

***FinMobility, which represents the Finnish road transport sector at the EU level, welcomes the opportunity to contribute to the forthcoming **Clean Corporate Vehicles** initiative and presents the following position.***

### **General Position**

Any proposal for mandatory investments and acquisitions of ZEV company vehicles is not supportable. It represents a clear case of double regulation, which reduces the cost-effectiveness of existing legislative measures already serving the same purpose. Instead of binding obligations, progress should be achieved through incentives and support mechanisms that allow companies to adapt in the most efficient manner. We encourage finding additional means to promote the acquisition and use of zero-emission vehicles, rather than imposing obligations targeted at companies. For example, member states receive significant revenues from ETS2 emissions trading, and allocating these as purchase subsidies and investment support for charging infrastructure would promote the clean transition in transport.

### **The Need for a Technology-Neutral Approach**

A future-oriented policy framework must remain technology-neutral. Limiting the focus to electricity and hydrogen would risk excluding other innovative low- and zero-emission solutions, such as renewable liquids and fuels. All viable technologies should be allowed to compete on equal terms, without discrimination, enabling the most cost-effective and practical solutions to emerge in different sectors and applications.

### **Incentives Through Regulatory Flexibility**

To further encourage the uptake of zero-emission vehicles and fuels, the legislative framework should include the possibility of easing regulatory burdens on such alternatives. Reducing compliance requirements for zero-emission solutions can provide a meaningful incentive without imposing disproportionate obligations on companies.

### **Infrastructure as a Prerequisite for Transition**

The rapid and balanced development of charging and refuelling infrastructure is as critical for a successful transition. Without adequate and geographically equitable infrastructure for alternative powertrains and fuels, the transition to low- and zero-emission vehicles cannot progress efficiently. Infrastructure development should therefore be treated as a priority in parallel with vehicle policy measures.

### **Existing Measures Already Provide Comprehensive Guidance**

The combination of the CO<sub>2</sub> emission performance standards for vehicle manufacturers and the emissions trading system for transport fuels already provides strong and comprehensive incentives to

improve the environmental performance of both the vehicle fleet and the energy used. Introducing an additional initiative to “green” corporate vehicles would not increase the overall number of low-emission vehicles in the market. Instead, it would distort demand by steering low-emission vehicles into a specific segment, regardless of their suitability for the intended purpose. This would inevitably increase costs compared to a situation in which demand for low-emission vehicles is guided freely by the existing CO<sub>2</sub> framework for manufacturers.

### Limitations in Heavy-Duty Vehicle Segments

It must be acknowledged that there are heavy-duty vehicle categories for which zero-emission solutions will not be viable in the foreseeable future. For example, very heavy timber truck combinations operating under extremely demanding conditions in Northern Europe are not compatible with current or near-future zero-emission technologies. Imposing obligations in such cases would be disproportionate and impractical.

### Required Scope Limitations if the Proposal Advances

If the Commission decides to proceed with the proposal despite these concerns, the scope of company obligations must be carefully limited. Trucks that are not subject to VECTO calculations should be excluded entirely. Furthermore, within the VECTO framework, EHC-type vehicles as well as vehicle subgroups 11, 12, and 16 should be excluded from the scope of the proposal.

### Conclusion

***The proposed mandatory measures would not provide added environmental benefits compared to existing EU regulations but would instead impose unnecessary costs and market distortions. A more effective approach would be to support the transition through technology-neutral incentives, targeted regulatory relief for zero-emission solutions, and accelerated infrastructure development.***

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