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Accompanying the document

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND 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 final}

1. INTRODUCTION

The automotive value chain is a pillar of the EU economy, accounting for EUR 589.3 billion and 3.7% of total value added of Europe's GDP , and direct employment of 10.6 million Europeans ([1]). In the context of Europe's twin transition towards climate neutrality and digital transformation and the increasingly unpredictable trade environment, maintaining a robust and competitive automotive industry is essential for safeguarding the EU's strategic autonomy and global economic standing.

The analysis included in the recent reports of Enrico Letta ([2]) and Mario Draghi ([3]) places the reduction of regulatory burden and the simplification of EU legislation among the top priorities. While the existing regulatory framework brings predictability and helps to achieve the EU's public policy objectives, it should, however, not put undue burden and unjustified costs on industry.

In her political guidelines for the European Commission's 2024–2029 mandate ([4]), President von der Leyen outlined a vision focused on driving sustainable prosperity and strengthening competitiveness across Europe, emphasising the need to make doing business faster and easier. Central to this vision are simplifying regulation and reducing regulatory burdens to create a more competitive and attractive Europe. The Commission has set a target to reduce administrative burden by at least 25% for businesses and by 35% for SMEs by 2029. ([5])

As part of this work, the Commission adopted the Competitiveness Compass in January 2025 ([6]) and the Clean Industrial Deal in February 2025 ([7]). In line with the agenda to simplify, the Industrial action plan for the European automotive sector ([8]), adopted in March 2025, stated that the Commission in consultation with stakeholders would develop a regulatory simplification package for the automotive industry by improving coherence and consistency between different regulatory requirements. This is part of the Commission's efforts to improve the business environment for the European automotive industry.

The Automotive Omnibus forms part of a wider package of measures aimed at simplifying the EU's automotive regulatory framework. The simplification agenda will be carried

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([1]) Figures based on Eurostat FIGARO data: https://ec.europa.eu/eurostat/web/esa-supply-use-input-tables/information-data#figaro

([2]) E. Letta, Much more than a market, 2024, available at: https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf

([3]) M. Draghi, The future of European competitiveness, 2024, available at: https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en#paragraph_47059, p. 18.

([4]) Political Guidelines for the next European Commission 2024-2029, available at: https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en

([5]) A simpler and faster Europe: Communication on implementation and simplification, available at: https://www.europarl.europa.eu/RegData/docs_autres_institutions/commission_europeenne/com/2025/0047/COM_COM(2025)0047_EN.pdf

([6]) Communication: A Competitiveness Compass for the EU (COM(2025) 30 final), available at: https://commission.europa.eu/topics/eu-competitiveness/competitiveness-compass_en

([7]) Communication: The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonisation (COM(2025) 85 final), available at: https://commission.europa.eu/topics/eu-competitiveness/clean-industrial-deal_en

([8]) Communication: Industrial action plan for the European automotive sector (COM(2025) 95 final), available at: https://transport.ec.europa.eu/document/download/89b3143e-09b6-4ae6-a826-932b90ed0816_en

forward when evaluating the type-approval framework regulation in 2026, when preparing secondary legislation for motor vehicles, in the parallel proposal for a revision of the CO2 performance standards for cars and vans and in upcoming reviews, such as the one for CO2 performance standards for heavy-duty vehicles.

A smarter approach to regulation – one that removes redundant requirements, avoids duplication, and ensures consistency – will help unlock the full potential of the automotive industry as a driver of sustainable European prosperity, without compromising social rights, road safety, and the environment. This simplification exercise will also deliver tangible savings to SMEs and large companies.

Process for identifying amendments for this Omnibus

At the beginning of 2025 the Commission announced that it would organise the Strategic Dialogue on the Future of the European Automotive Industry with European industry leaders, social partners, and stakeholders. The Commission received position papers from stakeholders before and after the Dialogue that took place on 30 January 2025, which highlighted their request for a simplification of the automotive regulatory framework. These initial industry contributions were of a general nature and thus cannot be taken up in the context of a legislative omnibus proposal, but are discussed further in section 4.

This was followed up by several bilateral exchanges as well as concrete simplification suggestions from industry associations and individual companies. These exchanges and the targeted stakeholder consultation led to a number of potential amendments being proposed by stakeholders.

On that basis, a preliminary number of simplification measures was put for discussion in the Motor Vehicle Working Group, a Commission expert group made up of Member State representatives and a broad range of stakeholders from the automotive industry and civil society.

Finally, the Commission launched a targeted stakeholder consultation in October 2025. This survey was sent to over 130 stakeholders (68 replies) of the automotive industry, comprising vehicle manufacturers, automotive component manufacturers, industry associations, NGOs, fleet operators, national type approval authorities, market surveillance authorities and other relevant national authorities..

The Commission applied the following criteria to determine which measures would be included:

- The simplification measures must improve the coherence and consistency of the automotive regulatory framework;
- The simplification measures are limited to automotive-specific requirements (i.e., no changes to EU legislation with a scope beyond the automotive sector); ([9])

([9]) Many regulatory requirements and reporting obligations to which the automotive industry is subject stem from regulations that are not automotive-specific, such as the Battery Regulation, the Deforestation Regulation, the Renewable Energy Directive, the Waste Framework Directive, the Data Act, the AI Act etc. Such regulations are outside the scope of this Automotive Omnibus but are addressed where appropriate in other Omnibus proposals (e.g., Chemicals Omnibus, Environmental Omnibus, Digital Omnibus)

- The simplification measures are limited to changes that cannot be done through secondary legislation, as the Omnibus is directed at primary legislation;
- The simplification measures must demonstrate a tangible reduction in administrative burden and/or cost savings;
- The simplification measures have no negative social, environmental, or economic impact.

On the basis of these criteria, nine proposed amendments were retained for the Automotive Omnibus. These proposals are described in detail in section 3. Possible further simplification measures beyond the Automotive Omnibus are described in section 4.

2. EU AUTOMOTIVE REGULATORY FRAMEWORK

The EU's automotive regulatory framework is designed to ensure vehicle safety, security, environmental protection, and the coherence of the single market. The type-approval system, laid out in Regulation 2018/858, ([10]) is a procedure where an authority in an EU Member State certifies that a vehicle model, system, or component meets all relevant EU safety, environmental, and technical requirements before it can be sold, registered, or put into service in the EU. Once approved in one Member State, the approval is valid throughout the entire EU, allowing for the free movement of the approved products within the single market.

The type-approval system is underpinned by Regulation 2019/2144 (the General Safety Regulation, 'GSR'). ([11]) The (GSR mandates advanced safety technologies in new vehicles to reduce road deaths and serious injuries. It requires manufacturers to fit a range of features, such as automated emergency braking and lane keeping systems, to all new cars, vans, trucks, and buses sold in the EU.

The environmental performance of vehicles sold in the EU is regulated by Regulation 2024/1257 ('Euro 7'). ([12]) This regulation sets maximum levels for pollutant emissions during the lifetime of vehicles and includes limits for emissions from brakes and tyres, as well as requirements for the battery durability of electric vehicles.

In addition, the EU's legal framework for vehicles also covers specific type-approval regulations for noise and for eCall, an in-vehicle emergency call system that automatically dials Europe's single emergency number, 112, after a serious road accident.

United Nations (UN) Regulations play an important role in the EU's type-approval framework. The World Forum for the Harmonization of Vehicle Regulations (WP.29) is a permanent working party in the institutional framework of the United Nations that adopts globally harmonised technical regulations on vehicle safety and environmental performance. In WP.29, the European Union votes based on a Council Decision on new

([10]) 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

([11]) 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

([12]) 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)

UN regulations and amendments to UN Regulations. The majority of type-approval requirements in the EU directly refers to harmonised UN regulations. The links between UN regulations and EU regulations allow manufacturers to access both EU and non-EU markets thanks to a harmonised set of regulatory requirements.

The automotive industry is also subject to CO_2 emission standards. The EU has adopted CO_2 emission performance standards for new cars and new light commercial vehicles under Regulation 2019/631, which mandates that the average emission level of these vehicles be zero from 2035. ([13]) A proposal for a revision of the Regulation is presented in parallel to the Automotive Omnibus. Lorries and buses are subject to the CO_2 standards for heavy-duty vehicles, which will be reviewed in 2027.

The automotive industry is also impacted directly or indirectly by certain rules governing the EU internal market for commercial road transport. These include rules on maximum weights and dimensions of vehicles ([14]), or rules on on-board vehicle units aimed at supporting the enforcement of the internal market for road transport and enhancing road safety, such as the tachograph and speed limitation devices for heavy duty vehicles.

Other pieces of legislation outside the automotive sector apply to motor vehicles, including the Data Act, the Artificial Intelligence Act, the REACH Regulation, and the Renewable Energy Directive. ([15])

3. MAIN ISSUES AND WAYS TO ADDRESS THEM

3.1. Regulation (EC) No 561/2006 on the harmonisation of certain social legislation relating to road transport, and Regulation (EU) No 165/2014 on tachographs in road transport

Regulation (EC) No 561/2006 lays down rules on driving times, breaks, and rest periods for drivers of vehicles engaged in the carriage by road of goods or passengers: Its objective is to ensure fair competition among road transport operators, to improve working conditions of drivers, and to contribute to road safety.

To check that the rules on driving times and rest periods are adhered to, some categories of vehicles are required to have a tachograph. The manufacture, installation, and use of the tachograph is regulated by Regulation (EU) No 165/2014. Vehicles registered in the Union and falling in the scope of Regulation (EC) No 561/2006 must be equipped with a tachograph, per Article 3(1) of Regulation (EU) No 165/2014.

([13]) Regulation (EU) 2019/631 of the European Parliament and of the Council of 17 April 2019 setting CO2 emission performance standards for new passenger cars and for new light commercial vehicles

([14]) Council Directive 96/53/EC of 25 July 1996 laying down for certain road vehicles circulating within the Community the maximum authorized dimensions in national and international traffic and the maximum authorized weights in international traffic

([15]) Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data (Data Act); Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence (Artificial Intelligence Act); Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency; Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources

These regulations apply to vehicles that exceed 3.5 tonnes in mass (including any trailer or semi-trailer) where the vehicle is used for road transport. The regulations equally apply to vehicles above 3.5 tonnes in mass that are used to carry more than nine people (including the driver).

From 1 July 2026 smart tachographs must be installed in Light Commercial Vehicles (LCVs) (i.e., vans, light trucks, or pick-up trucks with mass less than 3.5 tonnes) engaged in the international carriage of goods, unless the goods are for the driver's own use.

Any vehicle under 7.5 tonnes in mass that is not used for commercial road transport is exempt from these regulations, per Article 3(h) of Regulation (EC) No 561/2006.

Article 13 of Regulation (EC) No 561/2006 provides that "*each Member State may grant exceptions from* [driving times, breaks and rest periods rules]" to certain vehicles which are identified, either by their use-case (e.g., *13(1o) vehicles used exclusively on roads inside hub facilities such as ports, interports and railway terminals*), or by a combination of the use case and their technical characteristics (e.g., *13(1i) vehicles with between 10 and 17 seats used exclusively for the non-commercial carriage of passengers*). An exception is also already available for "*vehicles used for the carriage of goods within a 100 km radius from the base of the undertaking and propelled by means of natural or liquefied gas or electricity, the maximum permissible mass of which, including the mass of a trailer or semi-trailer, does not exceed 7.5 tonnes*". These exceptions can also apply cross-border "*with the agreement of the States concerned.*"

3.1.1. Tachograph obligations for electric vans in domestic transport with a weight between 3.5 tonnes and 4.25 tonnes

Issue description

Electric vans (also called LCVs) with a maximum permissible mass exceeding 3.5 tonnes and not exceeding 4.25 tonnes must have a tachograph installed unless they are not used for commercial road transport, in accordance with Regulation (EU) No 165/2014.

