



May 2025

This document lists several topics currently being discussed that may be of interest to your company and FCE members overall. Please review each item and indicate:

- your level of interest for each topic by selecting one of the three option available in the drop-down menu in the third column: Aware / Follow / Influence. If you do not have an opinion on the topic, please select the “none” option.

NONE	No interest on the topic and/or no estimated potential impact on the industry.
AWARE	Read for awareness and general information.
FOLLOW	Stay informed and follow closely to determine whether to influence. Secretariat to send written updates whenever they occur and maintain the file on the agenda of the WG. For these files, position papers may be drafted if the WG decides to.
INFLUENCE	To formulate a position on the topic and participate in consultative/lobbying activities. This includes participation in consultations (if still possible), position papers to be drafted, potential engagement with policy makers and stakeholders.

- where possible, share your main concerns and the potential impact on the industry regarding the topics you’ve marked, especially for those marked as “Influence” in the fourth column.

Implementation of adopted texts

Dossier and status	Relevance	Priority (PLEASE CHOOSE IN DROP-DOWN MENU FOR EACH FILE)	Concerns and potential impact on the industry
<p>Alternative Fuels Infrastructure Regulation (AFIR)</p> <p>In force since 13 April 2024.</p>	<p>AFIR supports the transition towards more sustainable transport by setting obligatory targets for the rollout of recharging and refuelling transport infrastructure. Implementation of AFIR through the Sustainable Transport Forum (STF).</p> <p>By the end of 2026, the European Commission will assess:</p> <ul style="list-style-type: none"> - targets (incl. threshold) - price transparency and payments - decrease of gross tonnage for vessels obliged using OPS 	<p>Cardtrend: AWARE Edenred: AWARE</p> <p>DKV: FOLLOW MTC: FOLLOW Radius: FOLLOW WEX: FOLLOW</p>	<p>Members' interest in following the delegated acts.</p>
<p>Alternative Fuels Infrastructure Regulation - National Policy Frameworks and Reporting</p> <p>Last reports published in May 2023</p>	<p>Member States drafting their National Policy Frameworks (NPFs) which should include national targets for the deployment of alternative fuels infrastructure.</p>	<p>Cardtrend: AWARE DKV: AWARE Edenred: AWARE MTC: AWARE</p> <p>Radius: FOLLOW WEX: FOLLOW</p>	<p>Members' interest in tracking Member States' progress on this topic (incl. country transition requirements and timescale).</p>

<p>Alternative Fuels Infrastructure Facility (AFIF)</p> <p>Funding instrument</p>	<p>The AFIF support recharging and hydrogen refuelling infrastructure rollout. In March 2025, the European Commission announced that EUR 570 million will already be made available under AFIF for the roll-out of alternative fuels infrastructure in 2025 and 2026 with a particular focus on heavy duty vehicles.</p> <p>Last call was published in February 2025 and will be closed in June 2025.</p>	<p>Cardtrend: AWARE DKV: AWARE WEX: AWARE Edenred: AWARE</p> <p>MTC: FOLLOW Radius: FOLLOW</p>	<p>Members' relative interest to the issue might be subject to change if regulations hindering/encouraging H2 for road transport change.</p>
<p>Regulation setting CO2 emission standards for Heavy-Duty Vehicles</p> <p>In force since 1 July 2024.</p>	<p>The legislation extends the CO2 emission standards for HDVs, setting targets up until 2040. Review to be expected in 2027.</p>	<p>MTC: NONE Radius: NONE</p> <p>DKV: AWARE</p> <p>Cardtrend: FOLLOW Edenred: FOLLOW WEX: FOLLOW</p>	<p>Will affect near time HDV procurement and thus the needs of our customers.</p>
<p>Corporate Sustainability Reporting Directive (CSRD) - Scope 3 Carbon emissions Reporting</p>	<p>Scope 3 emissions are defined as "emissions that results from activities not under the organisation's direct control but are related to business". Among the 15 categories listed in scope 3, category 1 "Purchased goods and services" and category 11 "Use of sold products" raise specific challenges in terms of avoiding double-counting and increase regulatory and financial risks for the industry.</p>	<p>Cardtrend: AWARE DKV: AWARE Edenred: AWARE</p> <p>Radius: FOLLOW WEX: FOLLOW</p> <p>MTC: INFLUENCE</p>	<p>Customers will seek help from FCE member to meet their obligations as they evolve.</p>
<p>European Trading System (ETS2) Directive</p>	<p>The legislation introduces a new emissions trading system, ETS2, which operates separately from the existing EU ETS. This new system will address CO2 emissions from fuel combustion in buildings and road transport.</p>	<p>MTC: NONE</p> <p>Cardtrend: FOLLOW DKV: FOLLOW Edenred: FOLLOW</p>	<p>Concerns about the definition of 'Fuel Supplier' and whether or not some reporting requirement will fall on the FCE members.</p>

