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WK 2023/2026 INIT

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WORKING DOCUMENT

From: General Secretariat of the Council
To: Antici Group (Simplification)

Subject: Omnibus IX (Automotive) - Technical requirements and testing procedures for motor vehicles - Follow-up to AGS of 23 January 2026 - Comments from delegations

Following the call for comments launched on 23 January, delegations will find attached the inputs received from: **AT, BE, CZ, DE, DK, FR, HU, IT, NL, PL, SE, SI and SK** .

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Guidelines to be followed

Please kindly provide your contributions in the table below.

Drafting suggestions: you may use 'track changes'* or formatting (for example bold-underline for additions and ~~strike-through~~ for deletions, where necessary, in a different colour). *Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted**.

New provisions may only be added in any of the '**existing cells**'.

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments ondocx**

Thank you for your cooperation!

Commission proposal	Drafting suggestions and Comments
<p>General Comments</p>	<p>CZ (Comments): In general, the Czech Republic (CZ) supports the proposed Omnibus proposals. Given the considerable complexity of the current legislative framework, CZ broadly welcomes and endorses measures aimed at its simplification and facilitating its application. In this context, CZ considers that the simplification initiative should be more ambitious and encompass additional measures to ensure that the automotive industry experiences tangible regulatory relief, is better prepared to cope with the challenges associated with the transition to electromobility, and, above all, remains competitive globally. A particularly critical element in this regard is enabling the full utilization of transitional technologies, notably plug-in hybrid electric vehicles (PHEVs),</p>

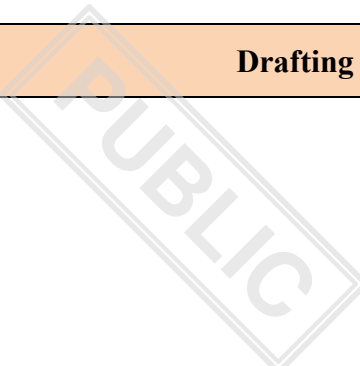
Commission proposal	Drafting suggestions and Comments
	<p>which play an essential transitional role for both consumers and manufacturers. The importance of this technology is explicitly acknowledged by the European Commission in its Impact Assessment accompanying the proposal for the revision of the CO₂ emission performance standards (SWD (2025) 1058). In that context, the envisaged tightening of the Utility Factor requires urgent reconsideration. Without corrective action, PHEVs would lose their classification as low-emission vehicles after January 2027, thereby discouraging manufacturers from further production of these vehicles or from investing further in their development. CZ therefore strongly urges maintaining the current Utility Factor values in order to ensure a realistic and technologically neutral transition.</p> <p>Furthermore, in the context of the proposed flexibility concerning the 2035 CO₂ target, corresponding adjustments are also necessary with respect to the brake emission limits set out in the Euro 7 Regulation (Annex I, Table 8). These limits were initially set out to be applicable only from 2035 and thus envisaged only for battery electric vehicles (BEVs), whereas vehicles with other powertrains will not be able to meet them. Thus, it is necessary to take into account the proposed adjustment of the CO₂ targets and to set specific limits also for vehicles with other types of powertrain technologies.</p> <p>To enhance legal certainty, the concept of “normal use” in Article 5 of the Euro 6 Regulation (Reg. 715/2007) should be clarified. Namely, it needs to be explicitly stated that emission limits must correspond to the laboratory driving cycles laid down in Commission Regulation (EU) 2017/1151, such as the NEDC and WLTP cycles, and not to emissions under real driving conditions (RDE). From that perspective, also the Regulation Euro 7 (Reg. 2014/1257)</p>

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	<p>deserves more clarification as regards the definitions of “manipulation devices” and “manipulation strategies” in Article 2.</p> <p>Taking into account that the current legal framework for heavy-duty vehicles (HDVs) is still incomplete and that the already adopted implementing provisions still leave a number of unresolved technical and methodological issues, CZ considers it appropriate to postpone certain Euro 7 requirements for HDVs to ensure legal certainty and predictability for the manufacturers.</p> <p>DE (Drafting suggestions):</p> <p>Not included topic: end-of-series (Article 49 Regulation (EU) 2018/858)</p> <p>DE (Comments):</p> <p>Germany is promoting further simplifications and the reduction of bureaucracy in the field of type approval regulations. In our perspective, deleting end-of-series regulation may be a possible step to reduce redundant burden.</p> <p>In addition to the preliminary assessment of the European Commission, who wanted to look at the process again, Germany would welcome a more comprehensive assessment by the COM and the opinion of the Member States about such a simplification of the type approval regulation.</p> <p>NL (Comments):</p> <p>1) With the mandatory tachograph from 1 July 2026 for light commercial vehicles of more than 2,5 ton up until 3,5t, seemingly the following situation</p>

Commission proposal	Drafting suggestions and Comments
	<p>will arise: electric vehicles between 2,5t and 3,5t that drive internationally are required to use a tachograph, yet larger vehicles between 3,5t and 4,25t used nationally do not require a tachograph (if a member states applies to proposed measure nationally). How does the Commission view this contradiction?</p> <p>2) In the presentation of the AGS on the 23rd of January the European Commission confirmed that article 13 allows member States to agree with other member states to exempt cross-border operation for the category of 3,5t till 4,25t. How does the interpretation of the term cross-border operation differ of article 2 561/2006?</p> <p>SK (Comments): Slovakia welcomes the opportunity to provide written comments. Slovakia maintains scrutiny reservation</p>
2025/0422 (COD)	
Proposal for a	
REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL	
amending Regulations (EC) No 561/2006, (EU) 2018/858, (EU) 2019/2144 and (EU) 2024/1257 of the European Parliament and of the Council as	

Commission proposal	Drafting suggestions and Comments
<p>regards the simplification of technical requirements and testing procedures for motor vehicles and repealing Council Directive 70/157/EEC and Regulation No 540/2014 of the European Parliament and of the Council</p>	
<p>THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,</p>	
<p>Having regard to the Treaty on the Functioning of the European Union, and in particular Articles 91 and 114 thereof,</p>	
<p>Having regard to the proposal from the European Commission,</p>	
<p>After transmission of the draft legislative act to the national parliaments,</p>	
<p>Having regard to the opinion of the European Economic and Social Committee¹,</p> <p>_____</p> <p>1 OJ C , , p . .</p>	
<p>Having regard to the opinion of the Committee of the Regions²,</p>	

Commission proposal	Drafting suggestions and Comments
<p>5 Regulation (EU) 2018/858 of the European Parliament and of the Council of 30 May 2018 on the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles, amending Regulations (EC) No 715/2007 and (EC) No 595/2009 and repealing Directive 2007/46/E (OJ L 151, 14.6.2018, p. 1, ELI: http://data.europa.eu/eli/reg/2018/858/oj).</p> <p>6 Regulation (EU) 2019/2144 of the European Parliament and of the Council of 27 November 2019 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/858 of the European Parliament and of the Council and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009 of the European Parliament and of the Council and Commission Regulations (EC) No 631/2009, (EU) No 406/2010, (EU) No 672/2010, (EU) No 1003/2010, (EU) No 1005/2010, (EU) No 1008/2010, (EU) No 1009/2010, (EU) No 19/2011, (EU) No 109/2011, (EU) No 458/2011, (EU) No 65/2012, (EU) No 130/2012, (EU) No 347/2012, (EU) No 351/2012, (EU) No 1230/2012 and (EU) 2015/166 (OJ L 325, 16.12.2019, p. 1, ELI: http://data.europa.eu/eli/reg/2019/2144/oj).</p> <p>7 Regulation (EU) 2024/1257 of the European Parliament and of the Council of 24 April 2024 on type-approval of motor vehicles and engines and of systems, components and separate technical units intended for such vehicles, with respect to their emissions and battery durability (Euro 7), amending Regulation (EU) 2018/858 of the European Parliament and of the Council and repealing Regulations (EC) No 715/2007 and (EC) No 595/2009 of the European Parliament and of the Council, Commission Regulation (EU) No 582/2011, Commission Regulation (EU) 2017/1151, Commission Regulation (EU) 2017/2400 and Commission Implementing Regulation (EU) 2022/1362 (OJ L, 2024/1257, 8.5.2024, ELI: http://data.europa.eu/eli/reg/2024/1257/oj).</p>	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-30deg);">PUBLIC</p>

