authorities free to choose implementation measures.
- **Vehicles covered:**
 - applies to **passenger cars and vans only**;
 - **Heavy-duty vehicles are excluded** and will be addressed later through the revision of HDV CO₂ standards planned for 2027.
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- **Financial support rules:** from **1 January 2028**, Member States may grant financial support **only to zero- or low-emission vehicles**; after 2028, support is limited to vehicles **“made in Europe”**, with details to be set by delegated act.

European Council

Supporters

- Austria, France, Greece, Ireland, Malta and the Netherlands
- **View:** Regulation would help create a second-hand market for EVs.

Reservations / Opposed to binding targets

- Czech Republic, Germany, Italy, Lithuania and Poland
- Germany and Italy, pushing for incentive-based scheme, even calling for withdrawals of the proposal (in Competitiveness Council).

2. Automotive Package (5/6)



FCE positioning on CCV – How to engage ?

- **Overall approach**
 - Do we support the **rationale of the proposal** (i.e. having a demand-side instrument)?
- **Scope**
 - **Restriction to LDVs :**
 - to be welcomed
 - strongly oppose any extension to HDVs
 - **Corporate fleet definition**
 - support a broad and inclusive scope?
 - **Technology approach:** currently channels corporate demand exclusively toward electrification
 - call for genuine technological neutrality
 - ensure recognition of CNFs as a valid decarbonisation pathways for fleet operators
- **Article 3: binding national targets for ZEV and LEV in corporate fleets**
 - **Reject binding targets**
 - Advocate for **demand-side financial incentives** instead
 - Ensure continued **inclusion of LEVs** as part of the solution

FCE positioning on CCV – How to engage ?

- **Article 4 : financial support for corporate vehicles**
 - **Ending financial support for CO₂-emitting vehicles**
 - **Conditioning of financial support for “Made-in-Europe” cars (tbd by delegated act)**
 - Should only apply to large fleet included in the scope
 - Cars running on CNF should be excluded
 - Lack a comprehensive list of demand-side incentives that could be implemented (e.g. fiscal incentives, purchase subsidies and operational cost support)
- **Article 6: monitoring and reporting**
 - **National plans to be submitted every two years** describing measures implemented to reach the targets
 - No real accountability from Member States

3. General Block Exemption Regulation



General Block Exemption Regulation (GBER) – [\(EU\)No 651/2014](#)

- Declares specific categories of State aid compatible with the internal market if they fulfil certain conditions.
- Sets out the conditions allowing Member States to grant public aid without having to request prior notification to the European Commission.

Scope limitation

- State aid compatibility currently limited to energy and hydrogen infrastructure.
- Article 36 a “*Investment aid for recharging and refuelling infrastructure*”:
 - Applies only to infrastructure supplying electricity or hydrogen to vehicles, mobile terminal equipment, or mobile ground handling equipment. Hydrogen infrastructures to solely supply renewable hydrogen by 31 December 2035.

Status

- Currently under revision
- Public consultation open until **23 April 2026**

3. General Block Exemption Regulation



FCE positioning proposal:

- Call for technological neutrality
- Alignment with AFIR and RED frameworks
- Call for amendment on Article 53 of draft Regulation (former article 36 a)

Article 53 “Investment aid for recharging or refuelling infrastructure”

*3. This Article shall only cover aid granted for fixed or mobile recharging or refuelling infrastructure that supplies vehicles, mobile terminal equipment or mobile Ground handling **equipment with electricity or hydrogen**. Mobile terminal equipment is used for the loading, unloading and transshipment of goods and intermodal loading units and for moving cargo within a terminal area. Mobile groundhandling equipment is used in service activities incidental to air or maritime transport.*

4. DG MOVE survey on administrative burden



Study on “*Stress-Testing and Rationalisation of EU Transport Legislation from Simplification and Burden Reduction Angle*”

- Survey aimed at collecting evidence on **administrative burdens** linked to EU transport legislation
- Opportunity to **highlight practical challenges** faced by FCC

Deadline: 2 April 2026

Should FCE participate in the survey ?

1. Application for individual authorisation, permit or licence, including exemptions
2. Application for general authorisation or exemption
3. Cooperation with audits & inspections by public authorities or their appointees
4. Notification of (specific) activities or events
5. Reporting – submission of (recurring) reports
6. Information labelling for third parties
7. Non-labelling information for third parties
8. Registration
9. Certification of products or processes
10. Application for subsidy or grant
11. Other

5. WGMM – Fleet cards monitoring methodologies



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.

One-pager technical abstract (*draft*)

Indicative timeline

- **23 March:** presentation of FC during SG1 regular meeting
- **By end of March :** internal validation of the technical abstract by FCE.
- **April:** submission of technical abstract to WGMM Secretariat, followed by a legal review (competition compliance) before submission to WGMM Technical Subgroup (SG1).
- **Q2:** discussion and endorsement of technical abstract in SG 1.
- **Q2:** FCE participation in a public webinar on monitoring methodologies, focusing on use-cases.