	<p>Several Member States have expressed criticism of ETS2, with some, including the Czech Republic, Estonia, Poland, and Slovakia, calling for a two-year postponement or even cancellation. Meanwhile, France, is advocating for an increase in the number of allowances to help reduce the price of CO2.</p>	<p>Radius: FOLLOW WEX: FOLLOW</p>	<p>Request from members to have the Tax Working Group opinion on how this Directive will concretely impact on fleet cards companies.</p> <p><i>WEX comment:</i> Vega is a good indication that the EU Policy Makers can assign unreasonable expectations of FCE members. We ought to seek to ensure this is not another example</p>
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Existing regulatory frameworks under revision

Dossier and status	Relevance	Priority (PLEASE CHOOSE IN DROP-DOWN MENU FOR EACH FILE)	Concerns and potential impact on the industry
<p>Energy Taxation Directive (RED 3) revision</p> <p>In the legislative train - blocked in the Council.</p>	<p>The proposed revisions to the Energy Taxation Directive will contribute to the EU climate targets by addressing exemptions and reductions in energy taxation that constitute de facto fossil fuel incentives, while promoting energy efficiency and the take-up of cleaner fuels.</p>	<p>MTC: AWARE WEX: AWARE</p> <p>Cardtrend: FOLLOW DKV: FOLLOW Edenred: FOLLOW Radius: FOLLOW</p>	<p>Members request to better understand the timeline and arguably also influence the revision.</p>
<p>Regulation setting CO2 Emission Standards for cars and vans</p> <p>In force since May 2023. Review tabled in March 2025.</p>	<p>In 2023, new emission reduction targets for cars and vans were adopted, set to take effect in 2030, with a goal of achieving a 100% emissions reduction by 2035. This would mark the end of internal combustion engines (ICE) in new cars and vans produced after that date.</p>	<p>Radius: AWARE</p> <p>Cardtrend: FOLLOW Edenred: FOLLOW MTC: FOLLOW</p>	<p>Many players associated with the road transport sector have identified this file as a priority and will be actively lobbying</p>

	<p>In March 2025, the European Commission introduced an amendment proposal to offer manufacturers greater flexibility in meeting their compliance obligations.</p> <p>While a comprehensive review of the Regulation is scheduled for 2026, the European Commission has committed to accelerating the revision process and is expected to launch a fact-based analysis in Q3/Q4 2025.</p>	<p>WEX: FOLLOW</p> <p>DKV: INFLUENCE</p>	<p>and campaigning on it. Important to understand FCE members' customers needs and important to ensure that their collective needs have a voice in the regulation construction.</p>
<p>Eurovignette Directive</p> <p>Application from February 2024. Revision to be tabled by Q2 2025</p>	<p>The legislation now extends the scope of the Directive to cover not only heavy goods vehicles (HGV) but heavy-duty vehicles (HDV) as well.</p> <p>In March 2025, the European Commission announced that it will adopt a targeted amendment of the Eurovignette Directive to extend the deadline beyond 31 December 2025 to fully exempt zero-emission heavy-duty vehicles from road charges.</p>	<p>MTC: NONE</p> <p>Radius: AWARE</p> <p>WEX: AWARE</p> <p>Cardtrend: FOLLOW</p> <p>DKV: FOLLOW</p> <p>Edenred: FOLLOW</p>	
<p>Weights and Dimensions Directive</p> <p>In the legislative train.</p>	<p>The Weights and Dimensions Directive sets maximum authorised dimensions of HDVs used in national and international commercial transport and the maximum authorised weights of HDVs used in international commercial transport.</p>	<p>MTC: NONE</p> <p>Radius: NONE</p> <p>Edenred: AWARE</p> <p>WEX: AWARE</p> <p>Cardtrend: FOLLOW</p> <p>DKV: FOLLOW</p>	

