September 2025

Response to the consultation on Clean corporate vehicles

Summary of recommendations:

- Transform this draft directive into a draft regulation, at least on the truck side.
- Provide for obligations on heavy goods vehicle fleets, based on shippers.
- Express the obligations to use zero-emission trucks in tonne-kilometers travelled.
- Set the following trajectory, consistent with the EU's 2040 climate target, whereas strict alignment with the "CO2 Heavy Goods Vehicle" Regulation appears insufficient:

Year	% of tonne-kilometers travelled with zero-emission trucks
2030	17,5%
2033	43%
2035	61%
2037	79%
2040	90%

France Hydrogène welcomes the consultation launched on 25 July by the European Commission on the greening of corporate fleets.

It is **imperative that this legislative initiative focuses in particular on fleets of heavy-duty vehicles** *(trucks, buses and coaches; this note focuses on this),* **representing around 6% of the EU's total GHG emissions. And particularly trucks**: they represent only 2% of the registered fleet, but account for a quarter of road transport emissions, i.e. 5.5% of the EU's total GHG emissions. It is therefore a **highly emissive segment, with a high level of controllability of the transition, and with limited cost impacts** (i.e. which can be transferred downstream, on the goods transported, in an almost transparent way, the transport item having on average a low weight in the added value of the products).

It is also **an industrial imperative**. European truck manufacturers are now well positioned, accounting for around 45% of the global market for trucks over 16 tonnes, with dominant players such as Volvo Trucks, Daimler Truck, MAN and Scania. But while Regulation (EU) 2024/1610 (known as "CO2 heavy goods vehicles") imposes a gradual increase in the share of low-emission vehicles in manufacturers' sales, this constraint could cause European manufacturers to lose up to 11% of market share by 2035[1] if parallel measures to create demand for zero-emission vehicles are not put in place.

Conversely, **implementing obligations to convert truck fleets to zero-emission would offer European manufacturers the visibility and market depth necessary to invest in zero-emission vehicle production lines** (which regulations on manufacturers alone do not allow), and thus to quickly increase competitiveness in these segments. Zero-emission conversion obligations on professional fleets also make it possible to have little or no recourse to public financial support for the decarbonization of these fleets, because the economic actors concerned – when all subject to the same measures on an equal basis – are able to absorb the related additional cost and pass it on to their product (e.g. goods transported), in acceptable levels.

In this context, **France Hydrogène makes four main recommendations**:

- **Transform this draft directive into a draft regulation, at least on the truck side: there is an industrial urgency to give visibility to European manufacturers**, so that they take the turn towards zero-emission vehicles and maintain their market share notably in the face of Chinese competition. The

[1] https://www.transportenvironment.org/te-france/articles/lindustrie-europeenne-des-camions-pourrait-perdre-jusqua-11-du-marche-de-lue-au-profit-des-rivaux-etrangers-selon-une-etude-du-bcg

delays in transposing a directive, and the inherent margins for transposition which would fragment the Single Market in a cross-border sector by nature, would be detrimental to European manufacturers who must regain visibility as quickly as possible. Moreover, for the overall credibility of the EU's climate and industrial action, it is imperative to send a strong market signal that manufacturers that have invested in zero-emission vehicle production lines will not be penalized for this (by not finding a market on the one hand; and, in the absence of a market for ZEV, on the other, perhaps seeing an ex-post cancellation of the manufacturers' obligations, thus rewarding the strategies of actors who are hindering the transition).

- **The obligations will have to be based on shippers**, economic actors best able to absorb and/or pass on the additional cost to downstream products (transported goods) and to lead, through their position, to a coherent reconfiguration of road freight in zero-emission terms. The certified monitoring will be done using the reporting tools already provided by the CSRD.

- The obligations will have to reflect and value the reductions in emissions and not only the number of vehicles converted: **the weighing for the calculation of avoided emissions will therefore have to be based not only on the type of vehicle** (payload, axles, etc.). as provided for by the VETCO software supporting the so-called "CO2 heavy goods vehicles" regulation**), but also on distance travelled, i.e. based on a metric of tonne-kilometers** (or passengers-kilometers in the case of coaches). Without such a weighting, the legislative initiative could miss its climate target, with a risk that conversions to ZEVs will be concentrated on average in the segments with the lowest mileage and therefore the least emission: of all trucks>16 tonnes, we estimate that those travelling more than 100,000 km/year represent only 28% of the fleet but 48% of emissions.

- The levels of obligations on the use of zero-emission trucks, expressed as a % of tonne-kilometers, will of course have to correspond **at least to the parallel obligations provided for on the offer ("CO2 heavy-duty vehicle" regulation).** But, given the average time it takes to renew fleets, **these obligations are not enough to align heavy goods vehicles with the Union's 2040 climate target**, even though this is a segment whose transition is particularly controllable.