Commission proposal	Drafting suggestions and Comments
<p>(2) The Industrial Action Plan for the EU automotive sector⁸ called for a regulatory simplification package for the automotive industry, by improving coherence and consistency between different regulatory requirements.</p> <hr/> <p>8 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Industrial Action Plan for the European automotive sector (COM(2025) 95 final).</p>	
<p>(3) Article 114 TFEU is the appropriate legal basis to adopt the measures necessary for the establishment and functioning of the internal market. In addition to Article 114 TFEU, this Regulation should have an additional specific basis to cover amendments to Regulation (EC) No 561/2006 that is based on Article 91 TFEU.</p>	
<p>(4) While this Regulation is adopted for the establishment and functioning of the internal market, the simplification and streamlining of motor vehicle technical requirements, testing procedures and type-approval rules also support the Union’s broader objective of fostering the gradual integration of candidate countries into the Union market. By promoting regulatory convergence, alignment with United Nations Economic Commission for Europe (UNECE) Regulations and coherent implementation of the Union acquis, this Regulation contributes to reducing technical barriers to trade, strengthening integrated European automotive value chains and enhancing the resilience and competitiveness of the European automotive ecosystem, without affecting the autonomy of Union law or decision-making.</p>	

Commission proposal	Drafting suggestions and Comments
<p>(5) To improve the working conditions of drivers, road safety and fair competition, Regulations (EC) No 561/2006 and (EU) No 165/2014 of the European Parliament and of the Council⁹ require the installation of a tachograph in goods vehicles with a weight above 3,5 tonnes. However, Article 3(2) of Regulation (EU) No 165/2014 allows Member States to exempt from that requirement the vehicles mentioned in Article 13(1) and (3) of Regulation (EC) No 561/2006.</p> <hr/> <p>⁹ Regulation (EU) No 165/2014 of the European Parliament and of the Council of 4 February 2014 on tachographs in road transport, repealing Council Regulation (EEC) No 3821/85 on recording equipment in road transport and amending Regulation (EC) No 561/2006 of the European Parliament and of the Council on the harmonisation of certain social legislation relating to road transport (OJ L 60, 28.2.2014, p. 1, ELI: http://data.europa.eu/eli/reg/2014/165/oj).</p>	<p>CZ (Comments): Is the term “goods vehicles” defined, or is it used interchangeably with “vehicles used for the carriage of goods” (see p. 19)?</p>
<p>(6) Due to the weight of the battery, battery-electric light commercial vehicles might exceed a weight of 3,5 tonnes and are therefore subject to the requirements laid down in Regulations (EC) No 561/2006 and (EU) No 165/2014, even though they have the same payload and use case as light commercial vehicles with an internal combustion engine that are outside the scope of those Regulations. Compliance with the requirements laid down in Regulations (EC) No 561/2006 and (EU) No 165/2014 represents a significant effort for vehicle operators and drivers and slows down the increase in the number of battery-electric light commercial vehicles.</p>	
<p>(7) To reduce unnecessary costs for vehicle manufacturers and operators, many of them being small and medium-sized companies, the requirement of</p>	<p>BE- (Comments):</p>

Commission proposal	Drafting suggestions and Comments
<p>tachograph installation for battery-electric light commercial vehicles with a weight below 4,25 tonnes should be removed.</p>	<p>BE supports the Commission's initiative to remove the obligation to equip e-vans between 3.5 and 4.25 tons with a speed limiter and to allow Member States that so wish to exempt them from the tachograph for national transport operations.</p> <p>FR (Drafting suggestions):</p> <p>The French authorities suggest the following amendment: <i>“To reduce unnecessary costs for vehicle manufacturers and operators, many of them being small and medium-sized companies, the requirement of tachograph installation for battery-electric light commercial vehicles with a weight below 4,25 tonnes should be removed may be exempted from the application of Regulation (EC) No 561/2006 on the harmonisation of certain social legislation relating to road transport, provided the objectives set out in by this regulation are not prejudiced, .”</i></p> <p>FR (Comments):</p> <p>The legislative proposal does not provide any change in the regulation on tachographs but only on social legislation. The French authorities believe this should be clarified in the recitals.</p>
<p>(8) As it is for the Member States to decide whether to use that exception, the exemption should only apply to electric light commercial vehicles engaged exclusively in domestic transport.</p>	<p>PL (Drafting suggestions):</p> <p>(8) Since it is for Member States to decide on the application of this exception, the exemption should apply only to electric light commercial vehicles.</p> <p>PL (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>In the opinion of Poland, removing the obligation for N2 electric vehicles weighing between 3.5 t and 4.25 t to install tachographs may contribute to removing barriers to the development of zero-emission vehicles in this gross vehicle weight range, by guaranteeing the same load capacity as vehicles powered by internal combustion engines. Such an exemption should apply to both domestic and international traffic.</p> <p>In addition, the draft regulations should take into account the fact that from July 1, 2026, the obligation to install second-generation smart tachographs (G2V2) in buses with a gross vehicle weight (GVW) of 2.5 to 3.5 tons, performing international commercial transport or cabotage, will come into force. This obligation stems from the provisions of Article 2(1)(aa) of Regulation (EC) No. 561/2006 of the European Parliament and of the Council of March 15, 2006, on the harmonization of certain social legislation relating to road transport and amending Council Regulations (EEC) No 3821/85 and (EC) No 2135/98 and repealing Council Regulation (EEC) No 3820/85 (OJ L 102, 11.4.2006, p. 1).</p> <p>In view of the above, we have doubts about the proposal to exempt electric vehicles with a GVW of 3.5-4.25 tons from the obligation to install tachographs in domestic transport, while imposing an absolute obligation to install tachographs in zero-emission vehicles with a lower GVW (from 2.5 tons to 3.5 tons) in international transport. Considering the possibility of building zero-emission N1 category vehicles with a GVW of 2.5 to 3.5 tons, the exemption proposed in the draft should be extended to vehicles in this weight category, regardless of whether the transport is carried out only domestically or internationally.</p> <p>This measure will prevent a situation in which zero-emission vehicles with a GVW between 2.5 and 3.5 t are not competitive with combustion engine vehicles.</p>

Commission proposal	Drafting suggestions and Comments
<p>(9) To reduce the burden that the installation and use of a tachograph places on non-professional drivers driving large motor caravans for non-commercial purposes and the impact that this can have on the demand for such vehicles, national authorities should be able to exempt such vehicles and operations from the driving and rest time rules and the use of the tachograph, provided that the objectives referred to in Article 1 of that Regulation are not jeopardised.</p>	<p>BE- (Comments): BE does not support the Commission's proposal to exempt motorhomes over 7.5 tons from being equipped with a tachograph. For the sake of clarity, it is also preferable to apply a single, harmonized rule throughout Europe. Leaving the choice to Member States creates confusion for citizens in the case of international transport.</p> <p>PL (Drafting suggestions): 9) In order to reduce the burden that the installation and use of the tachograph imposes on non-professional drivers driving large motorhomes for non-commercial purposes, and the impact this may have on the demand for such vehicles, such vehicles and their drivers should be exempt from the rules on driving and rest times and the use of the tachograph.</p>
<p>(10) Regulation (EU) 2018/858 of the European Parliament and of the Council permits the type-approval of motor vehicles as regards sound level and acoustic vehicle alerting systems either through Regulation (EU) No 540/2014 of the European Parliament and of the Council¹⁰ or through the UN Regulations, including Regulations No 138¹¹, No 51¹², and No 59¹³ of the UNECE. That parallel system risks causing market fragmentation. Moreover, Regulation (EU) No 540/2014 has become obsolete due to a deficit of updates in comparison with the three above-mentioned UNECE regulations. To ensure a coherent framework and full alignment with UN regulations, Regulation (EU) No 540/2014 should be repealed and Annex II to Regulation (EU) 2018/858 should be amended to only allow compliance with the applicable UN Regulations.</p>	<p>BE- (Comments): BE supports the COM proposal as it will strengthen the coherence and the harmonisation of technical regulations.</p>

