

POSITION PAPER

CLECAT comments on the Automotive Package (Clean Corporate Vehicles, CO2 performance standards HDVs and LDVs)

CLECAT, the European Association for Forwarding, Transport, Logistics and Customs Services, is pleased to set out its comments on the European Commission's Automotive Package, adopted on 16 December 2025, and its implications for freight forwarders and logistics service providers, including:

- the proposal for a Regulation on Clean Corporate Vehicles,
- the targeted amendment to the CO₂ emission performance standards for heavy-duty vehicles (Regulation (EU) 2019/1242), and
- the proposal revising the CO₂ emission performance standards for cars and vans (Regulation (EU) 2019/631).

Whereas CLECAT supports the EU's climate objectives and the transition towards zero-emission road transport, we underline that measures affecting fleet renewal must be proportionate, deliverable in practice and aligned with enabling conditions, including vehicle availability, charging and refuelling infrastructure, grid capacity and total cost of ownership.

As CLECAT highlighted in its most recent [position paper on Clean Corporate Fleets](#), decarbonisation policies for road freight will only be effective if they focus on enabling investment and operational feasibility, rather than introducing prescriptive obligations that risk outpacing market and infrastructure readiness. These considerations remain highly relevant in the context of the Automotive Package.

1. Proposal on a Regulation on Clean Corporate Vehicles

CLECAT welcomes the Commission's decision to exclude heavy-duty vehicles (HDVs) from the scope of the proposed Regulation on Clean Corporate Vehicles. This exclusion reflects a realistic and evidence-based understanding of the current state of zero-emission technologies, infrastructure readiness and operational diversity in the heavy-duty transport segment. At this stage, extending corporate fleet obligations to HDVs would risk imposing disproportionate requirements on operators without the necessary enabling conditions in place and could ultimately slow, rather than accelerate, fleet renewal and decarbonisation.

CLECAT takes note of the Commission's indication that the exclusion of heavy-duty vehicles may be revisited in the context of future revisions of the CO₂ emission performance standards for heavy-duty vehicles. We consider that any such reassessment should be preceded by a transparent and evidence-based evaluation of charging and refuelling infrastructure availability, grid capacity, vehicle supply and total cost of ownership across different heavy-duty transport profiles.

The Commission's proposal for a Regulation on Clean Corporate Vehicles establishes national targets for the uptake of low- and zero-emission cars and vans in new vehicle registrations by large undertakings. The proposal introduces differentiated national targets based on GDP per capita, with target levels ranging from 28% to 52% by 2030 and up to 95% by 2035. CLECAT has a direct interest in

this initiative, as vans play a role in logistics operations, in particular in urban distribution and last-mile delivery.

From the perspective of freight forwarders and logistics service providers operating across borders, this proposal raises important internal market concerns. CLECAT underlines that the differentiated national targets and the scope of application; covering all large undertakings, including long-term leasing companies, risk leading to divergent national incentive schemes, fiscal measures and compliance conditions. This may result in distortions both between companies established in different Member States and between operators within the same sector at national level, depending on their corporate structure, leasing arrangements or place of establishment. For logistics operators active in multiple Member States, such fragmentation risks distorting competition and significantly complicating fleet planning and long-term investment decisions.

CLECAT further notes that while Member States already apply different incentive schemes today, the proposal risks reinforcing these divergences over time. In particular, the envisaged narrowing of incentives from 2028 onwards to zero-emission cars and light commercial vehicles only, based on a strict tailpipe-emissions definition, risks disadvantaging logistics operators that deploy plug-in hybrid and other low-emission van solutions which can deliver meaningful emission reductions in daily operations.

CLECAT underlines the importance of incentive frameworks that reflect well-to-wheel emission performance and recognise the contribution of transitional technologies and alternative fuels alongside zero-emission vehicles. Where eligibility criteria are defined too narrowly, incentive schemes risk overlooking solutions that provide tangible environmental benefits, thereby weakening investment signals and limiting technology diversity during the transition.

CLECAT further notes that the Commission's proposal relies primarily on Regulation (EU) 2023/1804 (AFIR) to ensure the availability of charging infrastructure. However, AFIR obligations are largely focused on public infrastructure and do not sufficiently address grid connection capacity, timelines for depot electrification and access to reliable and affordable electricity. In the absence of effective solutions to these constraints, corporate fleet obligations may place compliance risks on operators for factors beyond their control. CLECAT therefore considers that AFIF funding should structurally support depot charging infrastructure, including grid connections and on-site energy storage, as a necessary complement to AFIR obligations and a prerequisite for meeting corporate fleet requirements.

A final observation CLECAT wants to make is that the current proposal focuses almost exclusively on new corporate fleets, while paying insufficient attention to the functioning of the second-hand vehicle market. A healthy and predictable flow of electric vehicles from corporate fleets into the second-hand market is essential for broader market uptake and for reducing the overall cost of fleet electrification. At present, this flow is not yet functioning properly, resulting in relatively high depreciation costs for electric vehicles in the corporate segment.

