

Clean Corporate Vehicles Regulation: Completing an essential legislation



Platform for Electromobility's reactions and recommendations to strengthen a regulation that can effectively boost the electric mobility transition

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The Platform for Electromobility welcomes the European Commission's proposal for a Regulation on clean corporate vehicles. The initiative moves in the right direction by finally addressing the demand side of road transport decarbonisation and recognising the central role of corporate fleets in the European vehicle market and its transition to zero-emission mobility.

At the same time, the proposal remains short, cautious and marked by several ambiguities that risk limiting its effectiveness. With targeted clarifications and adjustments, this Regulation could become a powerful and credible lever to accelerate electrification, support European industry, and deliver tangible emissions reductions.

The Platform would first like to welcome the followings.

The right tool for the right target

The Platform strongly supports the rationale of the proposal. For too long, EU road transport policy has relied almost exclusively on supply-side instruments, notably the CO2 standards for

WHAT IS THE PLATFORM FOR ELECTROMOBILITY?

A unique alliance of Europe-based producers, infrastructure managers, operators, transport users, cities and environmental civil society organisations from across industries and transport modes, collaborating to reach a sustainable, multimodal transport system in which people and goods are moved across land in Europe using exclusively fossil-free electricity. We unite all sectors constituting the electromobility ecosystem to pragmatically ensure the conditions for the full decarbonation of new light-duty vehicles by 2035, and build a sustainable European zero-emission transport system by collectively sharing their expertise, challenges and solutions.

cars and vans. Introducing binding requirements on corporate demand is both necessary and overdue.

Corporate vehicles represent over 60%¹ of new registrations, travel longer distances, and on average emit more CO₂ than privately owned vehicles². Acting on this segment is therefore one of the most efficient ways to: accelerate the mass uptake of zero-emission vehicles (ZEVs); support EU-based car makers in reaching their CO₂ reduction targets, while ensuring that the transition efforts are fairly shared across sectors and; provide investment certainly to charging infrastructure providers, grid operators, and the broader mobility ecosystem. It also enables a quicker development of a strong second-hand EV market, which is essential for affordability and social acceptance. Additionally, it delivers; achieve early and substantial CO₂ reductions in road transport, while and increasing the demand for European-made cars and their key components.

We particularly welcome the Commission's choice of a Regulation. This instrument provides the level of legal certainty and harmonisation that the market needs, especially for companies operating across multiple Member States.

The right scope and fleet definition

The Platform welcomes the proposal's broad definition of corporate fleets, including large leasing companies and all major private and commercial fleet segments. This approach reflects the reality of the European fleet market, where a significant share of corporate vehicles is managed through leasing and rental arrangements. By focusing on the size of the undertaking rather than on specific business models, the proposal helps avoid loopholes and ensures that all major corporate fleet operators are subject to a consistent framework.

The right differentiation between cars and vans

We welcome the proposal's separate trajectories for passenger cars and light commercial vehicles, acknowledging differences in use cases, technological maturity, and production capacity in Europe. This differentiation is justified and should be preserved, provided that ambition is real for both segments.

Further amendments to the text are needed to ensure the regulation's ambitions are set at the right level and improving clarity and predictability for investment decisions.

Area 1 | Targets striking an ambitious, clear and realistic trajectory to full decarbonisation

Recommendation 1 **Targets that stimulate the market without freezing it**

The Platform supports the introduction of binding minimum shares of clean vehicles in new corporate registrations. That said, the level and design of the targets require careful adjustment to be impactful.

Recommendations:

- Setting ambitious, proportionate and attainable targets, such as binding minimum shares of clean vehicles in new corporate registrations that go beyond current market trends, ensuring the whole ecosystem moves forward and drives innovation and investment while fostering the second-hand car market for European citizens.
- Setting a clear, long-term decarbonisation target and credible pathways towards full decarbonisation for all Member States for fleets covered by the proposal in order to reach carbon neutrality by 2050.

Recommendation 2 **Avoiding a fragmented, two-speed Europe**

The proposal introduces Member State-specific targets, reflecting differences in economic conditions. While this granularity is understandable, it should not undermine the core objective of convergence towards zero-emission mobility across Europe. While we recognise that differentiated targets aim to account for variations in purchasing power across Member States, this rationale must be relativised in the context of multinational corporate fleets operating across Europe. More broadly, the objectives of clean air and access to modern mobility solutions are shared across the Union.