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<p>10 Regulation (EU) No 540/2014 of the European Parliament and of the Council of 16 April 2014 on the sound level of motor vehicles and of replacement silencing systems, and amending Directive 2007/46/EC and repealing Directive 70/157/EEC (OJ L 158, 27.5.2014, p. 131, ELI: http://data.europa.eu/eli/reg/2014/540/oj)</p> <p>11 Regulation No 138 of the Economic Commission for Europe of the United Nations (UNECE) — Uniform provisions concerning the approval of Quiet Road Transport Vehicles with regard to their reduced audibility [2017/71] (OJ L 9, 13.1.2017, p. 33, ELI: http://data.europa.eu/eli/reg/2017/71(1)/oj).</p> <p>12 Regulation No 51 of the Economic Commission for Europe of the United Nations (UNECE) — Uniform provisions concerning the approval of motor vehicles having at least four wheels with regard to their sound emissions [2018/798] (OJ L 138, 4.6.2018, p. 1, ELI: http://data.europa.eu/eli/reg/2018/798/oj).</p> <p>13 Regulation No 59 of the Economic Commission for Europe of the United Nations (UNECE) — Uniform provisions concerning the approval of replacement silencing systems [2025/844] (OJ L, 2025/844, 30.4.2025, ELI: http://data.europa.eu/eli/reg/2025/844/oj).</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p>(11) As battery electric vehicle’s technology is evolving at a fast pace and the number of electric vehicles on the market is increasing, interoperability between vehicles, the charging infrastructure and the electricity grid is becoming increasingly critical. A harmonised approach to interoperability at Union level is essential to avoid fragmentation of certain technical requirements which are being developed outside of the vehicle type-approval framework, notably as regards the implementation of the revised Network Codes (a network code on demand connection established by Commission Regulation (EU) 2016/1388¹⁴ and a network code on requirements for grid connection of generators established by Commission Regulation (EU)</p>	<p>BE- (Comments): BE supports the COM proposal as it will strengthen the coherence and the harmonisation of technical regulations.</p>

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<p>2016/631¹⁵). Therefore, to ensure battery electric vehicle’s harmonised capabilities and enable interoperable vehicle-to-grid services, vehicles will need to meet certain technical requirements. Therefore, to ensure interoperability between vehicles, the charging infrastructure and the electricity grid, the empowerment should be provided in Regulation (EU) 2018/858 for the Commission to set out technical requirements as regards the communication and hardware interface of pure electric vehicles (PEV) and off-vehicle charging hybrid electric vehicles (OVC-HEV)with the recharging infrastructure, the electricity grid and the stationary power systems.</p> <hr/> <p>14 Commission Regulation (EU) 2016/1388 of 17 August 2016 establishing a Network Code on Demand Connection (OJ L 223, 18.8.2016, p. 10, ELI: https://eur-lex.europa.eu/eli/reg/2016/1388/oj).</p> <p>15 Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators (OJ L 112, 27.4.2016, p. 1, ELI: http://data.europa.eu/eli/reg/2016/631/oj).</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p>(12) The transition towards a more sustainable road transport has mainly been driven by the growth of sales of premium electric vehicle models. However, to ensure the continuity of this transition, it is necessary to make electric vehicles more affordable. Targeted regulatory measures (longer transitional period for new requirements, targeted incentives in the CO2 vehicle emission standards), fiscal (such as subsidy schemes) and non-fiscal (such as reserved parking space) benefits, in line with State aid rules, where applicable, can contribute to better affordability of small electric vehicles. However, a legal definition of a small electric vehicle is currently not provided in the type-approval framework. Therefore, it is appropriate to introduce a sub-category under the existing M1 vehicle category.</p>	<p>PL (Drafting suggestions): (12) The transition to more sustainable road transport has been driven primarily by the growth in sales of premium electric vehicle models. However, to ensure the continuity of this transition, it is necessary to increase the affordability of electric vehicles. Targeted regulatory measures (a longer transitional period for new requirements, targeted incentives for CO2 vehicle standards), fiscal incentives (such as subsidy programs), and non-fiscal incentives (such as reserved parking spaces), in line with state aid rules, where applicable, can contribute to increasing the affordability of small low- or zero-emission vehicles. However, there is currently no legal definition of a</p>

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	<p>small low- or zero-emission vehicle within the type approval framework. Therefore, a subcategory within the existing M1 vehicle category should be introduced.</p> <p>PL (Comments):</p> <p>In Poland's opinion, it is essential to maintain the technological neutrality of the newly created M1E vehicle group. Only in this way is it possible to simultaneously support European vehicle manufacturers and ensure the achievement of transport decarbonization goals. Restoring segments A and B on the vehicle market based solely on electric vehicles is practically impossible, even if these vehicles are covered by additional “special” financial/fiscal and non-financial incentive systems, as these vehicles do not meet their expectations in terms of performance characteristics (lack of vehicle charging points in old housing estates, lack of own renewable energy sources). These vehicles should be targeted at the poorer sections of society in order to accelerate the phase-out of the least environmentally friendly old vehicles and at the same time ensure a stable and reliable market for European production. This category of vehicles should include not only electric vehicles, but also plug-in hybrids (PHEVs) and extended-range electric vehicles (EREVs).</p>
<p>(13) When deciding on application dates of future motor vehicle requirements affecting this new small electric vehicle sub-category, the proportionally higher impact on development costs that new requirements can have on these vehicles as compared to heavier and more expensive ones, should be taken into account.</p>	<p>PL (Drafting suggestions):</p> <p>(13) When deciding on the application dates of future requirements for motor vehicles that affect this new subcategory of small low- or zero-emission vehicles, the proportionally higher impact on development costs that the current and new GSR requirements may have on those vehicles compared to heavier and more expensive vehicles should be taken into account.</p>

Commission proposal	Drafting suggestions and Comments
	<p>PL (Comments):</p> <p>In Poland’s opinion, it seems impossible to maintain full requirements for mandatory safety systems (GSR) for a new category of vehicles while reducing their manufacturing costs so that they become attractive not only in terms of purchase price but also future operating costs. Due to the assumed type of operation (mainly in urban areas), vehicles in this category could be deprived of some of the mandatory GSR systems, e.g., Intelligent Speed Assistance (ISA), which has little impact on reducing the number of accidents in urban driving conditions, where only a small number of roads allow speeds greater than 50 km/h. Similarly, the usefulness of the Driver Drowsiness and Attention Warning (DDAW) system in urban traffic should be considered negligible.</p> <p>Furthermore, experience to date indicates that these systems are among those most frequently switched off by drivers before starting to drive as they are considered unhelpful, often do not perform as expected, and are therefore stressful.</p>
<p>(14) As announced in the Industrial Action Plan for the EU automotive sector, the Commission is to issue a Commission Recommendation with options for incentive schemes that have proven effective in promoting the uptake of zero-emission vehicles and are compliant with competition rules. Recommendations to Member States for fiscal (i.e. purchase subsidies, tax exemptions, road-toll exemption) and non-fiscal (i.e. size-based parking rights allocation, dedicated charging infrastructure, etc.) measures could be also based on the new vehicle sub-category of small electric cars.</p>	<p>PL (Drafting suggestions):</p> <p>As announced in the EU Automotive Industrial Action Plan, the Commission is expected to issue a Recommendation containing options for incentive schemes that have proven effective in promoting low- and zero-emission vehicles and are compatible with competition rules. Recommendations to Member States regarding fiscal measures (e.g., purchase subsidies, tax exemptions, road toll exemptions) and non-fiscal measures (e.g., allocation of parking rights based on vehicle size, dedicated charging infrastructure, etc.) could also be based on a new vehicle subcategory: small low- and zero-emission cars.</p> <p>PL</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Extending the new vehicle category to include PEHVs and EREVs will undoubtedly accelerate the replacement of vehicles with newer, lower-emission models, even by people who, as a rule or for practical reasons (lack of access to charging points in old housing estates), do not want or cannot completely give up vehicles powered by liquid or gaseous fuels.</p>
<p>(15) Article 3(1) of Council Directive 92/6/EEC¹⁶ on the installation and use of speed limitation devices for certain categories of vehicles requires the installation and use of speed limitation devices in vehicles of the category N2 and N3 . Under that Article, such vehicles can be used on the road only if equipped with a speed limitation device. The installation requirement has been integrated into motor vehicle type-approval legislation with Regulation (EU) 2019/2144 of the European Parliament and of the Council.</p> <hr/> <p>16 Council Directive 92/6/EEC of 10 February 1992 on the installation and use of speed limitation devices for certain categories of motor vehicles in the Community (OJ L 57, 2.3.1992, p. 27, ELI: http://data.europa.eu/eli/dir/1992/6/oj).</p>	
<p>(16) Due to the weight of the battery, battery-electric light commercial vehicles might exceed a weight of 3,5 tonnes and are subject to the requirement to be equipped with speed limitation devices although they have the same payload and use case as light commercial vehicles with an internal combustion engine that are outside the scope of the Regulation (EU) 2019/2144. That requirement imposes unnecessary costs on vehicle manufacturers and enterprises purchasing such vehicles, slowing down the increase in the number of zero-emission light commercial vehicles. It is therefore appropriate to exempt zero-emission vehicles of category N2 with maximum technically</p>	

