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WORKING DOCUMENT

From:	Presidency
To:	Working Party on Technical Harmonisation (Measuring instruments)
Subject:	Directive amending Directive on measuring instruments (2014/32/EU) : MS comments on the questionnaire in WK 3475/25

AT

We support **option 1**.

We are still open to simplified test procedures in cases where the EVSE works with an electricity meter whose conformity has already been assessed. However, we are opposed to mixing provisions in one annex and a subassembly approach as described in the FI/SE paper will not be accepted.

We propose not to repeat many of the expert discussions that have already taken place in the preparation of the COM draft. The harmonisation of EVSE is too important an issue to postpone further.

We know this is a very difficult topic and thank you very much for all your efforts!

BE

I would like to inform you that Belgium prefers option II.

BG

Following your request, we would like to confirm that **Bulgaria** supports **Option I**: the proposal will include two separate Annexes with essential metrological requirements: one for the electrical energy meters and second one for the electric vehicle supply equipment (without sub-assembly approach).

The justification is as follows:

Several different aspects compared to the electricity meters (utility meters):

- energy is supplied and measured for different users (except in the case of home chargers) and appears more like a direct sale,
- charging stations can be powered with direct current and with different charging powers,
- charging stations are outdoors,
- the load is usually of unity power factor,
- the measuring instrument can be integrated into the station, etc.

In terms of public supply - more similar to gas stations: CS are configured in a way for different payment methods, in addition to the so-called ad hoc price, the design trend is that there is no user information screen and that the registration of the transaction is done by telematic means.

CZ

Response to Presidency questionnaire on Annexes III and IV (WK 3475/2025)

The Czech Republic prefers **Option II**:

The proposal will include two separate Annexes with essential metrological requirements: one for the electrical energy meters and second one for the electric vehicle supply equipment based on the SE/FI proposal (sub-assembly approach).

Two separated Annexes will enable defining respective requirements and referencing on technical specifications, harmonised standards and normative documents and adopting their potential amendments. Introducing the concept of sub-assemblies would provide more flexibility.

DE

Germany supports option I (COM proposal) and is generally open to specifying sub-assemblies in order to support manufacturers and users of EVSE.

DK

Regarding Annex V and Annex Va in MID

In the meeting flash regarding the WP meeting on 19th March, the Presidency asked delegations to answer a questionnaire regarding the proposal's Annex III (proposal for directive Annex V) and Annex IV (proposed new Annex Va) electric vehicle supply equipment (EVSE).

On the basis of the current information on the three proposed options Denmark's first preference is option II, which introduces two separate annexes with sub-assemblies. Sub-assemblies are already a part of the MID in other annexes, e.g. in Annex VI. We find that the description of the method of sub-assemblies in Annex VI could be used for the new Annex Va. However, we believe that in order for this to be a viable solution, the proposal will have to be more detailed and include definitions of the specific sub-assemblies of an EVSE that will require a conformity assessment. Therefore, Denmark prefers option II in the questionnaire if the definitions of the sub-assemblies are included in the annex, as we believe that this will be both a legally and technically sound option.

We can also accept option I, in case that option II is not possible as described above. In regards to option III, we are worried that the requirements will be unclear and we would therefore prefer two separate annexes with the essential requirements for EVSEs listed.

EE

Estonia can be flexible regarding the options as we have no clear preference.

FR

NOTE DES AUTORITES FRANCAISES

(courtesy translation)

Subject: Position of the French authorities on the working solutions proposed by the Presidency for the preparation of the compromise with regard to Annexes III and IV to the proposal for a revision of the Directive 2014/32/EU on measuring instruments

Ref.:

- Presidency Flash WK 3475/2025 INIT
- Commission proposal COM(2024) 561 final
- Proposal by the Swedish and Finnish authorities WK 1930/2025
- Member States' comments on Annexes WK 3411/2025 INIT

French authorities thank the Presidency for the opportunity to submit its opinion on the solutions envisaged for Annexes III and IV to the proposal for a revision of the Directive 2014/32/EU on measuring instruments.

