Clearing the roadblocks: why EU policy is hampering the decarbonisation of commercial road transport – and how we can turn the corner

A position paper from FCE[1]
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Introduction

Fleet cards are the invisible engine driving Europe's commercial road transport (CRT). These smart, secure tools enable millions of professional drivers to refuel, recharge, and access essential services – seamlessly and across borders. Fleet Cards Europe (FCE) represents leading independent providers based across the continent, serving the logistics, transport, and mobility sectors every day. Our members power the energy and mobility operations of thousands of B2B clients and hold a significant share of this vital market.

However, the CRT sector faces mounting challenges. In 2022, transport generated 31.6% of the EU's total CO_2 emissions, with 73.2% of that total coming from road transport alone – 27.5% from heavy-duty trucks and buses, 12.1% from light-duty trucks and 59.1% from cars[2]. Unlike most sectors, emissions from transport keep rising – up 27.8% in 2022 compared to 1990[3], in absolute terms. And despite the bold ambitions of the European Green Deal, current projections show only a 22% cut by 2050, far below the 90% reduction target[4].

The decarbonisation of CRT is not simply slow, it is fundamentally off-track. Uptake of zero-emission trucks remains extremely low, and the supporting charging and refuelling infrastructure is still far from sufficient. Crucially, the structural flaws in the current EU regulatory framework are actively hindering progress:

- **Policy incoherence**: instruments like CO_2 standards for HDVs, the Renewable Energy Directive (RED III), and ETS2 operate in silos and often contradict one another, creating a fragmented, high-risk investment environment.

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[1] This full-length paper includes expanded analysis and recommendations; a shorter position paper summarising its key points is available for download on the FCE website.
[2] European Commission, Statistical pocketbook 2024 – EU Transport, European Union 2024, ee264fc5-ec49-4751-9d92-08c038856ce1_en
[3] European Commission, Statistical pocketbook 2024 – EU Transport, European Union 2024, ee264fc5-ec49-4751-9d92-08c038856ce1_en
[4] European Environment Agency, Transport and environment report 2021, Decarbonising road transport – the role of vehicles, fuels and transport demand, 2022, https://www.eea.europa.eu/en/analysis/publications/transport-and-environment-report-2021

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- **Technology prescription**: the current tailpipe-only accounting system forces a single technological pathway, ignoring the immediate, verifiable decarbonisation potential of sustainable renewable fuels and viable alternatives like hydrogen. This is neither **technology-neutral** nor outcomes-driven.
- **SME burden:** the sector is dominated by small and medium-sized enterprises (SMEs), which are disproportionately exposed to high upfront costs for zero-emission vehicles, limited grid capacity, and inconsistent incentives.

This paper has been prepared by FCE members – experts with decades of hands-on experience in heavy-duty transport – who fully support the EU's climate goals but are increasingly concerned that the current trajectory is setting CRT up for systemic failure. Far from accelerating progress, several EU initiatives are actively hindering the decarbonisation of CRT. Urgent action is needed. We call on the European Union to realign its strategy and unlock the full potential of CRT in meeting its climate objectives.

FCE stands ready to be a constructive partner, delivering the essential digital infrastructure, data insights and sector expertise required to enable a realistic, inclusive, and scalable transition of CRT toward decarbonisation.

1. The role of fleet cards in supporting a cleaner and more efficient road transport sector

Unlike traditional payment instruments such as credit or debit cards, fleet cards do not initiate fund transfers but instead enable businesses to manage, monitor, and optimise their mobility-related expenditures and operations efficiently.

Accelerating the energy transition

As road transport gradually shifts from fossil fuels to cleaner, lower-emission alternatives, fleet card companies act as essential enablers of this transition. They provide access to a **growing network of service stations offering alternative fuels and EV charging stations**. This infrastructure and service network help accelerate and de-risk the transition for CRT operators (especially SMEs that lack dedicated in-house capacity to manage this complexity) by simplifying access to new energy types, supporting efficient route planning and generating economies of scale that lower total cost of ownership (TCO) over time.

