



ASOCIAȚIA DE MONITORIZARE TAXI TRANSILVANIA

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OFFICIAL POSITION

*on the Proposal for a Regulation of the European Parliament and of the Council
on Clean Corporate Vehicles*

COM(2025)0994 – 2025/0421(COD)

Draft Report PE787.931v01-00 — May 2026

Cluj-Napoca, May 2026

1. Introduction

The Asociația de Monitorizare Taxi Transilvania (AMTT) is an association based in Cluj-Napoca, representing operators from the taxi industry across Transylvania and other regions of Romania, and a member of the European network **T4SM — Taxis 4 Smart Mobility**. In this capacity, AMTT closely monitors the European legislative process in the field of mobility, including proposals targeting the decarbonisation of corporate vehicle fleets.

This document constitutes AMTT's official response to T4SM's call for national member consultations on the **Draft Report by co-rapporteurs MEP Tiemo Wölken and MEP François Kalfon** (PE787.931v01-00, published on 11 May 2026), drawn up under ordinary legislative procedure 2025/0421(COD).

AMTT supports the overarching objective of transitioning to zero-emission vehicles and acknowledges the urgency of climate action. However, we firmly believe that in its current form, this proposal fails to account for the fundamental structural realities of the taxi sector in Romania — with consequences that could lead to the **complete disappearance of this essential public transport service** from Romanian territory.

2. The Reality of the Taxi Sector in Romania

2.1. A Deeply Fragmented Sector — Incompatible with the Proposal's Logic

The proposed Regulation — including as amended in the Draft Report — is built on the implicit assumption that corporate transport operators possess the financial and organisational capacity to manage the transition to zero-emission vehicles. This assumption holds true for large fleets, leasing companies and logistics operators — that is, for *large undertakings* within

the meaning of Directive 2013/34/EU, explicitly referenced in Recital 11 and Article 3 of the proposal.

In Romania, the taxi sector is NOT organised into large fleets. The reality is radically different:

Indicator	Romania — 2025 Data
Taxi licences issued nationally	~78,000
Active (operationally valid) licences	~60,000
Economic entities under NACE 4933 (Rev.3)	~12,680
Total employees in the sector	10,426
Average vehicles per operator	<1.5 vehicles per operator
Electric vehicles in national fleet	70,826 (0.63% of total)

The dominant legal form is: **sole trader (PFA), individual enterprise (II), family enterprise (IF) or micro-enterprise LLC with a single vehicle and a single employee**. These entities do not qualify, by definition, as *large undertakings* subject to the mandatory targets of the Regulation.

Nevertheless, **Recital 15 of the proposal, retained unchanged in the Draft Report (Amendment 13)**, explicitly permits Member States to introduce ZEV requirements in "*licensing for specific passenger transport services (such as taxis, ride-hailing)*". This provision opens the door for Romania to transpose into national law electrification obligations directly applicable to individual taxi operators — operators who bear no relation to *large undertakings* and who have no access to any European or national financing instrument.

2.2. The Collapse of the Bucharest Market — An Ignored Warning Signal

The situation in Bucharest illustrates with utmost clarity the current fragility of the sector. The Bucharest municipality has issued **10,059 taxi licences** (PMB data, 2025). Of these, **fewer than 4,500 are currently active and validated** — meaning less than 45% of the authorised capacity is operational.

The primary cause of this collapse is **unfair competition from app-based transport operators without their own vehicle fleet**, who practise fares well below the real cost of operation, subsidised by external venture capital. In Bucharest, the effective market rate has fallen to **2.80–3.15 RON/km (approximately €0.57–0.63/km)** — below the already-minimal legal ceiling set by the local authority, itself among the lowest in the European Union.

We emphasise that taxi fares are **regulated by local authorities** under Law No. 38/2003 and cannot be increased at operators' discretion. Licensed taxi operators in Bucharest are already working at the limit of economic survival, **before any electrification requirement has been imposed**. Mandating a transition to electric vehicles under these conditions is equivalent to the administrative elimination of the service.

