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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 Romania

Delegations will find, attached, comments from **Romania** on the above-mentioned proposal.

Romanian position on the Proposal of a Regulation on clean corporate vehicles

We welcome the European Commission's proposal establishing national targets for greening corporate fleets, aligned with the EU decarbonisation trajectory and with clear objectives for 2030 and 2035, as well as the explicit distinction between passenger cars and light commercial vehicles.

1. Distinction between passenger cars and light commercial vehicles – an essential element

We consider it essential to maintain the distinction between passenger cars and light commercial vehicles, as:

- market realities and usage patterns differ;
- the speed of adoption of zero-emission vehicles varies between segments;
- production capacities and available supply in Europe differ significantly between the two categories.

A uniform approach would risk creating structural imbalances and disproportionate effects on certain economic sectors.

2. Level of targets – need for alignment with market realities

We underline that the setting of targets must:

- be consistent with national market realities;
- be aligned with the CO₂ emission standards Regulation;
- be based on updated impact assessments.

Setting excessively ambitious targets may lead to a slowdown in fleet renewal rates; reluctance among fleet managers to accelerate the uptake of electric vehicles; pressure on Total Cost of Ownership (TCO); incompatibility with certain operational use cases.

Such a scenario could result in lower sales and ageing vehicle fleets, contrary to the decarbonisation objective.

3. Impact on SMEs – relevant indirect effects

From Romania's perspective, it is relevant that the scope of the obligations applies exclusively to large enterprises, excluding SMEs, in line with the principle of proportionality and the need to avoid imposing excessive administrative and financial burdens on this segment.

However, although SMEs are not directly subject to compliance obligations, the proposal may generate significant indirect effects on the business environment, particularly through:

- the transmission of cost pressures in commercial relationships between large enterprises and SME suppliers/subcontractors (logistics, distribution, mobility services);
- influencing access to financing conditions and leasing/rent-a-car policies, including for fleets operated by SMEs;
- reshaping demand and supply dynamics in the second-hand vehicle market, affecting SMEs that predominantly purchase used vehicles, given their sensitivity to Total Cost of Ownership (TCO).

4. National targets for Romania

According to the Annex to the proposal, differentiated targets are established for Romania for passenger cars and light commercial vehicles, starting in 2030 and 2035:

- Corporate passenger cars (large enterprises): from 2030: 48% (ZEV+ZLEV), of which at least 31% ZEV; from 2035: 67% (ZEV+ZLEV), of which at least 56% ZEV.
- Corporate light commercial vehicles (large enterprises): from 2030: 28% (ZEV+ZLEV), of which at least 25% ZEV; from 2035: 67% (ZEV+ZLEV), of which at least 56% ZEV.

However, Romania is in the early stages of electrification of the road transport market and would need significantly lower targets. Taking into consideration the limited progress with the implementation of AFIR, *we would prefer that no targets are set for the time being, and they be defined through an implementing/delegated act at a later date. Similarly to Bulgaria, Romania would prefer to work further on fiscal incentives for greening corporate fleets. If the targets are set out in the regulation, we consider it very important that Member States should not be penalized for failing to achieve them.*

5. Article 4 – financial and fiscal support framework

Article 4 is of major relevance from a business perspective, as it establishes a framework for directing financial and fiscal support measures associated with the transition to zero- and low-emission corporate vehicles, with direct implications for Total Cost of Ownership (TCO) and acquisition/leasing decisions by economic operators concerned.

It is essential that national financial and fiscal support measures implementing Article 4 be designed in a predictable and proportionate manner, enabling investment planning by economic operators and avoiding market distortions, particularly in Member States with cost-sensitive markets. Moreover, calibration of support should be aligned with the availability of charging infrastructure, as stimulating the acquisition of ZEV/ZLEV vehicles in the absence of adequate operational conditions may lead to increased costs and uneven implementation.

6. Indirect effects of phasing out support for non-ZEV/ZLEV vehicles

Given that the proposal envisages the gradual phasing-out of public incentives for corporate vehicles not classified as ZEV/ZLEV, careful assessment of indirect effects on SMEs is necessary, including:

- potential increases in outsourced service costs (logistics, distribution, mobility services);
- changes in leasing and rent-a-car market conditions;
- additional pressure on the second-hand market, given SMEs' significant reliance on competitively priced used vehicles.

Although SMEs are excluded from the direct scope of the Regulation, support mechanisms and conditionalities under Article 4 may generate indirect effects through:

- cost transfer to suppliers/subcontractors in commercial relations with large enterprises;
- changes in market conditions in the leasing/rent-a-car segment;
- increased pressure on the second-hand market, where availability and affordability are key investment determinants for SMEs.

In this context, it would be appropriate to allow Member States sufficient flexibility to adopt support measures calibrated to national market specificities, including infrastructure availability and the capacity to absorb initial investment costs.

7. "Made in EU" conditionality

With regard to the “made in EU” conditionality for eligibility of public support, the methodology is to be established through delegated acts of the Commission. From a business perspective, this approach may generate:

- legal and operational uncertainty for authorities implementing support schemes;
- reduced predictability for economic operators (large enterprises, leasing companies, suppliers), in the absence of minimum criteria defined in the basic act;
- risks of competitive distortion regarding access to competitively priced vehicles, particularly in Member States with cost-sensitive markets.

For the time being, the article 5 concerning the Exercise of delegation is not very clear. The scope of the mandate of the Commission to adopt delegated acts is missing and it is not clear if it refers to the targets in the Annexes or further details concerning *Made in EU*.

8. IT solutions for the federation of data

Since the proposal was launched, the Commission keeps on arguing that data exist in each Member State concerning corporations/large undertakings vs SMEs (tax authorities), national registration databases (Police) etc. However, the registers existing in different authorities are not interoperable and do not communicate with each other. Much less do they communicate with the environmental authorities.

Since the suggestion to involve EUROSTAT in data processing was considered as adding administrative burden, are there any plans on the Commission side to develop IT tools for the interconnectivity of these national registers?