

Sofia, Prague, Budapest, Rome, Warsaw, Bratislava,

4th December 2025

Dear Ms. President,

last European Council's discussion on competitiveness and the debate on the Council General approach on the revision of the EU Climate Law clearly showed the need for the European Union to abandon, once and for all, the ideological dogmatism that has brought entire productive sectors to their knees, moreover with little or almost no tangible benefit in terms of global emissions.

Fully applying the principle of technological neutrality is key: it is evident that there is no silver bullet on the path to decarbonisation, and imposing a single technological solution curbs research, innovation and virtuous competition. This is particularly true and urgent for the European automotive and car components industry, a sector that is dramatically suffering from current EU policies and that needs immediate answers.

In our view, on top of the future revision of ETS, CBAM, HDVs CO₂ standards and the recent proposal concerning ETS₂, it is imperative that the upcoming revision of Regulation (EU) 2019/631 setting CO₂ emission performance standards for new passenger cars and for new light commercial vehicles confirm, even after 2035, the role of plug-in hybrid electric vehicles (PHEVs), fuel cell technology, and introduce the recognition of electric vehicles with range extenders (ERVs), as well as other future technologies that could contribute to the goal of reducing emissions. In particular, the proposal should recognise the role of zero-, low carbon and renewable fuels in the decarbonisation of transport, including road transport, classifying also biofuels (renewable fuels) as "carbon neutral fuels", as of Recital 11 of Regulation 2023/851, even before 2035. On the Heavy-Duty Vehicles (HDVs) CO₂ standards, we would consider it appropriate to reflect on a targeted adjustment to Regulation 2019/1242, to help HDVs manufacturers reach their targets and avoid any risk of penalties.

With regards to the upcoming legislative proposal on greening corporate fleets, announced last 26 February 2025 in the Clean Industrial Deal, should additional Minimum Zero Emission Vehicle (ZEV) obligations or quotas for corporate fleets at any level to be introduced, this would result in regulatory duplication and increased bureaucracy, contrary to the simplification objective pursued at EU level. Indeed, European CO₂ Emissions Regulation for passengers' cars and light-duty vehicles already provides for an effective tool for decarbonising in the automotive sector.

Therefore, the Commission's proposal should primarily focus on good practices, tax incentives and support programmes and reflect a technologically neutral approach in promoting the transition to low- and zero-emission vehicles. Moreover, limiting corporate fleets exclusively to ZEV would undermine corporate competitiveness, especially of Small and Medium-sized Enterprises, and introduce new economic and administrative burdens. Including HDVs in the scope of the Regulation would be disruptive for the overall transport system as well.

We are at a turning point both for the European Union automotive and car components industry and for the European climate action. We can and we must pursue our climatic goal in an effective way, while not killing our competitiveness in the meanwhile since there is nothing green in an industrial desert.

Yours sincerely,

Rossen Jeliakov, Prime Minister of Bulgaria

Giorgia Meloni, Prime Minister of the Italian Republic

Petr Fiala, Prime Minister of Czechia

Donald Tusk, Prime Minister of Poland

Viktor Orbán Prime Minister Hungary

Robert Fico, Prime Minister of Slovakia

H.E. **Ursula von der Leyen**, President of the European Commission

cc:

H.E. **Roberta Metsola**, President of the European Parliament

H.E. **Antonio Costa**, President of the European Council

H.E. **Mette Frederiksen**, Prime Minister of Denmark