2. Proposal for a regulation amending Regulation (EU) 2019/1242 as regards the calculation of emission credits for heavy-duty vehicles for the reporting periods of the years 2025 to 2029

CLECAT welcomes the Commission's proposal to introduce a narrowly scoped and temporary flexibility in the calculation of emission credits for manufacturers under Article 7(1)(a) and Annex I of Regulation (EU) 2019/1242 for the reporting periods 2025 to 2029. We support the pragmatic approach of the Commission's proposal, as the targeted flexibility proposed for the 2025–2029 period can contribute

to safeguarding deliverability in the short term. However, we consider it important that this adjustment does not modify the CO₂ reduction targets for 2030 and beyond.

CLECAT recalls that, at this stage of the transition, the main constraint on fleet renewal is no longer vehicle availability as such, but the uneven roll-out of heavy-duty charging and refuelling infrastructure, limited grid connection capacity, lengthy permitting procedures for depot electrification and significant disparities in energy pricing across Member States directly affect operating costs and undermine the business case for zero-emission heavy-duty vehicles. From an operator perspective, our members stress that investment in zero-emission heavy-duty vehicles becomes viable only where regulatory requirements are matched by favourable enabling conditions, notably vehicle availability, access to charging and refuelling infrastructure, sufficient grid capacity and predictable energy costs. Where these conditions are not yet in place, regulatory pressure risks creating investment hesitation rather than supporting effective fleet renewal.

The current slow uptake of zero-emission heavy-duty vehicles will therefore not be resolved by adjustments to the credit system alone. Accelerating deployment requires a coherent and firm policy framework that effectively addresses the enabling conditions for uptake, in particular the total cost of ownership, access to charging and refuelling infrastructure, and the availability of supportive financial incentives across all Member States.

3. Proposal for Regulation amending Regulation (EU) 2019/631 as regards CO₂ emission performance standards for new light duty vehicles (LEV's) and vehicle labelling

CLECAT welcomes the proposal revising Regulation (EU) 2019/631, in particular the introduction of additional compliance flexibilities and mechanisms that enhance technological and energy neutrality. The recognition of specific hybrid technologies, sustainable renewable fuels and material-related credits contributes to a more neutral and pragmatic framework.

While the revised CO₂ standards are formally addressed to vehicle manufacturers, their downstream effects are felt directly by freight forwarders and logistics service providers, which rely heavily on light commercial vehicles for urban and regional distribution.

CLECAT recognises that in several Member States the uptake of low- and zero-emission light-duty vehicles is increasing, supported by more advanced charging infrastructure, grid readiness and national incentive frameworks. However, this level of feasibility is not yet consistent across the EU. For logistics operators active in cross-border operations, uneven implementation risks distorting competition and complicating fleet planning within the internal market.

CLECAT underlines that, as with heavy-duty vehicles, the current uptake of low- and zero-emission light-duty vehicles will not be ensured by supply-side regulation alone. Effective deployment requires coordinated and EU-wide progress on enabling conditions, in particular access to charging infrastructure, grid capacity, predictable energy costs and supportive financial incentives, in order to ensure that compliance pathways remain feasible for commercial users operating in cross-border logistics chains.

The effectiveness of CO₂ standards for light-duty vehicles depends on coherent interaction with other Union instruments. Where charging infrastructure remains insufficient, grid connection timelines unpredictable or energy prices unstable, tighter vehicle standards risk constraining operational flexibility without delivering proportionate emission reductions.

Conclusions

CLECAT supports the EU's climate objectives and the transition towards zero-emission road transport. At the same time, the Automotive Package rightly recognises that effective decarbonisation of road freight depends on aligning regulatory ambition with operational reality across all vehicle segments. CLECAT particularly welcomes the Commission's decision to exclude heavy-duty vehicles from the scope of the Clean Corporate Vehicles proposal, reflecting current limitations in infrastructure development and market maturity, as well as the risk of disproportionate administrative burden. However, CLECAT underlines that differentiated national targets for cars and vans risk fragmenting the internal market if not accompanied by EU-wide enabling measures.

CLECAT also supports the Commission's pragmatic and time-limited approach to emission credit calculation in the targeted amendment of the CO₂ emission performance standards for heavy-duty vehicles. In relation to the revision of the CO₂ emission performance standards for LDV's, we welcome the increased technological and energy neutrality introduced through additional compliance flexibilities. Nevertheless, as with heavy-duty vehicles, CLECAT underlines that supply-side regulation alone will not ensure uptake. Uneven infrastructure deployment and grid constraints continue to affect feasibility for commercial users operating across borders, with direct implications for competition and fleet planning within the internal market.