Council of the European Union
General Secretariat

PUBLIC

Interinstitutional files:
2025/0422 (COD)
2025/0424 (COD)

Brussels, 21 January 2026

WK 919/2026 INIT

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From:	General Secretariat of the Council
To:	Antici Group (Simplification)
Subject:	Omnibus IX (Automotive) - Comments from delegations

Following the call for written comments and questions launched on 12 January, delegations will find attached the inputs received from: BE, DK, DE, IE, FR, IT, LU, NL, AT, PL, RO, FI and SE.

Omnibus IX (Automotive) -Member States AGS **12.01.2026**
(comments ddl 19.01.26**)**

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BELGIUM

- In **article 1 §1**, the European Commission proposes a new point (fa) in Article 13(1) of Regulation (EC) No 561/2006. The proposed amendment is to allow Member States to exempt e-Vans with GVWs between 3.5 tonnes and 4.25 tonnes engaged exclusively in domestic transport from the obligation to install smart tachographs, thereby putting them on equal footing with their fossil fuel equivalent with the same payload.

    - Question: Could the Commission clarify its understanding of the concept of 'domestic transport'? Does this notion require that the entirety of the operation takes place within the territory of a single Member State? How does the Commission intent to address situations in which transport operations (briefly) transit through the territory of another Member State without any loading or unloading activities?

- **Article 2 & Annex II (1)** : new subcategory of vehicules M_{1E}
    - Question: With regard to the new subcategory of vehicles (M_{1E}), to what extent will it be possible, where appropriate, to impose other technical criteria on this category in addition to the length limit?
    - If the co-legislators should agree on other additional technical criteria, should these be added to the definition in Annex II(1) to this proposal or could they be defined elsewhere?

- In **article 3**, the European Commission proposes an amendment to Regulation (EU) 2019/2144. The proposed amendment is to exempt e-Vans with GVWs between 3.5 tonnes and 4.25 tonnes (classed as N2 vans) from the obligation to be equipped with speed limitation devices, thereby putting them on equal footing with their fossil fuel equivalent.

    - Question: Does the Commission intend to establish a short-term monitoring scheme on the road safety effects of removing speed limitation devices for N2 electric vans, particularly in densely populated areas with high vulnerable road user exposure?

- **art. 4 – EURO 7**: On Laboratory test of low temperature for emissions in light-duty vehicles
    - Are there any differences between the laboratory test and the RDE-test in terms of the scope of the tests? Do the laboratory test and the RDE-test cover the same emissions, for instance carbon monoxide (CO) and hydrocarbons (HC)? Is every parameter of the laboratory test included in the RDE-test?
    - Does the RDE-test cover a significant amount of small-distance trajectories characteristic to urban areas?

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DENMARK

Question - Scope of the proposed exemptions for electric LCVs - *Article 13(1)(fa) of Regulation (EC) No 561/2006*

- *Can the Commission please clarify whether the proposed exemption from driving times and rest periods and tachograph rules for electric LCVs between 3.5 and 4.25 tonnes is intended to apply exclusively to domestic transport, as stated in recital 8, or whether it would also apply to international transport and cabotage between and in Member States that has implemented this exemption?*

- *How should Member States interpret the exemption given that recital 8 limits it to domestic transport, while the article does not? Does the Commission consider the recital sufficient, or is there a risk of divergent application or interpretation of the rules across Member States?*

Question - Scope of the proposed exemptions for motor caravans or motor caravan combinations that exceed 7.5 tonnes - *Article 13(2)(s) of Regulation (EC) No 561/2006*

- *Can the Commission please clarify how the proposed exemption to allow Member States to exempt motor homes from the rules on driving times and rest periods, and on the tachograph will work in practice?*

- *If one Member State chooses not to exempt motor homes, but a neighbouring Member State chooses the exemption, does that entail, that motor homes, that are registered in a non-exemption Member State and vice versa will be subject to the rules in the neighbouring countries? For example, could German motor homes on holiday along the west coast of Jutland be subject to a requirement to use a tachograph and comply with driving and rest times? Or is the requirement only in the country where the motor home is registered?*

Question - Interaction with existing rules for LCVs of category N1 (2.5-3.5 tonnes) - *Article 13(1)(fa) of Regulation (EC) No 561/2006*

- *If the exemption for LCVs between 3.5 and 4.25 tonnes from the rules on driving times and rest periods and tachograph applies to international transport, how will it interact with the rules that from July 2026 will subject 2.5 and 3.5 tonnes LCVs to the very same requirements?*

General questions/remarks

Question - Periodic roadworthiness testing (testing frequency of electric N2-vehicles between 3,5-4,25 tonnes) - Directive 2014/45/EU

- *Has the Commission considered whether the annual roadworthiness testing requirement for electric N2 vehicles between 3.5 and 4.25 tonnes is proportionate, given that their use is comparable to N1 vans, and if so, why is this not addressed in the omnibus package?*

- *It was not addressed during the negotiations on the Roadworthiness Package to change the testing frequency of electric N2-vehicles between 3.5 and 4.25 tonnes. However, as Denmark has previously proposed in a position paper to the Commission, the current rules constitute an unnecessary regulatory barrier that disadvantages electric LCVs between 3.5 and 4.25 tonnes and should therefore be reassessed in the light of technological developments and the green transition of road transport.*

Question - Community license requirements for electric N2-vehicles - Regulation (EC) No 1071/2009 and Regulation (EC) No 1072/2009

- *How come the omnibus package does not address the requirements to obtain community licenses for electric N2 vehicles between 3.5 and 4.25 tonnes, despite their functional similarity to N1 vehicles that does not have the same requirements?*

