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LIMITE

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° Cion doc.:	17016/1/25 REV1 + ADD1 REV1 + ADD2
Subject:	Proposal for a Regulation of the European Parliament and of the Council on clean corporate vehicles - Comments from Spain

Delegations will find, attached, comments and questions from **Spain** on the above-mentioned proposal.

Written comments and questions from Spain on the corporate fleet's proposal, presented at the WP on Land Transport January 2026

The Spanish authorities welcome the corporate fleets proposal as it may contribute to driving demand for electric vehicles, as well as to expanding the second-hand market for such vehicles. While continuing its analysis, the Spanish authorities would like to ask the Commission the following questions:

- Considering that the Impact Assessment indicates that this proposal will not lead to an increase in registrations of European vehicles in relation to compliance with the CO₂ standards Regulation, is the EU fleet target sufficient to achieve the emission reductions required of manufacturers under the Light-Duty Vehicles Regulation?
- Why does the Commission focus on low- and zero-emission vehicles when the most effective technology to decarbonize the transport sector is electric vehicles, also considering that large companies face no financial barriers to purchasing these technologies?
- The proposed fleet Regulation covers zero- and low-emission vehicles. Considering that, under Regulation (EU) 2019/631, such vehicles are defined as those emitting less than 50 g CO₂/km, which PHEV and REEV models currently on the market would be eligible to fall under this category?
- Why does the Commission focus on low and zero emissions vehicles when the most effective technology to decarbonize the transport sector are electric vehicles, also taking into consideration that big companies have no financial barriers to acquiring this technology?
- As in article 4 it is said that only Made in the EU vehicles may benefit from financial support from Member States, has the Commission assessed whether the concept of 'Made in the EU' entails any commercial risk, as pointed out by the Council Legal Service?
- The proposal makes public support conditional, as of 2028, on vehicles being "Made in the EU". Has the Commission assessed the impact this will have on vehicle affordability? This is particularly relevant in the context of Member States' social leasing schemes, as the impact on lower-income households could be significant.
- Why does the proposal envisage allowing European companies to continue investing in innovation for PHEV and REEV technologies beyond 2035 on the premise of their use in third-country markets? What is the rationale for including such a provision in a proposal concerning corporate fleets?
- The proposal introduces new obligations for Member States, such as reporting data on electric vehicle acquisitions by large companies. Is there currently any EUROSTAT statistical operation that collects this information?
- In the Impact Assessment, it is mentioned that one of the monitoring indicators will be the number of zero- and low-emission vehicles in the second-hand market. Is there currently any EUROSTAT statistical operation that collects this data?