6. AFIR review



Latest developments / discussions around AFIR

- **European Commission's report** on AFIR deployment:
 - Recharging infrastructure for cars and vans has been growing quickly in the EU and at a faster pace than the battery-electric vehicle uptake
 - Most likely, TEN-T targets for 2030 for LDVs to be met across the EU
 - Currently around 2,000 recharging points in the EU are fully suited to serve trucks. At the same time, around 320 hydrogen refuelling points are operational in the EU.
 - AFIF to co-finance a substantial share of recharging and refuelling infrastructure missing along TEN-T. But additional efforts required. Most Member States have support programme and Clean Transport Corridor initiative to be scaled up.
- Discussion in the **European Parliament** during which **price transparency** has been **raised by many MEPs**, several of whom calling for fairer pricing and stronger competition between mobility service providers.
- Transport stakeholders urge no weakening or delays to AFIR HDVs targets. Call for an EU-backed de-risking mechanism.
- Commission discussions underway on structuring support; Member States exploring options to ease rollout.

6. AFIR review



Next Steps

- AFIR review due end of 2026.
- **Public consultation** opening expected in **Q2 2026**.
- Impact assessment also planned, will look into (inter alia):
 - Measures covering user aspects, in particular with regard to fair and transparent prices and to the integration of electric recharging into the electricity system.
 - Measures to accelerate the roll out of sufficient publicly accessible electric recharging points and hydrogen refuelling stations for heavy-duty vehicles as well as the need to account for new technology developments (such as Megawatt charging).

7. Legislative tracker tool



- Provides a comprehensive overview of key files within the WG
- Ensure regular updates and visibility via FCE intranet (*monthly updates*)

Key features

- Influence/Knowledge-building/ monitoring
- Stage
- Key players
- Latest and upcoming institutional milestones
- FCE's concrete actions