- *Has the Commission assessed whether these rules constitute a disproportionate barrier to the uptake of electric LCVs between 3.5-4.25 tonnes and if not does the Commission plan to make such an assessment?*

Question - Classification of electric LCVs in the type-approval framework - Regulation (EU) No 2018 858

- *Why does the proposal not address the 3.5-tonne weight threshold for N1-type vehicles, given that battery weight often pushes electric LCVs into the N2 category, even when their use is comparable to N1 vehicles?*

- *Has the Commission considered a permanent increase of the weight threshold in the type-approval legislation (EU) 2018/858 for N1 vehicles or the creation of a new, dedicated vehicle sub-category specifically for electric commercial vehicles, for example "N1e", to put these vehicles on the same regulatory footing as diesel N1 vehicles? This is similar to what the Commission is proposing for small electric M1 vehicles.*

<u>Euro 7</u>
Question - Article 4(2) and Annex I – Heavy Duty Vehicles

Could the Commission elaborate on their environmental assessment of the proposal regarding the shift from "vehicle type" to "vehicle category" and whether the Commission can confirm that the proposal will not impact the environment or change the risks of type approval of "high emitters"?

If the Commission assesses an increase in the risks of approval of vehicle types (under the new category definition) – where aftertreatment systems are insufficient, could the Commission asses what these risks are?

Background

Denmark understands and support the overall efforts to lessen the burdens of the automotive industry, where possible without lowering the protection of our air quality and environment.

We are looking into the automotive omnibus regarding Euro 7 and have a question regarding the proposal on Heavy-Duty Vehicles (HDV).

Denmark recalls its analysis and presentations given at the expert group meeting "AGVES" with regards to "high emitters" of HDVs[1]. In many cases trucks ended up being "high emitters" because

1 https://www.danishroadtrafficauthority.dk/Media/638350311561191389/Heavy%20Duty%20Vehicle%20-%20NOx%20emission%20measurement%20with%20mobile%20remote%20sensing.pdf

their aftertreatment system (SCR) didn't function properly. This happened when a truck operated at low loads and with an "oversize" engine and aftertreatment system.

The emission system would work if the HDV is fully loaded, but will not reach sufficient working temperature if it is nearly empty, driving slightly downhill or just recently started to drive. This will occur more often for local transport than for long range transport and thus in this study Danish HDV are more often affected than foreign long-range transport.

This question and background information were also supplied to the Commission in the public consultation, but we haven't seen it reflected in the proposal.

Question - Assessment of environmental protection - Euro 7

Could the Commission assess and elaborate on whether the proposal of Euro 7 in its entirety maintain the environmental protection level of Euro 7 as laid down in regulation (EU) 2024/1257?

Background

Denmark notes that there might be elements of the proposal regarding the automotive omnibus on Euro 7 which are less stringent on environmental protection – since less tests are required for type approval of Euro 7 vehicles.

At the same time the proposal in article 4(1) on OBFCM, OBD and OBM systems and data include the "purpose of monitoring compliance of vehicle types".

Denmark is concerned of the proposed changes regarding low temperature testing and the affect the environment as well as the proposed changes to "vehicle category". But we are wondering whether the proposal could be assessed as "environmental neutral" in an overall assessment of the entirety of the proposal bearing in mind the expected compliance monitoring given in the proposed article 4(1).

We would very much appreciate the Commission assessment on this.

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PUBLIC

GERMANY

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 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

PUBLIC

General

- Germany welcomes the Automotive Omnibus initiative to simplify the regulatory package for the automotive industry.
- We are still analysing and evaluating the content of the proposed measures and reserve the right for further comments and additional proposals for simplification.
- At this stage we are specifically interested in the following points of the proposal:

1. We are 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. Therefore, we request that the Commission explain how this gap will be addressed
2. We are concerned, that the definition of “small affordable cars” does not take into the account the need for sufficient space of (young) families and the widespread length of current vehicles on the market. What led to the Commission’s assessment that 4,20 meters strikes the balance, taking into account those needs?

- Of particular interest for Germany is reducing bureaucracy in the field of type approval regulations. Therefore, Germany would like to hear the opinion of the Commission on simplifying the end-of-series regulation.

Repealing the end-of-series regulation may be an important step to reduce redundant work for the automotive industry in Europe.

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IRELAND

Key comments from Ireland:

- Ireland is broadly supportive of the proposed Automotive Omnibus proposals.
- Though acknowledging and supportive of the objective to promote the decarbonisation of the commercial vehicle fleet, the removal of requirement for speed-limitation devices (SLDs) for eVans, which would allow 4,25 tonne eVans to travel at far greater speeds than their ICE equivalents, does present a key road safety concern.
- While we appreciate the Commission's comments at the last working party meeting highlighting that other safety features are available in new vehicles that can mitigate some safety risk, we note that these features are advisory in most cases and can be ignored or switched off. We would welcome further consideration on how such road safety risk could be mitigated.
- We note that some of the terminology used for weights is inconsistent across the amending Directive and Regulation.

Specific comments:

Amending Directive 92/6/EEC

- As above, the proposed exemption of eVans up to 4.25 tonnes from speed limitation devices raises road safety concerns and should be considered carefully against the objective to promote the decarbonisation of the commercial vehicle fleet. Otherwise, 4.25 tonne eVans will be permitted to overtake their internal combustion engine equipped counterparts at speeds in excess of 90km/h.

