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EBA response to the Call for Evidence for a Regulation on Clean Corporate Vehicles

The transport sector contributes around a quarter of the EU's total greenhouse gas emissions, mostly from road transport. While current EU policies are helping to ameliorate this, achieving climate neutrality by 2050 will require a technology-neutral approach that supports all viable pathways. Biomethane offers one of the few immediately deployable alternatives for long-distance, high-demand transport segments, with life-cycle emissions reductions reaching up to 55% with partial blends, and even net-negative emissions with 100% bio-LNG, depending on the feedstock[1]. This makes biomethane a crucial tool for Europe's transport strategy. As corporate fleets account for around 60% of car registrations and nearly 100% of vans, buses, and trucks in Europe[2], decarbonising this segment while using all sustainable pathways, including carbon neutral fuels, can significantly influence the fleet market.

The European Biogas Association (EBA) welcomes the European Commission's initiative to decarbonise corporate vehicles as a strategic step towards climate neutrality. Corporate fleets account for a large share of new vehicle registrations, and due to their frequent renewal and intensive use, they can accelerate the transition to cleaner mobility.

EBA raises its concerns towards the current regulatory approach to account for emissions using a Tank-to-Wheel methodology instead of a full Well-to-Wheel assessment. This approach does not allow for a complete assessment of the environmental impact of a given fuel. Conversely, a Well-to-Wheel assessment shows biomethane to be a high performer in terms of GHG emissions reduction in transport. In fact, biomethane is a CO_2-neutral fuel that is already helping decarbonise transport, especially in the light- and heavy-duty segments. It can deliver net-negative emissions on a Well-to-Wheel basis and is fully compatible with existing infrastructure and vehicle technologies.

Europe is the world leader in biogas and biomethane production and continues to expand its use of compressed and liquefied biomethane as transport fuels, with over 2,100 bio-CNG and bio-LNG stations today [3]. This makes biomethane one of the most cost-competitive biofuels available. Being chemically identical to natural gas, it can be seamlessly used in existing CNG and LNG vehicle engines and infrastructure without additional investment. Its compatibility with the existing gas grid and refueling network, positions it as a highly scalable solution for transport decarbonisation. Overall, biomethane can significantly reduce greenhouse gas emissions, and thanks to existing certification schemes that track its use from well to wheel, vehicles fueled by biomethane can be recognised as zero-emission vehicles through certificates that disclose both the renewable attribute of the fuel and its emissions-saving potential.

However, the current focus on tailpipe emissions in discussions on the Clean Corporate Vehicles regulation fails to reflect the true climate impact of fuels. Thus, the EBA urges the Commission to apply a Well-to-Wheel GHG accounting approach within this regulation ,consistent with other legislations such as the CountEmissionsEU framework, which accounts for emissions from both vehicle use and energy provision[4]. Recognising Well-to-

[1] EBA (2023) Biogases Beyond Energy: Transport
[2] European Commission (2025) Greening corporate fleets COM(2025)96
[3] EBA (2023) Statistical report
[4] European Commission (2023) Regulation 2023/0266

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Wheel emissions is essential to capturing the full value of renewable and low-carbon fuels. The CO_2 standards regulations for cars, vans[5], and for heavy-duty vehicles[6] already mandate the development of methodologies to account for CO_2-neutral fuels by 2025. In addition, biomethane produced in compliance with the Renewable Energy Directive sustainability criteria offers a scalable and cost-effective path to immediate emission reductions. Therefore, the Clean Corporate Vehicles regulation must align with this direction.

As industry representatives are also raising concerns towards rigid and binding targets for large fleet operators, such as mandates and quotas, EBA shows concerns towards regulatory approaches to Zero Emission Vehicle (ZEV) mandates that could limit solutions to only certain categories of vehicles, such as battery electric vehicles and hydrogen fuel cell vehicles. Given the current state of infrastructure deployment and the limited availability and affordability of electric heavy-duty vehicles suited for long-haul or high-payload operations, specific ZEV mandates would disproportionately impact logistics and freight companies. Such a narrow scope contradicts the principle of technology-neutrality and risks excluding effective and already available alternatives such as biomethane. While operators are committed to decarbonisation, mandatory quotas without the right enabling conditions can firstly hinder progress rather than accelerating it, and second, can fail to consider the disproportional economic effect on smaller operators, thereby putting an economic burden on low-margin economic actors. The EBA thus calls on the Commission to prioritise enabling measures. These include:

- Purchase grants;
- Tax and toll exemptions;
- Funding for sufficient fueling infrastructure.

Such tools are essential to bridge the economic and operational gap between the uptake of carbon-neutral emission-fueled and conventional-fueled vehicles.

To complement the importance of technology-neutrality towards all renewable fuel types, the Commission should assess the possibility of having a dedicated vehicle category powered exclusively by CO_2 neutral fuels. Within this category, vehicles operating on certified biomethane and bio-LNG must be explicitly eligible. As such, these vehicles, when operating solely on certified CO_2 neutral fuels, should be eligible for a zero-emission status, and the regulatory recognition should reflect not only zero tailpipe emissions, but also the entire lifecycle CO_2 performance, in line with the Renewable Energy Directive and CountEmissionsEU. This designation would ensure that carbon neutral fuels receive the same regulatory and market recognition as battery-electric vehicles and fuel cell electric vehicles. It would also guarantee that they are treated as an equivalent compliance pathway, while maintaining consumer choice, supporting technological diversity, and delivering the same CO_2 reduction potential. The monitoring and verification processes for these fuels must rely on Union-wide methodologies and mass balance approaches already established in the Renewable Energy Directive to ensure availability, economic scalability and reliability of infrastructure.

Overall, a level playing field is essential to enable and not restrict diverse pathways to decarbonisation. Shippers and logistics providers should be able to progressively reduce the GHG footprint of their operations using a technology-neutral, Well-to-Wheel framework. As large companies will already report emissions using CountEmissionsEU, this approach creates strong market signals without excessive administrative burden. It ensures biomethane and other sustainable fuels are fairly incentivised alongside electrification. However, if the Clean Corporate Vehicles regulation includes EV-only mandates, the current definition of clean vehicles supported by the Clean Vehicles Directive[7] could be narrowed, excluding biomethane as one of Europe's most

[5] European Commission (2019) Regulation (EU) 2019/631
[6] European Commission (2019) Regulation 2019/1242
[7] European Commission (2019) Directive (EU) 2019/1161

effective and scalable decarbonisation tools. An alignment between this directive and the upcoming regulation on Clean Corporate Vehicles is hence pivotal for the biogases sector.

In conclusion, EBA urges the Commission to ensure that this initiative promotes technology neutrality, incorporates Well-to-Wheel emission accounting, focuses on enabling conditions, and empowers operators to choose the most effective decarbonisation options. Recognising the role of biomethane is not just about fairness, it is about delivering real, immediate, and cost-effective climate action.

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About the European Biogas Association (EBA)
EBA fully believes in the future potential of renewable gas in Europe. Founded in 2009, the association is committed to the deployment of sustainable biogas and biomethane production and use throughout the continent. EBA counts today on a well-established network of over 300 national associations and other organisations covering the whole biogas and biomethane value chain across Europe and beyond.