Although they have the same payload as a combustion engine van, electric vans are heavier as a result of their batteries. This additional weight, which pushes them over the 3.5 tonne threshold of Regulation (EC) No 561/2006, means that they must be equipped with a tachograph and that their drivers must follow the rules on driving times and rest. As a result, they suffer from a competitive disadvantage vis-a-vis combustion engine vans (which are usually classed as N1, while the electric vans are classed as N2 owing to the added weight of their batteries), rendering them less attractive to customers--many of whom are SMEs--due to the costs involved in installing and using a tachograph. Furthermore, for SMEs there is an additional administrative burden involved in having the tachograph in that they must organise and record their drivers' working times according to the rules on driving times and rest periods.

According to original equipment manufacturers (OEMs), this additional burden hampers the uptake of electric vans compared to similar combustion engine vans, which can result in increased difficulty for OEMs to reach CO_2 performance targets for vans. To reach the EU's target to have 100% zero-emission vans and cars in 2030, approximately 17% of van

sales in 2025 need to be zero-/low-emission. ([16]) According to industry data, zero- and low-emission vans sold in 2024 amounted to only 8.1% of sales, meaning that reaching the 2025 target will be difficult. ([17])

This issue has also been recognised and considered in the recent revision of the EU Driving Licence Directive ([18]), whereby a category B licence will be valid two years after it was issued for the first time for vehicles with a maximum authorised mass exceeding 3.5 tonnes but not exceeding 4.25 tonnes.

Stakeholder views

Stakeholders from OEMs, trade associations, civil society, type-approval authorities, and market surveillance authorities raised the requirement for smart tachographs in e-Vans with a gross vehicle weight (GVW) between 3.5 tonnes and 4.25 tonnes as an inconsistency vis-a-vis their fossil fuel equivalent. As one market surveillance authority noted, "the adjustments to the regulations could make the relevant vehicle models more attractive on the market and lead to a greater increase in the proportion of electric commercial vehicles," thus contributing to the decarbonisation of road transport.

The proposed amendment was perceived by stakeholders during the targeted stakeholder consultation to have a positive impact on administrative burden (33 out of 43 responses, others "N/A"), a positive impact on the environment (31 out of 41 responses, others "N/A"), and a positive social impact (23 out of 33 responses, others "N/A").

In addition, OEMs and a broad range of stakeholders, including fleet operators, mentioned that eliminating tachographs in e-Vans would save time and costs, as drivers of such vans are required to comply with reporting obligations related to driving times and rest and fleet operators must keep records of their drivers' activities and organise the work of their drivers to meet the rest requirements. Civil society organisations were largely in favour of removing the smart tachograph obligation as it would bring down the costs of e-Vans vehicles, facilitating their deployment and therefore positively impacting the environment.

One stakeholder mentioned that removing the obligation to have smart tachograph devices in e-Vans between 3.5 and 4.25 tonnes would have a positive impact on the current shortage of qualified drivers, who otherwise need to have extended driving training to operate smart tachographs.

([16]) Fit for 55: zero CO2 emissions for new cars and vans in 2035, available at: https://www.europarl.europa.eu/news/en/press-room/20230210IPR74715/fit-for-55-zero-co2-emissions-for-new-cars-and-vans-in-2035

([17]) New commercial vehicle registrations: vans +8.3%, trucks -6.3%, buses +9.2% in 2024, available at: https://www.acea.auto/cv-registrations/new-commercial-vehicle-registrations-vans-8-3-trucks-6-3-buses-9-2-in-2024/#:~:text=New%20EU%20electrically%20chargeable%20bus%20registrations%20rose,growth%20of%20161.7%25%2C%20while%20Spain%20increased%20by

([18]) DIRECTIVE (EU) 2025/2205 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 22 October 2025 on driving licences, amending Regulation (EU) 2018/1724 of the European Parliament and of the Council and Directive (EU) 2022/2561 of the European Parliament and of the Council, and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012.

Accordingly, a simplification of the regulatory framework is considered both timely and necessary to facilitate the transition towards zero-emission mobility.

Proposed amendment

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.

Therefore, the Commission proposes a new point (fa) in Article 13(1) of Regulation (EC) No 561/2006:

> '(fa) vehicles used for the carriage by road of goods and propelled by means of electricity, the maximum permissible mass of which, including the mass of a trailer or semi-trailer, exceeding 3.5 tonnes but does not exceed 4.25 tonnes';

Expected impact

The expected impact includes cost savings for road operators that will no longer have to pay for the purchase and installation of smart tachographs for e-Vans. The operators will benefit from the regulatory simplification thanks to the reduction in administrative burden linked to the smart tachograph (reporting requirements, organising drivers' working time, etc.). The domestic commercial transport sector is composed primarily of SMEs and microenterprises, many of which have only a few vehicles at their disposal and for which the tachograph represents an additional administrative burden. This measure will have a positive impact on simplifying SMEs' operations compared to the current situation.

The measure is expected to have no impact on road safety, as the equivalent fossil fuel van is already exempt from the smart tachograph requirement. It is also expected to have a positive social impact, according to stakeholders, by reducing administrative burden.

In addition, levelling the playing field between diesel vans and e-Vans that have the same payload and use-case by removing the costs linked to the installation and use of the tachograph could help stimulate the uptake of such e-Vans. According to one OEM's market data, sales could increase up to 3.5x if the smart tachograph obligation was removed, with positive environmental effects in line with the EU's CO_2 regulation's target of 100% zero-emission cars and vans by 2035.

Currently, the scope of Regulations (EC) No 561/2006 and (EU) No 165/2014, which aim to improve the working conditions of drivers, ensure fair competition among operators, and improve road safety, is determined for the carriage by road of goods primarily by the maximum permissible mass of the vehicle, with the result that the weight of the battery powering the vehicle determines whether the driver of the vehicle should be subject to EU rules on driving times and rest rules, and therefore the rules on the use of the tachograph. The scope of this amendment is limited to levelling the playing field between combustion engine vans and electric vans vis-à-vis tachograph installation by allowing national authorities to exempt electric vans from such rules.

Moreover, this amendment proposal does not impact the objectives and agreement between the European Parliament and the Council of 2020 (Regulation (EU) 2020/1054, 'Mobility Package 1'), whereby vehicles engaged in the carriage by road of goods exceeding 2.5 tonnes and engaged in **international** road transport or cabotage will be subject to the rules

on driving times and rest periods, and the installation and use of the smart tachograph, from 1 July 2026.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
+	o	+

Cost savings for Businesses (Large companies and SMEs)

The exemption of e-Vans with GVW between 3.5 and 4.25 tonnes from the obligation to have tachographs installed is expected to relieve the EU automotive industry of significant recurrent costs. The cumulative savings of the measure in the period between 2027 and 2029 lie between EUR 629 million (lower-bound estimate[19]) and EUR 2203 million (upper-bound estimate [20]) (see Table 1), with the upper-bound estimate based on sales increasing 3.5x in response to the removal of the smart tachograph. The savings are likely to be passed on to customers, with 78% of those savings going to SMEs and 22% going to large companies ([21]).

Table 1 - Estimated Savings from Tachograph Exemption for e-Vans with GVW between 3.5t and 4.25t

Annual Savings *(in million Euro)*	2027	2028	2029	Cumulative savings through 2029
Lower-bound Estimate *(Adjustment*	117	159	208	485 *(378 for SMEs)*

([19]) The "lower-bound estimate" of annual adjustment cost savings has been calculated using annual sales projections of electric light commercial vehicles (eLCV, or e-Vans) in the Bloomberg NEF database *Electric Vehicle Sales*, with the share of each year's affected eLCVs estimated at 14% (Source: industry stakeholder). Multiplying these two figures yields the number of affected eLCVs for each of the following years: 2027: ~60000 affected eLCVs; 2028: ~78000 affected eLCVs; 2029: ~97000 affected eLCVs. Multiplying this sales estimate of exempted eLCVs with the cost savings per device yields the annual "lower-bound estimate" for cost savings presented in Table 1. The following device cost estimates were used: an average cost of EUR 1600 per tachograph device, installation costs of EUR 250 (Source: industry stakeholders), annual calibration costs of EUR 100 (Source: https://op.europa.eu/en/publication-detail/-/publication/77e544e8-8e4e-11ec-8c40-01aa75ed71a1) Moreover, to quantify the administrative costs related to the handling of the tachograph, the following assumptions were used: operation of a tachograph requires 50 minutes per month, i.e., 10 hours per year (source: tachograph manufacturer) and an average hourly labour cost in the transport sector of EUR 29.20 (Source: [lc_lci_lev] Labour cost levels by NACE Rev. 2 activity).

([20]) The "upper-bound estimate" is calculated using the amount that e-Van sales would increase by removing the smart tachograph requirement, estimated to be 3.5 times (Source: Industry stakeholder projection).

([21]) Share estimate based on Eurostat data of the share of SMEs and large companies operating in freight transport by road and removal services (Source: https://ec.europa.eu/eurostat/databrowser/view/sbs_sc_ovw__custom_18691566/bookmark/table?lang=en&bookmarkId=f9acb0b4-6c19-495f-8c21-8a9bfffe96a8&c=1761901818000)

Cost Savings([22])*)*				
Lower-bound Estimate *(Administrative Cost Savings*([23])*)*	17	40	86	144 *(113 for SMEs)*
TOTAL ANNUAL SAVINGS (lower-bound estimate)	134	199	294	629 *(491 for SMEs)*
Higher-bound Estimate *(Adjustment Cost Savings)*	410	557	730	1698 *(1324 for SMEs)*
Higher-bound Estimate *(Administrative Cost Savings)*	61	142	302	0505 *(394 for SMEs)*
TOTAL ANNUAL SAVINGS (higher-bound estimate)	471	699	1032	2203 *(1718 for SMEs)*

** Differences between the cumulative amounts and the sum of the three years are due to rounding.*

3.1.2. Tachograph obligations for motor caravans used exclusively for non-commercial carriage by road

Issue description

National divergences exist on whether large motorhomes (greater than 7.5 tonnes) need a tachograph installed. In case C-666/21, the Swedish authorities asked the Court to clarify whether Regulation (EC) No 561/2006 on driving times and rest rules applied to the drivers of such motorhomes. The Court ruled that the "*the notion of 'carriage by road of goods', […] covers carriage by road by a vehicle whose maximum permissible mass, within the meaning of Article 4(m) of Regulation No 561/2006, as amended, exceeds 7.5 tonnes, including where it is fitted out not only as a temporary private living area but also for the*

([22]) Adjustment cost: costs of complying with substantive requirements in regulation, other than charges and administrative costs. The costs classified under adjustment costs are: tachograph device, installation cost of tachograph, calibration cost of tachograph.

([23]) Administrative costs: costs of complying with the administrative requirements imposed by regulation. Commercial drivers must regularly spend time operating the tachograph which subtracts from their working time. Therefore, the cost listed under administrative costs is the labour cost for the time spent by the driver handling the tachograph in place of other work.

non-commercial loading of goods, without that vehicle's cargo capacity or the category in which it appears in the national road traffic register having any effect in that regard."