  Thus, if we were to simply consider the obligation to sell new zero-emission heavy-duty vehicles from 2025 and transform it into a stock representing the tonne-kilometers transported in zero-emission (taking into account an annual renewal rate of 12%), the emissions of the fleets concerned would only be reduced by around 60% in 2040. **We therefore propose the following trajectory for the use of zero-emission trucks, expressed in tonne-kilometers**:

Year	Propositions, in % of tonne-kilometers travelled with zero-emission trucks	
	France Hydrogène	*Vs effects if alignment with the CO2 truck regulation (incompatible with the 2040 climate target)*
2030	**17,5%**	*14%*
2033	**43%**	*29%*
2035	**61%**	*38%*
2037	**79%**	*50%*
2040	**90%**	*61%*

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APPENDIX – Main sources and numerical models

Main sources:

- ACEA, Vehicles on European roads, 2023
- Note from the Council of Economic Analysis (CAE) "Decarbonising road freight transport", March 2025
- European Environment Agency, "Greenhouse gas emissions in transport", October 2024
- Global Markets insights, "Size of the European Heavyweight Market"
- Transport & Environment
- ICCT, A total cost of ownership comparison of truck decarbonization patways in Europe

Breakdown of emissions by segments:

Distribution of vehicles within trucks					
	Number of vehicles (fleet)	Share of vehicles in total trucks)	Share of total emissions from road transport	Respective GHG shares among trucks	Shares of total EU emissions
16-35 tons	2680000	42%	9%	24%	1,3%
>35 tons	3700000	58%	17%	76%	4,2%
Total	6380000	100%	26%	100%	5,5%

Analysis of the 16-35 tonnes category, segmented by usage profiles (average annual mileage)					
Annual mileage	% of the fleet 16-35 t	% of total truck fleet	Average value (thousands of km/year)	% of emissions on the 16-35 tonne category	% of total truck emissions
<50 000	40%	17%	35	24%	6%
50 - 100 000	55%	23%	70	66%	16%
100 - 130 000	5%	2%	115	10%	2%
Total	100%	42%	/	100%	24%

Analysis of the >35 tonnes category, segmented by usage profiles (average annual mileage)					
Annual mileage	% of the fleet>45t	% of total truck fleet	Average value (thousands of km/year)	% of emissions on the category >35 tonnes	% of emissions on total Trucks
<100 000 km/an	55%	32%	75	40%	30%
100 - 150 000 km/h	35%	20%	125	42%	32%
>150 000 km/h	10%	6%	190	18%	14%
Total	100%	58%	/	100%	76%

Summary on long-distance trucks (>100,000km/year)	
Share of the truck fleet	28%
Share of GHG trucks	48%

Fleet renewal:

Considering an average fleet renewal time of 8.4 years (source: T&E), or an annual renewal rate of around 12%.

Below, a model of the impact on emissions (or ZEV stock) if truck fleets were renewed (12%/year) by including in the renewed share a % of ZEV trucks equal to the obligation that applies in parallel to manufacturers on their sales of heavy goods vehicles (*methodological simplification, postulating that 1% of ZEV sales is equivalent to 1% of tonne-kilometers spent in ZEV*).

It can be seen that this leads to a result that is largely insufficient in terms of the EU's 2040 climate target.

In a second table, we propose a trajectory that leads to a level of tonne-kilometers travelled in ZEV in 2040 of 90% (right-hand column "ZEV stock"), compatible with the Union's climate target. In the left-hand column ("% of ZEV switching to the share renewed during the year") we simulate what this level of obligation on the stock (since this is what we propose to regulate via chargers) induces for manufacturers' sales.

Simulation of the conversion of the fleet to zero emissions if strictly parallel to the obligation on manufacturers (with a starting point of 0% ZEV in stock)			
Year	% of transition to ZEV on the share renewed during the year	% of the fleet acquired in ZEV over the year	% of the ZEV fleet: stock
2025	15%	1,8%	1,8%
2026	15%	1,8%	3,6%
2027	15%	1,8%	5,4%
2028	15%	1,8%	7,2%
2029	15%	1,8%	9,0%
2030	45%	5,4%	14,4%
2031	45%	5,4%	19,8%
2032	45%	5,4%	25,2%
2033	45%	5,4%	28,8%
2034	45%	5,4%	32,4%
2035	65%	7,8%	38,4%
2036	65%	7,8%	44,4%
2037	65%	7,8%	50,4%
2038	65%	7,8%	52,8%
2039	65%	7,8%	55,2%
2040	90%	10,8%	60,6%

Simulation of the conversion of the fleet to zero-emission with the application of additional factors from 2030 (compared to the CO2 RGMT for heavy goods vehicles), to be consistent with the 2040 climate target.

Year	% of transition to ZEV on the share renewed during the year	% of the fleet acquired in ZEV over the year	% of the ZEV fleet: stock
2025	15% (in line with the RGMT manufacturers)	1,8%	1,8%
2026	15%	1,8%	3,6%
2027	15%	1,8%	5,4%
2028	15%	1,8%	7,2%
2029	15%	1,8%	9,0%
2030	70% (additional factor of 25% compared to the RGMT CO2 trucks)	8,4%	17,4%
2031	70%	8,4%	25,8%
2032	70%	8,4%	34,2%
2033	90%	10,8%	43,2%
2034	90%	10,8%	52,2%
2035	90%	10,8%	61,2%
2036	90%	10,8%	70,2%
2037	90%	10,8%	79,2%
2038	Transition to 100%	12,0%	82,8%
2039	100%	12,0%	86,4%
2040	100%	12,0%	90,0%