This proposal provides for a limited update of Annex V on electric energy meters (Annex III of the proposal) and the addition of a new Annex Va on measuring systems for electric vehicle supply equipment (Annex IV of the proposal).

As part of the preparation of a compromise, the Presidency proposes to the Member States three working options concerning these annexes, following the discussions held at the technical harmonisation meetings on 24 January 2025 and 14 February 2025.

The option I keeps two separate annexes setting out the essential metrological requirements, one for active electric energy meters and the other for measuring systems for electric vehicle supply equipment ('EVSE'). This is the option retained in the Commission proposal COM(2024) 561 final.

The Commission explained at the meeting on 24 January 2025 that this option I had been chosen in order not to restrict the Member States' optionality given by Article 3 of Directive 2014/32/EU, whether or not to prescribe the use of measuring instruments for measurement tasks. The French authorities understood from the discussions that this could lead to two approaches to implementation: some Member States could opt for a conformity assessment of the measuring system for EVSE, in accordance with Annex Va, while others could require a conformity assessment only for the electricity meter installed in the EVSE measuring system, in accordance with Annex V. These two approaches would run counter to the harmonisation of requirements for the placing on the market of measuring systems for EVSE. Indeed, manufacturers of measuring systems for EVSE would have to carry out two conformity assessments in order to ensure the placing on the market in all EU Member States of their measuring systems. Furthermore, the requirements of the operating conditions of measuring systems for EVSE in the Commission proposal COM(2024) 561 would differ depending on whether the Member State adopts Annex V or Annex Va for the conformity assessment of measuring systems for EVSE, thereby undermining consumers protection. The French authorities invites the Presidency to refer to the technical elements provided in its contribution WK 3411/2025 INIT. Finally, the introduction of a new Annex Va which would be limited to a single use - measuring electricity of EVSE - is contrary to the principle of Directive 2014/32/EU which harmonises the requirements for categories of measuring instruments, regardless of the possible uses.

The option II also keeps two separate annexes setting out the essential metrological requirements, one for active electrical energy meters, the other for measuring systems for EVSE, but introducing sub-assemblies for the conformity assessment (meter, computer, conversion and connection devices) of measuring systems for EVSE under Annex Va. This is the workable solution proposed by the Swedish and Finnish authorities (doc WK 1930/2025) and presented at the meeting on 14 February 2025.

This option II would harmonise the requirements between the two annexes by considering the meter as a sub-assembly which requirements are outlined in Annex V. Nevertheless, the French authorities consider that assessing the conformity of several sub-assemblies of the measuring system for EVSE would create administrative burden. Furthermore, the definition of sub-assemblies (meter, calculator, conversion and connection devices) as proposed by the Swedish and Finnish authorities is not technologically neutral since it is based on current types of measuring systems. This is likely to hamper technological developments, which are numerous in the field of EVSE. Some current technologies do not fit into the definition of sub-assemblies as proposed (meter, calculator, conversion and connection devices).

The option III holds back a single annex setting out the essential metrological requirements for electricity meters, supplemented by requirements for measuring systems for EVSE. This was the option proposed by the WELMEC working group prior to the Commission's proposal.

The French authorities consider that this option would harmonise the requirements for placing on the market of measuring systems for EVSE, in line with those existing for electricity meters. The resulting annex would then cover any application requiring electrical energy metering (electricity transport and distribution, charging stations,

photovoltaic panels, battery electricity storage, smart lighting, etc.) with the same level of metrological and performance requirements. A single annex will avoid fragmentation of the market between the different technologies for measuring electrical energy. Consequently, a single type of conformity assessment will be sufficient for manufacturers of such measuring instruments.

For all the reasons presented above, the French authorities are in favour of option III consisting of a single annex setting out the essential metrological requirements for the measurement of electrical energy.

Nevertheless, if option I was to be chosen, the French authorities remind the need to harmonise the requirements between Annexes V and Va as proposed in its contribution WK 3411/2025 INIT.

ES

Spain prefers the option:

1. **Option I:** the proposal will include two separate Annexes with essential metrological requirements: one for the electrical energy meters and second one for the electric vehicle supply equipment (without sub-assembly approach).