The Court based its judgment on road safety considerations and the existing exemption under Article 3(h) of Regulation (EC) No 561/2006 that sets a ceiling of 7.5 tonnes for vehicles used for the non-commercial carriage of goods. Following the judgment, the European Commission has been contacted by several citizens, associations, national authorities, and by the European Parliament ([24]) to clarify the legal framework applicable to large motorhomes. It is therefore desirable to have legal clarity regarding the installation and use of tachographs in motorhomes used exclusively for private purposes, as this device – originally designed for professional drivers – would represent a significant burden for non-professional drivers.

Stakeholder views

Following the judgement of the Court of Justice in Case C-666/21, the caravan industry identified differences in interpretation between Member States and has therefore called for a clarification on the rules that apply to motorhomes for private use in the EU. In certain Member States there has been a substantial decrease in sales of these large motorhomes following the judgement.

Representatives from caravan users believe that the social and tachograph legislation was not designed for large private-use motorhomes, and therefore request a legal clarification in this Omnibus.

National authorities have provided diverging feedback on the proposed amendment, with seven out of 16 against (others neutral or N/A) due to the possible impact on road safety that such large motorhomes may have, especially if they are carrying goods such as horses or other motor vehicles. The national authorities in favour of the proposed amendment highlighted the fact that Regulations (EC) No 561/2006 and (EU) No 165/2014 were already interpreted to mean that motorhomes were exempt from the tachograph obligation even before the Court judgment, and that the proposed amendment only enshrines this interpretation in the legal text.

Proposed amendment

The proposed amendment is to add a new point (s) in Article 13 of Regulation (EC) No 561/2006 that would allow Member States to grant exceptions to motorhomes from the rules on driving times and rest periods, and those of the tachograph. Such an exception could be extended cross-border among Member States who have made use, notified this exemption, and agreed with the other Member States concerned. The Commission proposes therefore to introduce a new point, (s), in Article 13(1) of Regulation 561/2006:

> '(s) motor caravans, as defined by point 5.1 of Part A of Annex I of Regulation (EU) 2018/858, used exclusively for non-commercial carriage by road.';

While this does not ensure an EU-wide exemption to the rules on driving times, rest periods, and the use of the tachograph, it makes use of the existing practice of Article 13 of Regulation (EC) No 561/2006, whereby domestic exceptions can be extended cross-border in agreement with the Member States concerned. This reflects the feedback received

([24]) See for example Petition 0242/2025 of the European Parliament.

through the targeted stakeholder consultation, where Member States have different views on how large motorhomes of more than 7.5 tonnes are to be treated regarding driving times, rest periods, and the use of the tachograph insofar as road safety is concerned. It will therefore remain for Member States to balance the benefits and possible risks of such an exception.

Expected impact

This measure is expected to alleviate the adjustment costs faced by citizens and manufacturers due to the current ambiguity resulting from divergent national interpretations of recent court rulings. It is expected to have a neutral environmental, social, and safety impact.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
o	o	o

Cost Savings

The exemption of motorhomes from the obligation to install a tachograph is expected to relieve motorhome customers of EUR 550 000 per year in costs (see Table 2).

Table 2 - Estimated Savings for Motorhome Owners from Tachograph Exemptions of Large Motorhomes ([25])

Annual Savings *(in Euro)*	2027	2028	2029	Cumulative savings through 2029
Estimate *(Adjustment Cost Savings)*	550 000	550 000	550 000	1 650 000
Estimate *(Administrative Cost Savings)*	N/A	N/A	N/A	N/A
TOTAL ANNUAL SAVINGS (lower-bound estimate)	550 000	550 000	550 000	1 650 000

3.2. Regulation (EU) 2019/2144 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate

([25]) The annual savings estimates were calculated using an average cost of EUR 1600 per tachograph device, installation costs of EUR 250 (Source: industry stakeholders), annual calibration costs of EUR 100 (Source: https://op.europa.eu/en/publication-detail/-/publication/77e544e8-8e4e-11ec-8c40-01aa75ed71a1), and sales of 295 per year for motorhomes above 7.5 tonnes (Source: Industry association). Future sales increases due to the tachograph exemption could not be quantified and are thus not taken into account in the calculations.

technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users

Regulation (EU) 2019/2144, also known as the General Safety Regulation (GSR), lays down EU vehicle safety requirements for vehicle type-approval, including those addressing the specific concerns of vulnerable road users, such as pedestrians and cyclists. It requires vehicles, including passenger cars, vans, trucks, buses, and coaches, to be equipped with a number of advanced vehicle safety systems. The regulation is expected to save over 25 000 lives and prevent at least 140 000 serious injuries by 2038. ([26])

Amongst the advanced safety features required under the regulation are intelligent speed assistance and automated emergency braking. Intelligent speed assistance helps drivers adhere to the speed limit by automatically informing them of the speed limit. Depending on the system's level of activation, it can range from simple warnings to active speed reduction. Automated emergency braking (AEB) automatically applies the brakes to avoid or mitigate collisions with other vehicles, pedestrians, and cyclists.

Additional safety features in Regulation 2019/2144 are driver drowsiness and attention warning systems, which use sensors and vehicle data to monitor for signs of fatigue and distraction before providing a warning to the driver to take a break. These systems analyse driving patterns like lane drifting or jerky steering, as well as direct driver cues like eye movements and yawning, to assess alertness. If drowsiness is detected, the system alerts the driver through visual, auditory, or haptic feedback, helping to prevent accidents caused by fatigue.

The regulation also requires reversing detection, which uses cameras and/or sensors to detect obstacles when reversing, and emergency lane keeping (ELK), which prevents unintentional lane departures. Finally, vehicles must have an event data recorder (EDR) that records key data from the moments leading up to a collision.

The regulation was implemented in two phases, with new cars and some other vehicles required to have certain features by July 2022. A second phase of requirements took effect in July 2024 for all new vehicles.

3.2.1. Speed-limiting device obligation for e-Vans with a weight between 3.5 tonnes and 4.25 tonnes

Issue description

Council Directive 92/6/EEC sets out rules on the installation and use of speed limitation devices for buses, coaches, and heavy goods vehicles. The Directive was subsequently amended by Directive 2002/85/EC to extend the scope to lighter vehicles of categories, including Vans above 3.5 tonnes. The speed limitation device has been included in the General Safety Regulation as a requirement for all commercial vehicles with a weight above 3.5 tonnes.

([26]) COMMISSION STAFF WORKING DOCUMENT IMPACT ASSESSMENT Accompanying the document Proposal for a Regulation of the European Parliament and of the Council 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

As with the smart tachograph requirement, e-Vans with GVWs between 3.5 tonnes and 4.25 tonnes (which fall into category N2 due to the weight from their batteries) are required to be equipped with a speed limitation device, while their fossil fuel equivalent (category N1) with essentially the same payload and use-cases is not subject to this requirement. The inclusion of such a device in these e-Vans thus means that diesel vans can drive at higher speeds. Furthermore, the speed limitation device adds additional expense to the e-Van, discouraging their uptake by customers, of which there are many SMEs, compared to their combustion engine equivalent.

Similar to the tachograph, this issue has been taken into account in the recent revision of the EU Driving Licence Directive ([27]), whereby a category B licence will be valid for two years after it was issued for the first time for vehicles with a maximum authorised mass exceeding 3.5 tonnes but not exceeding 4.25 tonnes.

Stakeholder views

In the targeted stakeholder consultation, OEMs and industry associations mentioned the positive impact removing the speed-limiting device would have on levelling the playing field between e-Vans and their fossil-fuel equivalent. Because the speed limitation device adds costs to the e-Van, several stakeholders noted that eliminating this requirement would contribute to decreasing the total cost of ownership of these vehicles, used by many SMEs, in particular tradesmen, that need vans with this payload.

Seven type-approval authorities raised concerns that removing speed-limiting devices would impact negatively on safety. Although some of the specific tests for vehicles of category N1 are not applicable to vehicles of category N2 (e.g., rear and side impact tests), the level of safety of e-Vans with GVWs between 3.5 tonnes and 4.25 tonnes is expected to remain robust due to the comprehensive standards, such as the cab impact and electric safety tests, that ensure a high level of vehicle integrity and occupant protection. In addition, the widescale deployment of advanced driver assistance systems (ADAS) in these vehicles today contributes to their enhanced safety performance, providing equivalency compared to their fossil-fuel counterparts with similar use-case and payload.

Proposed amendment

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, N1 diesel vans.

In Article 9 of Regulation (EU) 2019/2144, the Commission proposes adding the following paragraph:

> ‘5a. Vehicles of category N2 propelled by means of electricity, with maximum permissible technical 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.;

([27]) DIRECTIVE (EU) 2025/2205 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 22 October 2025 on driving licences, amending Regulation (EU) 2018/1724 of the European Parliament and of the Council and Directive (EU) 2022/2561 of the European Parliament and of the Council, and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012.

Moreover, through a separate Directive proposal (also adopted as part of the Automotive Package), the Commission proposes adding a new paragraph in Article 3 of Directive 92/6/EEC exempting the vehicles in question from the need to be equipped with a speed limitation device to allow them to be used on the road:

'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 exclusively 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.'.

Expected impact

Removing the requirement to have speed limitation devices in e-Vans with GVW between 3.5 and 4.25 tonnes would encourage the uptake of such zero-emission vans versus their fossil fuel counterpart, thus delivering positive environmental effects in line with the CO_2 Regulation. It would remove an adjustment cost that would likely benefit customers, many of whom are SMEs. From a social perspective, the impact is likely to be neutral.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
+	o	o

Cost savings for the automotive value chain

The exemption of e-Vans from the obligation to install speed limiting devices is expected to relieve the EU automotive industry of significant recurrent adjustment costs, as light commercial vehicles between 3.5t and 4.25t sold in the future will benefit from these savings. The total savings of the measure lie between EUR 223.7 million (lower-bound estimate [19]) and EUR 782.9 million (upper-bound estimate [20]) from 2027 to 2029 (see **Error! Reference source not found.** 3). Of these savings, 78% are attributable to SMEs and 22% to large companies.

Table 3 - Estimated Savings from Speed Limiting Device Exemption for e-Vans with GVW between 3.5t and 4.25t ([28])

Annual Savings *(in million Euro)*	2027	2028	2029	Cumulative savings through 2029
Lower-bound Estimate *(Adjustment Cost Savings)*	57.1	74.6	92.0	223.7 *(174.5 for SMEs)*

([28]) The Annual savings were calculated using an average cost of EUR 700 per speed limiting device and installation costs of EUR 250 (Source: industry stakeholders). The lower- and upper-bound estimates were calculated with the same methodology as in Table 1.

Lower-bound Estimate *(Administrative Cost Savings)*	N/A	N/A	N/A	N/A
TOTAL ANNUAL SAVINGS (lower-bound estimate)	57.1	74.6	92.0	223.7 *(174.5 for SMEs)*
Higher-bound Estimate *(Adjustment Cost Savings)*	199.9	260.9	322.2	782.9 *(610.7 for SME)*
Higher-bound Estimate *(Administrative Cost Savings)*	N/A	N/A	N/A	N/A
TOTAL ANNUAL SAVINGS (higher-bound estimate)	199.9	260.9	322.2	782.9 *(610.7 for SME)*

3.3. Regulation (EC) 2024/1257 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)

Regulation (EU) 2024/1257, also known as the Euro 7 Regulation, covers the type-approval of vehicles, engines, and related systems and components with respect to their emissions and battery durability, aiming to reduce air pollution from both exhaust and non-exhaust sources like brakes and tyres. It introduces measures for on-board monitoring of emissions, battery performance, and emission performance throughout a vehicle's lifetime.