  While noting comments that supportive ADAS systems may help address road safety concerns if an N2 eVan up to 4.25 tonnes was not equipped with an SLD, we would maintain some concern that such ADAS systems can be ignored, are often advisory, and/or can be switched off. Further the lack of an SLD requires greater dependence on driver behaviour and enforcement by local police services.

- Secondly, we note some inconsistency in the different terms used for weights quoted throughout; for example, "*not exceeding 4.25 tonnes*" includes 4.25 tonnes, whereas "*below 4.25 tonnes*" is less than 4.25 tonnes.

  The maximum permissible mass and maximum technically laden mass refer to different weights, e.g.,

  - "*but not exceeding 4.25 tonnes*"
  - *N2 e-vans with a maximum permissible mass exceeding 3.5 tonnes and below 4.25 tonnes*
  - *category N2 with maximum technically permissible laden mass between 3,5 and 4,25 tonnes*

  Clarification and uniformity are required on this, including confirming if it is:

  - Greater than 3.5 tonnes and less than or equal to 4.25 tonnes, or
  - Greater than 3.5 tonnes or less than 4.25 tonnes.

Amending Regulation

- As above, the proposed exemption of eVans up to 4.25 tonnes from speed limitation devices raises road safety concerns and needs to be considered carefully against the objective to promote the decarbonisation of the commercial vehicle fleet.
- Similarly, the introduction of a new 'M1e' category does raise a potential concern that safety standards/requirements for these vehicles could be lower than other M1 vehicles. However, if the original intention is only to allow MS to implement favourable regimes/conditions for this vehicle category, then this is a reduced concern.
- We would consider that the wording to exclude eVans in Regulation (EU) 2019/2144 and Regulation (EC) No 561/2006 is ambiguous and could be argued to include hybrid vehicles. This should perhaps be clearer.
- As referenced above, the terminology used for weights is inconsistent across the amending Directive and Regulation.

- **Amendments to Regulation (EC) No 561/2006 and Reg (EU) 2019/2144**
  - Overall, we have no major concerns about removing the requirement of tachographs for N1 eVans up to 4.25 tonnes and for motorhomes within EU MS. Nonetheless, we would welcome some additional clarity in the proposal.
  - Article 13(1) - The wording suggested in paragraph (fa) is ambiguous and could be argued to include hybrid vehicles. We would suggest the wording could be changed to "*propelled "purely" by means of electricity*" or to use "solely/only" to further clarify this. For example,

    In Article 9 of Regulation (EU) No 2019/2144, the following paragraph 5a is inserted:

    '5a. Vehicles of category N2 propelled [purely] 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.'.

  - Article 13(2) - The inclusion of the motorhome exemption in Article 13 may be problematic, as it would require national legislation in each member state to exclude motorhomes from the requirement to fit a tachograph.
  - If the exemption was included in Article 3 instead, the exemption would apply in every MS automatically and would allow citizens to travel through member states without need to fit a tachograph, if this is the intention of the proposal. We would understand that citizens would be required to fit one depending on which MS they are travelling to if the exemption is included in Article 13.

- **ANNEX II - Regulation (EU) 2018/858 (Cat M1E)**
  - Ireland has no major issue with introducing a new 'M1e' class for small electric passenger cars. However, we note there would be road safety concerns if this class were exempted from safety requirements (particularly those required under the GSR Regulation), while other passenger cars and commercial vehicles in EU categories were required to incorporate them. This could lead to diverging safety levels and requirements for smaller electric vehicles on EU roads.

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FRANCE

Objet : Commentaires des autorités françaises sur la proposition d'omnibus automobile - Règlement modifiant les règlements 561/2006, 2018/858, 2019/2144 et 2024/1257 en ce qui concerne la simplification des exigences techniques et des procédures d'essai applicables aux véhicules à moteur, et abrogeant la directive 70/157/CEE et le règlement 540/2014 relatifs au niveau sonore des véhicules - Directive amendant la directive 92/6/CEE afin d'exempter certain véhicules électriques N2 de l'obligation d'installer et d'utiliser un limiteur de vitesse

Réf. : Documents 2025/0422 (COD), COM (2025) 993 final, SWD (2025) 1056 final et 2025/0424 (COD)

Les autorités françaises remercient la Commission et la Présidence pour la présentation d'un « omnibus automobile », au sein du paquet législatif automobile.

Par la présente note, elles transmettent à la Présidence leurs commentaires et questions, en vue du groupe de travail du 23 janvier.

- **S'agissant de la création d'une sous-catégorie pour les petits véhicules électriques (M1E)**

Les autorités françaises saluent la création d'une sous-catégorie pour les petits véhicules électriques (M1E) et de sa définition. **Elles prennent acte du critère de longueur maximale de 4,20 mètres proposé et conviennent de sa pertinence au regard du volume de véhicules concernés (12.6% du marché UE** d'après la Commission**)**. Cette part a vocation à augmenter avec le développement et la mise sur le marché de véhicules conformes aux critères retenus pour la catégorie M1E.

La France rappelle que la **définition de cette sous-catégorie** doit **favoriser l'émergence de véhicules petits et vertueux, abordables et efficients.** Elle souligne à ce titre qu'un critère unique sur la longueur peut conduire à des effets de bord non maitrisés en regard des objectifs visés. Ce point fera l'objet de propositions françaises.

Les autorités françaises rappellent enfin que la définition et les avantages accordés à la sous-catégorie M1E doivent tenir compte de la **sécurité des véhicules et des autres usagers de la route** ainsi que de **l'impact sur la filière européenne de quadricycles électriques légers et lourds**.