FI

On the questionnaire for the workable solution for the Presidency compromise proposal for Annexes V and Va, **Finland supports option II**. This option would allow aligning the functional requirements and MPE's for EVSE's with the requirements of Annex V and provide a flexible solution for the manufacturers to combine an EVSE conforming to the requirements of the MID. The sub-assembly approach also offers a reasonable solution for repair and maintenance of the EVSE. When choosing the workable solution for Annexes V and Va, the possibility for member states to use optionality as described in article 3 should be kept open.

We could also be open to option III if similar benefits could be achieved as when using the sub-assembly approach.

IT

Consultations are running in Rome to provide the Italian comments by 2 April.

On the questionnaire, we have received no indication yet about the preferred option for Annexes V and Va, but I am confident that we will express our view together with the comments on the partial compromise text.

LT

We provide Lithuania's response to the options outlined in the Presidential Flash (WK 3475/25) Annex I questionnaire regarding Annex III and Annex IV of the proposal: **Lithuania prefers Option II:** The proposal will include two separate Annexes with essential metrological requirements: one for electrical energy meters and another for electric vehicle supply equipment (EVSE), based on the SE/FI proposal (sub-assembly approach).

LT Comment: EVSE can operate at various voltage levels and in different forms (AC/DC). Therefore, an electric vehicle charging station is generally considered a measuring system that comprises not only the energy meter/consumption indicator itself but also sensor subsystems and related technical components. We believe that the most practical approach would be to adopt the

MID Annex Va - system with a sub-assembly structure (Figure 3 in the SE/FI proposal WK 1930/25). We think that this approach clearly identifies specific system components that can be replaced as separate parts and to which the relevant metrological requirements apply. Since Lithuania has no prior experience in regulating EVSE, as this equipment is currently not included in legal metrology in our country, our proposal is based solely on initial observations regarding potential regulatory requirements for EVSE. We remain flexible regarding the selection of options and look forward to further discussions on this matter.

LV

As mentioned during the Working Party meeting on March 19, we would prefer option 2 for the proposed MID “electric” Annexes III (V) and IV (Va). In our view, this option could provide flexibility and adaptability, which are important for technological development, while also promoting harmonization and preventing the emergence of differing national regulation. At the same time, we share the point made by Germany during the last meeting that this option requires a clear conception of what constitutes a sub-assembly.

MT

Please note my experts' preference towards Option II.

NL

However, before the Presidency prepares a presidency compromise proposal on these two annexes, we would like to know which workable solutions you prefer:

March 25th 2025; Position of **The Netherlands**, in [blue](#).

1. **Option I:** the proposal will include two separate Annexes with essential metrological requirements: one for the electrical energy meters and second one for the electric vehicle supply equipment (without sub-assembly approach).

This is our preferred option. This option does justice to the differences between a separate [meter](#) and a charging [system](#). It appeals to metrological and consumer logics as it forces EVSE systems to be assessed in a comparable way to petrol stations (directed at the full system). Please be aware that it is already a compromise that can meet the differences in opinion in WELMEC through the use of the optionality clause in the MID.

*The proposal is to a large extent ready, so there is a potential to move forward quickly. **We believe this is the only option that can be handled at the pace we are operating.***

2. **Option II:** the proposal will include two separate Annexes with essential metrological requirements: one for the electrical energy meters and second one for the electric vehicle supply equipment based on the SE/FI proposal (sub-assembly approach).

In principle, we would very much appreciate a sub-assembly approach in the new Annex Va for example for easy replacement of the charging cable. However, we do not believe that the

meter can be assessed separately from the cabinet in which it is installed. So in any case, there is also a need for an overall assessment of the full system, e.g. to check if the meter stays within its rated operating conditions in all circumstances and to see if the meter reading corresponds to the energy transferred at the transfer point. As we do not want this overall check to descend upon (market) surveillance, this task should stay under the responsibility of the manufacturer and its notified body by means of an overall conformity assessment.

As we believe option II is written in a way that it would open up the possibility to use an Annex V approved meter in a EVSE system without any further conformity assessment, we cannot agree to this proposal.