Euro 7 builds on the emission rules in the Euro 6 Regulation for light-duty vehicles and Euro VI Regulation for heavy-duty vehicles, continuing the latest Euro 6/Euro VI emission test methods, but widens the scope to address durability and emerging sources of pollution from brakes and tyres. Stronger lifetime requirements mean vehicles must maintain compliance over higher mileage and longer years in service, closing gaps between laboratory and real-world performance.

In addition, by regulating particulate emissions from brake systems and setting minimum battery durability standards, Euro 7 recognises that electrification alone does not eliminate all environmental impacts and seeks to ensure clean mobility across diverse propulsion technologies.

The expected benefits of Euro 7 include improved air quality, especially in dense urban environments, and thus a reduction in health impacts linked to nitrogen oxides,

particulates, and other harmful pollutants. By mandating continuous on-board monitoring and transparent reporting, the regulation aims to increase consumer confidence, reduce regulatory loopholes, and ensure vehicles remain clean in day-to-day use rather than only during type-approval testing.

In parallel, durability provisions for batteries and other emission-control components are designed to extend useful life, minimise premature degradation, and promote more sustainable resource use. Collectively, these measures support the EU's broader climate and public-health objectives while encouraging innovation in cleaner propulsion, filtration, and energy-management technologies.

3.3.1. Laboratory test of low temperature for emissions in light-duty vehicles

Issue description

Regulation (EU) 2024/1257 (Euro 7) sets out the methods for measuring emissions from light-duty (passenger cars and vans) and heavy-duty vehicles (lorries, coaches, and buses), as well as the emission limits that manufacturers must demonstrate compliance with. These are set out in Annex I of the Regulation. The Euro 7 Regulation establishes that the methods for measuring pollutant exhaust and evaporative emissions from light-duty vehicles (passenger cars and vans) shall reflect those laid down in Regulation (EU) 2017/1151 (i.e., the Euro 6e rules, which are currently applied).

The 'laboratory test at low temperature' is an emissions test for which OEMs must demonstrate compliance at -7 °C. Under the currently applicable Euro 6e rules, this test applies a dedicated set of limits ([29]) that reflect the expected increase of emissions at low temperatures. However, the Euro 7 Regulation did not include the specific emission limits for this test, as was the case under Euro 6. Moreover, the conditions for the low-temperature emissions test overlap with the Real Driving Emissions test specifications, which covers emissions in temperatures ranging from -7 °C to 38 °C.

The temperature conditions of the 'laboratory test of low temperature for emissions' referred to in Table 1 and 2 of Annex V of the Euro 7 regulation are covered by the 'gaseous pollutant and particle number (PN) in the road testing ('Real Driving Emissions' - RDE) test that are also provided in the same tables. Having to perform a dedicated cold ambient test in a laboratory to demonstrate compliance with the new Euro 7 emission limits constitutes a significant type-approval testing burden for vehicle manufacturers. Therefore, it is deemed justified to simplify the specific low-temperature laboratory (Type 6) test.

To that end, the Commission considered two possible approaches:

Option 1: introduction of the dedicated Euro 6 emission limits for the 'laboratory test at low temperature for emissions' in Euro 7 to reduce the development burden for vehicle manufacturers;

([29]) Commission Regulation (EU) 2017/1151 of 1 June 2017 supplementing Regulation (EC) No 715/2007 of the European Parliament and of the Council on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6).

Option 2: elimination of low-temperature (Type 6) tests in their entirety, reducing development burden and the number of tests at type-approval.

Stakeholder views

Of the 68 stakeholders who submitted replies to the targeted stakeholder consultation, 44 responded to the proposal on simplifying the Euro 7 Type 6 test. A large majority (n=40; 91%) supported action to tackle this problem, while three (7%) opposed it.

Supporters of option 1 (12 stakeholders), i.e., those in favour of maintaining the low-temperature test with the inclusion of Euro 6 limits in Euro 7, highlighted the need to preserve the intent of the co-legislators to adhere to Euro 6 rules. They emphasised reduced regulatory burden, legal certainty, and consistent environmental testing at low temperatures. They argued that this approach complements Real Driving Emissions (RDE) testing and does not negatively affect environmental outcomes if limits for carbon monoxide (CO) and hydrocarbons (HC) remain. This group included automotive suppliers, business associations, national authorities, and vehicle manufacturers.

Proponents of option 2 (12 stakeholders), i.e., eliminating the Type 6 test, argued that the test is redundant, as RDE testing already covers the relevant temperature range and modern vehicles are able to meet stricter standards. Removing the test would cut testing costs and simplify type-approval without impacting environmental protection. Support came from automotive suppliers, business associations, one NGO, type-approval authorities, and vehicle manufacturers.

16 stakeholders supported both options, citing similar benefits such as reduced administrative effort while maintaining high environmental standards.

A small group (three stakeholders) opposed both options, fearing that removing or weakening the low-temperature test would hinder detection of non-compliance at -7°C and undermine consumer, environmental, and health safeguards, because these temperature conditions are not often observed in Europe and would therefore not be tested through the RDE test. One stakeholder, who was neither in favour of nor against the proposals, cautioned that emissions could increase in northern Member States from this simplification.

Proposed amendment

The proposed amendment is to delete the row corresponding to Laboratory test of low temperature for emission in table 1 and table 2 of Annex V of Regulation (EU) 2024/1257 regarding application of test requirements and declarations for vehicles of categories M1 (passenger cars) and N1 (vans) for respectively manufacturers and for Member States, Commission and recognised third parties (Option 2 ([30])).

This amendment reflects option 2, i.e., the option that provides the highest level of simplification by significantly reducing regulatory burden and the number of tests while avoiding duplication, creating cost savings, and maintaining stringent emission control and public health protection.

([30]) As Option 1 involves keeping existing Euro 6 testing standards, it would not entail any cost savings for manufacturers nor for type-approval authorities and was therefore ruled out.

Expected impact

The removal of the Type 6 low-temperature laboratory test from the Euro 7 framework would not reduce the level of environmental protection afforded by Union legislation. The purpose of the Type 6 test under Euro 6 was to verify the control of pollutant emissions of petrol vehicles only at low ambient temperatures in a laboratory environment (-7 °C) using a modified version of the now-obsolete New European Driving Cycle (NEDC).

Under the Euro 7 framework, these conditions are already covered comprehensively by the Real Driving Emissions (RDE) test, which requires the verification of pollutant emissions for all powertrains under a wide range of ambient conditions, including temperatures down to –7 °C. The RDE procedure provides a more representative assessment of emissions during actual driving, including the cold-start phase, and applies to all vehicle and fuel types (unlike the Type 6 test, which excludes diesel vehicles).

Moreover, the continuous verification of emission control system performance through on-board monitoring (OBM) and the reinforced in-service conformity testing regime under Euro 7 provide oversight of emissions during real use and throughout the vehicle's lifetime. Consequently, maintaining a separate laboratory Type 6 test would duplicate requirements without additional environmental benefit. Conversely, its removal streamlines the type-approval process without compromising environmental outcomes.

Impact per type (+ positive; - negative; o neutral)

As described above, the proposed amendment would reduce administrative burden for manufacturers and for Member States, the European Commission, and recognised third parties. It would not entail any adjustment costs, nor would it have any impact on the environment, road safety, or society.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
o	o	o

Cost savings for the automotive value chain

OEMs would benefit from recurrent adjustment cost savings, detailed in Table 4, that would be generated through the simplification of test procedures during type-approval, resulting in a significant decrease in complexity and regulatory burden.

Table 4 - Estimated cost savings from removing low-temperature emissions test ([31])

Annual Savings *(in million Euro)*	2027	2028	2029	Cumulative savings through 2029
Lower-bound Estimate	155	155	155	465

([31]) Using a conservative estimate that the low-temperature test represents 6% (lower-bound estimate) to 10% (upper-bound estimate) of the type-approval testing budget (this test being one test out of seven), and assuming that the light-duty vehicle industry's annual budget for emission type approval (Euro 6/7) ranges from EUR 1 650 000 000 to 3 500 000 000 (Source: EU industry).

(Adjustment Cost Savings)				
Lower-bound Estimate *(Administrative Cost Savings*)	N/A	N/A	N/A	N/A
TOTAL ANNUAL SAVINGS (lower-bound estimate)	155	155	155	465
Higher-bound Estimate *(Adjustment Cost Savings)*	275	275	275	825
Higher-bound Estimate *(Administrative Cost Savings)*	N/A	N/A	N/A	N/A
TOTAL ANNUAL SAVINGS (higher-bound estimate)	275	275	275	825

Removing the **low-temperature emissions testing** of the full Type 6 test procedure would therefore lead to a cost savings of **EUR 155 000 000 to 275 000 000 per year.**

Other economic impacts for Member States and Citizens

Removing the low-temperature test will have a positive impact and significant spillover effects for type-approval authorities and technical services in charge of type-approvals of vehicles for emissions at Member State-level, as it will facilitate the management and assessment of type-approval files. It is however not possible to quantify the corresponding cost savings.

3.3.2. Vehicle types for Euro 7 engine (Separate Technical Unit) type-approval

Issue description

In accordance with Regulation (EU) 2024/1257 (Euro 7), heavy-duty vehicles (HDVs) must undergo a Real Driving Emissions (RDE) demonstration test for every vehicle type to obtain a Euro 7 engine type-approval (i.e., a type-approval of the engine as a separate

technical unit). This marks a departure from the current provisions in Euro VI ([32]), where the engine type-approval RDE tests are performed per vehicle *category* (e.g., N3 heavy lorries), rather than per vehicle *type* (roughly equivalent to a vehicle model).

The type-approval Regulation (EU) 2018/858 sets out in article 4 that a vehicle 'category' refers to a broader classification of vehicles based on similar characteristics, such as size or function (e.g., city buses, coaches, or lorries), while a vehicle 'type' is a more specific classification within a vehicle category, distinguished by design or operational features. Vehicle type is to be understood as 'type of vehicle' as defined in article 3(32) of the type-approval Regulation (EU) 2018/858. For example, within the category of buses, there might be different type of vehicles based on size, purpose, or engine used.

The additional testing requirement therefore places a disproportionate financial and operational burden on manufacturers, especially for those producing diverse types within a single vehicle category, without providing additional environmental benefits, as the results are essentially the same across vehicle types within the same vehicle category. The requirement to test each type of vehicle separately, even when they use the same engine family, is unnecessarily costly and complex and appears to be an oversight in the drafting of Annex V of the Regulation, which became evident during the preparation of Euro 7 implementing rules for heavy-duty vehicles.

Feedback from industry stakeholders highlights that small-volume manufacturers who rely on large engine manufacturers face significant commercial pressures and may suffer major setbacks from the Euro 7 per-type testing requirements, potentially disrupting the EU commercial vehicle market. Industry stakeholders have expressed concerns over the survival of these small manufacturers; correcting the oversight by requiring testing per *vehicle category* instead of per *type* would reduce the burden of compliance. At the same time, it is crucial to maintain clear divisions of responsibility and compliance obligations between engine manufacturers and vehicle original equipment manufacturers (OEMs).