- **S'agissant de l'exemption de tachygraphe et limiteur de vitesse de certains véhicules utilitaires légers (VUL) électriques**

Les autorités françaises estiment que **la proposition d'exemption de tachygraphe de certains véhicules utilitaires légers (VUL) électriques doit être améliorée** afin d'éviter tout risque de dégradation des effets utiles de la règlementation sociale européenne, au préjudice des conditions de travail des conducteurs et de la sécurité routière et afin de faciliter les contrôles. En particulier, la rédaction proposée ne clarifie pas suffisamment **l'articulation de cette exemption avec l'entrée au 1er juillet 2026 des véhicules utilitaires légers de plus de 2,5 tonnes dans le champ d'application du règlement 561/2006** relatif à l'harmonisation de certaines dispositions de la législation sociale dans le domaine du transport routier, dès lors qu'ils opèreront en transport international ou en cabotage. Par ailleurs, elles soulignent que la rédaction proposée n'est pas suffisamment précise en ce qui concerne le mode de propulsion des véhicules qui seraient éligibles à de telles exemptions ; **seuls les véhicules dont la motorisation est exclusivement électrique devraient être pris en compte**, les véhicules à motorisation hybride électrique et thermique ne devant pas pouvoir bénéficier de telles exemptions.

Elles proposent ainsi d'amender l'article 1 du règlement Omnibus comme suit (amendement de l'article 13 du règlement 561/2006) :

> *« '(fa) vehicles used for the carriage of goods, **which are not involved in international transport operations or in cabotage operations** and propelled **exclusively** 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;'; »*

Par ailleurs, elles estiment que la mesure dérogatoire proposée, qui est destinée à favoriser l'essor des véhicules électriques, n'a pas vocation à devenir définitive et que, ces véhicules devant constituer à terme la majorité du parc roulant, une telle dérogation incitative devrait être associée à une **date limite**, pour des raisons sociales et de sécurité routière.

De même, elles souhaitent que **l'exemption de limiteur de vitesse** ne soit pas envisagée sans une **juste prise en compte des enjeux de sécurité routière**. En outre, elles proposent de modifier par cohérence l'article 3 du règlement Omnibus (amendement à l'article 9 du règlement UE 2019/2144) :

> *« '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.'."*

- **S'agissant du règlement Euro 7**

Les autorités françaises **ne soutiennent pas l'option retenue** pour la réduction des charges administratives résultant du règlement Euro 7. En effet, elles estiment indispensable le **maintien des essais en laboratoire pour les véhicules légers** (tels que prévus à l'heure actuelle dans le règlement Euro 6) qui peuvent seuls détecter certains polluants **en fixant clairement les valeurs limites associées**. En effet, les tests en conditions de conduite réelles (RDE) ne concernent aujourd'hui que les polluants NOx (oxydes d'azote) et PN (particules fines en nombre), en aucun cas les CO (monoxyde de carbone) et THC (hydrocarbures imbrulés totaux). Le fait de ne pas faire les tests des véhicules à froid en laboratoire ne protège pas non plus juridiquement les constructeurs et les autorités d'une interprétation a posteriori divergente. La fixation claire des limites à satisfaire à l'essai à froid en laboratoire garantie la sécurité juridique de l'ensemble.

Elles proposent ainsi la rédaction suivante à l'annexe I de la proposition de règlement Omnibus :

> *« **Annex I to Regulation (EU) 2024/1257 is amended as follows:***
>
> ***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***

Test temperature 266 K (-7 °C)			
Vehicle category	*Class*	*Mass of carbon monoxide (CO) L_1 (g/km)*	*Mass of hydrocarbons (HC) L_2 (g/km)*
M	-	15	1.8
N_1	I	15	1.8
	II	24	2.7
	III	30	3.2
N_2	-	30	3.2

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;~~

~~(2) in table 2, the entry for 'Laboratory test of low temperature for emissions' is deleted;~~

***~~(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: […]*

Annex III to Regulation (EU) 2024/1257 is amended as follows:

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 (***)

***(***)UN Regulation No 83, 08 series of amendments**.»*

Le considérant 17 de la proposition de règlement Omnibus devra être ajusté en conséquence.

Les autorités françaises **soutiennent la proposition concernant les véhicules lourds** et l'article concernant la **modification des habilitations de la Commission** (article 14 point j du règlement 2024/1257).

- **S'agissant de la recharge intelligente et/ou bidirectionnelle**

Les autorités françaises **accueillent favorablement l'introduction d'un mandat habilitant la Commission pour la prise d'un acte délégué** en matière de recharge bidirectionnelle. En effet, la recharge intelligente et/ou bidirectionnelle doit permettre de moduler la demande de recharge pour limiter son impact sur le réseau électrique.

- **S'agissant du niveau sonore des véhicules**

Les autorités françaises **soutiennent les mesures de simplification** administrative concernant les exigences de niveau sonore des véhicules, qui vont dans le bon sens.

* * * * *

Les autorités françaises se tiennent à la disposition de la Commission et de la Présidence pour toute information complémentaire.

Courtesy translation

This is a courtesy translation. In the event there are any differences with the French version, the latter shall prevail.

Subject: Comments from the French authorities on the automotive omnibus proposal - Regulation amending regulations 561/2006, 2018/858, 2019/2144 and 2024/1257 on the simplification of technical requirements and test procedures for motor vehicles and repealing directive 70/157/EEC and regulation 540/2014 on the noise level of vehicles - Directive amending Directive 92/6/EEC to exempt certain N2 electric vehicles from the obligation to install and use a speed limitation device

Ref.: Documents 2025/0422 (COD), COM (2025) 993 final, SWD (2025) 1056 final et 2025/0424 (COD)

PUBLIC

The French authorities thank the Commission and the Presidency for presenting an 'automotive omnibus' as part of the automotive legislative package.