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<p>permissible laden mass between 3,5 and 4,25 tonnes from the requirement to be equipped with speed limitation devices.</p>	
<p>(17) Manufacturers of category M1 and N1 vehicles are required to perform laboratory tests of engines in low-temperatures pursuant to Annex V to Regulation (EU) 2024/1257. As the temperature conditions of the laboratory test of low temperature for emissions are covered by the gaseous pollutant and PN in road testing Real Driving Emissions test, demonstrating emission compliance at low temperature conditions (at -7 °C) is covered by having to comply to the Real Driving Emissions requirements (from -7 °C to 38 °C). Therefore, to reduce costs for manufacturers related to the specific requirements laid down Annex V to Regulation (EU) 2024/1257, it is appropriate to remove that dedicated low temperature laboratory requirement as such removal will not compromise environmental standards ensured by the Real Driving Emissions test</p>	<p>BE- (Comments): As mentioned during the last AGS discussion on this proposal and given that RDE tests do not have the same coverage that laboratory test, does the Commission intend to integrate measures for CO & HC emissions into future UNECE regulations ?</p> <p>DE (Comments): Germany is concerned that the elimination of the low-temperature test (Type 6 test) under Euro 7 could create a testing gap. In our assessment, the current evaluation of real-driving emissions (UNR 168) does not adequately cover hydrocarbons and carbon monoxide. Furthermore, most portable emissions measurement systems (PEMS) currently in use would need to be retrofitted.</p> <p>Germany supports the proposal by France to not remove the low-temperature test and to add the limit table for low-temperature test from Regulation 715/2007.</p> <p>FR (Comments): The French authorities do not support the option chosen for reducing the administrative burden resulting from the Euro 7 regulation. In fact, they consider it essential to maintain laboratory tests for light vehicles (as currently provided for in the Euro 6 regulation), which are the only way of detecting certain pollutants by clearly setting the associated limit values. Tests under real driving conditions (RDE) currently only concern the pollutants NOx (nitrogen oxides) and PM (particulate matter), and never CO</p>

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	<p>(carbon monoxide) and THC (total unburnt hydrocarbons). Nor does the fact that vehicles are not tested cold in the laboratory legally protect manufacturers and authorities from differing interpretations a posteriori. Clearly defining the limits to be met by the laboratory cold test guarantees legal certainty.</p> <p>They suggest an amendment to Annex I of the proposed Omnibus regulation. Recital 17 will have to be adjusted accordingly.</p> <p>SE (Comments):</p> <p>General support of the proposal to remove the laboratory test at low-temperatures from the requirements. This will reduce the burden at type approval for both the manufacturer and the type approval authority, since these conditions are covered by the Real Driving Emissions test. The RDE test does not cover all emission compounds that are covered by the low-temperature test, that is THC and CO. There are currently no margins or conformity factors defined for these emission compounds. Also in the RDE test for temperatures between 0 and – 7 degrees there is an extended temperature factor of 1.6.</p> <p>Is the understanding from the Commission that the impact of removing the low-temperature test will not lead to increased emissions?</p>
<p>(18) Annex V to Regulation (EU) 2024/1257 requires that, for the engine testing of heavy-duty vehicles, demonstration tests be performed for all applicable fuels within each vehicle type. In order to significantly reduce administrative costs related to those tests without compromising environmental standards, it is appropriate to introduce test requirements at vehicle category level in tables 1, 2, 3, 4, 7 and 8 of that Annex V.</p>	<p>BE- (Comments):</p> <p>Could the Commission further elaborate on the equivalence of the proposed testing by category instead of by type ?</p> <p>DE (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>Germany has the understanding that the proposed change to “vehicle categories” for the type approval of heavy commercial vehicles (HDV) lacks a definition of the term “vehicle categories”. We therefore ask to clarify with COM and propose a definiton.</p> <p>DK (Drafting suggestions):</p> <p>Delete proposal in Annex I paragraph (3), (4), (5) and (6) regarding changing Annex V to Regulation (EU) 2024/1257 and reference to “category” for M2, M3, N2 and N3.</p> <p>DK (Comments):</p> <p>Denmark proposes to delete proposal to change requirements for engine testing of Heavy-Duty Vehicles (HDV).</p> <p>Type approval of vehicles is essential to ensure emission reductions of new vehicles coming into the European market. The proposal raises the risks of higher emission of air pollution from HDV.</p> <p>There are many types and variants of HDV. If emission type approval is relaxed to only be carried out for HDV “category”, there may be types which are not covered correctly of the emission testing. This may result in the aftertreatment-system not working as intended leading to “high emitters” in our streets.</p>
<p>(19) Regulation (EU) 2024/1257 introduces on-board monitoring (OBM) systems and on-board fuel and electric energy consumption monitoring (OBFCM) devices, which are aimed at facilitating real-time compliance checks, harmonisation efforts, lifecycle oversight, reduced testing expenses, and streamlined enforcement measures. In order to efficiently receive, process,</p>	<p>BE- (Comments):</p> <p>BE supports this proposal</p> <p>DK</p>

Commission proposal	Drafting suggestions and Comments
<p>and store OBM and OBFCM data it is necessary to clarify that the empowerment of the Commission to adopt implementing measures also covers the adoption of methods and requirements necessary for the monitoring compliance of vehicle types.</p>	<p>(Comments): Support</p>
<p>(20) To ensure legal clarity following the repeal of Regulation (EU) No 540/2014 that contained a provision repealing Council Regulation 70/157/EEC¹⁷, it is necessary to provide for the repeal of Council Directive 70/157/EEC in this Regulation. To provide manufacturers of vehicles with sufficient time to adjust their production processes, it is appropriate to provide for the transitional period during which vehicles could still be approved in accordance with Regulation (EU) No 540/2014,</p> <hr/> <p>17 Council Directive 70/157/EEC of 6 February 1970 on the approximation of the laws of the Member States relating to the permissible sound level and the exhaust system of motor vehicles (OJ L 42, 23.2.1970, p. 16, ELI: http://data.europa.eu/eli/dir/1970/157/oj).</p>	
<p>HAVE ADOPTED THIS REGULATION:</p>	
<p><i>Article 1</i></p>	
<p>Amendments to Regulation (EC) No 561/2006</p>	
<p>Article 13(1) of Regulation (EC) No 561/2006 is amended as follows:</p>	

Commission proposal	Drafting suggestions and Comments
(1) the following point (fa) is inserted:	
<p>‘(fa) vehicles used for the carriage of goods and propelled by means of electricity, the maximum permissible mass of which, including the mass of a trailer or semi-trailer, exceeds 3,5 tonnes but does not exceed 4,25 tonnes;’;</p>	<p>AT (Comments): AT is critical towards the exemptions from the tachograph requirement for electrically powered vehicles of class N2 with a maximum permissible mass of not more than 4.25 t as (1) the complexity of the regulations increases. (2) the proposal counteracts the extension of the obligation to equip vehicles of category N1 with recording equipment from July 1 2026 to vehicles over 2.5 t in cross-border traffic.</p> <p>BE- (Comments): BE supports the Commission's initiative to remove the obligation to equip e-vans between 3.5 and 4.25 tons with a speed limiter and to allow Member States that so wish to exempt them from the tachograph for national transport operations.</p> <p>FR (Drafting suggestions): The French authorities suggest the following amendment: “(fa) vehicles used for the carriage of goods, <i>which are not involved in international transport operations or in cabotage operations</i> and propelled <i>exclusively</i> by means of electricity, the maximum permissible mass of which,</p>

Commission proposal	Drafting suggestions and Comments
	<p><i>including the mass of a trailer or semi-trailer, exceeds 3,5 tonnes but does not exceed 4,25 tonnes;”</i></p> <p>FR (Comments):</p> <p>The French authorities believe that the proposed exemption of certain electric light commercial vehicles from the tachograph requirement needs to be improved in order to avoid any risk of undermining the useful effects of European social regulations, to the detriment of drivers' working conditions and road safety, and in order to facilitate checks. In particular, the proposed wording does not sufficiently clarify the relationship between this exemption and the entry on 1 July 2026 of light commercial vehicles over 2.5 tonnes into the scope of Regulation 561/2006 on the harmonisation of certain social legislation relating to road transport, as soon as they operate in international transport or cabotage. In addition, they point out that the proposed wording is not sufficiently precise with regard to the propulsion mode of the vehicles that would be eligible for such exemptions; only vehicles powered exclusively by electricity should be taken into account, as hybrid electric and combustion engine vehicles should not be able to benefit from such exemptions.</p> <p>In addition, they believe that the proposed derogation, which is intended to encourage the development of electric vehicles, is not intended to become permanent and that, as these vehicles should eventually make up the majority of the vehicle fleet, such an incentive derogation should be associated with a deadline, for social and road safety reasons.</p> <p>SI (Drafting suggestions):</p> <p>‘(fa) zero-emission vehicles used for the carriage of goods and propelled by means of electricity, the maximum permissible mass of which, including the mass of a trailer or semi-trailer, exceeds 3,5 tonnes but does not exceed 4,25 tonnes;’;</p>