Ultimately, aligning the Euro 7 requirements with the initial intention of strengthening emission limits without expanding testing complexity would ensure a balanced and fair regulatory environment that supports the sustainability and competitiveness of the European vehicle industry.

Stakeholder views

Of the 68 consulted participants, 34 (50%) responded on the proposal to refer to vehicle categories rather than types for heavy-duty vehicle type-approval. Among them, most (n=23; 68%) supported the change, eight (24%) had no clear preference, and none opposed it, though three (9%) offered nuanced views.

Supporters highlighted the reduced administrative and testing burdens the proposed amendment would bring without compromising environmental standards. The measure would avoid redundant engine testing across vehicle types, lower approval costs, and enhance regulatory coherence, predictability, and market stability, potentially leading to

([32]) Euro VI refers to Regulation (EC) No 595/2009 on type-approval of motor vehicles and engines with respect to emissions from heavy-duty vehicles, while Euro 6 refers to Regulation (EC) No 715/2007 on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles. Euro 7 (Regulation (EU) 2024/1257 on type-approval covers emissions from both light- and heavy-duty vehicles.

lower HDV prices and accelerating fleet renewal. One engine manufacturer estimated cost reductions of up to 90% for type-approval. Positive or neutral environmental, social, and safety impacts were expected, alongside clear economic benefits. Support came from a range of stakeholders, including automotive suppliers, business associations, NGOs, market surveillance and type-approval authorities, and HDV manufacturers.

The three organisations who did not indicate a preference for or against the proposed amendment consisted of one manufacturer and two national authorities. These stakeholders provided neutral views, citing the potential concern that the proposed amendment might make it more difficult to harmonise Euro 7 and UNECE regulations.

Proposed amendment

The proposed amendment is to refer to 'vehicle categories' rather than 'vehicle types' for Euro 7 engine (Separate Technical Unit) type-approval, i.e., 'Required demonstration tests for all fuels for which the type-approval is granted per vehicle ~~**type**~~ **category** and a declaration of compliance for all fuels, all payloads and all applicable vehicle categories in respectively tables 3, 4, 7 and 8 of Annex V to Regulation (EU) 2024/1257.'

Expected impact

As outlined above, the expected impact on the environmental will be neutral with no change in impact on safety or society. There would, however, be major administrative burden reduction.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
o	o	o

Cost savings for the automotive value chain

The total cost saving is recurrent and would consist of administrative cost savings as the testing procedure simplification relieves manufacturers of heavy-duty vehicles and/or engine manufacturers that supply engines for OEMs (in cases where the OEM does not manufacture its own engines) from substantive testing obligations.

Based on discussions with industry stakeholders and presentations as part of the Advisory Group Vehicle Emissions Standards (AGVES), on average heavy-duty vehicle manufacturers that produce Category N3 and M3 vehicles have 4 or 5 types within a specific category. In certain situations, this can exceed 10 to 15 types per category. Some stakeholders referred to an increase in type-approval procedures from 4 to 10 if 'type' is mentioned instead of 'vehicle category.' Therefore, a conservative estimate is that 1.5 times more procedures must be carried out if 'type' is mentioned instead of 'vehicle category.'

The resulting adjustment cost savings **range from EUR 262 500 000 to EUR 1 125 000 000 per year for car manufacturers.** Table 5 presents an overview of the cost savings.

Table 5 - Estimated savings from transitioning Euro 7 RDE testing from vehicle types to vehicle categories for heavy-duty engine type-approval ([33])

Annual Savings *(in million Euro)*	2027	2028	2029	Cumulative savings through 2029
Lower-bound Estimate *(Adjustment Cost Savings*)	263	263	263	789
Lower-bound Estimate *(Administrative Cost Savings)*	N/A	N/A	N/A	N/A
TOTAL ANNUAL SAVINGS (lower-bound estimate)	263	263	263	789
Higher-bound Estimate *(Adjustment Cost Savings)*	1 125	1 125	1 125	3 375
Higher-bound Estimate *(Administrative Cost Savings)*	N/A	N/A	N/A	N/A
TOTAL ANNUAL SAVINGS (higher-bound estimate)	1125	1125	1125	3375

Other economic impacts for Member States and Citizens

The simplification and clarification as well as the streamlining of the documentation will have some positive impact and significant spillover effects for type-approval authorities and technical services in charge of type-approvals of vehicles for emissions at Member States level. This will significantly facilitate the management and assessment of type-approval files. It is however impossible to quantify the corresponding cost savings.

([33]) Annual EU type-approval costs for EU HDV manufacturers, assuming an EU type-approval budget of EUR 500 000 and EUR 1 500 000, for 350 to 500 type-approval certificates per year, would be from EUR 175 000 000 to EUR 750 000 000 per year. The additional cost estimate amounts to the yearly EU type-approval estimated budget at EU industry level that is multiplied by 1.5x to account for additional testing that would be required if done by vehicle type instead of vehicle category. (Source: EU industry)

3.3.3. OBM and OBFCM data infrastructure and common methods

Issue description

Under the Euro 7 Regulation, new vehicles will periodically transmit data about their real-world fuel consumption and emissions to manufacturers who will then transmit it to type approval/market surveillance authorities through so-called on-board fuel and electric energy consumption monitoring (OBFCM) devices and on-board monitoring (OBM) systems.

The information from OBM and OBFCM can support the work of Member State authorities, enabling more targeted testing and providing a realistic picture of the environmental performance of Euro 7 vehicles. To fully realise the potential of OBM and OBFCM data, it is essential that the data are available in common data formats, and that quality control procedures be put in place to make datasets comparable across manufacturers.

However, there is currently no provision at EU level to enable the receiving, compiling, processing and storage of OBM data. Creating specific rules for OBM data management by authorities would ensure clarity and harmonisation in this respect, increase effectiveness, reduce administrative burden for manufacturers and authorities, and provide simplification. A shared repository managed at EU level could aggregate anonymised OBM data, ensuring consistent reporting and enabling cross-border analysis. This would complement the systems already in place for OBFCM under Regulation (EU) 2019/631 and could later be extended to data on pollutants.

Stakeholder views

Stakeholder views on this matter were collected during the development of the Euro 7 implementing rules. The need for simplified OBM and OBFCM data management was raised repeatedly in the Advisory Group Vehicle Emissions Standards (AGVES). At the 20th AGVES meeting on 25–26 September 2024, discussions centred on the outcomes of an ad hoc meeting on the data annex of the draft On-Board Monitoring (OBM) implementing act. Member State representatives underlined the importance of effective data management, especially regarding storage solutions, and suggested exploring server-based approaches to limit the volume of stored and transmitted data.

At the 22nd AGVES meeting on 4–5 February 2025, discussions centred on the data infrastructure required for OBM across the Union. Stakeholders provided technical input on implementation, highlighting the need to reduce data-collection burdens without compromising regulatory robustness. Industry representatives called for clear timelines and obligations for data transmission. There was broad agreement on ensuring that OBM and OBFCM data are received, compiled, processed, and stored in a harmonised way to support the effective monitoring of in-use compliance with Euro 7 standards. Both industry and Member State authorities expressed support for a streamlined approach that would simplify procedures and reduce administrative burden.

Proposed amendment

> In Regulation (EU) 2024/1257, Article 14(4) point (j) is replaced by the following:‘(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 t.'

With this measure, it will be clarified that the Commission is empowered to ensure that OBM, OBD and OBFCM data are received, compiled, processed and stored effectively in a harmonised manner to monitor real-world performance of Euro 7 vehicle types.

Expected impact

The development of OBM and OBFCM data infrastructure and common methods for its processing will help fully realise the potential of OBM and OBFCM data. Member States could use aggregated data to identify vehicles or technologies with abnormal emission or fuel-consumption behaviour, focusing laboratory and on-road tests where anomalies are detected, thereby reducing the administrative costs related to enforcement of the Euro 7 standard.

The Commission, Member States, and technical services could develop shared methodologies for interpreting OBM and OBFCM data (e.g., statistical baselines, criteria for anomaly detection). Making simplified summaries of OBM and OBFCM data accessible (via the web, for example) could raise awareness of real-world efficiency and pollutant emission performance of vehicles.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
o	o	o

Cost savings for the automotive value chain

A harmonised EU-level OBM/OBFCM data infrastructure could generate substantial cost savings in comparison to each Member State developing and maintaining its own system. The savings arise from economies of scale, reduced duplication, and harmonised compliance processes. Instead of dealing with multiple national systems, vehicle manufacturers would be able to transmit standardised data one time, reducing software-integration and certification expenses.

Developing one secure EU platform would avoid separate national investments in servers, databases, cybersecurity systems, and maintenance contracts at each Member State issuing Euro 7 emission approvals and for car manufacturers who are currently processing, compiling and storing the same data at their own level. A single analytical engine would be able to identify anomalies across the EU fleet, allowing economies of scale in data science and algorithm development. Lastly, shared insights from harmonised analytics help all Member States focus limited testing resources where non-compliance is most likely, saving time and laboratory costs.

At car manufacturers' level, setting up common measures for compiling, managing, processing and storing data would lead to recurrent annual cost savings starting from the entry into force of such measures. Such recurrent annual cost savings can be estimated as follows:

- The data platform would cover **both Light-Duty Vehicles (LDVs) and Heavy-Duty Vehicles (HDVs)**
- Data volumes: tens of millions of vehicles would transmit data each year
- Infrastructure & storage: must include receipt of data, validation, anonymisation/aggregation, secure storage, retrieval/reporting, redundancy/backup, long term archive
- Annual operating costs would include: cloud/data centre cost, software maintenance and upgrades, data management staff, compliance/security, aggregation/reporting, type-approval authority overhead
- There would be economies of scale: once the system is built, per-vehicle cost declines, but data volumes likely increase and complexity (many OEMs, many vehicle variants) grows.

On this basis, the cost savings are related to: (i) input, processing and storage of data; (ii) reporting and saving data; (iii) cloud and storage as well as IT management; (iv) security and back up. These cost savings are estimated for each of the above-mentioned categories while taking into account the estimated number of LDVs reporting to the system (20 000 000) and HDVs (2 000 000). This gives rise to potential savings for OEMs of EUR 150 000 (lower-bound estimate) to 2 400 000 (upper-bound estimate) per year (see Table 6). Some cost savings would also exist at the level of part and components manufacturers (due to the highly cross-integrated value chain) but this could not be assessed quantitatively.

Table 6 – Estimated savings for OEMs from implementing a harmonised EU-Level OBM/OBFCM data infrastructure under Euro 7 standards

Annual Savings *(in million Euro)*	2027	2028	2029	Cumulative savings through 2029
Lower-bound Estimate *(Adjustment Cost Savings)*	N/A	N/A	N/A	N/A
Lower-bound Estimate *(Administrative Cost Savings*)	0.15	0.15	0.15	0.45
TOTAL ANNUAL SAVINGS (lower-bound estimate)	0.15	0.15	0.15	0.45
Higher-bound Estimate *(Adjustment Cost Savings)*	N/A	N/A	N/A	N/A
Higher-bound Estimate	2.40	2.40	2.40	7.20

(Administrative Cost Savings)				
TOTAL ANNUAL SAVINGS (higher-bound estimate)	2.40	2.40	2.40	7.20

Other economic impacts for Member States and Citizens

As OBM data infrastructure has yet to be developed, cost saving estimates for authorities are based on a representative scenario where savings are realised by using a harmonised EU-level approach rather than a national approach for each Member State issuing Euro 7 vehicle approvals. In this illustrative scenario, it is assumed that a harmonised EU platform would be developed once and then accessed by Member States through dedicated portals, with each Member State responsible only for limited national adaptations, help-desk functions, and enforcement modules.