They hereby send to the Presidency their comments and questions with a view to the working group meeting on 23 January.

- **Regarding the creation of a sub-category for small electric vehicles (M1E):**

The French authorities welcome the creation of a subcategory for small electric vehicles (M1E) and its definition. They take note of the proposed maximum length criterion of 4.20 metres and agree that it is appropriate given the volume of vehicles concerned (12.6% of the EU market according to the Commission). This share is set to increase with the development and growing sales of vehicles that will meet the criteria defined for the M1E category.

France points out that the definition of this subcategory must encourage the emergence of small, environmentally friendly, affordable and efficient vehicles. It stresses that a single criterion based on length could lead to unintended consequences in terms of the objectives sought. This point will be the subject of French proposals.

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.

- **Regarding the exemption of certain electric light commercial vehicles from the tachograph and speed limiter requirement:**

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.

They therefore propose amending Article 1 of the Omnibus Regulation as follows (amendment of article 13 of Regulation 561/2006):

> *« '(fa) vehicles used for the carriage of goods, **which are not involved in international transport operations or in cabotage operations** and propelled **exclusively** 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;'; »*

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.

Similarly, they wish that the **exemption of speed limiters** not be envisaged without **due consideration of road safety issues**. In addition, they propose that article 3 of the Omnibus Regulation (amendment to Article 9 of Regulation EU 2019/2144) be amended for consistency:

> *« '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.'."*

- **Regarding the Euro 7 regulation:**

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.

They therefore propose the following wording for Annex I of the proposed Omnibus Regulation:

> *« **Annex I to Regulation (EU) 2024/1257 is amended as follows:***
>
> ***insert a table 1Bis: Emission limit for the carbon monoxide and hydrocarbon tailpipe emissions ~~after a cold start~~ at low temperature test for vehicles of categories M1 and N1 with internal combustion engine***

Test temperature 266 K (-7 °C)			
Vehicle category	*Class*	*Mass of carbon monoxide (CO) L_1 (g/km)*	*Mass of hydrocarbons (HC) L_2 (g/km)*
M	-	15	1.8
N_1	I	15	1.8
	II	24	2.7
	III	30	3.2
N_2	-	30	3.2

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;~~

~~(2) in table 2, the entry for 'Laboratory test of low temperature for emissions' is deleted;~~

***~~(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: […]*

Annex III to Regulation (EU) 2024/1257 is amended as follows:

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 (***)

***(***)UN Regulation No 83, 08 series of amendments**.»*

Recital 17 of the proposed Omnibus Regulation will have to be adjusted accordingly.

The French authorities **support the proposal concerning heavy-duty vehicles** and the article concerning the **modification of the Commission's powers** (Article 14 point j of Regulation 2024/1257).

- **Regarding intelligent and/or bi-directional charging:**

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 possible to modulate the demand for charging in order to limit its impact on the electricity network.

- **Regarding vehicle noise level:**

The French authorities **support the administrative simplification measures** concerning vehicle noise level requirements, which are a step in the right direction.

* * * * *

The French authorities remain at the disposal of the Commission and the Presidency for any further information.

****

ITALY

Italy believes that the proposed omnibus regulation should also address other pieces of type approval legislation in order to take account of the difficult situation industry is facing with. Moreover, we think the present text should be amended in order to fully reflect the principle of technology neutrality.

Doc COM (2025(993)) - Articles

Article 5.1, point 1 should be amended as follows:
"1. Regulation (EU) No 540/2014 is repealed **from 1st July 2027".**

Justification:
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"*

Article 7.2 **Entry** into force and application
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.

The two proposals (art.7 in doc 993 and art 2 in doc 999) make mutually reference to each other.

Article 7

Entry into force and application

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

2. It shall apply from [on the twentieth day following that of its publication in the *Official Journal of the European Union*]. However, Articles 3 shall apply from ...[the transposition date in the proposal amending Directive 92/6]

Article 2

Transposition

1. Member States shall adopt and publish, [three months after the entry into force of the Regulation based on COM(2023) 993 final] at the latest, the laws, regulations and administrative provisions necessary to comply with this Directive. They shall forthwith communicate to the Commission the text of those provisions.

   They shall apply those provisions from [OP: please insert the date of application of the amendments to Regulation (EU) 2019/2144 in COM(2023) 993 final].

   When Member States adopt those provisions, they shall contain a reference to this Directive or be accompanied by such a reference on the occasion of their official publication. Member States shall determine how such reference is to be made.

2. Member States shall communicate to the Commission the text of the main provisions of national law which they adopt in the field covered by this Directive.

Article 4, amendments to Regulation (EU) 2024/1257

In addition to the text proposed by the Commission we would like to suggest that articles 10.6, 10.7, 11.2, 20.1, 20,2 and 21 (2nd para.) are amended according to the attached text.

Justification

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 EU2019/2144. 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 of approval requirements have not been adopted so far industry will have a few months to adapt.

PUBLIC

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 Euro VI legislation is still quite "young" and represent one of the most advanced standard at global level.

Add a new Article 4a: Amendments to Regulation (EU) 2023/443 amending Regulation (EU) 2017/1151 as regards the emission type approval procedures for light passenger and commercial vehicles

Annex XXI, Appendix 5 – Table A8. App5/1 – row three and four.

