

Response to the Call for Evidence on Clean Corporate Vehicles



September 2025

Fleet Cards Europe (FCE) welcomes the opportunity to contribute to the European Commission's work on Clean Corporate Vehicles. FCE members fully support the European Union's climate objectives as outlined in the European Green Deal. The decarbonisation of Europe's road transport sector presents a significant challenge with far-reaching implications for European economies.

It is essential to strike the right balance—advancing towards climate neutrality while enabling the transport sector to grow sustainably and remain competitive.

As trusted partners to fleet operators across Europe—serving businesses of all sizes and vehicle types—FCE members are uniquely positioned to represent the concerns and priorities of business fleet operators. Through daily engagement and operational support, fleet card companies have a deep understanding of the challenges these businesses face in managing their fleets and are committed to ensuring their voices are heard.

This document outlines FCE's perspective and recommendations in response to the European Commission's call for evidence and focuses on heavy-duty vehicles (HDVs) decarbonisation.

A technology-neutral approach to decarbonising road transport

FCE acknowledges the European Commission's commitment to accelerating the transition to zero-emission vehicles (ZEVs) in pursuit of its climate targets. However, we raise concerns about the approach—questioning not the objective, but the method.

FCE strongly advocates for **a technology-neutral, evidence-based strategy to decarbonising road transport**—one that encourages fair competition and supports all viable pathways to reducing greenhouse gas emissions. Fleet operators must retain the freedom to choose the most appropriate solutions for their operational needs. There is no one-size-fits-all solution. While electrification is a strong option for cars and light-duty vehicles, the decarbonisation of heavy-duty transport presents specific challenges that require a broader mix of technologies.

To this end, FCE urges the European Commission to **move beyond a full electrification model and instead embrace a genuinely technology-neutral approach**. Decarbonisation will be driven by a combination of electrification and ICE (Internal Combustion Engine) vehicles running on sustainable renewable fuels, including liquid and

gaseous fuels, such as bio-CNG, bio-LNG, e-fuels (hydrogen-based fuels), hydrogen and HVO (Hydrotreated Vegetable Oil).

FCE further calls on the EU to implement a framework based on well-to-wheel emissions which account for the full decarbonisation potential of the energy carrier over its life cycle. This includes **adapting the CO₂ Standards Regulation to recognise the emissions reduction potential of renewable fuels** through life-cycle greenhouse gas (GHG) savings—aligned with the Renewable Energy Directive, the EU Emissions Trading System (EU ETS) and Eurovignette Directive –and granting ZEV status to vehicles running exclusively on CO₂-neutral fuels.

Such an approach is particularly important for harder-to-abate sectors like heavy-duty vehicles (HDVs) and would better reflect the diverse energy realities across EU Member States. Not all countries have equal access to low-carbon energy sources, sufficient resources, or robust electricity grids. A technology-open framework would allow each Member State to leverage its own energy mix while remaining competitive and contributing effectively to EU climate goals.

In this context, fleet card providers will play a key role in supporting the effective implementation of such a framework. They offer integrated, secure solutions that allow fleet operators to trace and report the use of renewable fuels and demonstrate their progress towards reaching decarbonisation targets.

Clarify the scope and ensure a differentiated approach

FCE wishes to highlight a key shortcoming in the current call for evidence: the lack of clarity regarding the types of vehicles covered by the initiative – whether it concerns light-duty vehicles (LDVs), heavy-duty vehicles (HDVs), or both. Greater transparency on this point is essential, as the challenges, technological pathways, and decarbonisation potential vary significantly depending on the vehicle category and its specific use case.

FCE therefore calls on the European Commission **to clearly define the scope of the forthcoming initiative** before proceeding further. Moreover, the initiative should adopt a **differentiated approach that reflects the distinct operational realities and decarbonisation challenges of different vehicle types and usage patterns**. A one-size-fits-all solution risks undermining the effectiveness and fairness of the regulatory framework.

Finally, as long as the CO₂ Standards Regulation does not recognise the emissions reduction potential of renewable fuels, FCE calls on the Commission to broaden the scope of the Clean Corporate Vehicles initiative to include vehicles powered by sustainable renewable fuels, currently classified as low-emission vehicles (LEVs). Alternatively, the initiative could adopt performance-based objectives that do not exclude other viable low-

carbon solutions capable of delivering tangible decarbonisation results in the medium term.

Prioritise enabling conditions and demand-side incentives

FCE welcomes the European Commission's willingness to focus on stimulating demand for cleaner vehicles, rather than targeting only the supply side. In this regard, FCE urges the Commission to prioritise the enabling conditions necessary to support the uptake of both zero-emission vehicles (ZEVs) and low-emission vehicles (LEVs). This includes **introducing strong demand-side measures such as fiscal incentives, purchase subsidies, and operational cost support.**

To ensure ZEVs and LEVs can compete on equal footing with conventional vehicles—particularly in the heavy-duty vehicle (HDV) segment—these incentives **must address the total cost of ownership (TCO)**, including **operational expenses (OPEX)**. With an average truck age of 13.9 years in the EU (ACEA, 2024), relying solely on regular fleet renewal cycles is unlikely to be sufficient to meet the 2030 climate targets or to replace the existing fleet with zero-emission vehicles (ZEVs) in time. Currently, ZEVs account for just 2.3% of the heavy-duty truck market (>3.5t), indicating that only early adopters have made the switch so far (ACEA, 2024). To accelerate the transition, continuous and targeted fleet renewal incentives will be essential for enabling broader uptake and ensuring the sector's success in decarbonisation.