Cost Savings for Member States

Although the cost to the European Commission would be EUR 1 200 000, the EU-level approach is estimated to result in cumulative savings of **EUR 20 000 000 for Member States**, including one-off savings and recurrent savings (see Table 7).

Table 7 - Estimated cost savings for Member States from implementing a harmonised EU-level OBM data infrastructure compared to national data infrastructure ([34])

Annual Savings *(in million Euro)*	One-Off	2027	2028	2029	Cumulative savings through 2029
Estimate *(Adjustment Cost Savings)*	12.5	N/A	N/A	N/A	12.5
Estimate *(Administrative Cost Savings)*	N/A	2.5	2.5	2.5	7.5
TOTAL ANNUAL SAVINGS	12.5	2.5	2.5	2.5	20

([34]) Assuming each Member State independently develops its system, the one-off cost would total EUR 16 200 000 for all 27 Member States, compared to EUR 1 200 000 for a central EU platform. This would result in EUR 15 000 000 savings in 2027. With annual operating costs of EUR 2 700 000 (assuming EUR 100 000 per Member State for 27 Member States) versus EUR 200 000 for the EU system, additional savings of EUR 2 500 000 per year are projected for 2028 and 2029, totalling EUR 20 000 000 in cumulative savings for the Union over three years.

(lower-bound estimate)					

3.4. Regulation (EC) 540/2014 on the sound level of motor vehicles and of replacement silencing systems

Regulation (EC) 540/2014 establishes the technical and administrative rules for the EU type-approval of motor vehicles and replacement silencing systems based on their sound levels. Its main objectives are to reduce noise pollution from vehicles, protect the environment and public health, and ensure the proper functioning of the internal market by harmonising noise requirements.

The regulation includes labelling requirements for manufacturers and distributors and the obligation for manufacturers to include an Acoustic Vehicle Alerting System (AVAS) in new hybrid electric and electric vehicles are equipped to alert pedestrians to their presence.

3.4.1. Misalignment with UN Regulations on noise

Issue description

When demonstrating compliance of a new vehicle type with noise-related requirements, vehicle manufacturers in the EU must comply with Regulation (EU) No 540/2014. UN Regulations have an enhanced scope that restricts noise from backfire, sound actuators, and sound enhancement systems are considered equivalent under EU type-approval but are not mandatory in the EU.

Because the EU Regulation does not contain any legal empowerment that would enable it to be updated in line with technology developments, it has not been updated in more than six years. EU manufacturers apply the UN regulations to be competitive on international markets. The incoherence between mandatory requirements in 540/2014 and the UN regulations carries the risk of creating a competitive disadvantage and generates an administrative burden.

Stakeholder views

During the targeted stakeholder consultation, no stakeholders came out in favour of keeping Regulation 540/2014. For OEMs, although Regulation (EU) No 540/2014 is less restrictive than the UN rules, the majority of OEMs (6 out of 11) stated their support for this regulatory simplification, citing the reduced costs and administrative burden in applying one global standard for noise; the other five OEMs expected no impact from repealing the regulation. Of other stakeholders who replied, the majority, including industry associations (11 out of 13), market surveillance authorities (2 out of 3) and type approval authorities (7 out of 11), supported repealing this regulation, citing the stronger environmental benefits offered by the UNECE regulations through reduced noise pollution.

Proposed amendment

The proposed amendment is to repeal Regulation (EU) No 540/2014 with effect from the date of application of the Omnibus Regulation. In addition, an amendment to Annex II to Regulation (EU) 2018/858 is proposed to replace the reference to the repealed Regulation

by a reference to the noise-related UN Regulations: UN Regulations 51 on noise of M and N categories of vehicles; UN Regulation 59 on replacement silencing systems; and UN Regulation 138 on quiet road transport vehicles or AVAS. Transitional provisions are proposed to ensure smooth transition of the industry to the modified legal framework.

Expected impact

The proposed amendments would remove a competitive disadvantage for EU car manufacturers when selling their cars globally by preventing them from having to demonstrate administrative compliance with two sets of requirements on noise. This will likely reduce administrative burden (i.e. duplication of tests and markings), although OEMs did not provide any data on this. The proposed changes would remove any potential loopholes and result in a simpler, more consistent framework and likely have a positive economic impact for the automotive industry, type-approval authorities, and market surveillance authorities alike. In addition, society would benefit from the enhanced scope under the UN Regulations that restricts noise from backfire, sound actuators, and sound enhancement systems.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
o	o	+

Cost savings for the automotive value chain

There is no clear data on the number of OEMs applying only EU Regulation No 540/2014 and not the UN Regulations on noise, but it is expected that the streamlining of the regulatory requirements will remove unnecessary cost for any OEM operating globally and facing double certification.

3.5. Regulation (EU) 2018/858 on the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles

Regulation (EU) 2018/858 is a framework for the approval and market surveillance of motor vehicles in the European Union that replaced the previous Directive 2007/46/EC. Its objective is to enhance the quality and independence of motor vehicle testing, strengthen checks on cars already on the market, and increase overall EU oversight of the automotive sector.

The regulation increases the quality and independence of vehicle type-approval and testing by ensuring technical services have robust management systems and qualified personnel. Furthermore, to ensure continued compliance, the regulation mandates increased checks on vehicles that have already been approved and are on the market. It includes measures to strengthen the process for enforcing conformity of production requirements and to regularly verify the performance of national approval authorities. In addition, there are provisions for type-approval of new technologies or concepts that may be incompatible with existing regulations to encourage innovation.

3.5.1. New vehicle subcategory for small cars

Issue description

Between 2020 and 2024, vehicle prices in the EU rose 18.3%, according to official European statistics published by Eurostat. Between 2020 and 2024, vehicle prices in the EU rose 18.3% , ([35]) This is even more pronounced for battery-electric vehicles, partially due to manufacturers having started electrification upmarket with larger vehicles and SUVs to off-set the costs associated with batteries (making up to 40% of total EV value([36])). Between 2020 and 2024, vehicle prices in the EU rose 18.3%, according to official European statistics published by Eurostat. ([37]) This is even more pronounced for battery-electric vehicles, partially due to manufacturers having started electrification upmarket with larger vehicles and SUVs to off-set the costs associated with batteries (making up to 40% of total EV value ([38]). At the same time, yearly sales of small passenger cars, i.e., segments A and B, in the EU have decreased by 1.6 million units since 2019. European car manufacturers' market share has been eroded by competition from China. There is therefore a need to develop a new sub-category of small electric car made in Europe that would give consumers more choice of zero-emission models and would benefit European manufacturers.

Developing a new sub-category of small affordable electric car would enable Member States to developed targeted incentives for such cars, providing benefits to both citizens through increased choice and to OEMs, who would benefit from the demand in this market segment. To ensure that the car would indeed be small, it should not exceed 4.2 metres in length. This length was chosen by comparing the available electric models on the market that are under EUR 25,000, which demonstrates that there is very little choice in the market, with only 12 battery-electric vehicle models of this size with a sales price (before purchase incentives) below EUR 25,000.

Stakeholder views

In bilateral discussions, one OEM suggested the introduction of a new vehicle category for small cars, with lighter regulatory requirements. Other OEMs saw the need for a label or vehicle subcategory as a basis for targeted support measures.

The discussion in the Motor Vehicle Working Group on 2 October and subsequent roundtable discussions with stakeholders from industry and civil society showed negative views on a possible introduction of a new vehicle category, but broad support for a subcategory within the established passenger cars (M1) vehicle category. OEMs and some

([35]) Source: Eurostat, HICP - annual data (average index and rate of change)[prc_hicp_aind__custom_19207785]

([36]) Reshaping the Road Ahead: Exploring Supply Chain Transformations in the EU Automobile Industry. Available at: https://single-market-economy.ec.europa.eu/publications/reshaping-road-ahead-exploring-supply-chain-transformations-eu-automobile-industry_en

([37]) Source: Eurostat, HICP - annual data (average index and rate of change)[prc_hicp_aind__custom_19207785]

([38]) Reshaping the Road Ahead: Exploring Supply Chain Transformations in the EU Automobile Industry. Available at: https://single-market-economy.ec.europa.eu/publications/reshaping-road-ahead-exploring-supply-chain-transformations-eu-automobile-industry_en

civil society organisations also expressed a preference for this subcategory to be defined by length only to not interfere with battery size.

OEMs asked for regulatory simplification measures for such a vehicle subcategory, in particular a "freezing" of regulatory requirements to avoid costly redevelopment of existing vehicle types for small cars, and targeted support measures of fiscal and non-fiscal nature. Civil society organisations saw a need to incentivise small electric vehicles but expressed concerns about possible derogations from existing safety requirements. Member State authorities also expressed concerns about any derogations from regulatory requirements.

Proposed amendment

The proposed amendment consists of the introduction in Annex I, Part A, point 2 of Regulation (EU) 2018/858 of a new point 2.4 defining a sub-category for small electric vehicles of category M1 ('M1E'), based on a maximum length of 4.2 metres.

Expected impact

By introducing a new sub-category of passenger cars, the 'M1E' classification, policymakers at both the EU and national levels will have a legal definition of small cars that can be used for targeted support schemes using fiscal and/or non-fiscal incentives to stimulate production.

This amendment will facilitate the introduction of targeted simplification measures in EU Regulations when appropriate and allows Member States to target fiscal and/or non-fiscal incentives to support demand for small electric vehicles in line with State aid rules, where applicable. This will lead to positive impacts on the environment in line with the CO_2 Regulation and will bring societal benefits by giving consumers more choice when buying a zero-emission vehicle.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
+	o	+

Cost savings for the automotive value chain

The proposed amendment will provide the industry with some limited gains. However, targeted incentive mechanisms and/or simplification measures for this sub-category of small electric cars can lead in the future to important cost savings for the automotive value chain and consumers.

3.5.2. Improving electric vehicle to grid interoperability

Issue description

With electric vehicle technology evolving rapidly and the penetration of electric vehicles on the market increasing, interoperability between vehicles, the charging infrastructure, and the electricity grid is becoming increasingly critical.

The motor vehicle type-approval framework does currently not permit the introduction of technical requirements to address the vehicle's interaction with charging infrastructure and the electricity grid. There is an increasing risk of fragmentation with certain technical requirements for motor vehicles being introduced outside of the vehicle type-approval framework, as is the case with the Renewable Energy Directive where Art. 20a (3) introduces requirements on the access to battery data for vehicle manufacturers.

Similarly, the implementation of the revised Network Codes that address market rules, system operation, and grid connection rules, will establish technical requirements for manufacturers of electric vehicles. Furthermore, improved interoperability will become important to support faster development of new services such as vehicle-to-grid (V2G) functionalities that can contribute to stabilising electricity supply and balance peak demand while lowering energy costs for vehicle owners and supporting greater integration of renewable power.

Stakeholder views

OEMs have called for a repeal of Art. 20a (3) of the Renewable Energy Directive.