<table>
<tr><th>Regulation Text</th><th>Amendment</th></tr>
<tr><td>Appendix 5 – Table A8. App5/1 – row four:
Parameters for the determination of fractional UFs (as applicable)
<table>
<tr><th>Parameter</th><th>Value</th></tr>
<tr><td>d_{nea} (*)</td><td>800 km</td></tr>
<tr><td>d_{neb} (*)</td><td>2 200 km</td></tr>
<tr><td>d_{nec} (*)</td><td>4 260 km</td></tr>
<tr><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></tr>
</table></td><td>Appendix 5 – Table A8.App5/1 – row four:
Parameters for the determination of fractional UFs (as applicable)
<table>
<tr><th>Parameter</th><th>Value</th></tr>
<tr><td>d_{nea} (*)</td><td>800 km</td></tr>
<tr><td>d_{neb} (*)</td><td>2200 km</td></tr>
<tr><td>d_{nec} (*)</td><td>2200 km</td></tr>
<tr><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></tr>
</table></td></tr>
</table>

Justification

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.

Doc COM (993) 2025 - Annexes

Annex II
Definition of small electric vehicle M1E

In para. 2.4.1. of EU Regulation (EU) 2018/858 a definition of small electric vehicle is proposed. We believe that this definition should be amended in order to make it technology neutral. Therefore, propulsions other than electric should be covered.

"2.4. Small ~~electric~~ **zero emission** vehicle:

2.4.1. Small ~~electric~~ **zero emission** vehicle means a zero emission pure electric vehicle or a **CO2 neutral fueled vehicle** that belongs to category M1, having a length not exceeding [4.2] metres….."

"CO2 neutral fuel means a renewable and/or synthetic fuel as defined by Directive 2018/2001 including biofuel, biogas, biomass fuel, Renewable liquid and gaseous transport Fuel of Non Biological Origin (RFNBO) or a Recycled Carbon Fuel (RCF), where the emissions of the fuel in use e(u) can be taken to be net zero, meaning that the CO2 equivalent of the carbon incorporated in the chemical composition of the fuel in use

e(u) is of biogenic origin, or has been avoided being emitted as CO2 into the atmosphere or has avoided its existing fate. Other renewable and/or synthetic fuels not listed in Directive 2018/2001 can fulfil this definition provided that they meet the above conditions and the sustainability criteria of said Directive and associated delegated acts."

Regarding the maximum length 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.

We are also considering to propose a similar definition for small N1E vehicles.

PUBLIC

ANNEX

Stop the clock Euro 7 for M2, N2, M3, N3

(EU) 2024/1257	*Proposed amendment*
Article 10 *Emission type-approval, conformity of production, in-service conformity and market surveillance* [...] 6. With effect from 29 May 2028, 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. 7. With effect from 29 May 2029, 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.	*Article 10* *Emission type-approval, conformity of production, in-service conformity and market surveillance* [...] 6. With effect from 29 May 20**33**, 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. 7. With effect from 29 May 20**34**, 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.
Article 11 *Specific obligations of Member States concerning the emission type approval of systems, components and separate technical units* [...]	*Article 11* *Specific obligations of Member States concerning the emission type approval of systems, components and separate technical units* [...]

2. With effect from 29 May 2028, 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	2. With effect from 29 May 20**33**, 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
Article 20 *Repeal* 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 2031. 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. 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 2031.	*Article 20* *Repeal* 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 203**4**. 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. 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 203**4**.
Article 21 *Entry into force and application* This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union. 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. It shall apply from 29 May 2028 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 2029 for new vehicles of categories M2 , M3 , N2 , N3 , O3 and O4 and components, systems and separate technical units for those vehicles.	*Article 21* *Entry into force and application* This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union. 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. It shall apply from 29 May 20**33** 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 20**34** for new vehicles of categories M2 , M3 , N2 , N3 , O3 and O4 and components, systems and separate technical units for those vehicles.

PUBLIC

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. 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	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. 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

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LUXEMBOURG

- Regarding Proposal 3.1.1, document „SWD (2025) 1056 final".

We acknowledge the objective of this proposal, namely, to encourage the use of electric vehicles in domestic transport by alleviating certain regulatory obligations. However, we wish to emphasis that, as currently drafted, this measure risks creating an imbalance between operators established in large Member States and those located in smaller countries such as Luxembourg.

Indeed, the proposed exemption would primarily benefit companies operating across extensive territories, where the concept of "domestic transport" covers significant distances. Conversely, in smaller Member States, this provision would have only a marginal impact, which could be perceived as indirectly favoring markets in larger countries.

To ensure an equitable approach consistent with the spirit of the European internal market, we suggest that the exemption be subject to an objective condition, such as a maximum distance from the company's registered office for vehicles benefiting from this measure. A restriction based on distance, rather than solely on the notion of "domestic transport," would prevent indirect discrimination between operators based on the geographical size of their Member State. We view the European market as a single market, and a distance-based criterion would constitute a neutral and proportionate measure, fully respecting the principle of equal treatment among businesses, regardless of their location.

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NETHERLANDS

The Netherlands welcomes the Automotive Omnibus and its aim to improve the consistency and coherence between current legislation. It is important to simplify legislation and reduce administrative burden for the Automotive sector.

At the same time, questions remain about the potential additional effects of the proposed changes in respect to the underlying policy goals. The Netherlands welcomes the Commission to provide written or oral answers to these questions so that we can further develop our position based on this information.

Since the Netherlands is still developing its final position, a scrutiny reservation remains.