Simplifying fleet management in an increasingly complex ecosystem

As fleets evolve to include both internal combustion engine (ICE) vehicles and electric vehicles (EVs) and become more diverse, operators face a growing set of operational challenges. The supply side is becoming increasingly fragmented, with new technologies and market entrants complicating fleet management and decision-making. Fleet card providers are uniquely positioned to simplify this transition by offering integrated solutions that streamline operations.

A key enabler is a **unified service card and invoicing system that accommodates all energy types –** including electricity – across both traditional fuel stations and diverse EV charging networks. This simplifies decision-making and the overall customer journey for fleet managers navigating this complexity.

Digitalisation: a catalyst for sustainable transport

FCE members' ambition is to empower drivers, dispatchers, and fleet managers to operate their fleets sustainably – supported by digital tools, process automation, and transparency. Beyond facilitating energy access, **fleet card providers offer critical data and digital services that enable informed, environmentally responsible decision-making**. These include:

- Real-time, smart routing that optimises energy use, journey time and refuelling options,
- Fleet-wide carbon emissions tracking,
- Driver behaviour analytics to identify cost and emissions savings.

By leveraging these actionable insights, transport operators can immediately lower energy use, improve efficiency, reduce emissions, and cut operational costs, even before the full realisation of a connected transport ecosystem.

2. Why current EU policies are hampering the decarbonisation of commercial road transport

In 2023, **road freight accounted for over 78% of all inland freight transport in the European Union**, amounting to 1.9 trillion tonne-kilometres (*IRU, 2024*). Trucks – defined as vehicles over 3.5 tonnes – form the backbone of this system and are vital to both the EU and global economies. However, decarbonising CRT remains one of the most pressing and complex climate challenges, particularly for the **SMEs that make up 80% of the sector.** Many of these businesses are family-owned and operate with extremely tight profit margins.

By 2030, road freight volumes in the EU are expected to increase by 9% compared to 2023. In the longer term, demand is projected to keep rising, fuelled by growing consumption, trade, investment, and broader economic growth throughout the region (*IRU, 2025*).

The HDV segment is especially critical to achieving climate neutrality. Yet, as we will demonstrate, the current trajectory falls far short of what is needed.

2.1 -The decarbonisation of CRT is well behind schedule

Despite some encouraging progress, the EU CRT sector remains **heavily reliant on diesel**. As of the first quarter of 2025, **93.4% of all new truck registrations** were still diesel-powered (*ACEA, 2025*), underscoring how entrenched conventional fuels remain in the market. Reinforcing the problem is the **aging truck fleet,** with an average vehicle age of **13.9 years** across the EU. This slow natural replacement cycle makes it unlikely that the region will meet its 2030 climate targets without much stronger intervention.

Worryingly, the overall number of new truck registrations is also in decline. In Q1 2025, **total registrations fell by 16%**, with the heavy-duty segment – crucial for long-haul freight – dropping by 16.6%. While sales of zero-emission trucks are increasing, they still represent a very small share of the market. From such a low base, the current rate of growth is far from sufficient to drive a meaningful shift away from diesel within the necessary timeframe.

The poor uptake of zero-emission trucks

Electrically chargeable trucks recorded a strong 50.6% year-on-year increase in registrations during the first quarter of 2025, bringing their market share up to 3.5% (*ACEA, 2025*). While this signals growing interest, overall adoption remains very limited. **ZEVs still account for just 2.3% of the total heavy-duty truck fleet**, indicating that the transition is still largely confined to early adopters.

One of the main barriers is cost. Despite offering lower operating expenses over time, ZEVs come with **significantly higher upfront purchase prices**, preventing the TCO from reaching parity with diesel trucks across many transport segments. As a result, most operators – particularly SMEs – are unable to justify the switch without external support.

The current lack of charging infrastructure

The lack of dedicated infrastructure for HDVs has become one of the most pressing obstacles to decarbonising commercial road transport – far more severe than in the light-duty vehicle sector.

