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LIMITE

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WORKING DOCUMENT

From: To:	General Secretariat of the Council 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 Slovakia

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

INTERNÉ

SK COMMENTS AND QUESTIONS ON THE PROPOSAL FOR A REGULATION AND THE IMPACT ASSESSMENT - CLEAN CORPORATE VEHICLES

Slovakia welcomes the opportunity to provide written comments and questions on the proposal for a regulation and the impact assessment accompanying the Clean Corporate Vehicles Regulation Proposal. Slovakia maintains a scrutiny reservation.

1. Life-cycle emissions (LCA)
How has the Commission accounted for the full life-cycle emissions of corporate vehicles — including vehicle and battery manufacturing, electricity generation and end-of-life treatment — given the current reliance on tailpipe CO metrics?
A sole focus on tank-to-wheel emissions may overlook the significant environmental footprint of battery supply chains and could result in burden-shifting to non-transport sectors.

2. Energy mix (EU vs. national level)
With reference to the analytical methods described in Annex 4, why does the impact assessment rely on an EU-average electricity mix rather than on granular Member State-specific data, which varies significantly across the Union?
The use of an aggregate average may obscure the situation in Member States where a high share of fossil fuels in the power sector could result in zero-emission vehicles having a higher carbon footprint than anticipated.

3. Emission shifting between sectors
How has the Commission ensured that this measure leads to a genuine net reduction in greenhouse gas emissions rather than merely shifting the emission burden from the road transport sector to the power generation sector?
This consideration is particularly relevant in the context of the ETS2 system, as the absence of cross-sectoral analysis could lead to sub-optimal climate outcomes in certain regions.

4. Rebound effect (increased usage resulting from lower operating costs)
Why does the impact assessment not include an analysis of the 'rebound effect', whereby lower operating costs of zero-emission vehicles may incentivise increased mileage and more intensive vehicle use?
The omission of this economic phenomenon could lead to an overestimation of the actual CO reductions achieved through the transition of corporate fleets.

5. Review / Update of the impact assessment
Is the Commission committed to conducting a formal review of the impact assessment should real-world evidence during implementation demonstrate lower-than-expected environmental benefits?
Such a mechanism would be essential to ensure that policy interventions remain proportionate and evidence-based, particularly in light of evolving electricity mixes and material constraints.

6. ESG considerations
Did the Commission consider whether existing ESG-driven fleet decarbonisation measures implemented by companies might reduce the marginal environmental benefit of the proposed regulation?
Specifically, how was the baseline scenario adjusted to reflect voluntary corporate commitments, and does the impact assessment avoid potential double-counting of emission reductions that would have occurred in the absence of this legislative intervention?

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7. Secondary vehicle market

Did the Commission assess the expected mileage and remaining service life of corporate vehicles entering the secondary market, and how was consumer acceptance of high-mileage zero-emission vehicles reflected in the impact assessment, particularly in relation to their contribution to lifecycle emission reductions?

8. Statistics of corporate fleets

Can the Commission provide us with the most recent statistical data on the corporate fleets per Member State?

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