Commission proposal	Drafting suggestions and Comments
	SI (Comments): We propose that this exemption be introduced for all zero-emission vehicles and not just electric ones.
(2) the following point (s) is added:	
‘(s) motor caravans, as defined in Part A, point 5.1, of Annex I to Regulation (EU) 2018/858, used exclusively for non-commercial carriage.’	BE- (Comments): BE does not support the Commission's proposal to exempt motorhomes over 7.5 tons from being equipped with a tachograph. For the sake of clarity, it is also preferable to apply a single, harmonized rule throughout Europe. Leaving the choice to Member States creates confusion for citizens in the case of international transport. PL (Drafting suggestions): Article 3 new point J) caravans, as defined in point 5.1 of Part A of Annex I to Regulation (EU) 2018/858, used exclusively for non-commercial transport. PL (Comments): In Poland’s opinion, the Commission's proposal to exempt motorhomes with a maximum permissible weight exceeding 7.5 tons from the obligation to have a smart tachograph by adding a new editorial unit (point s in Article 13 of Regulation 561/2006) may be problematic in practice for users of such

Commission proposal	Drafting suggestions and Comments
	<p>vehicles. It should be noted that Article 13 of Regulation 561/2006 gives Member States the optional possibility of waiving the requirement for a vehicle to be equipped with a tachograph.</p> <p>This may lead to a situation where one Member State decides not to exempt motorhomes, but a neighboring Member State decides to do so. Considering that such vehicles are mainly used for international tourism covering the whole of Europe, the lack of exemption of motorhomes from the obligation to have a tachograph in even one of the EU countries through which the vehicle intends to travel renders the provision on its exemption in the country of registration from the requirement to use a tachograph and comply with driving and rest times ineffective.</p> <p>Therefore, it would be more appropriate to include this provision in Article 3 of Regulation 561/2006, which would introduce a general EU exemption for this type of vehicle from the provisions requiring the use of tachographs and compliance with driving time standards, rest periods and breaks, so that motorhomes with a GVW of over 7.5 tons would be uniformly exempt from these obligations throughout the EU, without the need for individual EU Member States to implement the above provisions.</p>
<p><i>Article 2</i></p>	<p>SK (Comments):</p> <p>Article 2 contains amendments to Regulation (EU) 2018/858. It is proposed to introduce a new subcategory “E” for small electric vehicles. The introduction of this subcategory is not for the purposes of type-approval legislation. This subcategory is intended for purposes of other legal acts to support small electric vehicles. We would consider it more appropriate for the definition to be included in the legislation for whose purposes it is intended.</p>
<p>Amendments to Regulation (EU) 2018/858</p>	<p>AT</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The regulatory gap that makes it impossible to implement Article 20a of RED III and the Battery Regulation should also be closed. This also applies analogously to the amendment of Regulation (EU) 2024/1257 (Euro 7).</p> <p>With regard to the definition of “Made in Europe”, the Industrial Accelerator Act and the new CO₂ fleet limits must be taken into account.</p> <p>Small electric vehicles: With regard to the “10-year moratorium” on future legislation, it should be clarified that the recording of consumption data and CO₂ labeling also applies to this class.</p>
Regulation (EU) 2018/858 is amended as follows:	
(1) in Article 5, the following paragraph 4 is inserted:	
<p>‘4. The Commission is empowered to adopt delegated acts in accordance with Article 82 supplementing this Regulation by laying down technical requirements as regards the communication and hardware interface of pure electric vehicles (PEV) and off-vehicle charging hybrid electric vehicles (OVC-HEV) with the recharging infrastructure, the electricity grid and the stationary power systems capable of supporting smart and bidirectional charging functionalities.’</p>	<p>AT (Comments):</p> <p>AT supports empowering Cion to adopt delegated acts on external interfaces for bidirectional communication with charging infrastructure. However, data protection requirements, including opt-out options, must be duly taken into account.</p> <p>FR (Comments):</p> <p>The French authorities welcome the introduction of a mandate empowering the Commission to adopt a delegated act on bi-directional charging. Intelligent and/or bi-directional charging should indeed make it</p>

Commission proposal	Drafting suggestions and Comments
	<p>possible to modulate the demand for charging in order to limit its impact on the electricity network.</p> <p>HU (Drafting suggestions):</p> <p>HU: We do not have a specific proposal.</p> <p>HU (Comments):</p> <p>HU: We propose that the newly introduced, preferential “M1E” vehicle category be extended, in a technology-neutral manner, beyond electric propulsion to include other zero-emission powertrain options. In this regard, in addition to purely electric vehicles, we also propose extending the scope to “zero-emission” vehicles and vehicles “operated with CO₂ - neutral fuels”.</p>
<p>(2) Annexes I and II are amended in accordance with Annex II to this Regulation.</p>	<p>CZ (Comments):</p> <p>CZ can support the proposed definition of “small electric vehicles” based on the vehicles' length, with a proposed length of 4.2 meters. CZ also supports extending this definition to other zero-emission vehicles in order to ensure technological neutrality. However, CZ will not be in a position to accept a smaller dimensional threshold. The category of “small electric vehicles” must cover vehicles that are attractive to European consumers, that is, small “family” cars suitable for everyday use by average families living in both rural and urban areas.</p> <p>FR</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>The French authorities suggest the following amendment: « (1) in Annex I, Part A, the following point 2.4 is inserted after point 2.3.1.: ‘2.4. Small electric vehicle: 2.4.1. Small electric vehicle means a pure electric vehicle that belongs to category M1, having a length not exceeding 4.2 metres <u>and an electric energy consumption not exceeding [175] Wh/km.</u> For this subcategory of vehicles, the letter ‘E’ shall be added as suffix to letter and numeral identifying the vehicle category (M1).’ »</p> <p>FR</p> <p>(Comments):</p> <p>The French authorities welcome the creation of a subcategory for small electric vehicles (M1E) and its definition. They point out that the share of this subcategory of vehicles is set to increase with the development and growing sales of vehicles that will meet the criteria defined for the M1E category.</p> <p>The French authorities also point out that the definition of this subcategory must encourage the emergence of small, environmentally friendly, affordable and efficient vehicles. They stress that a single criterion based on length could lead to unintended consequences in terms of the objectives sought.</p> <p>To ensure real affordable and efficient vehicles, a maximum electric energy consumption should be added. It would not be understandable that high energy consumption electric vehicles be part of flexibilities that will be</p>

Commission proposal	Drafting suggestions and Comments
	<p>offered to this category of vehicles, which is created to promote affordable and environmentally friendly electric vehicles.</p> <p>Finally, the French authorities recall that the definition and advantages granted to the M1E subcategory must take into account the safety of vehicles and other road users, as well as the impact on the European light and heavy electric quadricycle industry.</p> <p>SE (Comments):</p> <p>If this sub category is introduced and a length provision is to constitute it, it should be 4.25 – 4,3 meters in order not to prevent market distortion nor to exclude car models that would contribute to achieving the purpose of the regulation.</p> <p>SK (Comments):</p> <p>SK is currently analysing the proposal, as well as comments provided by the other Member States. With regard to definition of “Small electric vehicle” SK agrees with IT that we should be referring to small zero-emission vehicle and include CO2 neutral fueled vehicle. Regarding the proposed max. Length, SK maintains scrutiny reservation.</p>