Electric truck charging infrastructure remains critically underdeveloped. By the end of 2024**, only 160 public truck-specific charging points** were in operation across the EU (*International Council on Clean Transportation, 2024*), a figure that falls dramatically short of what is needed. Even with the planned infrastructure rollout under the AFIR regulation, the EU is projected to meet just 47% of the electricity demand for electric HDVs by 2030 (*European Commission, 2025*). To enable a viable shift to zero-emission trucks, **at least 50,000 public charging stations for HDVs will be required** *(ACEA, 2025*).

The situation is even more acute for hydrogen refuelling. **Out of 368 hydrogen refuelling stations** either operational or planned in the EU, **only 9 are equipped with 700-bar pumps** – the pressure standard required for heavy-duty trucks (*Hydrogen Europe, 2025*). Although AFIR mandates a basic hydrogen network, it would support only 10,000 to 15,000 trucks, far below the 70,000 hydrogen-powered HDVs expected on EU roads by 2030. To meet this projected demand, the **EU would need to scale up to at least 2,000 hydrogen refuelling stations** (*ACEA, 2025*).

2.2 - What are the most important roadblocks preventing faster progress

In Europe, **80% of CRT operators express concern about the decarbonisation process**. Among their main worries, 42% highlight increased costs and customers' reluctance to absorb them, while 30% point to inadequate government support. An overwhelming 94% believe that decarbonisation is already affecting their operations, and 52% consider it important or very important when planning future investments. Despite this, 56% of operators still do not track their carbon emissions, reflecting a significant gap between awareness and action (*IRU, 2025*).

When asked about **the main reasons for not advancing decarbonisation**, operators most frequently cite the **lack of willingness from customers to pay a premium for low-carbon services.** Closely following this is the perception that **decarbonisation technologies are prohibitively expensive.** Many operators also point to the **absence of sufficient incentives** from governments and regulators, the belief that current technologies are not yet mature enough, and the lack of internal financial resources to support the transition.

These insights make it clear that the decarbonisation of commercial road transport in the EU is not simply progressing too slowly – it is at risk of systemic failure without immediate and coordinated policy intervention. There are three particularly critical obstacles to address. First, the EU's reluctance to fully embrace a technology-neutral approach limits innovation and locks in suboptimal solutions. Second, regulatory fragmentation across the EU creates uncertainty and inconsistency for operators, making it harder to scale up decarbonisation efforts. Third, and most importantly for the many SMEs in the sector, the total cost of ownership for diesel trucks remains significantly lower than for zero-emission alternatives, making the business case for transition extremely challenging.

The failure to embrace technology neutrality

FCE fully supports the EU's commitment to accelerating the shift toward ZEVs. However, we contest the narrow, prescriptive means by which this goal is being pursued, particularly within the HDV sector.

Decarbonising HDV transport is uniquely challenging. While battery-electric and hydrogen vehicles represent significant pathways, their widespread adoption necessitates fundamentally new powertrains and massive infrastructure overhauls – a highly disruptive process. In contrast, **sustainable renewable fuels** (e.g., HVO, bio-CNG, bio-LNG, e-fuels) **offer immediate, scalable, and less disruptive emissions reduction in conventional engines**. Industry data suggests these fuels will remain a dominant decarbonisation path in the near term (*IRU, 2025*).

FCE strongly advocates for a **genuinely technology-neutral and evidence-based approach**. Fleet operators must be empowered to select the technologies that best meet their **diverse operational requirements**, as there is demonstrably no single, one-size-fits-all solution for HDVs. Furthermore, adopting a technology-open framework is critical for strategic resilience across the European Union, allowing Member States to leverage their varied national energy mixes and infrastructure realities to remain competitive while contributing effectively to climate goals.

The lack of regulatory harmonisation across the EU

The lack of regulatory harmonisation across EU transport policies is a critical flaw undermining climate ambition. **FCE urges the European Commission to align regulatory approaches immediately.**

The core issue lies with the CO_2 Standards for heavy-duty vehicles, which rely exclusively on a **restrictive tailpipe emissions approach.** By accounting only for the use phase, this singular metric effectively forces compliance toward an electric-only solution, severely penalising and disregarding the immediate, scalable contribution of sustainable, CO_2-neutral fuels.