3. **Option III:** the proposal will include only one Annex with essential metrological requirements for the electrical energy meters supplemented by requirements for electric vehicle supply equipment (adapted Annex V).

This option can be interpreted in two ways: combining the annexes by means of separate chapters or also at the same time harmonising the meter requirements.

In case we make separate chapters this option would be more or less comparable to option I.

However, we oppose the idea to 'harmonise' Annexes V and Va. They serve distinctly different purposes and the conditions under which the meter operates in a system can be significantly different from the conditions under which the meter is tested according to Annex V.

Postscript

In contrast with the worries expressed by others about restrictive effects of EVSE-specific requirements, we *observe the opposite*. Regulating energy measurements in EVSE using Annex Va has a *stimulating* effect for the industry: a manufacturer will have the freedom to design and bring to market a system without a separately certified and distinct 'metering box' built in. It is therefore an *advantage* to have the complete system evaluated for metrological accuracy, regardless of which parts – internally – take care of the sensing and metering.

Regulating EVSE as complete systems -- with measuring part, indicating options and transfer point all within scope -- is in our opinion the only way to ensure trustworthy measurements of energy transferred *at the transfer point*.

SK

I would like to inform you, that preferred solution regarding Annex III and Annex IV for Slovakia is **Option II**:

Option II: the proposal will include two separate Annexes with essential metrological requirements: one for the electrical energy meters and second one for the electric vehicle supply equipment based on the SE/FI proposal (sub-assembly approach).

RO

Regarding the questionnaire from the WK 3475/2025, Romania is in favor for Option II. Thank you.

SE

In regards to the options outlined in the Presidency Flash (WK3475/25), Sweden supports the option II and, depending on the outline, option III could be an alternative.

The SE approach to the development of the targeted technical amendment is to:

- keep requirements technology neutral and in line with NLF and the New Approach,
- introduce minimum changes in order to simplify regulation,
- use the well-proven set of requirements and tools available in the current version of the directive and
- have requirements on the product design flexible enough so that they do not constrain the in-use phase of the product in maintenance, repair and subsequent verification.

These objectives will be in line with the EU simplification efforts, support innovation and minimize administrative burden especially to SMEs.

Our opinion is, as you already know, that option II has the potential to fulfil these objectives (as stated in doc. WK 1930/2025 Proposal from SE and FI for measuring electrical energy in charging stations for EVSE).

Regarding option III, it is difficult to have a clear picture of the outline of the legal text, as the option is introduced very briefly. However, since it refers to the requirements in Annex V, our preliminary opinion is that it could be an alternative if it is outlined in such a way that the objectives above are met and could solve for problems highlighted in the SE/FI proposal. When choosing the workable solution for Annexes V and Va, the possibility for member states to use optionality as described in article 3 should be kept open.

SI

Opinion of Slovenia on options I, II and III

Option I:

the proposal will include two separate Annexes with essential metrological requirements: one for the electrical energy meters and second one for the electric vehicle supply equipment (without sub-assembly approach).

Option II:

the proposal will include two separate Annexes with essential metrological requirements: one for the electrical energy meters and second one for the electric vehicle supply equipment based on the SE/FI proposal (sub-assembly approach).

Option III:

the proposal will include only one Annex with essential metrological requirements for the electrical energy meters supplemented by requirements for electric vehicle supply equipment (adapted Annex V).

Option	Preference	Comments
I	YES, acceptable	The option is acceptable. However, it is necessary to ensure that the requirements for the measuring systems for EVSE are as technically neutral as possible. Due to MID Article 3, the optionality clause, and potentially use of different Annexes for regulating the measuring systems for EVSE across Member States, we perceive a risk of fragmentation of the internal market in the field of measuring systems for EVSE, which must be avoided as much as possible.
II	YES, acceptable	The option is acceptable. We support a simple system where the requirements for the measuring systems for EVSE are technically as neutral as possible. This option may reduce the risk of fragmentation of the internal market in the measuring systems for EVSE. However, it is necessary that, in addition to the option with sub-assemblies, the option for complete measuring systems remains within Annex Va.
III	NO	Option I could be better and more transparent than option III.