Stakeholders from the energy industry, grid operators, and charging operators have called for the inclusion of the specifications contained in ISO 15118-20 into the type-approval framework to enable Vehicle-to-Grid (V2G) communication for electric vehicles. OEMs called for the incorporation of network codes into the motor vehicle type-approval framework to create legal certainty for OEMs vis-à-vis compliance with vehicle-to-grid interoperability requirements, but did not consider the ISO 15118-20 standard mature enough to be included in the type-approval framework.

Proposed amendment

Article 5 of Regulation (EU) 2018/858 is amended as follows:

a) the following paragraph 4 is inserted:

'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 physical interconnection 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.'

Expected impact

The proposed amendment is expected to help to facilitate the integration of electric vehicles into the energy system, with positive effects from optimisation of the energy system. . The safety and social impacts are neutral.

Impact per type (+ positive; - negative; o neutral)

Environmental	Safety	Social
+	o	o

Cost savings for the automotive value chain

The proposed amendment will reduce the costs for automotive manufacturers in terms of having clear approval mechanisms for network codes, avoiding legal uncertainty for conformity with this legislation and avoiding unnecessary administrative burden from technical requirements outside motor vehicle legislation. However, the exact cost savings will depend on future secondary legislation.

4. FURTHER SIMPLIFICATION MEASURES TO BE CONSIDERED OUTSIDE THE OMNIBUS

The Automotive Omnibus includes only a limited number of targeted, but effective simplification measures. In the simplification context, the Association of European Automotive Manufacturers (ACEA) had cited approximately 130 upcoming pieces of legislation affecting the automotive industry. However, this list includes 25 pieces of horizontal legislation. ([39])

The list includes upcoming requirements in Battery Regulation delegated acts (carbon footprint, due diligence), Euro 7 Implementing Acts for light-duty vehicles and for heavy-duty vehicles, CO2 in-service verification, potential Data Act Delegated Acts, nine potential REACH restrictions, nine future requirements in the End-of-Life of Vehicles Regulation (which is still in trilogues). The Euro 7 secondary legislation does not add any new requirements, but clarifies the methods needed for emissions type-approval, giving manufacturers legal certainty.

Furthermore, the list from ACEA includes nearly 70 updates of UN Regulations, which are not all mandatory in EU legislation at this point. Of these, the European Commission has identified approximately 40 amendments of existing UN Regulations or new UN Regulations.

Stakeholders raised other issues concerning simplification of the regulatory framework for the automotive industry that are not addressed in this Omnibus but will be considered in the further development and implementation of motor vehicle legislation.

4.1. Grouping all new regulatory requirements into batches, becoming mandatory at the same time to ease compliance for manufacturers and reduce homologation costs

The Association of European Automotive Manufacturers (ACEA) proposed that the Commission group all regulatory requirements into batches with the same mandatory application at a single date per year to ease compliance for manufacturers. For requirements stemming from motor vehicle type-approval, this can be implemented by the Commission when setting the mandatory application dates in secondary legislation – unless the legislator has established a different date in the legal act.

([39]) REACH Regulation; Classification, Labelling, and Packaging of substances and mixtures Regulation; Persistent Organic Pollutants Regulations; Battery Regulation; Renewable Energy Directive; Data Act; Regulation on fluorinated greenhouse gases; Restriction of hazardous substances Directive; Critical Raw Materials Act; European Sustainable Products Regulation; Radio Equipment Directive; Low-Voltage Directive; Electromagnetic Compatibility Directive; Pyrotechnic Articles Directive; Alternative Fuels Infrastructure Regulation; Artificial Intelligence Act; Market Surveillance Regulation; Pressure Equipment Directive; Pressure Vessels Directive; Transportable Pressure Equipment Directive; Intelligent Transport Systems Directive; Network Code on Grid Connectors; Cyber Resilience Act; Machinery Regulation; Roadworthiness Directive.

However, it would not be appropriate to set application dates for regulatory requirements affecting several industrial sectors based solely on the needs of the automotive industry. When it comes to primary legislation, be it horizontal or sector-specific, it is the prerogative of the legislator to establish the application dates, taking into consideration the implications on businesses and enforcement authorities.

4.2. Respecting lead time for industry between the adoption of regulations and the application dates

ACEA and other industry stakeholders proposed in addition that the Commission recognise the need for lead time for the industry to adjust to new regulatory requirements, in particular for heavy-duty vehicles that have longer development cycles. In the Industrial Action Plan for the EU automotive sector, the Commission has committed to give, when making legislative proposals, sufficient lead time for the industry to reflect such new regulatory requirements in the product development process. This is a general principle, but it cannot be turned into a legal requirement in an Omnibus Act.

4.3. Applying new regulatory requirements for new types of vehicles only and not vehicles already type-approved

ACEA requested that new regulatory requirements should only apply to new types of vehicles and not to existing type-approved vehicles to avoid costs associated with the redevelopment or redesign of existing type-approved vehicles. It is easier to develop and design new vehicle types according to the regulatory requirement, while a continuous redevelopment or redesign of type-approved vehicles for new regulatory requirements can lead to additional costs. However, it is not possible in horizontal legislation outside motor vehicle type-approval to distinguish between new vehicle types and existing vehicle types. Horizontal legislation applies to products placed on the market.

In motor vehicle type-approval legislation, there is always a different application date for new vehicle types and for all new vehicles (i.e., for existing vehicle types) to take into account the need for redevelopment. In certain cases, such as the eCall Regulation, requirements have only been established for new vehicle types. The decision not to regulate existing vehicle types needs to be taken on a case-by-case basis, considering on the one hand the costs of redevelopment of existing vehicle types, which can have a high impact on small cars with lower margins, and on the other hand the societal benefits of the new regulatory requirements.

4.4. Simplifying the type-approval framework

With the increasing speed of innovation in the industry, in particular trends on automated driving and software updates, it is appropriate to assess the simplification potential in the EU type-approval framework for motor vehicles. Regulatory complexity can be a constraint for EU manufacturers in global competition with manufacturers from other jurisdictions.

In 2026, the Commission will undertake an evaluation of the Motor Vehicle Type-Approval Framework Regulation, Regulation (EU) 2018/858. This will help assess the potential to reduce testing and reporting costs for the automotive industry. Preliminary analysis by the Commission services, taking into account suggestions from stakeholders, has identified the potential to reduce the number of laboratory tests during type-approval by using more virtual testing and by using risk-assessment practices to assess how ex-ante tests can be best combined with in-use monitoring (as already applied in the Euro 7

Regulation, where lighter ex ante tests are complemented by on-board monitoring of emission performance).

Consideration of further specific simplification measures

Several stakeholders requested simplification measures that can be addressed through secondary legislation. Below is a non-exhaustive overview of topics that will be considered for further simplification.

4.5. Type-approval framework for electric trucks with range extenders

Several heavy-duty vehicle manufacturers requested the current emission type-approval provisions for heavy-duty vehicle engines be made more flexible to make extended-range electric vehicles (EREV) economically viable. EREV are electric vehicles that use a small internal combustion engine (ICE) or another type of generator to recharge the main traction battery, but the engine does not directly power the wheels. This allows the driver to rely on electric power until the battery is low, at which point the range extender kicks in to recharge it, allowing for continuous driving and eliminating range anxiety.

In type-approval terms, EREVs are the same legal category, 'off-vehicle charging hybrid electric vehicle,' as plug-in hybrid electric vehicles. During the current ramp-up of electric charging infrastructure for heavy-duty vehicles, extended-range electric vehicles (EREV) might be a potential solution to extend the range of a full battery-electric vehicle.

The current emission type-approval regulations (Euro VI and in the future Euro 7) do not provide flexibility for such technologies, as the engine for charging the battery would have to be tested against the same requirements as an internal combustion engine used for the propulsion of the vehicle. It seems appropriate to develop new test methods for the type-approval of electric trucks with range extenders in Euro 7 implementing legislation for heavy-duty vehicles, without prejudging the CO_2 determination of such vehicles.

4.6. Direct vision requirement for trucks

Several manufacturers and components suppliers argued that the Direct Vision requirements are very costly and equivalent levels of safety could be achieved through less burdensome technical solutions, such as driver assistance systems, without having to re-design the truck cabin to meet the direct vision requirements.

Direct vision requirements for heavy-duty truck and buses were introduced in Regulation (EU) 2019/2144 to decrease blind spots and thus improve the safety of vulnerable road users like pedestrians and cyclists. Vehicles are assessed and given a star rating (from 0 to 5) based on how much a driver can see directly through the windows, with the rating usually fixed at the point of manufacture. Vehicles with a lower star rating (e.g., 0, 1, or 2) must be fitted with a Progressive Safe System to be compliant.

The Direct Vision requirements are considered an important achievement for the protection of vulnerable road users from accidents with heavy-duty vehicles. In the absence of a requirement to achieve the same result with less costly solutions, a simplification of the existing requirement would have serious negative consequences on road safety. However, the Commission recognises the cost on vehicle manufacturers and is considering a delay of mandatory application of next- generation Direct Vision requirements developed in the UN context.

4.7. In-service CO2 verification

Tyre manufacturers have raised strong concerns about the requirement that new original equipment tyres are used for the in-service verification of heavy-duty vehicles under the Heavy-Duty Vehicles CO_2 Emissions Regulation, although such tyres are already subject to type-approval testing under existing legislation. This requires a further technical and legal assessment and could be addressed either in the upcoming Revision of the Heavy-Duty Vehicles CO2 Emissions Regulation (due December 2027) or in secondary legislation under that Regulation.

5. CONCLUSIONS

The measures proposed in the Automotive Omnibus would simplify requirements and streamline procedures under Regulation (EC) No 561/2006, Regulation (EC) 2019/2144, Regulation (EC) 2024/1257, Regulation (EC) 540/2014, and Regulation (EU) 2018/858, in addition to a separate Directive proposal (also adopted as part of the automotive package) amending Directive 92/6/ECC, with the aim and expectation of reducing administrative cost for industry and authorities, while maintaining a high level of road safety and environmental protection.

As regards **tachograph obligations for electric Vans with GVW between 3.5 and 4.25 tonnes,** the proposed amendment will reduce administrative burden for their owners and will facilitate the uptake of e-Vans in line with the CO_2 Regulation, thus delivering positive benefits for the environment. The savings from the proposed changes could amount to **at least EUR 134 000 000 and up to EUR 471 000 000 in 2027**, the first full year that the measure would likely take effect. The range of cost savings represents the possible ramp-up (estimated at 3.5x) associated with the amendment, substantially accelerating the move to zero-emissions road transport by levelling the playing field between electric vans and diesel vans with the same payload.

As regards tachograph obligations for motorhomes used exclusively for private transport, the proposed measure will reduce costs for manufacturers and will create legal clarity regarding installation of tachographs following the CJEU judgement in case C666/21. The savings from the proposed changes could amount to **at least EUR 550 000** in 2027, the first full year the measure would take effect.

As regards **speed limiting devices for electric vans with a GVW between 3.5 and 4.25 tonnes**, the proposed measures will reduce costs for manufacturers. The savings from the proposed changes could amount to **at least EUR 57 100 000 and up to EUR 199 900 000** in 2027, the first full year the measure would take effect.

As regards **laboratory tests of low temperature for emissions in light-duty vehicles**, the proposed measures will reduce costs for manufacturers. The savings from the proposed changes could amount to **at least EUR 155 000 000 and up to 825 000 000** in 2027, the first full year the measure would take effect.