Commission proposal	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 3</i></p>	<p>SK (Comments):</p> <p>The Commission is proposing a change regarding the speed limitation devices. According to current regulations, vehicles heavier than 3.5 tonnes must be equipped with speed limitation devices. According to this proposal electric vehicles from 3.5 tonnes to 4.25 tonnes do not have to be equipped with speed limitation devices.</p> <p>We would like to ask how the Commission assessed the impact on road safety. In 2012 the Commission argued that speed limiters should also be fitted to N1 vans up to 3.5 tonnes, where it was argued that weight and speed have a fairly significant impact on road safety.</p> <p>We understand that the Commission is trying to facilitate the conditions for one group of vehicles, however, the proposals should be technologically neutral. The impacts on road safety should be thoroughly assessed.</p> <p>Could the Commission clarify whether the safety implications of this approach, including for 4.25-tonne N2 vehicles at motorway speeds, have been assessed?</p>
<p style="text-align: center;">Amendment to Regulation (EU) 2019/2144</p>	
<p>In Article 9 of Regulation (EU) No 2019/2144, the following paragraph 5a is inserted:</p>	
<p>‘5a. Vehicles of category N₂ propelled by means of electricity, with maximum technically permissible laden mass between 3,5 and 4,25 tonnes, shall not be</p>	<p>AT (Comments):</p>

Commission proposal	Drafting suggestions and Comments
<p>required to be equipped with speed limitation devices in accordance with UN Regulation No 89.’.</p>	<p>AT is critical towards increasing the threshold for equipping N2 electric vehicles with speed limiters from 3.5 t to 4.25 t. It must be ensured that the technical requirements applicable to N2 vehicles are sufficient to guarantee an appropriate level of road safety and environmental compatibility, even at higher design speeds for vehicles with a maximum mass of up to 4.25 t.</p> <p>BE- (Comments):</p> <p>BE supports the Commission's initiative to remove the obligation to equip e-vans between 3.5 and 4.25 tons with a speed limiter and to allow Member States that so wish to exempt them from the tachograph for national transport operations.</p> <p>FR (Drafting suggestions):</p> <p>The French authorities suggest the following amendment: <i>‘5a. Vehicles of category N2 propelled exclusively by means of electricity, with maximum technically permissible laden mass between 3,5 and 4,25 tonnes, shall not be required to be equipped with speed limitation devices in accordance with UN Regulation No 89.’</i></p> <p>FR (Comments):</p> <p>The French authorities wish that the exemption of speed limiters not be envisaged without due consideration of road safety issues.</p> <p>In addition, they point out that the proposed wording is not sufficiently precise with regard to the propulsion mode of the vehicles that would be eligible for such exemptions; only vehicles powered exclusively by electricity should be taken into account, as hybrid electric and combustion engine vehicles should not be able to benefit from such exemptions.</p>

Commission proposal	Drafting suggestions and Comments
	<p>SE (Comments): “propelled by means of electricity” is not clearly defined. Is the intention to include only pure electric vehicles or also OVC-HEV (Off-Vehicle Charging Hybrid Electric Vehicles)?</p> <p>SI (Drafting suggestions): ‘5a. Zero-emission vehicles of category N₂ propelled by means of electricity, with maximum technically permissible laden mass between 3,5 and 4,25 tonnes, shall not be required to be equipped with speed limitation devices in accordance with UN Regulation No 89.’</p> <p>SI (Comments): We propose that this exemption be introduced for all zero-emission vehicles and not just electric ones.</p>
<p><i>Article 4</i></p>	<p>SK (Comments): SK supports IT proposal to adopt a ‘stop-the/clock’.</p>
<p>Amendments to Regulation (EU) 2024/1257</p>	
	<p>DE</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Germany emphasizes that, in our opinion, the definition and regulation of “manipulation devices” and “manipulation strategies” contained in the main legislative act leaves too much room for interpretation and poses a serious threat to the legal certainty of Euro 7 type approvals. In our view, the Automotive Omnibus before the Euro 7 introduction date is the last opportunity to make important changes to the regulation in order to establish legal certainty. This is the only way to avoid significant bureaucratic effort and costs for vehicle manufacturers and authorities due to future legal proceedings. We therefore ask the Member States and the COM for their support. We are our drafting suggestions as soon as possible.</p>
<p>Regulation (EU) 2024/1257 is amended as follows:</p>	<p>HU</p> <p>(Drafting suggestions):</p> <p><u>HU:</u></p> <p><i>Article 10</i></p> <p>6. With effect from 29 May 2033, approval authorities shall, in the case of new types of vehicles of category M₂, M₃, N₂ or N₃ and new types of trailers of category O₃ or O₄ which do not comply with this Regulation, refuse to grant EU emission type-approval or national emission type-approval to such new types of vehicles and trailers on grounds relating to CO₂ and pollutant emissions, fuel and electric energy consumption or battery durability.</p> <p>7. With effect from 29 May 2034, national authorities shall, in the case of new vehicles of category M₂, M₃, N₂ or N₃ and new trailers of category O₃ or O₄, which do not comply with this Regulation, consider certificates of conformity to be no longer valid for the purposes of registration and shall prohibit the registration, sale or entry into service of such new vehicles and trailers on grounds relating to CO₂ and pollutant emissions, fuel and electric energy consumption, energy efficiency or battery durability.</p> <p><i>Article 11</i></p>

Commission proposal	Drafting suggestions and Comments
	<p>2. With effect from 29 May 2033, Member States shall prohibit the sale or installation of a system, component or separate technical unit intended to be fitted on a vehicle of category M₂, M₃, N₂ or N₃, or on a trailer of category O₃ or O₄ approved under this Regulation, where the system, component or separate technical unit is not type-approved in accordance with this Regulation.</p> <p>Article 20</p> <p>1. Regulation (EC) No 715/2007 is repealed with effect from 1 July 2030. Regulation (EC) No 595/2009 is repealed with effect from 1 July 2034. References to Regulations (EC) No 715/2007 and (EC) No 595/2009 shall be construed as references to this Regulation and shall be read in accordance with the correlation table set out in Annex VI to this Regulation.</p> <p>2. Regulation (EU) 2017/1151 is repealed with effect from 1 July 2030. Regulations (EU) No 582/2011 and (EU) 2017/2400, as well as Implementing Regulation (EU) 2022/1362 are repealed with effect from 1 July 2034.</p> <p>Article 21</p> <p>This Regulation shall enter into force on the twentieth day following that of its publication in the <i>Official Journal of the European Union</i>.</p> <p>It shall apply from 29 November 2026 for new types of vehicles of categories M₁ and N₁ and components, systems and separate technical units intended for vehicles of categories M₁ or N₁ type-approved under this Regulation and from 29 November 2027 for new vehicles of categories M₁ and N₁ and components, systems and separate technical units for those vehicles.</p> <p>It shall apply from 29 May 2033 for new types of vehicles of categories M₂, M₃, N₂, N₃, O₃ and O₄ and components, systems and separate technical units intended for vehicles of categories M₂, M₃, N₂, N₃, O₃ or O₄ type-approved under this Regulation and from 29 May 2034 for new vehicles of categories M₂, M₃, N₂, N₃, O₃ and O₄ and components, systems and separate technical units for those vehicles.</p>

Commission proposal	Drafting suggestions and Comments
	<p>It shall apply from 1 July 2028 for new types of C₁ class tyres, from 1 April 2030 for new types of C₂ class tyres and from 1 April 2032 for new types of C₃ class tyres.</p> <p>It shall apply from 1 July 2030 for vehicles of categories M₁ and N₁, constructed by small-volume manufacturers and from 1 July 2031 for vehicles of categories M₂, M₃, N₂ and N₃ constructed by small-volume manufacturers. However, Article 11(3) shall apply from 28 May 2024.</p> <p>HU (Comments):</p> <p>HU: We propose that the text by the Commission be supplemented so as to amend Article 10(6) and (7), Article 11(2), Article 20(1) and (2), as well as the second subparagraph of Article 21(2), with a view to extending the application dates laid down in the aforementioned operative provisions by five years (i.e. deferring the application of the relevant requirements).</p> <p><u>Justification:</u> It is well known that, by 2030, the average CO₂ emission reduction target for heavy-duty vehicles will be further tightened from –15% to –43%. In addition, new safety requirements will enter into force at the end of 2029 (for example, provisions on the direct vision of trucks, as well as further steps under the General Safety Regulation (EU) 2019/2144).</p> <p>The simultaneous application of these new requirements will require extremely significant human and financial resources in order to ensure compliance. The EURO 7 requirements would constitute an additional burden and, given that a number of type-approval requirements have not yet been adopted, the industry would have only a few months to adapt.</p> <p>We therefore consider it justified to introduce a five-year “stop-the-clock” mechanism in order to allow the industry to focus its investments on electrification and vehicle safety. The current Euro VI framework is still</p>