These incentives must also be coupled with infrastructure readiness and supportive regulation. The expansion of charging and refuelling infrastructure requires urgent and targeted investment. Compared to light-duty vehicles (LDVs), HDVs face more acute infrastructure challenges, which risk delaying decarbonisation in this crucial segment. By the end of 2024, there were 15,000 e-trucks and 170 hydrogen-powered trucks on EU roads (European Commission, 2025). However, a dedicated, publicly accessible recharging network for HDVs running on electricity or hydrogen still does not exist.

Despite ambitious infrastructure rollout plans, only 160 truck-specific charging points were deployed across Europe in 2023 (International Council on Clean Transportation, 2024), and a significant gap remains—particularly in the availability of high-power charging for long-haul electric HDVs. AFIR-mandated HDV charging stations are expected to meet just 47% of the electricity demand projected for the electric HDV fleet by 2030 (European Commission, 2025), which falls well short of what is needed. To support the transition, 50,000 publicly accessible HDV chargers will be required (ACEA, 2025).

The situation is even more critical for hydrogen. Of the 368 hydrogen refuelling stations currently operational or planned across the EU, only 9 are equipped with 700-bar pumps suitable for HDVs (Hydrogen Europe, 2025). While AFIR mandates a basic hydrogen network, it would only support around 10,000 to 15,000 HDVs—far below the 70,000



hydrogen trucks expected by 2030 (*Hydrogen Europe, 2025*). To meet demand, at least 2,000 hydrogen refuelling stations will be needed (*ACEA, 2025*).

The Clean Corporate Vehicles initiative should therefore be closely coordinated with existing EU instruments and funding mechanisms. Aligning these tools will ensure policy consistency, planning security, and efficient use of both public and private resources.

Reject purchase mandates for corporate fleets

FCE firmly opposes any EU-level mandatory purchasing targets—direct or indirect—for corporate fleets. Mandating the adoption of specific technologies risks distorting markets, undermining innovation, and interfering with companies' operational strategies. Fleet decisions must reflect diverse real-world constraints such as payload, route distances, downtime, and refuelling or charging availability.

Imposing a one-size-fits-all mandate could lead to inefficiencies, increased costs, and ultimately higher consumer prices. Many fleet operators already invest in cleaner vehicles. Penalising the use of renewable fuels or ignoring voluntary progress could discourage further innovation and sustainability efforts.

Mandates without supporting measures—such as fiscal incentives, charging infrastructure, or grid upgrades—would further burden hauliers operating on slim margins and risk widening the gap between bigger and smaller market players. Of the 1.03 million road transport companies in the EU, 89% are SMEs with fewer than 10 employees (*IRU, 2024*). In such a scenario, operators may be pushed to choose the cheapest vehicles available, which are increasingly imports from non-EU countries. This risks accelerating the decline of European OEMs, undermining EU industrial competitiveness.

Furthermore, purchase mandates fail to stimulate real customer demand. They may inflate prices, worsen the collapse of EV residual values, and force fleet operators to retain older vehicles longer—undermining both decarbonisation and economic objectives. In short, this approach risks achieving the opposite of the aim of the Clean Corporate Vehicle Initiative: fewer new, cleaner vehicles and reduced mobility options for European citizens and businesses.

FCE and its members stand ready to engage in a constructive dialogue with the European Commission to help design a balanced, effective, and inclusive Clean Corporate Vehicles initiative. We look forward to contributing our expertise and insights to ensure the framework supports both climate objectives and the operational realities of fleet operators across Europe.



About us

Whether physical or digital (e.g., via a mobile app), **fleet cards are identification instruments that provide access to a wide range of vehicle-related goods and services**—including conventional and alternative fuels, roadside assistance, toll payments, ferry fees, and more. Unlike payment instruments such as credit or debit cards, fleet cards have purpose-built features tailored for business-to-business (B2B) use. They do not initiate fund transfers but instead enable businesses to efficiently manage, monitor, and optimise their mobility-related expenses and operations.

Fleet card providers play a vital role in the road transport and mobility ecosystem, contributing to a cleaner and more efficient industry through a broad suite of services. These include settlement solutions (e.g., fueling, charging, tolls), vehicle-related services (e.g., parking, washing, maintenance, and repair), telematics, fleet and transport management tools, and digital platforms that promote e-mobility, sustainability, and cost optimisation.

FCE members represent a significant share of this market, comprising leading independent providers headquartered across Europe and serving the logistics, transport, and mobility sectors every day.