1) **Regulatory barriers for electric vans: in particular the removal of the tachograph requirement and speed restriction for EVs 3,5 < 4,25t:**

- 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 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?
- The Driving Time Regulation (561/2006) currently offers Member States the possibility to exempt EVs between 3,5t and 4,25t from the tachograph requirement (art. 13.1.f). This exemption is limited within a 100 km radius from the place of business. This limitation can be seen as a measure that contributes to guaranteeing road safety and the wellbeing of drivers. It namely prevents drivers from having to cover long distances and can in practice reduce the possibility of insufficient rest times. How does the Commission look at the effects on road safety and the wellbeing of drivers when the applicability of the tachograph exemption is not limited to a 100 km radius?
- How does the exemptions proposed by the Commission relate to art. 6.1.c and 9.2.j-k of the Driving Licenses Directive (2025/2205) that set the rules for driving a motor vehicle power wholly or in part by alternative fuels? Does the Commission feel that it will still be sufficiently clear to drivers and law enforcement in which situation a driver is allowed to drive a vehicle and under which conditions?

2) **Creation of a separate type of approval category for small (< 4,2 m) electric cars:**

- Will there be a possibility to develop safety requirements to this vehicle subcategory where necessary in order to improve road safety?
- Which safety systems are being considered for potential removal from mandatory requirements for the new subcategory?
- How does the Commission ensure an equivalent level of safety between M1e and M1 vehicles given the different requirements?
- How does this new subcategory fit within the global UNECE regulations?

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AUSTRIA

Please note that the following comments are of preliminary nature. AT is still analysing the Omnibus IX proposal and therefore raises a scrutiny reservation.

ad COM(2025) 993: Proposal for a regulation 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 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

Art 2 [Amendments to Regulation (EU) 2018/858 - Annex I, Part A, new point 2.4]

- In the present draft, it is stated that the technical requirements for the new vehicle class M1E are to be "frozen" for ten years and only defined as binding at a later stage. How do we sensibly tackle the resulting lower level of safety and environmental compatibility?

Art 2 [Amendments to Regulation (EU) 2018/858 - Art 5, new paragraph 4] and Art 4 (1) [Amendments to Regulation (EU) 2024/1257 – Ar 14 (4), new version of point j]

- Is it also envisaged, in connection with the empowerment of Cion for delegated acts with regard to external interfaces for bidirectional communication with charging infrastructure, to close the regulatory gap that currently makes the implementation of Art 20a of RED III and the Battery Regulation impossible? Directive (EU) 2018/2001 (RED III) requires vehicles to record data that manufacturers must make available. Currently there is no technical requirement in the type-approval framework for vehicles to record and communicate such data. The same applies to Art 14 of Regulation (EU) 2023/1542 (Battery Regulation). This initiative is an opportunity to close this regulatory gap.

Art 3 [Amendments to Regulation (EU) 2019/2144 - Art 9, new paragraph 5a]

- The present proposal provides that a speed limiter for electric vehicles of class N2 should only be required for vehicles from 4.25 t onwards. This effectively leads to an increase in the permitted speed and greater strain on technical systems and components. Has it been assessed whether the technical requirements for N2 vehicles are sufficient to ensure an adequate level of road safety and environmental compatibility even for higher design speeds of vehicles up to 4.25 tonnes and that the ambitious objectives of the EU road safety policy are not undermined?

Concerning the requirement "Made in Europe" with regard to the new category M1E

- In the present draft, a practicable definition of "Made in Europe" is lacking. This raises two questions:
  - First, in which legal act is this characteristic to be laid down?
  - Second, which framework conditions and measures are envisaged to ensure an effectively implementable type approval and market surveillance of this characteristic?

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PUBLIC

POLAND

Omnibus IX: Automotive omnibus

- 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 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 (Simplification of technical requirements and testing procedures for motor vehicles)

- Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 92/6/EEC to exempt certain N2 electric vehicles from the requirement to install and use a speed limitation device (Exemption of certain N2 electric vehicles)

1. What are the reasons for the Commission's decision not to consider derogations from the provisions of the General Safety Regulation for the proposed new vehicle subcategory (M1E)?
2. Are the outlines of the Super-Credit provisions already known, and if so, how do they relate to the Commission's legislative proposal on the decarbonisation of corporate fleets?
3. Why is it proposed to exempt electric vehicles in the 3.5–4.25 t GVW range from the obligation to install tachographs in domestic transport, while at the same time maintaining the obligation to install tachographs in vehicles with a lower GVW (2.5–3.5 t) in international transport, without distinction as to the type of drive?
4. Why has no reference been made to the possibility of further development of plug-in hybrid technologies (PHEVs), which could be facilitated by refraining from tightening the utility factor for this type of vehicle in the Euro 6e-bis-FCM standards and by cancelling the planned tightening of the utility factor in the Euro 7 secondary legislation?

Commentary

From 1 July 2026, the installation of second-generation smart tachographs (G2V2) will become mandatory in buses with a gross vehicle weight (GVW) of between 2.5 and 3.5 tonnes performing international commercial transport or cabotage. This obligation results from the provisions of Article 2(1) (aa) of Regulation (EC) No 561/2006 of the European Parliament and of the Council of 15 March 2006 on the harmonisation 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).

In light of the above, we have some concerns regarding the proposal to exempt electric vehicles with a maximum permissible weight of between 3.5 and 4.25 tonnes from the obligation to install tachographs in domestic transport, while at the same time maintaining the obligation to install tachographs in vehicles with a lower GVW (between 2.5 and 3.5 tonnes) in international transport, without distinction as to the type of drive.

In the opinion of Poland, the current Omnibus IX draft does not sufficiently take into account the potential for maintaining the competitiveness of the European automotive industry through a broader acceptance of technology-neutral approaches to transport decarbonisation. In particular, the current draft does not refer to the possibility of further developing plug-in hybrid technologies (PHEVs), which could be supported by refraining from tightening the utility factor for this type of vehicle under the Euro 6e-bis-FCM standards.

