



CLIMATE GROUP
EV100

**Driving demand
through an ambitious
corporate fleet
regulation**

EV100 position paper on the
EU Regulation on Clean
Corporate Vehicles

| April 2026

Our position

Climate Group EV100, representing over 120 major businesses committed to decarbonising their fleets, welcomes the Commission's proposal for a Regulation on Clean Corporate Vehicles as a key demand-side lever to accelerate road transport decarbonisation.

A well designed and implemented Regulation will mobilise companies to transition at scale, drive innovation, provide investment certainty, accelerate infrastructure development, send clear demand signals to manufacturers to meet CO2 standards, and boost the second-hand EV market.

However, to fully deliver on its potential, the Regulation must raise the ambition of national targets, reconsider the exclusion of address heavy-duty vehicles (HDVs), and focus exclusively on Zero-Emission Vehicles (ZEVs). A supportive ecosystem of enabling conditions is also necessary alongside the Regulation.



1 Raise the ambition

While the proposed targets on corporate fleet are a welcome start, in many cases, they do not sufficiently deviate from "business-as-usual" trajectories. To effectively drive the decarbonisation of corporate fleets, we recommend increasing the targets in line with the commitments already being made by industry leaders in EV100

Moreover, the great disparity in proposed national targets risks a "multiple speed Europe", with a fragmented single market that would ultimately jeopardise multinational companies' efforts to manage uniform fleet

procurement. Allowing low ambition to persist in lagging markets risks locking in continued combustion engine sales precisely where corporate fleets dominate.



2

Reconsider the exclusion of heavy-duty vehicles (HDVs)

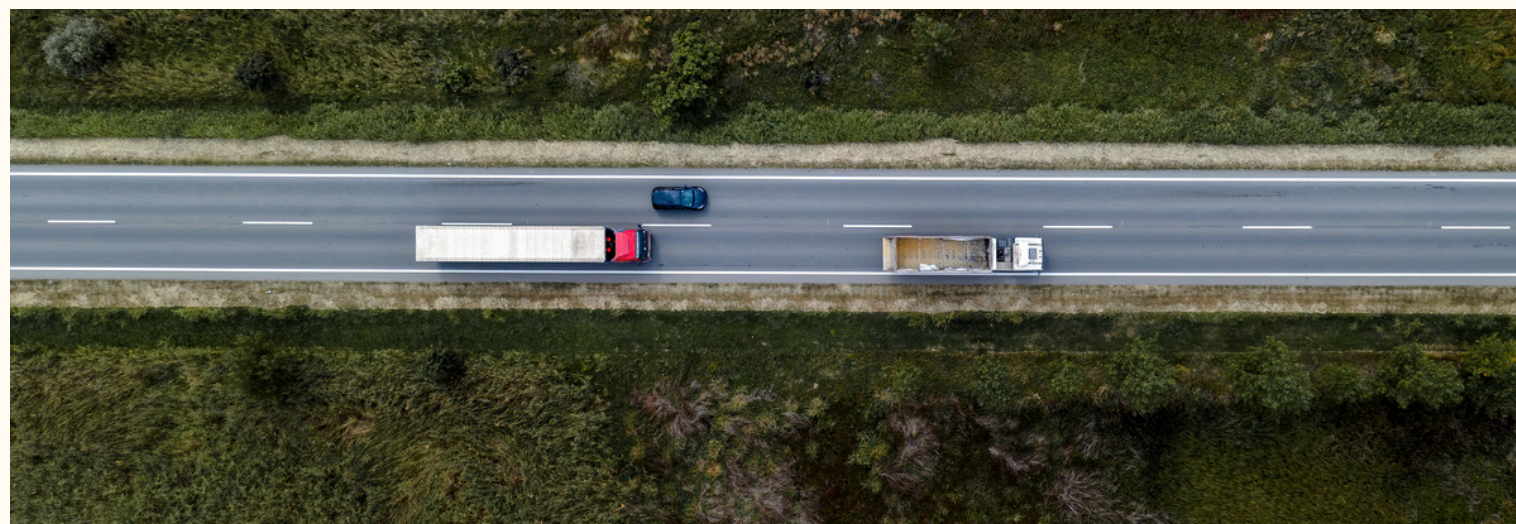
The current exclusion of HDVs from the proposal is a missed opportunity to decarbonise the backbone of European logistics.