Commission proposal	Drafting suggestions and Comments
	<p>relatively “young” and, at global level, is considered one of the most advanced standards; in our view, it is capable of ensuring a sufficiently high level of environmental protection over the proposed deferral period.</p> <p>We therefore propose postponing the application of the EURO 7 requirements for heavy-duty vehicles by five years.</p>
	<p>IT (Drafting suggestions):</p> <ul style="list-style-type: none"> (1) Article 10, point 6, replace 29 May 2028 with 29 May 2033. (2) Article 10, point 7, replace 29 May 2029 with 29 May 2034. (3) Article 11, point 2, replace 29 May 2028 with 29 May 2033. (4) Article 20, point 1, replace 29 July 2031 with 29 May 2034. (5) Article 20, point 2, replace 29 July 2031 with 29 May 2034. (6) Article 21, third paragraph, replace 29 May 2028 with 29 May 2033 (7) Article 21, third paragraph, replace 29 May 2029 with 29 May 2034. <p>IT (Comments):</p> <p>It is proposed to postpone by [5] years the application of EURO 7 requirements for Heavy Duty Vehicles. As known in 2030 the average CO2 target for HDV will be further reduced from – 15% to – 43%. Moreover, at the end of 2029 new safety requirements will enter into force (e.g. direct field of vision for trucks and further steps of general safety regulation EU 2019/2144. The simultaneous application of these new requirements will imply very high human and financial resources to meet the relevant provisions. EURO 7 requirements represent an additional burden and since several type approval requirements have not been adopted so far industry will have a few months to adapt.</p> <p>For the above reason, as for other adopted omnibus packages, it would be suitable to adopt a ‘stop-the-clock’ of [5] years in order to allow industry to focus their investment on electrification and vehicle safety, bearing in mind that the present</p>

Commission proposal	Drafting suggestions and Comments
	Euro VI legislation is still quite “young” and represent one of the most advanced standard at global level.
(1) Article 14(4), point (j) is replaced by the following:	IT (Drafting suggestions): (8) Article 14(4), point (j) is replaced by the following: IT (Comments): Paragraph renumbering
‘(j) the methods, requirements and tests, including compliance thresholds, to ensure performance of OBFCM devices, OBD and OBM systems and the sensors of such devices and systems, for off-board communication of data recorded by such devices and systems, including for the purpose of monitoring compliance of vehicle types;’;	AT (Comments): AT supports empowering Cion to adopt delegated acts on off-board communication with OBM, OBD and OBFCM systems. Data protection, including opt-out options, must be ensured. DE (Drafting suggestions): ‘(j) the methods, requirements and tests, including compliance thresholds, to ensure performance of OBFCM devices, OBD and OBM systems and the sensors of such devices and systems, for off-board communication of data recorded by such devices and systems, including for the purpose of monitoring compliance emissions and battery durability of vehicle types;’; DE (Comments): "Emissions and battery durability" are specified as OTA parameters in Euro 7 IA (Regulation (EU) 2025/1707, Annex 1, Appendix 6, Table 6.3). The data transmitted via OBM are an indication of vehicles types that should be tested. Conformity assessment should still be based on ISC and not on OMB data.

Commission proposal	Drafting suggestions and Comments
	<p>DK (Comments): Support</p> <p>FR (Comments): The French authorities support the article concerning the modification of the Commission's powers.</p>
<p>(2) Annex V is amended in accordance with Annex I to this Regulation.</p>	<p>CZ (Comments): CZ fully supports simplification in the area of mandatory testing and therefore supports the removal of mandatory laboratory testing at low temperatures. At the same time, in order to continue control of pollutant emissions such as total hydrocarbons (TCH) and carbon monoxide (CO), which are not covered by RDE testing, CZ proposes the reintroduction of emission limit values as set out under the Euro 6 standard. Compliance with these limits could be demonstrated through a manufacturer’s Declaration of Conformity rather than through mandatory physical testing within the Type Approval procedure. This approach would provide manufacturers with a degree of regulatory relief while avoiding the creation of a regulatory gap with respect to TCH and CO emissions.</p> <p>DK (Drafting suggestions): Delete proposal in Annex I paragraph (3), (4), (5) and (6) regarding changing Annex V to Regulation (EU) 2024/1257 and reference to “category” for M2, M3, N2 and N3.</p>

Commission proposal	Drafting suggestions and Comments																								
	<p>DK (Comments): See comments to preamble no 18</p> <p>FR (Drafting suggestions): The French authorities suggest the following amendment: <u>Annex I to Regulation (EU) 2024/1257 is amended as follows:</u> <u>insert a table 1Bis: Emission limit for the carbon monoxide and hydrocarbon tailpipe emissions at low temperature test for vehicles of categories M1 and N1 with internal combustion engine</u></p> <table border="1" data-bbox="1171 834 1883 1214"> <thead> <tr> <th colspan="4"><i>Test temperature 266 K (-7 °C)</i></th> </tr> <tr> <th><i>Vehicle category</i></th> <th><i>Class</i></th> <th><i>Mass of carbon monoxide (CO) L1 (g/km)</i></th> <th><i>Mass of hydrocarbons (HC) L2 (g/km)</i></th> </tr> </thead> <tbody> <tr> <td><i>M₁</i></td> <td><i>-</i></td> <td><i>15</i></td> <td><i>1,8</i></td> </tr> <tr> <td><i>N₁</i></td> <td><i>I</i></td> <td><i>15</i></td> <td><i>1,8</i></td> </tr> <tr> <td></td> <td><i>II</i></td> <td><i>24</i></td> <td><i>2,7</i></td> </tr> <tr> <td></td> <td><i>II</i></td> <td><i>30</i></td> <td><i>3,2</i></td> </tr> </tbody> </table> <p>Annex V to Regulation (EU) 2024/1257 is amended as follows: (1) in table 1, the entry for ‘Laboratory test of low temperature for emissions’ is deleted;</p>	<i>Test temperature 266 K (-7 °C)</i>				<i>Vehicle category</i>	<i>Class</i>	<i>Mass of carbon monoxide (CO) L1 (g/km)</i>	<i>Mass of hydrocarbons (HC) L2 (g/km)</i>	<i>M₁</i>	<i>-</i>	<i>15</i>	<i>1,8</i>	<i>N₁</i>	<i>I</i>	<i>15</i>	<i>1,8</i>		<i>II</i>	<i>24</i>	<i>2,7</i>		<i>II</i>	<i>30</i>	<i>3,2</i>
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	<i>II</i>	<i>30</i>	<i>3,2</i>																						

Commission proposal	Drafting suggestions and Comments
	<p>(2) in table 2, the entry for ‘Laboratory test of low temperature for emissions’ is deleted;</p> <p>(3) in table 3, the entry for ‘Gaseous pollutants, PN in road testing (RDE) for each fuel and for the applicable vehicle categories (M2, M3, N2 and N3)’ is replaced by the following: [...]</p> <p><u>Annex III to Regulation (EU) 2024/1257 is amended as follows:</u></p> <p><u>In table 1, column “Laboratory exhaust emission measurement”, insert at the end “For low temperature emission test, the reference for the declaration of compliance is UN Regulation No 83 (***)</u></p> <p><u>(***)UN Regulation No 83, 08 series of amendments.”</u></p> <p>FR (Comments):</p> <p>The French authorities do not support the option chosen for reducing the administrative burden resulting from the Euro 7 regulation. In fact, they consider it essential to maintain laboratory tests for light vehicles (as currently provided for in the Euro 6 regulation), which are the only way of detecting certain pollutants by clearly setting the associated limit values. Tests under real driving conditions (RDE) currently only concern the pollutants NOx (nitrogen oxides) and PM (particulate matter), and never CO (carbon monoxide) and THC (total unburnt hydrocarbons). Nor does the fact that vehicles are not tested cold in the laboratory legally protect manufacturers and authorities from differing interpretations a posteriori. Clearly defining the limits to be met by the laboratory cold test guarantees legal certainty.</p> <p>The French authorities support the proposal concerning heavy-duty vehicles.</p>
	IT