3. Financial Barriers — A Reality Incompatible with the Proposal's Requirements

3.1. Low Fares, High Costs — An Impossible Equation

A basic economic analysis demonstrates the structural incompatibility between Romania's regulated taxi fares and the cost of transitioning to electric vehicles:

Economic Parameter	Value
Taxi fare Cluj-Napoca (daytime)	4.05 RON/km (~€0.82/km)
Taxi fare Bucharest (effective market rate)	2.80–3.15 RON/km (~€0.57–0.63/km)
Entry-level electric vehicle (taxi-suitable)	€25,000–35,000
Adequate electric vehicle (range, durability)	€35,000–45,000
Current combustion vehicle (Dacia Logan/Sandero, used)	€8,000–14,000
Investment gap per vehicle	€20,000–35,000

At a fare of 4.05 RON/km (Cluj-Napoca) and an average working day of 10–12 hours, an independent taxi operator generates a gross daily income of approximately **250–350 RON (€50–70)**. From this, the following must be deducted: fuel, mandatory insurance (third-party liability and comprehensive), vehicle inspection, servicing, local taxes and duties, association fees, and dispatch commission. **The net margin available to service a loan of €25,000–35,000 is effectively zero.**

The argument of *"lower total cost of ownership over the vehicle's lifetime"* — frequently invoked in favour of electric vehicles — is valid over an 8–10 year horizon, but presupposes access to long-term bank financing. **A micro-operator — a sole trader or single-vehicle LLC — does not meet the creditworthiness criteria** required by financial institutions for a loan of this magnitude, particularly in the absence of any dedicated public guarantee scheme for the sector.

3.2. Charging Infrastructure — A Structural Bottleneck

The Draft Report's co-rapporteurs acknowledge the importance of charging infrastructure — Amendment 13 introduces a reference to *"dedicated recharging points at specific locations, especially in private buildings"*, while Amendment 42 requires Member States to include charging infrastructure rollout policies in their national plans. We welcome these additions, but consider them insufficient to address the Romanian reality.

Available data for Romania is alarming:

EV Infrastructure Indicator	Romania vs. EU
Electric vehicles per charging point (Romania)	1 point per 280 EVs
Electric vehicles per charging point (EU average)	1 point per 9 EVs

Electric vehicles in national fleet (Dec. 2025)	70,826 (0.63% of total)
Fast DC public charging points	Concentrated exclusively in major cities

A taxi operator working 10–12 hours a day cannot afford a 45–60 minute charging stop in the middle of their working shift. **Charging downtime is direct loss of income.** Romania's public fast-charging network does not even cover major urban areas at sufficient density for intensive commercial operation. In rural areas and small towns — where a significant share of independent taxi operators work — infrastructure is virtually non-existent.

4. A National Legislative Paradox: Electrification Requirements Without Access to Funding

AMTT draws attention to a fundamental contradiction in Romanian public policy, directly relevant to the impact assessment of this European proposal: **every national financing programme funded by European resources for the acquisition of low- or zero-emission vehicles has systematically and continuously excluded taxi operators** — regardless of the NACE code applied. The exclusion has covered both **NACE 4932 (Rev.2 — Taxi operation)**, the traditional taxi code, and **NACE 4933 (Rev.3 — the unified code, currently applicable to taxi services)**. The ongoing transition from NACE Rev.2 to Rev.3 has brought no improvement — the exclusion has persisted under both codes.

The most recent and most striking example is the state aid scheme **e-DRIVE**, launched for public consultation by the Romanian Ministry of Transport and Infrastructure in May 2026 (Modernisation Fund, total budget: **€100 million**). The programme explicitly targets the acquisition of zero-emission vehicles for road passenger transport. The declared eligible NACE codes are **4931 (scheduled transport) and 4932 (occasional transport)**. NACE 4933 — the only code applicable to taxi services under Rev.3 — is entirely absent from the eligibility criteria. Consequently, **a €100 million programme, funded by European resources and explicitly designed to electrify road passenger transport in Romania, completely ignores the taxi service sector.**

This systematic, documented and continuous exclusion has had the following direct consequences:

- Licensed taxi operators cannot access the e-DRIVE scheme — NACE 4933 (Rev.3) is absent from the eligibility criteria
- Taxi operators were unable to access the Rabla programme for commercial vehicles — NACE 4932 and 4933 excluded
- Taxi operators were unable to access PNRR (Recovery and Resilience Facility) funds for fleet electrification
- Taxi operators were unable to access regional financing schemes for low-emission vehicles
- Licence holders have no access to any dedicated bank guarantee scheme for the acquisition of ZEV vehicles

The Romanian State has thus created a paradoxical situation: it has systematically excluded licensed taxi operators from every green transition financing instrument, while preparing to impose electrification requirements upon them through the

transposition of the present European Regulation. This is not a transition policy — it is administrative elimination by deliberate omission.

We note that Amendment 7 of the Draft Report introduces an obligation for the Commission to assess the Regulation's impact on SMEs. We welcome this addition, but emphasise that it concerns a post-adoption report, with no guarantee of immediate protection. Romania requires **the conditioning of national implementation on the prior existence of accessible financing instruments for NACE codes 4932 (Rev.2) and 4933 (Rev.3)** — not an impact report drafted after the sector has ceased to exist.