A demand-side push for large fleet operators and shippers would support manufacturers in meeting the CO₂ targets set in the Regulation for MHDVs and accelerate the production of e-trucks.

Despite representing only 2% of the vehicles on EU roads, HDVs are responsible for over 28% of road transport CO₂ emissions and roughly 6% of total EU greenhouse gas emissions. A corporate mandate targeting the largest logistics buyers would yield a significantly higher "carbon return on investment" per vehicle replaced than the passenger car segment alone.

We call on legislators to address this key sector by requiring the European Commission to propose a demand-side Regulation for HDV fleets by 2027 in the framework of the revision of the Regulation on CO₂ targets for MHDVs. This should be guided by a revised impact assessment of such demand-side targets.

Binding zero-emission targets on HDVs would provide the investment certainty required for logistics companies to commit to long-term electrification and for energy providers to prioritise high-power charging at corporate depots and hubs.



3

Focus on zero-emission vehicles only

EV100 urges policymakers to set corporate fleet targets for ZEVs only – that is, vehicles with zero tailpipe emissions – therefore excluding low-emission vehicles such as Plug-in Hybrids (PHEVs) from being counted toward corporate mandate compliance

Low-emission vehicles are a "costly bridge to the past" that not only would undermine the scope of this Regulation but would also dilute climate efforts.

To secure Europe's clean transport future, policymakers must champion Battery Electric Vehicles (BEVs) as the most efficient and proven technology for zero tailpipe emissions. Regulatory support for low carbon fuels for road transport is

an inefficient use of scarce resources which are better allocated for hard-to-abate sectors such as aviation and maritime transport, where electrification is less viable.

Furthermore, we advise against continued reliance on PHEVs, as their real-world emissions exceed laboratory results, rendering them an unsuitable solution for clean transport.

4 Enable the ecosystem

Fleet targets are key drivers for zero-emission fleet transition. However, to unlock their full potential, the supportive ecosystem needs to be strengthened by ensuring:

- Reliable and consistent supply of ZEVs to enable companies to fulfill their clean fleet targets. Any weakening in the supply-side CO₂ targets would compromise the ability of corporate fleets to decarbonise at the required pace to achieve EU climate goals. Therefore, maintaining the existing CO₂ standards and a clear path towards 100% zero emission vehicle sales by 2035 is a key factor to ensure the success of this Regulation.
- Continue developing an accessible, reliable and ideally renewably powered charging infrastructure, including consistent implementation of the Alternative Fuel Infrastructure Regulation (AFIR).



- Strategic investment in resilient electricity grids, planning reform, and optimised smart charging infrastructure.
- Robust incentives for EV adoption at national level, including favourable taxation policies, addressed exclusively to ZEVs. A favorable taxation regime for corporate BEVs, specifically through Benefit-in-Kind (BiK), remains a decisive factor in corporate economic decision-making. Everyday incentives, such as the implementation of the Eurovignette exemption for zero-emission HDVs, can reduce operating costs and enable European fleets to deploy ZEVs at scale. Specific funding should be dedicated to the transition to ZEVs for SMEs that work closely with large companies.



Supporters





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EV100 is a global network of over 120 companies committed to decarbonising their entire fleet by only purchasing and/or procuring zero-emission (BEVs and FCEVs) cars and vans (up to 7.5 tonnes) by 2030, medium-duty vehicles (between 7.5 and 20 tonnes) by 2035, and heavy-duty vehicles (above 20 tonnes) by 2040.

