Position paper The Netherlands – Clean Corporate Vehicles

The Netherlands welcomes the announcement of a legislative proposal on Clean Corporate Vehicles before the end of 2025. This legislation comes at a crucial time for the EU automotive sector and is a concrete follow-up of the *Industrial Action Plan for the European automotive sector*. A legislative proposal on corporate vehicles is needed to accelerate the uptake of zero-emission vehicles (ZEV), increase the supply of second-hand electric vehicles, and reduce the overall EU transport emissions. The EU legislative proposal on Clean Corporate Vehicles should therefore complement existing EU-measures by providing demand stimulation. As such, it would additionally support the EU automotive industry in increasing their global competitiveness and meeting their emission reduction targets.

Potential for light-duty vehicles (LDVs)
More than half of all new light duty vehicles are registered to corporate fleets. In 2024, 34,9% of all new sales of passenger cars in the Netherlands was fully battery-electric[1] and 11,2% of all new light commercial vehicles.[2] The share of fully battery-electric corporate passenger cars was 39,2%.[3] The potential of electrification of corporate fleets, mostly applies to the short term (2026-2035) considering the 100% emission free reduction of the sales of new light duty vehicles per 2035.[4] Swift action from the European Commission on this proposal is therefore important to fully utilize the emission reduction potential ahead of 2035.

Potential for heavy-duty vehicles (HDVs)
Nearly all purchase of heavy-duty vehicles are done by companies. In 2023, the freight transport sector was responsible for nearly a quarter of the CO_2-emissions of the mobility domain in the Netherlands. In the Netherlands the uptake of ZEVs is rapidly growing and already accounts for 8% of all newly registered HDVs in 2025. The high uptake rate can be attributed to strong national demand stimulating policies, such as the introduction of zero-emission zones in 28 large municipalities in 2025, the introduction of a truck toll in 2026, and purchasing subsidies, as well as supporting policies for the roll-out of charging and hydrogen refueling infrastructure. Yet, while the demand for heavy-duty ZEVs is rising in the Netherlands, the uptake rates across Europe lag behind, resulting in an uneven market and playing field. Since freight transport is a predominantly international market with a large share of the trips being cross-border transport, the European transport market would benefit from an EU-harmonized measure to stimulate the demand of heavy-duty ZEVs. This measure could focus on large shippers or carriers which are responsible for most CO_2-emissions and in many cases already have high CO_2-reduction ambitions.

Scope
To ensure emission reduction targets are met, the Netherlands argues that the Clean Corporate Vehicles-measure should apply to all corporate road vehicles, ranging from light-duty vehicles (passenger cars and vans) to heavy-duty vehicles (e.g., trucks and coaches) (i.e., all M and N-category vehicles), with minimal exceptions. As a result, the Clean Corporate Vehicles-measure provides market certainty to vehicles manufacturers and their suppliers with regard to light-duty and heavy-duty ZEVs. As already stated in the input to the public consultation and in a previous letter to the Commission, the Netherlands asks the Commission to research the impact of different design options for demand stimulation for both light and heavy ZEVs. The Commission should assess the expected available supply of ZEVs in line with the CO2 emission standards for light-duty (CO2-LDV) and heavy-duty vehicles (CO2-LDV).

Objective
The Netherlands urges the Commission to maximize both the uptake of ZEVs and the CO_2-emission reduction in the road transport sector by means of legislation. The Commission should pay attention to the different markets for the abovementioned categories and vehicle types. The measure should maximize benefits for the general public and SME's by increasing the availability of second-hand ZEVs and let end-users reap the benefits of lower operating costs of ZEVs. This would speed up the decarbonization of road vehicles in the EU and contribute to a fair transition.

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[1] Rijksdient voor Ondernemend Nederland (RVO) and Revnext (8 juli 2025), *Trendrapport Nederland markt personenauto's (Editie 2025)*, p. 5.
[2] RVO and Revnext (1 november 2024), *Trendrapport Lichte Bedrijfsvoertuigen: Overzicht van ontwikkelingen tot medio 2024*, p. 9
[3] RVO and Revnext, *Trendrapport (Editie 2025)*, p. 13.
[4] Revnext (11 juli 2025), *Syntheserapport: naar een nieuw evenwicht in de autobelasting*, p. 6.

Criteria for an effective measure
The Netherlands argues that any effective measure on Clean Corporate Vehicles should adhere to the following criteria:

- Any EU measure should ensure a level-playing field by creating a baseline for all EU Member States, whilst being in line with the EU's international trade commitments. This is particularly important considering the cross-border nature of freight transport and trade in second-hand vehicles. EU measures would avoid competitive disadvantages for companies from one member state to another.
- The EU measure should not lead to unintended distortion of the market and ensure that producers of ZE-vehicles are still motivated to lower overall prices and increase the supply of ZE-vehicles as intended through both CO2-LDV and CO2-HDV.
- Any proposed measure should be accompanied by an impact assessment on different design choices and substantiated reasoning on the effectiveness of the measure. Additionally, the impact assessment should ensure that measures are proportional and based on objective criteria, whilst avoiding unnecessary barriers to trade.

Relation to other EU-measures on emission reduction for road transport
An EU-regulation on clean corporate vehicles should complement existing EU-measures and should by no means substitute, lower or contradict them. Maintaining existing EU-measures for the EU automotive sector (such as CO_2-emission standards for cars, vans, and trucks, the AFIR-targets and the Clean Vehicles Directive) and the effective introduction of ETS-2 per 2027 is indispensable. All these measures are needed for reaching the EU climate targets and for increasing the competitiveness of the EU automotive sector.

An EU-measure on Clean Corporate Vehicles would create the enabling conditions for vehicle producers to meet the CO_2-emission standards for light- and heavy-duty vehicles. The Netherlands argues that the automotive industry – and the entire value chain – primarily benefit from stable transition enabling standards that are predictable, ensure certainty of investment for first-movers, and create a level playing-field.

The Netherlands is working on a tax incentive for employers ("*pseudo-eindheffing*") for an increased uptake of emission-free cars. Under the proposal employers would pay a tax of 12% of the catalog value of any fossil fuel powered passenger car that they provide to employees. Emission-free vehicles are exempted from this tax. If implemented, the measure would take into effect per 1 January 2027 for any newly provided passenger cars and 1 July 2030 for existing passenger cars that have already been provided to an employee (including lease contracts). Although the Netherlands and other member states are developing fiscal measures (which remains a national competence), establishing an EU-wide norm-setting measure for corporate fleets should provide the required impetus for the abovementioned objectives and criteria and ensure a level playing field in the EU. Ideally, national (fiscal) measures should be complemented and reinforced by an EU-wide measure.