Recommendation:

- While maintaining national targets, the regulation should explicitly ensure that lagging Member States are encouraged—and supported—to catch up, in particular in infrastructure deployment³, rather than locking in structural disparities and creating a two-speed Europe in corporate electrification.

Recommendation 3 **Low-emission vehicles: a blurred pathway**

The inclusion of low-emission vehicles (LEVs) alongside zero-emission vehicles raises concerns. This approach dilutes the signal towards full electrification; diverting investments from future-proof, zero-emission technologies towards transitional solutions that still emit CO₂.

Recommendation:

- Prioritising zero-emission vehicles across the Regulation, with a clear and credible pathway towards their future uptake in corporate fleets.

Recommendation 4 **End any support to CO2-emitting vehicles**

We support the principle, set out in Article 4 of ending public financial support for CO2-emitting vehicles but we urge to end any support to low-emission vehicles too. This is essential to ensure coherence between public spending and climate objectives. Moreover, the proposal remains vague as to what precisely constitutes “financial support” and how this prohibition will be implemented and enforced at national level.

Recommendations:

- ➡ The scope of prohibited financial support should be clearly defined, and financial support for the procurement or purchase of a new vehicles, as well as their operation, should be strictly reserved for zero-emission solutions.
- ➡ Article 4 should apply to all incentives, not only those for large fleets included in the scope of the regulation.

Recommendation 5 **Made-in-Europe requirements**

We support conditioning public financial support for uptake of corporate cars on “Made-in-Europe” criteria, provided this approach is applied in a coherent way across EU industrial policy instruments, including the Industrial Accelerator Act⁴. A consistent framework would help reinforce Europe’s strategic objectives without creating conflicting signals for industry. This measure must be used carefully and smartly to avoid possible negative side effects. Industrial realities, notably the complexity of broader European supply chains, must be properly acknowledged to make sure that it does not result in making EVs less competitive and thus less affordable, which would ultimately slow down the electric transition.

Recommendation 6 **Lack of demand-side incentives**

The proposal shifts all responsibility for demand-side incentives to Member State implementation. Following up on previous guidance, the Commission missed the opportunity to create a non-exhaustive, comprehensive list of measures that Member States could implement, both for new vehicle acquisition, operations, and residual value guarantees.

Recommendation:

- ➡ The Regulation should be more precise on demand-side incentives that Member States could include.

Area 3 | Gaps and missed opportunities in the Regulation

Recommendation 7 **Multimodality and light electric transport**

The proposal does not recognise the growing role of multimodal, public, and light electric mobility solutions for corporate needs. Companies increasingly rely on a mix of solutions to meet mobility needs: small cars, public transports (buses, trams, metros, local and regional trains, etc.), sharing of e-cars, e-bikes and e-scooters, etc.

Recommendation:

- A broader and more forward-looking perspective on corporate mobility, encouraging the use of all electric mobility solutions, should be promoted, for example through a recital within the regulation and through strong accompanying measures such as recommendations for tax incentives at Member States level.

Recommendation 8 **Smart and bidirectional charging**

Corporate fleets are ideally suited to become early adopters of smart and bidirectional charging, given their predictable usage patterns and focus on cost efficiency. Vehicle-to-Grid (V2G) and smart charging technologies can support a grid-friendly rollout of electromobility; enhance energy system resilience; facilitate renewable energy integration; reduce costs for both fleet operators and the electricity system.

Recommendation:

- Without delaying implementation, the Regulation should explicitly encourage the deployment of smart and bidirectional charging solutions alongside fleet electrification.

Recommendation 9 **Heavy-duty vehicles (HDVs)**

We regret the absence of any binding commitments for heavy-duty vehicles, as large fleets (except bus fleets, for which the Clean Vehicles Directive applies) have not been regulated at EU level. While the challenges differ from light-duty segments, HDV fleets also represent a major decarbonisation opportunity.

Recommendation:

- The Regulation should at least establish a clear roadmap or review clause to progressively integrate HDVs (other than buses) into the clean corporate vehicle framework.

