

POSITION PAPER

Eurovignette: extension of toll exemption for zero-emission vehicles

In the context of the upcoming EU Automotive Industrial Action Plan, CLECAT, the European Association for Forwarding, Transport, Logistics and Customs Services takes the opportunity to provide proposals to incentivise the shift to zero-emission heavy-duty vehicles. The revised [Directive 1999/62/EC](#) – the so-called Eurovignette Directive – provides an effective tool to reduce the operational costs of zero-emission vehicles, by allowing Member States to exempt them from road charges, until the end of 2025. However, considering the low uptake of zero-emission HDVs in the European road transport sector due to operational and financial constraints, CLECAT considers that this possibility should be extended.

This position paper advocates for extending this exemption in line with the CO₂ standards for heavy-duty vehicles, until 31 December 2030, to ensure a sustainable and economically viable transition to zero-emission freight transport across the European Union.

Background

The adoption of zero-emission vehicles in the heavy-duty sector remains critically low. Battery-electric trucks accounted for less than 2% of EU registrations in 2024, indicating a slow market penetration. Operational obstacles such as the lack of charging/refuelling infrastructure and corresponding grid connections, combined with financial barriers, including high purchase prices and a fragmented landscape of national subsidy schemes, limit the capacity of the logistics industry to successfully transition towards decarbonised road freight activities.

One of the main limiting factors for the increased use of zero-emission vehicles remains the lack of proper energy infrastructure to support their operational use of ZEV. This is not expected to reach the required level until the mid-to-long term. Despite the binding targets set by the Alternative Fuels Infrastructure Regulation (AFIR), the implementation of fast-charging stations along the TEN-T core network and hydrogen refuelling stations remains inconsistent and behind schedule. This lack of infrastructure undermines the operational feasibility of zero-emission trucks, which rely on accessible charging and refuelling options for long-haul transport.

High upfront costs, uncertainties about power charging possibilities and residual value continue to deter fleet operators from transitioning to these cleaner technologies. These vehicles face purchase costs that are two to three times higher than their diesel counterparts, and operators often have limited access to cost-effective financing mechanisms.

Reductions of road charges play a crucial role in offsetting the higher total cost of ownership for zero-emission trucks in comparison to diesel powered trucks. Removing them prematurely would disproportionately penalise early adopters and potentially stifle demand for zero-emission solutions, jeopardising the EU's emission-reduction targets. The objective should be to ensure ZEVs and related

transport services can swiftly become the preferred choice of transport operators and will be relatively more competitive than operations with conventional vehicles powered by fossil fuels.

Amendment to Eurovignette Directive

In light of these challenges, we propose to amend Article 7ga(1) of Directive 1999/62/EC to allow Member States to exempt zero-emission heavy-duty vehicles from road charges until **31 December 2030**. This extension aligns with the EU's climate goals while addressing the systemic barriers to decarbonising freight transport. It provides additional time for the development of charging and refuelling infrastructure, allows for increased market penetration of zero-emission vehicles, and maintains a crucial economic incentive for operators to transition to cleaner technologies.

To implement this extension, we propose the following amendment to the existing text of Article 7ga (1) of Directive 1999/62/EC:

*“Without prejudice to the reduction of rates provided for in paragraph 3, Member States may provide for reduced rates of infrastructure or user charges, or exemptions to pay infrastructure or user charges for zero emission vehicles of any vehicle group from 24 March 2022 until 31 December ~~2030~~ **2025**. From 1 January ~~2031~~ **2026**, such reductions shall be limited to 75% compared to the charge applicable to CO2 emission class 1, as defined in paragraph 2.”*

CLECAT considers that this proposed revision should be limited to this specific amendment, without prejudice to a more extensive review of the Eurovignette Directive in view of the introduction of ETS 2 for road transport in 2027.

Alignment with CO2 standards for HDVs

In addition, the possibility to exempt ZEV from road charges aligns with the CO2 emission standards for HDVs, set out in the revised [Regulation \(EU\) 2019/1242](#). The Regulation stipulates that CO2 emissions from new heavy-duty vehicles must be reduced by 45% by 2030 compared to 2019. Road charge discounts complement these goals by providing an additional economic incentive for the market ramp-up of zero-emission vehicles until 2030.

By combining regulatory requirements with financial incentives, ultimately proposing both supply- and demand-side measures, the EU can take a holistic approach which will accelerate the transition to emission-free technologies.

CLECAT remains at the disposal of interested parties for any further information.