

Director General

Ursula von der Leyen
President
European Commission

200, rue de la Loi
B-1049 Brussels

21 October 2025

Dear President von der Leyen,

We would like to thank you for your leadership and the decisive actions taken to support the chemical industry during these challenging times.

I am writing to share a critical perspective on the Clean Corporate Fleets initiative — that of the shippers, whose operational realities and responsibilities merit careful consideration in the policy discussion.

The European Commission is considering legislation that would establish mandatory targets for the purchase or use of zero-emission trucks, either by directly requiring operators to comply or by placing obligations on Member States or shippers to ensure uptake.

However, we are concerned that this proposal does not account for the distinct characteristics and operational realities of sectors such as ours. The chemical industry handles a wide range of sensitive and potentially hazardous materials, handled on Seveso sites requiring strict compliance with safety protocols and risk-management procedures.

In particular, in the event of an accident or fire, electric or hydrogen-powered trucks behave differently from diesel vehicles. The interaction between high-voltage lithium-ion batteries, which are susceptible to thermal runaway, and hazardous cargo that may be flammable, corrosive, or explosive, presents unique safety risks. Similar discussions at the UN Working Party on the Transport of Dangerous Goods have highlighted the importance of developing external warnings for imminent thermal threats to hazardous cargo.

Therefore, it is essential to consider that the use of electrical or fuel cell vehicles at Seveso sites for the transport of dangerous goods should be excluded.

The chemical industry is already taking important steps to reduce emissions by adopting safe alternative fuels such as HVO or biodiesel, which can reduce emissions by up to 90%. These efforts deliver immediate and substantial environmental benefits, yet they are insufficiently supported by current legislation (e.g. Weights & Dimensions, Eurovignette). **We urge policymakers to recognize and support these impactful measures.**

In the same context, it is imperative to address the lack of reliable alternatives on rail transport **Imposing a zero-emission target for road transport, without offering competitive, reliable, and sustainable alternatives such as rail, is inevitably undermining the competitiveness of the industry.** Regulation on Rail Infrastructure Capacity and the Combined Transport Directive has not even started, leaving industry stakeholders without viable modal alternatives.

We trust that policymakers and regulatory agencies will pursue flexible solutions that safeguard public safety while supporting the interests of shippers .

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Marco Mensink', with a stylized, flowing script.

Marco Mensink

This letter will also be shared for information with Commissioner for Sustainable Transport and Tourism Mr Apostolos Tzitzikostas.