This narrow view stands in sharp contrast to major EU frameworks – including **REDIII, EU ETS**, and the **Eurovignette Directive** – which correctly adopt a broader **WTW perspective**, acknowledging the decarbonisation potential of these fuels.

This inconsistency creates a profound regulatory distortion, undermining both the comparability and effectiveness of EU climate policy. It erects artificial barriers and fails to align with policies like REDIII and ETS2, which already treat sustainable renewable fuels as zero-emission at the point of use.

For SMEs, the TCO of a diesel truck remains significantly cheaper than the TCO of a zero-emission truck

The transition to ZEVs in road transport faces significant economic and financial challenges, as **the TCO of a diesel truck remains substantially cheaper**, particularly for SMEs. ZEVs have a **much higher Capital Expenditure (CapEx)**, costing two to five times more than diesel trucks. While they offer lower Operating Expenditure (OpEx), this is highly reliant on **volatile and non-harmonised energy prices** across the EU.

Since OpEx (driven by energy) accounts for 60-80% of TCO, this national price disparity undermines the long-term cost projections essential for competitive cross-border business. Furthermore, the effectiveness of ZEVs' emission reduction is locally dependent on how electricity or hydrogen is produced.

Even if TCO parity were achieved, a major hurdle is the **financing risk for lenders.** New assets like electric heavy-duty vehicles (e-HDVs) have uncertain lifespan and residual values, making banks hesitant to provide the larger loans required, or leading them to charge higher interest rates. This issue is **amplified for SMEs with limited capital access**, making them cautious about undertaking the increased financial risk and extended payback periods.

Finally, the deployment of essential ZEV charging and refuelling infrastructure, even with high subsidies, is not commercially viable without **investor confidence in sufficient customer uptake.** This confidence is currently lacking because transport operators have not yet been sufficiently incentivised to make the necessary purchasing transition.

3. Turning the corner – Policy Recommendations

In line with the challenges above, FCE calls on EU policymakers to **adopt a coherent, harmonised, and implementation-focused approach** to accelerate the decarbonisation of the HDV sector. Achieving a shift to zero-emission road freight is essential for reaching the EU's climate neutrality objective by 2050. However, success requires realistic, inclusive, and economically viable policies that reflect the diversity of operators across the CRT sector, particularly SMEs.

The primary action required to guarantee the effectiveness of the transition is to:

Policy Recommendation 1 - Conduct an EU-wide stress test of all road-transport decarbonisation policies to assess coherence, effectiveness, and unintended consequences.

Currently, the EU's ambition is undermined by a lack of coherence and inconsistency of key instruments. Major regulations—such as CO_2 standards for HDVs, RED III, ETS2, taxation rules, infrastructure legislation, and CountEmissionsEU—**operate in silos and often contradict one another**. A comprehensive stress test is therefore essential to identify these contradictions, assess real-world feasibility, and determine whether the existing trajectory is compatible with Europe's climate targets.

Furthermore, the EU's ambition is hampered by **inconsistent national implementation**. Because the main instruments are Directives requiring national transposition, they often result in divergent and unaligned national rules that fragment the Single Market and send conflicting signals to operators.

FCE also warns against **over-regulation**. The policy focus should shift from introducing new frameworks to **optimising and streamlining existing ones**. Continually adding new layers of regulation risks creating complexity, slowing implementation, and increasing administrative burdens - contradicting the European Commission's own simplification agenda.

To address these challenges, FCE recommends a set of policy adjustments aimed at improving consistency, simplifying compliance, and providing a clear, unified investment signal across the EU. FCE stands ready to engage in technical discussions and public dialogues to support greater policy alignment and accelerate the sector's transition towards greener mobility.

Policy Recommendation 2 - Establish technology-neutral regulatory alignment across transport legislation

To accelerate HDV decarbonisation and ensure coherence across EU climate legislation, FCE **calls for targeted amendments to the CO_2 Standards Regulation for HDVs**. The current tailpipe-only approach must be replaced with a **technology-neutral WTW framework** that captures the full climate impact of all propulsion technologies, including sustainable renewable fuels.