“Who’s Who heatmap for priority files

FCE's approach	Title	Reference (incl. document link)	Status	Aim (Short description)	Legislative instrument	Stage	European Parliament (Lead Committee(s) Reporteur(s))	Key players Council of the EU (Council configuration Preparatory body Commission's member)	European Commission (Lead services (incl. unit))	Next Institutional milestone (Parliament's incl. next meeting/w/EP and)	Comments	FCE's object
Influence	CO ₂ emission performance standards for new light-duty vehicles and vehicle labelling	2023/0400 (OOB)	Recent ongoing	Amends Regulation (EU) 2015/1011 to grant vehicle manufacturers additional flexibilities in meeting CO ₂ reduction targets. Specifically, it lowers the 2020 CO ₂ reduction target for vans from 50% to 40% (compared to the 2021 baseline) and aligns the 2025 target for vans and commercial 100% to 90% (light-duty vehicles), provided that the remaining emissions are offset through the use of low carbon fuel or sustainable renewable fuels (sourced at 30%).	Regulation	First reading	ENVI - Environment, Climate, Food Safety Massimiliano Sassi (EP, ITA)	ENVI - Environment WP on the Environment	W. Hockstetter DG CLIMA B.3 Mobility Road	EC draft report expected in April Council Working Environment Council 17 March	Listed among the EP, Council and Commission legislative priorities for 2023.	Ensure genuine technological neutrality in the a. Possible inclusion of use of alternative fuels, in alignment with the Commission's definition. b. Ensure a lifecycle approach to ensure possible further than focusing on vehicle category emissions c. Support introduction of new vehicle category for technological fuels.
Influence	Clean Corporate Vehicle (CCV)	2023/0421 (OOB)	New proposal	Accelerate the uptake of zero- and low-emission vehicles (ZEVs and LEVs) in corporate fleets, which strengthening the competitiveness of the EU economy and reducing CO ₂ emissions from light-duty vehicles (LDVs) and large companies.	Regulation	First reading	TRAN - Transport & Tourism ENVI - Environment, Climate, Food Safety Françoise Kalfon (SAD, FR)	TTE - Transport, Telecommunications, Energy WP on Land Transport	DG MOVE B.4 Sustainable and Intelligent Transport	EP Reporteur(s) and shadow nomination Squad@ WP meeting 17 March	The proposal is listed among the European Parliament, Council and Commission legislative priorities for 2023. There are also indications that a blocking minority may be emerging within the Council.	Position to be refined following labelling proposals. Ensure genuine technological neutrality approach. Ensure that HDVs remain out of the scope. Monitor demand-side incentives and infrastructure. Monitor purchase incentives.
Influence	CO ₂ emission standards for HDVs	2023/0423 (OOB)	Recent ongoing	Amends Regulation (EU) 2019/1242 to give greater flexibility to truck manufacturers in earning emission credits during the 2025-2029 period.	Regulation	First reading	ENVI - Environment, Climate, Food Safety -	ENVI - Environment WP on the Environment	W. Hockstetter DG CLIMA	EC evaluation of targeted amendments to extend truck procedure on 12 March (no change in Commission's CoDec) to adapt the amendments without the need of a tripartite		
Knowledge-building	ETS2	(EU) 2023/959	Adopted	The legislation introduces a new emissions trading system, ETS2, which extends measures from the existing ETS1. The new system will address CO ₂ emissions from fuel combustion in buildings and road transport.	Directive	End of procedure			W. Hockstetter DG CLIMA	Adoption of the Market Stability Reserve (MSR) published on Nov. 25.	Implementation delayed to 2028 instead of 2027 following tripartite agreement on the 2023 climate targets. Several Member States have expressed objections of ETS2, with some, including the Czech Republic, Estonia, Poland, and Slovakia, calling for a two-year postponement or even cancellation (IMM).	Concerns about the definition of "Fuel Supplier" requirement will fall on the FCE members
Knowledge-building	CountEmission EU	2023/0296 (OOB)	New proposal	Aims to establish a harmonized and voluntary framework for measuring greenhouse gas emissions from transport and logistics across the EU, enabling companies to make informed decisions based on operational performance and reducing greenwashing practices. It ensures consistent measurement of emissions using a needs-to-need approach. The initiative includes protections for SMEs and focuses on transparency in emissions reporting while preventing potential risks of emissions data for pricing or liability purposes.	Regulation	Second reading	ENVI - Environment, Climate, Food Safety TRAN - Transport & Tourism P. Moran (SAD, ITA) N. Linn (EP, GER)	TTE - Transport, Telecommunications, Energy WP on Transport - Intermodal Questions and Networks	DG MOVE B.4 Sustainable and Intelligent Transport	Tripartite agreement reached in Nov. 25. EP Formal adoption in plenary expected in April 2024.		
Knowledge-building	CSFD	(EU) 2022/2464	In force	Scope 2 emissions are defined as "emissions that result from activities not under the organization's direct control but are related to business". Among the 15 categories listed in scope 2, category 1 "Purchased goods and services" and category 11 "Use of sold products" raise specific challenges in terms of avoiding double counting and ensure regulatory and financial risks for the industry.	Directive	End of procedure	JURI - Legal Affairs P. Durand (RENEW, FR)	ECCOFIN - Economic and Financial Affairs WP on company law	H. McDermott DG FOMA		European Sustainability Reporting Standards (ESRS) are mandatory, standardized rules under CSRD.	
Knowledge-building	CS3D	(EU) 2023/1700	In force	The aim of this Directive is to foster sustainable and responsible corporate behaviour to companies' operations and across their global value chains. The new rules will ensure that companies in scope identify and address adverse human rights and environmental impacts of their actions inside and outside Europe.	Directive	End of procedure	JURI - Legal Affairs L. Madlen (SAD, RES)	COMPET - Internal Market, Industry, Research, Space WP on company law	D. Reijnders DG JUST			
Knowledge-building	EuropeNet	(EU) 2023/952	Recent ongoing	Aims to modernize and extend the framework for charging heavy goods vehicles and other motor vehicles for the use of road infrastructure across the EU. It broadens the scope of road users to include passenger cars, vans, and buses (not just heavy goods vehicles), and introduces mandatory national cost charges to cover the full cost of road infrastructure provision. Partially recent ongoing (2023/0134) focusing on improving the legal clarity of the current directive, simplifying its implementation and ensuring the consistent application of CO ₂ -based charging rates.	Directive	First reading	TRAN - Transport & Tourism Mariano Ros (SAD, ITA)	TTE - Transport, Telecommunications, Energy WP on Land Transport	A. Tziakopoulos DG MOVE	EP to adopt its report following the Council adoption of its negotiating mandate on 4 March 2023.	EP and Council position seems to be aligned. The Council decided not to raise a proposal to reduce road charges for HDVs with more sustainable trailers due to potential additional administrative burden, more complex toll pricing and its potential impact on the introduction of electronic toll services and the need to respect existing concession contracts.	
Monitoring	AFR	(EU) 2023/1864	In force	AFR supports the transition towards more sustainable transport by setting obligatory targets for the rollout of recharging and refuelling transport infrastructure: HDV charging points every 100km along the TEN-T core network and every 200km along the TEN-T comprehensive network. Full coverage required in 2030. Hydrogen facilities every 200km along the TEN-T core network.	Regulation				DG MOVE B.4 Sustainable and Intelligent Transport	EC public consultation on AFM rules to open in Q1/Q2 2024.	AFM decisions expected for the end of 2023. Feb. 2024: debate in TRAI Committee dealing with price transparency has been raised by many FCE's, several of whom calling for more pricing and stronger competition between mobility stakeholders.	AFM decisions expected for the end of 2023. The planned F&B fund round cancelled as problem ran out of

8. AOB / open discussion



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

Sustainability working group calendar :

April 21st at 10:00 CEST

June 11th at 10:00 CEST

July 23rd at 10:00 CEST