

Brussels, 18 November 2024

## Joint Industry Statement on the EU Consultation on the Greening of Corporate Fleets

The signatories representing the postal, express integrator, transport and logistic sectors welcome the opportunity from the European Commission to provide feedback and reaction to the potential initiative on the Greening of Corporate Fleets. It is undebatable that there is a need to decarbonise transport operations, reflected in the decarbonisation efforts already taken by the signatories of this letter. Nonetheless, a number of hurdles currently prevent true progress in sustainable transition, particularly in the transition to zero emission vehicles (ZEV). Whilst support in the form of financial tools and fiscal incentives such as reduced vehicle registration fees, favourable tax treatment, and purchase grants are crucial for encouraging the adoption of ZEV across all sectors, the pursuit and implementation of **mandatory purchase targets of zero-emission vehicles must be avoided** in order to effectively and efficiently expediate the achievement of zero emission transport.

It is strongly believe that the introduction of mandatory purchase targets not only presents an ineffective policy tool in the collective effort to reduce emissions, but could result adverse impacts on companies transitioning to more sustainable alternatives. For example, the purchase of ZEV continues to pose a significant financial burden on companies when compared to conventional or low-carbon alternatives. The introduction of mandatory purchase targets would simply not address this problem and may even artificially maintain or inflate high prices. Such consequences places operators, in particular SMEs, under significant financial duress, or redirects resources into less effective carbon reduction endeavours.

Moreover, and crucially, key energy infrastructure needed to support the operational use of ZEV is currently not ready, and is not expected to be at the required level until the mid-to-long term. In a number of regions, significant levels of grid congestion restricts any additional electricity from being drawn from national grids. Additionally, long permitting times reduce the ability for operators to install and implement necessary upgrades grid connections and charging infrastructure at depots, significantly restricting the number of possibilities to recharge fleets; this also increases the total cost of ownership of such vehicles as the cost of electricity at public charging facilities tends to more expensive than depot-based solutions. Ultimately, the introduction of mandatory targets without addressing the serious enabling infrastructure challenges would force operators to purchase vehicles without the ability to use them. Not only will this come at a substantial cost, but it would also reduce the effectiveness, efficiency, and competitiveness of European operators.

Finally, the availability of zero emission solutions must also be considered within the discussion of greening corporate fleets. Whilst the availability of some types of ZEV should improve in the coming years, current levels remain limited. This is particularly apparent for small vehicle sectors in which there are is less focus. Such limitations contribute to transition limitations experienced within the transport sector.

The undersigned parties would once again like to thank the European Commission on the opportunity to contribute to the policy discussion around this topic, and continue to express their support for the decarbonisation of transport. However it must be emphasised that any potential policy initiative in this area must truly reduce the cost of ZEVs, in addition to being aligned with the necessary energy infrastructure and vehicle availability across all modes.

## About signatories

**PostEurop** is the association which represents European postal operators since 1993 and is officially recognised as a Restricted Union of the [Universal Postal Union \(UPU\)](#). It is committed to supporting and developing a sustainable and competitive European postal communication market accessible to all citizens and ensuring a modern and affordable universal service. Its 53 Members employ 1.6 million people and deliver billions of items annually to over 295 million homes and 48 million companies across Europe.

**European Association for Forwarding Transport Logistics and Customs Services (CLECAT)** represents the interests of more than 19.000 companies employing in excess of 1.000.000 staff in logistics, freight forwarding and customs services. Multinational, medium and small freight forwarders and Customs agents are all within its membership, making the organisation the most representative of its kind.

**European Express Association (EEA)** represents express delivery companies and associations, both large and small, in Europe. By communicating on behalf of the express industry with one single voice, the EEA works to ensure that policy-makers fully understand the challenges we face as an industry and as a result, that policy is implemented in a way which maximises the benefits for all involved.