The EU has been the leading global exporter of plug-in hybrid vehicles for eight years, demonstrating strong industrial potential in this segment. For this reason, the continued development and production of PHEV

technologies are important for sustaining European manufacturing, preserving jobs and strengthening the EU's industrial resilience.

Plug-in hybrid vehicles (PHEVs) and electric vehicles with range extenders (EREVs) play an important role in reducing CO_2 emissions, particularly in urban areas and in regions with limited charging infrastructure. New PHEV models already enable a higher share of electric driving, which suggests the need for a reassessment of the role of this technology in the transition towards zero-emission mobility.

Against this background, it is important not only to take PHEVs into account in the current simplification of existing legislation under Omnibus IX, but also to reconsider and cancel the planned tightening of the utility factor in the Euro 7 secondary legislation, which is expected to be finalised this year.

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PUBLIC

ROMANIA

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 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 (COM(2025)993)

- Overall, we are globally in support of the text.
- The Automotive Omnibus is a positive first step and we welcome the Commission's announced willingness to push forward its simplification agenda in the coming months. We welcome the simplifications on noise regulation, LCV homologation and EV charging.
- We are currently analysing the proposed amendments to Regulation (EC) No 561/2006 regarding the obligation to install tachographs (national derogations).
- On Euro 7, we propose aligning the annexes on the low temperature test with the Euro 6, instead of deleting them, as currently proposed by the Commission, which could create a legal risk.
- We also propose a few guiding principles in terms of the present proposed simplification norms, as follows:
    - we would like the new simplification proposals / rules to apply only to new type approvals (and not be regulating the past);
    - we would like to see a streamlining of the proposal by grouping the new rules into 3-year batches;
    - we would like to have a minimum of 3 years to comply with the new requirements.
- On small cars, we can agree with the proposed definition, in its present form (4.2m max, EV only).
- We agree with the exemption from the obligation to have a speed limiting device and a tachograph for electric vehicles whose maximum permissible mass is between 3500 – 4250 kg.
- On article 6, transitional provisions – is it true that the CoC for vehicles produced before the date of entry of the Regulation and approved in accordance with Regulation (EU) 540/2014 also remain valid? In our view, the following amendment would render the text clearer:

  "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."
- We would like to know – how was the minimum length for small electric vehicles established?
- Regarding article 2, we propose an **editorial amendment**, namely introducing a new paragraph regarding Article 82 (2) Regulation (EU) 2018/858:

  "(2^1) Article 82(2) is replaced by the following:

  2. The power to adopt delegated acts referred to in Article 4(2), Article 5(3) **and (4),** Article 26(3), Article 30(8), Article 31(8), Article 41(5), Article 44(7), Article 55(3) and (4), Article 57(2), Article 61(11), Article 70(3), Article 72(3) and Article 85(2) shall be conferred on the Commission for a period of five years from 4 July 2018. The Commission shall draw up a report in respect of the delegation of power not later than nine months before the end of the five-year period. The delegation of power shall be tacitly extended for periods of an identical duration, unless the European Parliament or the Council opposes such extension not later than three months before the end of each period."

Proposal for a Directive of the European Parliament and of the Council amending Directive 92/6/EEC to exempt certain N2 electric vehicles from the requirement to install and use a speed limitation device (COM(2025)999)

- We propose the following amendment:

  "Article 3(1) of Directive 92/6/EEC is replaced by the following:

PUBLIC

‘1. Member States shall take the necessary measures to ensure that motor vehicles of categories N2 and N3, except those vehicles of category N2 propelled by means of electricity and with a maximum permissible mass between 3,5 and 4,25 tonnes, may be used on the road only if equipped with a speed limitation device set in such a way that their speed cannot exceed 90 kilometres per hour.’.”

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PUBLIC

FINLAND

- We are still analysing the proposals and we are currently in a process of formulating our position in more detail to this proposal.
- In general, we welcome the Commission's ambition to support the automotive sector in moving towards clean mobility and improving competitiveness of the sector.
- For the written comments, we would like to have more information
    - Concerning the repeal of Directive 70/157/EEC and Regulation (EU) No 540/2014: Is the sale and entry into service of a replacement silencing system type-approved according to Directive 70/157/EEC still allowed from 1 July 2027? This is not clearly stated in the proposal.
    - How can it be ensured that freezing the new technical requirements for small electric vehicles for ten years does not undermine road safety?

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PUBLIC

SWEDEN

Please find below two questions from Sweden concerning the Omnibus Automotive:

- **Legal definition of a small electric vehicle (art. 2 in COM 2025 993):** SE request the Commission to elaborate on the definition of the new subcategory M1E. In particular we wonder: How was the cost limit of 25 000 euros selected to serve as a guidance to find the length specification of 4,2 meters? How large part of the vehicles produced in the EU is of this size or smaller? Was other parameters for the definitions considered, other than length and weight, for example energy efficiency? Was it considered to introduce a subcategory for electric vehicles, without any reference to size at all? If not, why? How has the risks of distorted competition between EU vehicle manufacturers by the definition (and potential incentives linked to it) been considered?

- **Changes in testing procedures for Euro 7 vehicles (art. 4 in COM 2025 993):** Is CO and THC at lowered temperatures covered when Type 6 test at lower temperature is removed? If so, how? (The removal of the test in lower temp is motivated by that RDE is still done and includes low temperature. However, to our understanding, the THC is not measured and CO has no limit value and conformity factor in RDE).