5. The Concrete Risk: The First EU Member State Without a Functional Taxi Service

AMTT states with full responsibility that, **in its current form and given Romania's specific national context, the proposed Regulation — if transposed into national law without explicit protective safeguards — will lead to the disappearance of the taxi service from Romanian territory.** Romania would thereby become the first EU Member State in which an essential public transport service is eliminated as a side effect of a decarbonisation policy.

The mechanism is direct and foreseeable:

- Recital 15 of the proposal (retained in the Draft Report — Amendment 13) permits Member States to condition the licensing of taxi services on ZEV requirements
- The Romanian State, in the absence of explicit European safeguards, will transpose this provision by conditioning taxi licence renewals on ownership of an electric vehicle
- Micro-operators — sole traders, individual enterprises, single-vehicle micro-LLCs — have no financial capacity to acquire an electric vehicle costing €25,000–45,000
- Licences will not be renewed; operators will abandon the activity
- The taxi service will disappear silently, without any compensatory measure

The situation in Bucharest — where fewer than 45% of issued licences remain active — demonstrates that the sector is already extremely fragile. **An aggressive policy is not needed to eliminate it — the absence of an explicit protection mechanism is sufficient.**

We underline that taxi services constitute an **essential mobility service**, with a critical role for persons without a driving licence, the elderly, people with disabilities and users in areas not served by public transport. Their disappearance is not an acceptable side effect of the green transition — it is a public policy failure.

6. Specific Requests Addressed to T4SM and the Co-Rapporteurs

On the basis of the above analysis, AMTT requests that T4SM advocate at European level for the following amendments and clarifications:

6.1. Explicit Protection for Micro-Operators

We propose the introduction of an explicit amendment to **exclude from the scope of any ZEV requirements derived from this Regulation** taxi transport operators who do not qualify as *large undertakings* within the meaning of Directive 2013/34/EU. This exclusion must be operative both at EU level and in national transposition.

6.2. Rewording of Recital 15 — Prohibition of Licence Conditioning

Recital 15, retained in the Draft Report (Amendment 13), must be supplemented with an explicit safeguard clause: **Member States may not condition the licensing or authorisation of taxi services on ZEV requirements in the absence of an accessible and functioning public financing programme for micro-operators**. This clause is necessary to prevent abusive national transpositions.

6.3. Conditioning of National Implementation on the Existence of Financing Instruments

Amendments 41–43 of the Draft Report (Article 6 — national plans) are welcome but insufficient. We request that national plans be required to include **a dedicated chapter on financial support measures accessible to individual taxi operators**, including the explicit eligibility of NACE code 4933 (Rev.3) for public financing instruments for ZEV acquisition. The absence of this chapter should constitute grounds for the Commission to reject the plan.

6.4. Recognition of Taxi Services as an Essential Mobility Service

We request the introduction of an explicit recital recognising taxi services as an **essential public mobility service**, distinct from freight transport or private corporate fleets, and imposing on Member States the obligation to ensure the continuity of this service throughout the green transition process.

6.5. Sector-Specific Impact Assessment for Taxi Services

Amendment 49 of the Draft Report provides for an assessment of the impact on SMEs. We request that this assessment include **a specific chapter on taxi transport services**, with data disaggregated by Member State and analysis of the impact on micro-operators. The assessment must be carried out *prior to* the adoption of any national measure conditioning licence renewal.

7. Conclusion

The Draft Report by co-rapporteurs Wölken and Kalfon represents an important step towards a more ambitious legislative framework for the decarbonisation of European corporate vehicle fleets. AMTT appreciates the numerous improvements introduced by the co-rapporteurs relative to the Commission's original proposal — in particular the references to charging infrastructure, second-hand market accessibility and the impact on SMEs.

Nevertheless, **the taxi sector in Romania constitutes an extreme and particular case**, characterised by: structural fragmentation without equivalent in Western Europe, regulated fares at levels that preclude recovery of investment in electric vehicles, unfair competition that

has already dramatically reduced the number of active operators, deficient charging infrastructure, and systematic exclusion from all national financing programmes.

Without explicit protective amendments, Romania will be the first EU Member State in which the taxi service disappears as a consequence of the transposition of a European decarbonisation regulation. This is not a conclusion AMTT desires — it is a projection grounded in concrete data and the documented economic reality of the sector.

We call on T4SM to make the Romanian case a central argument in the amendment phase negotiations (June–July 2026) and to actively support the protective amendments identified in this document.

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