A unified and technology-inclusive regulatory framework is essential to provide investment certainty, safeguard European competitiveness and enable all viable pathways to contribute to the EU's 2050 climate neutrality goal. FCE therefore urges a **fast-track revision** of the HDV CO_2 Standards Regulation, synchronising it with the 2026 review for cars and vans. This alignment is necessary to send a clear, consistent market signal and foster a unified legislative environment across the EU transport sector.

Decarbonisation must be driven by a **balanced mix** of Zero-Emission Vehicles (ZEVs) and Internal Combustion Engine (ICE) vehicles powered exclusively by sustainable renewable fuels that meet RED criteria. To operationalise this, FCE supports introducing a **Renewable Fuel Coefficient (RCF)** that adjusts reported vehicle emissions based on the verified share of CO_2 neutral fuels used annually (ranging from 0 for full fossil fuel reliance to 1 for CO_2 certified neutral fuel usage). Incorporating this mechanism brings the HDV regulation into alignment with emissions accounting principles already established under the REDIII and the EU ETS2.

To ensure accurate monitoring and verification, FCE also calls for the **integration of fleet cards** into the compliance framework. Fleet card companies can play a pivotal role in implementing the CCF by providing **auditable, high-integrity consumption and transaction data**, ensuring accurate verification and compliance with EU carbon accounting principles.

Policy Recommendation 3 - Build a unified and coherent EU system for CO_2 emission accounting in road transport

The EU must establish a single, coherent **WTW CO_2 accounting framework** for road transport, to ensure transparent, verifiable, and technology-neutral emissions reporting. This framework should integrate existing and upcoming legislative instruments, ensuring consistency between the *CountEmission EU Regulation*, *RED III*, and the *HDV CO_2 Standards Regulation*.

FCE urges EU policymakers to **recognise fleet card providers as essential digital infrastructure** within this architecture. Their auditable, real-time data offers the most practical, scalable, and transparent basis for tracking fuel consumption, monitoring renewable fuel use, and verifying emissions across corporate and commercial fleets. Fleet cards are a trusted, verifiable, and technology-neutral source for monitoring renewable fuel consumption in corporate fleets and **should be formally integrated into all WTW emissions-accounting systems**. Policymakers should explicitly integrate fleet cards data into upcoming Renewable Fuel Coefficient (RCF) monitoring and reporting regulations.

Furthermore, the EU should establish a **single, EU-wide digital system for crediting and transferring RED III**–compliant renewable fuels. This system should **enable cross-border reporting of CO_2** savings, ensuring that renewable fuels produced or whose greenhouse gas quotas are used in one Member State can be accurately credited to operators in another.

Finally, FCE calls for the **rapid adoption and harmonised implementation of the CountEmission Regulation**. The Regulation must ensure transparent, WTW-based emissions reporting and be applied coherently across all relevant EU frameworks using robust, auditable data provided by digital infrastructure such as fleet cards.

Policy Recommendation 4 - Financing and taxation: reducing cost barriers for SMEs

Targeted financial and fiscal measures are urgently needed to reduce the TCO gap between ZEVs and conventional diesel trucks, with a particular focus on easing the burden for SMEs. These measures should create a stable, predictable framework that reduces investment risk, improves access to capital, and accelerates the transition to cleaner freight transport, regardless of the energy used.

4.1 - Establish EU-level purchase subsidy scheme to de-risk ZEV investments

To address the financing barriers faced by SMEs and the **current** lack of **consistent** support across Member States**, FCE recommends the introduction of a targeted** EU-level **purchase subsidy scheme**, designed to prioritize carbon reduction outcomes rather than specific technologies. **Such a mechanism** would play a central role in mitigating residual value risk and providing greater investment certainty for both operators and financiers. By lowering perceived risk, the scheme would enable commercial banks to offer more favourable lending conditions, expand access to credit for smaller operators, and reduce overall borrowing costs.