Area 4 | Key measures for Member States' national plans

Enhance the national plans under Article 6 of the Commission's proposal by fully integrating the needs of diverse fleets, including charging infrastructure and targeted measures by fleet type, while ensuring stakeholder participation in their development

Recommendation 10 **Enable second-hand market creation**

Specific support should be provided to the second-hand market through National implementation plans, including measures such as:

- ➡ Removing registration and circulation taxes;
- ➡ Offering favourable depreciation and vat treatment;
- ➡ Providing incentives and premia for high-mileage and second-life vehicles to support vulnerable communities;
- ➡ Reduce residual value risk for professional fleets via guarantees, risk-sharing, or resale support schemes.

Recommendation 11 **Professional mobility fleets in national compliance plans**

While the Regulation's scope allows for the inclusion of taxis, ride-hailing services, and other professional or shared mobility fleets when operated by large undertakings, in practice many of these operators will not meet the thresholds set out in the proposed regulation. These vehicles are intensively used, predominantly urban, and can have a significant positive impact on air quality and emissions.

Rather than reopening the core fleet definition, the Platform considers it more effective to address these segments through Member States' compliance and implementation plans. This would allow national authorities to design targeted measures for high-impact professional fleets, improve visibility on national actions, and partially address the absence of a strong EU-level compliance mechanism.

Recommendation:

- ➡ Encourage Member States to explicitly include taxis, ride-hailing services, and other professional and shared mobility fleets in national implementation and compliance plans, with tailored measures reflecting their high utilization and environmental impact.

Recommendation 12 **Comprehensive and impactful compliance mechanisms**

A credible and transparent compliance framework is essential to ensure the Clean Corporate Vehicles Regulation delivers real-world emissions reductions. To maintain market confidence, the Regulation must focus on Member State accountability while allowing for national flexibility in policy design.

Recommendations:

- The Regulation should establish EU-wide monitoring and proportionate consequences for missed national targets. Enforcement revenues should be reinvested into electrification, charging infrastructure, and clean mobility.
- In line with Article 6, MS should report annually on the effectiveness of their chosen policy mix (e.g., fiscal incentives or mandates).
- If a Member State chooses to introduce company level targets, it should ensure that any accompanying compliance mechanisms are proportionate and that revenues are reinvested into charging infrastructure and clean mobility.

Recommendation 13 **Thresholds and support for SMEs and fragile actors**

The Platform supports the use of size thresholds to focus binding obligations on large undertakings and avoid disproportionate burdens on SMEs and one-person companies. While not in the scope, smaller and more fragile actors will be directly affected by market shifts driven by large fleets and must be supported to ensure a fair and effective transition. Targeted incentives, access to charging infrastructure, and adapted financing solutions will be essential to enable SMEs and individual operators to absorb the costs of electrification and fully benefit from the increased availability of electric vehicles.

Recommendation:

- Retain size thresholds for binding obligations while ensuring that SMEs and one-person companies are supported through dedicated incentives and enabling measures at national level.

Conclusion

The Platform for Electromobility considers that the tool chosen by the Commission is the right one. A binding regulation addressing corporate demand is both timely and necessary. Strong, ambitious and credible targets can become an effective driver of Europe's transport decarbonisation. Broadening the perspective is essential for this regulation to rapidly increase the demand for zero-emission vehicles in the EU. Beyond the CCV regulation, policymakers should create conditions that let authorities, fleet operators, and investors plan confidently, coordinate infrastructure, and scale up ZEVs to meet the EU's climate and industrial goals.

¹ Transport & Environment. (2020, October). *Company car report* (Dataforce).

https://www.transportenvironment.org/uploads/files/2020_10_Dataforce_company_car_report.pdf

² Dataforce. (2024). *Car market forecast 2024–2025* (corporate cars emissions share). Retrieved from

<https://www.dataforce.de/en/news/dataforce-car-market-forecast-2024-2025/#:~:text=Another%20effect%20considered%20in%20the,range%20of%20full%2Dhybrid%20models>

³ Platform for Electromobility. (2025, December 5). *From targets to consumer-friendly deployment of publicly accessible charging points for EVs*. <https://www.platformelectromobility.eu/2025/12/05/from-targets-to-consumer-friendly-deployment-of-publicly-accessible-charging-points-for-evs/>

⁴ This does not prejudice on the Platform's opinion on the upcoming Industrial Accelerator Act.



Platform members



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