New proposals tabled / announced

Dossier and status	Relevance	Priority (PLEASE CHOOSE IN DROP-DOWN MENU FOR EACH FILE)	Concerns and potential impact on the industry
<p>Decarbonise Corporate Fleets</p> <p>Legislative proposal expected by the end of 2025.</p>	<p>The goal is to accelerate the adoption of zero-emission vehicles within corporate fleets to meet the 2035 zero-emission target. Currently, the European Commission defines a corporate fleet as <i>'vehicles purchased by legal entities, rather than by individuals.'</i></p> <p>There is a risk that the legislative proposal may introduce mandatory targets for zero-emission vehicles in corporate fleets; however, according to numerous observers, this seems less likely than before.</p>	<p>Cardtrend: FOLLOW MTC: FOLLOW Radius: FOLLOW</p> <p>Edenred: INFLUENCE DKV: INFLUENCE WEX: INFLUENCE</p>	<p>Understanding customer obligations and effectively representing their interests is crucial. A key priority for members is long-term strategic planning, including climate transition modelling and planning.</p>
<p>"CountEmissions EU" - EU framework for harmonised measurement of transport and logistics emissions</p> <p>Awaiting Council's 1st reading position</p>	<p>The initiative sets out a voluntary EU methodology for the measurement and reporting of greenhouse gas emissions from freight and passenger transport.</p>	<p>MTC: NONE</p> <p>Radius: AWARE WEX: AWARE</p> <p>Cardtrend: FOLLOW Edenred: FOLLOW</p> <p>DKV: INFLUENCE</p>	<p>Topic which will have a direct impact on customers.</p>
<p>Access to in-vehicle data</p> <p>Publication uncertain <i>FCE contributed to the public consultation in June 2022.</i></p>	<p>With the entry into force of the Data Act on 12 September 2025, the European Commission will publish guidance on in-vehicle data.</p> <p>Following an assessment of the Data Act's impact, the Commission will consider further actions, including a potential legislative proposal regarding access to in-vehicle data and the establishment of a European Automotive Data Platform.</p> <p>If published, this legislative proposal would outline the conditions for accessing and using in-vehicle</p>	<p>MTC: NONE</p> <p>Cardtrend: FOLLOW Edenred: FOLLOW DKV: FOLLOW Radius: FOLLOW WEX: FOLLOW</p>	

	generated data. Its goal is to establish clear, competition-friendly EU rules for services that rely on access to car data.		
<p>Guidance & Recommendation on shortening grid connection procedures and grid connection prioritization</p> <p>Expected in Q1/Q2 2025</p>	Drawing on Member States best practices, the European Commission will issue Guidance and Recommendations on shortening the waiting time for recharging points' connections to grids and their priority treatment.	<p>DKV: AWARE Edenred: AWARE MTC: AWARE WEX: AWARE</p> <p>Cardtrend: FOLLOW Radius: FOLLOW</p>	
<p>Guiding principles regarding anticipatory grid investment</p> <p>Expected in Q2 2025</p>	The guidelines will identify conditions under which anticipatory investments in grid projects should be granted. This will allow to anticipate the future needs of the recharging infrastructure in the grid planning.	<p>MTC: NONE Radius: NONE</p> <p>Edenred: AWARE DKV: AWARE WEX: AWARE</p> <p>Cardtrend: FOLLOW</p>	
<p>European Clean Transport Corridor initiative to foster HDVs charging hubs</p> <p>Expected in Q3 2025</p>	The initiative aims to accelerate the deployment of heavy-duty vehicle charging hubs along key logistics corridors in the TEN-T, including urban nodes and multimodal freight terminals. It will be implemented under the Competitiveness Coordination Tool, focusing on simplifying permitting, securing financing to reduce investment risks, and aligning with grid priority areas in the Renewable Energy Directive.	<p>MTC: NONE</p> <p>Radius: AWARE</p> <p>Cardtrend: FOLLOW DKV: FOLLOW Edenred: FOLLOW WEX: FOLLOW</p>	Important topic as there is currently a lack of HDV charging infrastructure which needs to be rolled out faster.