A **harmonised and predictable EU-level subsidy framework** would establish a common baseline of support across Member States. This would ensure that SMEs - often the most capital-constrained actors—can participate equitably in the transition to zero and low-emission transport.

4.2 - Promote user-centric national incentives

At the national level, Member States should urgently reorient financial support from general public infrastructure projects toward user-centric incentives that directly benefit fleet operators. Funding **should prioritise vehicle purchase incentives and operational subsidies, particularly** for SMEs transitioning to ZEVs. Support should remain technology-neutral and tied to measurable carbon reduction outcomes, ensuring that financial resources are directed where they achieve the greatest climate impact. **Such measures would support CRT operators in achieving TCO parity with diesel vehicles more rapidly, especially during the early stages of technology deployment.** In parallel, Member States should provide assistance for depot-based charging and refuelling**/charging** infrastructure, enabling operators to integrate zero **and low** emission technologies efficiently into their daily operations.

4.3 - Implement a carbon-based taxation model

To support the financial transition, the **EU should modernise its energy taxation system by shifting from source-based to carbon-based taxation**. This means taxing fuels according to their carbon content rather than their energy source. Such a paradigm shift would align fiscal policy with climate objectives, ensure consistency and transparency across Member States, and provide a clear, long-term market signal to accelerate decarbonisation. By establishing taxation on the basis of CO_2 emissions, rather than fuel type, the EU can create a level playing field and encourage investment in the most effective low-carbon solutions.

Policy Recommendation 5 - Infrastructure deployment: ensuring a technology-neutral and scalable roll-out

To accelerate the decarbonisation of commercial road transport, the EU must adopt a comprehensive, market-led infrastructure strategy that is both technology-open and investment-friendly. A predictable and harmonised policy framework will be essential to attract private capital, ensure infrastructure scalability, and support all viable zero-emission technologies.

5.1 - Align public funding and regulatory incentives with a technology-neutral demand outlook

Public funding and regulatory incentives for charging and refuelling infrastructure must be aligned with a technology-neutral demand outlook. Infrastructure roll-out should not be limited to electrification alone but must also accommodate vehicles powered by CO_2-neutral fuels, including bio-CNG, bio-LNG, hydrogen, and e-fuels. This inclusive approach will boost investor confidence and ensure that infrastructure investments remain commercially viable across all Member States, regardless of national energy mixes or technological preferences.

5.2 - Prioritise large-scale reform and investment in electricity grid infrastructure

Grid capacity is another critical barrier. FCE stresses the **urgent need for large-scale reform and investment in electricity grid infrastructure to support the high-power demands of HDV charging networks,** particularly along the Trans-European Transport Network (TEN-T). Without significant upgrades to grid capacity, the deployment of high-volume charging pools for heavy-duty vehicles will remain constrained, undermining broader decarbonisation goals. The Commission should collaborate with the fleet card industry to direct investments toward locations with verified commercial demand, ensuring grid readiness for freight transport.

5.3 - Redirect public subsidies to user and depot-centric solutions

Most commercial road transport (CRT) operators charge at depots and logistics hubs. Public subsidies should therefore prioritise private, user-focused infrastructure that offers greater power capacity, lower total cost of ownership (TCO) barriers (see Recommendation No. 4), and reduced dependence on public charging availability**.**

5.4 - Accelerate and coordinate AFIR Implementation based on market data

Without stronger coordination, the Alternative Fuels Infrastructure Regulation (AFIR) risks remaining a political target rather than a market driver. The Commission should accelerate the review of national rollout plans and establish transparent, regular dialogue through the Sustainable Transport Forum (STF) on AFIR implementation. Discussions must be informed by market data—such as freight flows from fleet card operators—to guide a coordinated, demand-based rollout that delivers measurable operational impact.

Policy Recommendation 6 - Greening corporate fleets: promote a strategic, technology neutral approach

To accelerate the decarbonisation of corporate and commercial vehicle fleets while maintaining economic competitiveness, the **EU should promote a strategic, technology neutral policy framework under the upcoming *Clean Corporate Vehicle Initiative*** (*see policy recommendation n°2 above*). FCE urges policymakers to focus on market-based incentives rather than rigid compliance measures that risk distorting competition and undermining cost-effectiveness.