Commission proposal	Drafting suggestions and Comments																																
	<p>(Drafting suggestions):</p> <p>Article 4a (new): Amendments to Regulation (EU) 2023/443 amending Regulation (EU) 2017/1151 as regards the emission type approval procedures for light passenger and commercial vehicles.</p> <p>Annex XXI, Appendix 5 – Table A8. App5/1 – row three and four.</p> <table border="1" data-bbox="1173 480 1807 767"> <thead> <tr> <th colspan="2">Regulation Text</th> <th colspan="2">Amendment</th> </tr> </thead> <tbody> <tr> <td colspan="2">Appendix 5 – Table A8. App5/1 – row four: Parameters for the determination of fractional UFs (as applicable)</td> <td colspan="2">Appendix 5 – Table A8. App5/1 – row four: Parameters for the determination of fractional UFs (as applicable)</td> </tr> <tr> <td>Parameter</td> <td>Value</td> <td>Parameter</td> <td>Value</td> </tr> <tr> <td>d_{nea} (*)</td> <td>800 km</td> <td>d_{nea} (*)</td> <td>800 km</td> </tr> <tr> <td>d_{neb} (*)</td> <td>2 200 km</td> <td>d_{neb} (*)</td> <td>2200 km</td> </tr> <tr> <td>d_{nec} (*)</td> <td>4 260 km</td> <td>d_{nec} (*)</td> <td>2200 km</td> </tr> <tr> <td>(...)</td> <td>(...)</td> <td>(...)</td> <td>(...)</td> </tr> <tr> <td colspan="2">(*) The value to be applied shall be that corresponding to the emission characters EA, EB and EC as specified in Table 1, Appendix 6 to Annex I.</td> <td colspan="2">(*) The value to be applied shall be that corresponding to the emission characters EA, EB and EC as specified in Table 1, Appendix 6 to Annex I.</td> </tr> </tbody> </table> <p>IT</p> <p>(Comments):</p> <p>In order to determine the range in electric mode of hybrid vehicles with external recharging systems (plug in hybrid vehicles) Utility Factors (UF) apply. According to Regulation (EU) 2023/443 new UF should apply as from 1st January 2027. Since the plug-in hybrid technology has made huge progress in terms of range driven in electric mode we believe that the parameters currently listed in Regulation (EU) 2023/443, Annex XXI appendix 5 are not representative of the performance of state of art plug in hybrid vehicles. In order to promote this technology and allow industry to continue to invest on it during the transitional period and beyond 2035 it is proposed to frozen the current UF</p>	Regulation Text		Amendment		Appendix 5 – Table A8. App5/1 – row four: Parameters for the determination of fractional UFs (as applicable)		Appendix 5 – Table A8. App5/1 – row four: Parameters for the determination of fractional UFs (as applicable)		Parameter	Value	Parameter	Value	d _{nea} (*)	800 km	d _{nea} (*)	800 km	d _{neb} (*)	2 200 km	d _{neb} (*)	2200 km	d _{nec} (*)	4 260 km	d _{nec} (*)	2200 km	(...)	(...)	(...)	(...)	(*) The value to be applied shall be that corresponding to the emission characters EA, EB and EC as specified in Table 1, Appendix 6 to Annex I.		(*) The value to be applied shall be that corresponding to the emission characters EA, EB and EC as specified in Table 1, Appendix 6 to Annex I.	
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Commission proposal	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 5</i></p>	<p>FR (Comments): The French authorities support the administrative simplification measures concerning vehicle noise level requirements, which are a step in the right direction.</p>
<p style="text-align: center;">Repeals</p>	
<p>1. Regulation (EU) No 540/2014 is repealed.</p>	<p>HU (Drafting suggestions): HU: Regulation (EU) No 540/2014 shall cease to apply as of 1 July 2027.</p> <p>HU (Comments): HU: We propose to align the repeal of Regulation (EU) No 540/2014 of the European Parliament and of the Council of 16 April 2014 on the sound level of motor vehicles and replacement silencing systems, amending Directive 2007/46/EC, and repealing Directive 70/157/EEC, with a specific date, namely 1 July 2027.</p> <p><u>Justification:</u> The aforementioned legislation is widely recognised as outdated. Furthermore, specifying the exact date of repeal will assist the relevant automotive industry stakeholders and national administrations in adapting to the changes in the applicable vehicle noise requirements.</p> <p>IT (Drafting suggestions): 1. Regulation (EU) No 540/2014 is repealed.with effect from 1 July 2027.</p> <p>IT</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The amendment is consistent with the explanatory text where it is said that “As Regulation (EC) No 540/2014 has become obsolete, it is proposed to repeal the Regulation with effect from 1 July 2027”</p>
<p>2. Directive 70/157/EEC is repealed with effect from 1 July 2027.</p>	
<p><i>Article 6</i></p>	
<p>Transitional provision</p>	
<p>Certificates of conformity for new vehicles produced after [OP: please insert the date of entry into force of this Regulation] and approved before 1 July 2028 in accordance with Regulation (EU) 540/2014 shall continue to be valid for the purposes of Articles 48 and 49 of Regulation (EU) 2018/858.</p>	
<p><i>Article 7</i></p>	
<p>Entry into force and application</p>	
<p>This Regulation shall enter into force on the twentieth day following that of its publication in the <i>Official Journal of the European Union</i>.</p>	

Commission proposal	Drafting suggestions and Comments
<p>2. It shall apply from [on the twentieth day following that of its publication in the <i>Official Journal of the European Union</i>]. However, Articles 3 shall apply from ...[the transposition date in the proposal amending Directive 92/6]</p>	<p>HU (Drafting suggestions): <u>HU:</u> We do not have a specific proposal.</p> <p>HU (Comments): <u>HU:</u> We propose to establish coherent, clarified, and unambiguous provisions with regard to the cross-references between this point and Article 2(1) of the draft Directive of the European Parliament and of the Council amending Directive 92/6/EEC, aimed at exempting certain N2 category electric vehicles from the obligation to install and use speed-limiting devices.</p> <p>IT (Comments): The relationship between art.7.2 which recalls art.3 (exemption for e-vans to be fitted with a speed limitation device) and art. 2 of doc. COM (2025) 999 should be clarified.</p> <p>The two proposals (art.7 in doc 993 and art 2 in doc 999) make mutually reference to each other</p>
<p>This Regulation shall be binding in its entirety and directly applicable in all Member States.</p>	
<p>Done at Strasbourg,</p>	

Commission proposal	Drafting suggestions and Comments
<p><i>For the European Parliament</i> <i>For the Council</i></p>	
<p><i>The President</i> <i>The President</i></p>	
	<p>IT (Drafting suggestions):</p> <p>ANNEX II Annexes I and II to Regulation (EU) 2018/858 are amended as follows: (1) in Annex I, Part A, the following point 2.4 is inserted after point 2.3.1.: ‘2.4. Small zero emission electric-vehicle: 2.4.1. Small zero emission electric vehicle means a pure electric vehicle or a vehicle running exclusively on CO2 neutral fuel that belongs to category M1, having a length not exceeding [4.2] metres, or to category N1, having a length not exceeding 5.0 metres. For these subcategories of vehicles, the letter ZE shall be added as suffix to letter and numeral identifying the vehicle category (M1 and N1)</p> <p>IT (Comments):</p> <p>Regarding the maximum length of M1E we maintain a reservation since we believe that it should be limited to 3,70 m in order to better represent a vehicle of small dimensions (e.g. a city car). A length of 4.20 m would also include medium cars as well as small SUVs.</p> <p>We also propose a similar approach for zero emission vans (category N1).</p>

Commission proposal	Drafting suggestions and Comments
	<p>Moreover, we believe that this definition should be amended in order to make it technology neutral. Therefore, propulsions other than electric should be covered.</p>
	<p>IT (Drafting suggestions):</p> <p>2.4.2 "CO2 neutral fuel" means all fuels defined by the Renewable Energy Directive (EU) 2018/2001, provided that they meet the sustainability criteria of that Directive and associated delegated acts, where the same amount of CO2 from biomass, ambient air or recycled carbon sources is bound in the fuel production as is released during combustion in the use phase. Those fuels shall include renewable and/or synthetic fuels, such as biofuel, biogas, biomass fuel, renewable liquid and gaseous transport fuel of non-biological origin (RFNBO) or a recycled carbon fuel (RCF).”</p>
	<p>IT (Drafting suggestions):</p> <p>2.5 CO2 Neutral Fuel vehicle (NF). 2.5.1. CO2 Neutral Fuel Vehicle means a vehicle of category M or N running exclusively on CO2 neutral fuels. For these subcategories of vehicles, the letter NF shall be added as suffix to letter and numeral identifying the vehicle category (M and N)</p> <p>IT (Comments):</p> <p>While M1ZF and N1ZF are temporary subcategories which are linked to specific objectives of the proposed CO2 LDV Regulation (super credits), MNF and NNF pave the way for a stable consolidation of this category in the type approval legislation.</p>