6.1 - Reject binding fleet purchase mandates

FCE fundamentally opposes any EU regulatory measure that imposes binding fleet purchase mandates or technology-specific targets for HDVs. Such prescriptive approaches risk placing disproportionate financial burdens on CRT companies – especially SMEs – by disregarding operational realities, increasing exposure to investment risk, and prematurely locking fleet operators into technologies that are not yet commercially viable at scale.

6.2 - Ensure equitable cost sharing across the transport value chain

To address current market imbalances - where freight rates do not reflect the additional costs of decarbonisation - and to create stable demand for low-carbon transport services, the EU should promote fair cost distribution across the transport value chain. The EU and Member States should develop regulatory or collaborative frameworks to ensure that decarbonisation costs are shared equitably among carriers, shippers, and logistics providers. This approach would strengthen market stability and support long-term investment confidence. Furthermore, Member States should be encouraged to provide tax incentives or rebates for shippers that can demonstrate verified and quantifiable emissions reductions in their supply chains, thereby rewarding climate-efficient transport procurement. These tax incentives should remain technology-neutral, rewarding transport operators based on *verified Total Emissions Reduction (TER)* rather than on prescribed technologies or vehicle types. This approach would align incentives to move greener of the whole value chain with climate objectives while safeguarding competition and innovation.

Conclusions

The CRT sector stands at a critical juncture, with fleet card providers playing a key role in the energy transition by simplifying complex operations and enabling access to a growing, multi-energy network. Decarbonising CRT is indispensable to achieving the European Union's climate neutrality goals by 2050. Yet, progress is hampered by fragmented regulations, a narrow focus on electrification, insufficient infrastructure, and limited financial support for SMEs.

Current tailpipe-only accounting further penalises scalable, immediately deployable solutions such as sustainable renewable fuels—despite their proven CO_2 reduction potential. To ensure an inclusive, evidence-based, and cost-effective transition, the EU must urgently adopt a WTW methodology that recognises all viable decarbonisation pathways and provides investment certainty across the value chain.

Despite early progress, the market share of zero-emission vehicles remains marginal, infrastructure deployment continues to lag behind demand, and high upfront costs still deter wider adoption. Without swift, coordinated, and inclusive policy intervention, the CRT sector risks missing the 2030 climate targets, undermining the EU's broader decarbonisation agenda.

FCE calls on policymakers to realign the EU's regulatory and financial frameworks with the practical needs of the CRT sector —embracing a technology-neutral approach that values both electric and CO_2-neutral fuel solutions, adopting WTW accounting, reducing the total cost of ownership gap, reforming taxation, and accelerating infrastructure rollout.

Fleet card providers are uniquely positioned to drive this transition. By offering unified service cards for all energy types—traditional fuels, sustainable alternatives, and EV charging—they simplify fleet management, particularly for SMEs. Their digital tools enable real-time emissions tracking, route optimisation, and data-driven decision-making, while their auditable transaction data can underpin a credible CO_2 accounting system.

By harmonising regulations, streamlining legislation, and leveraging fleet card data capabilities, the EU can build a coherent, flexible, and economically viable path to net zero. Only through such a comprehensive and inclusive strategy can the EU deliver a commercially viable, socially equitable, and climate-effective transition for one of the hardest-to-abate sectors of the economy.

About FCE

Whether physical or digital (e.g., via a mobile app), fleet cards are identification instruments designed specifically for business-to-business (B2B) use, offering access to a wide range of vehicle-related goods and services. Fleet card providers play a pivotal role in the CRT sector, enabling a cleaner and more efficient industry through a comprehensive suite of services. These include payment settlement solutions (e.g., fuelling – both conventional and alternative – charging, tolls, ferry fees), vehicle-related services (e.g., parking, washing, maintenance, and repair), as well as telematics, fleet management tools, and digital platform solutions that support 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.