As regards **vehicle types for Euro 7 engine (Separate Technical Unit) type-approval**, the proposed measures will reduce costs for manufacturers. The savings from the proposed changes could amount to **at least EUR 263 000 000 and up to EUR 789 000 000** in 2027, the first full year the measure would take effect.

As regards **OBM and OBFCM data infrastructure and common methods**, the proposed measures will reduce administrative costs for manufacturers. The savings from the proposed changes could amount to **at least EUR 150 000 and up to EUR 2 400 000** in 2027, the first full year the measure would take effect.

The digitalisation of reporting requirements for on-board fuel and electric energy consumption monitoring (OBFCM) devices and on-board monitoring (OBM) systems can reduce the administrative burden for authorities and facilitate analysis of the accompanying data. The electric vehicle to grid interoperability measure will facilitate the penetration of electric vehicles on the market.

The proposed repeal of the EU's noise regulation in favour of the UN Regulations on noise will deliver societal benefits by reflecting the latest technological innovations. The amendments to the type-approval framework to create a new sub-category for small affordable electric vehicles will facilitate the creation of demand-side measures.

Beyond direct cost savings, these regulatory adjustments are expected to **enhance operational efficiency for manufacturers and their customers, in particular SMEs**. Overall, the amendments support a more efficient regulatory environment, allowing industry to maintain compliance while fostering long-term resilience and innovation.

Savings for all measures				
(in million euro)		**One-off**	**Recurrent** annual average savings ([40])	**Cumulative** recurrent cost savings for 2027, 2028, 2029
Businesses				
SMEs	Administrative cost savings	N/A	• 37.6 (e-Van tachograph)	• 113 (e-Van tachograph)
SMEs	Adjustment cost savings	N/A	• 126 (e-Van tachograph) • 58.3 (Speed Limiting Device)	• 378 (e-Van tachograph) • 175 (Speed Limiting Device)
Large companies	Administrative cost savings	N/A	• 10.6 (e-Van tachograph) • 00.15 (Euro 7 - OBM and OBFCM data infrastructure)	• 32 (e-Van tachograph) • 0.45 (Euro 7 - OBM and OBFCM data infrastructure)

([40]) Recurrent cost savings are calculated by dividing by three the cumulative savings for 2027, 2028 and 2029

Large companies	Adjustment cost savings	N/A	• 35.6 (e-Van tachograph) • 16.3 (Speed Limiting Device) • 155 (Euro 7 low-temperature emission test) • 263 (Euro 7 vehicle category vs vehicle type)	• 107 (e-Van tachograph) • 49 (Speed Limiting Device) • 465 (Euro 7 low-temperature emission test) • 789 (Euro 7 vehicle category vs vehicle type)
All	Administrative cost savings	N/A	48.5	145.45
All	Adjustment cost savings	N/A	654.3	1 963
Citizens				
Administrative cost savings		N/A	N/A	N/A
Adjustment cost savings		N/A	0.55 (Motorhome Tachograph)	1.65 (Motorhome Tachograph)
Member States				
Administrative cost savings		N/A	2.5 (Euro 7 - OBM and OBFCM data infrastructure)	7.5 (Euro 7 - OBM and OBFCM data infrastructure)
Adjustment cost savings		12.5 (Euro 7 - OBM and OBFCM data infrastructure)	N/A	N/A
Totals				
Total administrative cost savings		N/A	51	153
Total adjustment cost savings		12.5	655	1 965
Total Savings		12.5	706	2 118

ANNEX I: METHODOLOGY AND EVIDENCE COLLECTED

In the context of the Strategic Dialogue on the Future of the EU Automotive Industry in January 2025, industry leaders raised the issue of regulatory simplification. This led to the development of the Automotive Industrial Action Plan, which was adopted in March 2025. One of the actions in the Automotive Industrial Action Plan was a simplification package (Automotive Omnibus).

In the months following the Strategic Dialogue, European Commission services gathered input from stakeholders in the automotive sector. Trade associations, individual companies, civil society, and other stakeholders contributed policy simplification ideas, which were assessed by the Commission along two axes: the potential to reduce administrative costs for the automotive industry while not leading to adverse social or environmental impacts, and respecting the scope of an automotive-specific Omnibus.

Furthermore, numerous bilateral meetings with automotive manufacturers, automotive component suppliers, automotive industry associations, and civil society were held. The outcomes of these bilateral meetings contributed to identifying feasible simplification measures within the scope of the Automotive Omnibus. ([41])

At the beginning of October, based on stakeholder input, the Commission presented possible simplification measures at a meeting of the Motor Vehicle Working Group (MVWG), a Commission expert group made up of Member State representatives and a broad range of stakeholders from the automotive industry and civil society. Those measures that were presented to the MVWG have been explained in the Staff Working Document.

On 14 October, after analysing the feedback from the Motor Vehicle Working Group, a **Targeted Stakeholder Consultation** in the form of a survey was sent to stakeholders impacted by the Automotive Omnibus simplification package, including: automotive manufacturers, automotive component suppliers, automotive aftermarket operators, transport operators, the respective business associations of all the above as well as business associations of motorcycles and large motorhomes, civil society, national type approval authorities, and other ministries. The objective of this targeted stakeholder consultation was firstly to collect evidence about the regulatory, social, and environmental impacts of the envisaged simplification measures, and secondly to receive additional suggestions for simplification. The consultation also sought quantitative data for the cost savings that the concerned businesses expect to derive from the envisaged measures. Of the 130 invited stakeholders, the European Commission received 68 responses.

ANNEX II: ORGANISATIONS THAT WERE CONSULTED AS PART OF THE STAKEHOLDER CONSULTATION

Organisations that the Targeted Stakeholder Consultation was sent to:

1. All Members of the Working Group on Motor Vehicles (**Error! Bookmark not defined.**)

([41]) See *Process for identifying amendments for this Omnibus in the Introduction for more details on the criteria.*

2. In addition, the following organisations and companies:

Name of the organisation that replied	**Sector (industry/NGO/Public Authority/Academy)**
SMMT - Society of Motor Manufacturers and Traders	Business Association
UETR – European Union of Road Transport	Business Association
CONFETRA – Confederazione Generale Italiana dei Trasporti e della Logistica	Business Association
FNTR - Federation Nationale de Transports Routiers	Business Association
BGL - Bundesverband Güterkraftverkehr Logistik und Entsorgung	Business Association
ZMPD - European Road Safety Charter	Business Association
TLP - Transport i Logistyka Polska	Business Association
TLN - Transport en Logistiek Nederland	Business Association
IndustriAll	Business Association
DHL	Fleet Operator
Amazon	Fleet Operator
Recharge Batteries	Business Association
Milence	Automotive Industry Supplier
ZF Group	Automotive Industry Supplier
Valeo	Automotive Industry Supplier

Mahle	Automotive Industry Supplier
Forvia	Automotive Industry Supplier
ChargeUp Europe	Business Association
Bosch	Automotive Industry Supplier
Daimler Truck	Original Equipment Manufacturer
Volvo Group	Original Equipment Manufacturer
Iveco	Original Equipment Manufacturer
MAN	Original Equipment Manufacturer
Scania	Original Equipment Manufacturer
Tesla	Original Equipment Manufacturer
Nissan	Original Equipment Manufacturer
Honda	Original Equipment Manufacturer
Volvo cars	Original Equipment Manufacturer
Ford	Original Equipment Manufacturer
Hyundai/Kia	Original Equipment Manufacturer
Toyota Europe	Original Equipment Manufacturer
BMW	Original Equipment Manufacturer
Mercedes	Original Equipment Manufacturer

Stellantis	Original Equipment Manufacturer
Renault	Original Equipment Manufacturer

Organisations that replied to the stakeholder consultation

Name of the organisation that replied	Sector (industry/NGO/Public Authority/Academy)
ACEM - Association des Constructeurs Européens de Motocycles	Business Association
ADPA - Automotive Data Publishers' Association	Business Association
AECC - Association for Emission Control by Catalyst	Business Association
AIRC-International (Association Internationale des Réparateurs en Carrosserie)	Business Association
Amazon Europe Core SARL	Fleet operator
BMW Group	Vehicle manufacturer (OEMs)
Bundesverband Güterkraftverkehr Logistik und Entsorgung (BGL) e.V.	Business Association
Caravaning Industrie Verband e.V.	Business Association
CECRA (European Council for Motor Trades and Repairs)	Business Association
CITA (International Motor Vehicle Inspection Committee)	Business Association

CLCCR (International Association of the Body and Trailer Building Industry)	Business Association
CLEPA European Association of Automotive Suppliers	Automotive parts and components supplier
CONEBI (Confederation of the European Bicycle Industry)	Business Association
Confederazione Generale Italiana dei Trasporti e della Logistica (CONFETRA)	Business Association
CSDD (Road Traffic Safety Directorate)	Type approval authority (Latvia)
Cummins	Automotive parts and components supplier
Daimler Truck AG	Vehicle manufacturer (OEMs)
Deutsche Post AG	Fleet operator
E-Mobility Europe	Business Association
ESCA - European Small Volume Car Alliance	Business Association
Eurogas Aisbl	Business Association
European Automobile Manufacturers' Association (ACEA)	Business Association
European Caravan Federation (ECF)	Business Association
European Cyclists' Federation (ECF)	Non-governmental organisation (NGO)
European Environmental Bureau	Non-governmental organisation (NGO)
European Garage Equipment Association	Business Association
European Tuning Organization (E.T.O)	Business Association

Executive Agency Road Transport Administration	Type approval authority (Bulgaria)
Federal Ministry of Innovation, Mobility and Infrastructure	Type approval authority (Austria)
Federal Public Service Mobility and Transport (as Belgian Market Surveillance authority and Vehicle Regulation authority)	Market surveillance authority (Belgium)
Federal Roads Office FEDRO	Market surveillance authority (Switzerland)
Federation of European Manufacturers of Friction Materials (FEMFM)	Business Association
FIA (Federation Internationale de l'Automobile)	Business Association
FIGIEFA - Automotive Aftermarket Distributors	Business Association
Ford Motor Company	Vehicle manufacturer (OEMs)
FORVIA	Automotive parts and components supplier
Honda Motor Europe (both vehicle AND motorcycle manufacturer)	Vehicle manufacturer (OEMs)
Institute for Transport Sciences (KTI)	Research institute (Hungary)
Insurance Europe	Business Association
International Road Transport Union (IRU)	Business Association
Iveco Group	Vehicle manufacturer (OEMs)
Japan Automobile Manufacturers Association	Business Association

Kraftfahrt-Bundesamt (Federal Motor Transport Authority)	Type approval authority (Germany)
Leaseurope	Business Association
Liquid Gas Europe	Business Association
MAHLE International GmbH	Automotive parts and components supplier
MAN Truck & Bus SE	Vehicle manufacturer (OEMs)
Ministry of Industry and Tourism	Type approval authority (Spain)
Ministry of Infrastructure and Transport	Type approval authority (Italy)
Ministry of Transport	Type approval authority (Czechia)
Ministry of Transport	Type approval authority (Slovakia)
RDW (Rijksdienst voor het Wegverkeer)	Type approval authority
Renault Group	Vehicle manufacturer (OEMs)
Road Safety Authority (Ireland)	Market surveillance authority
Robert Bosch GmbH	Automotive parts and components supplier
Scania AB	Vehicle manufacturer (OEMs)
State Office for Metrology	Type approval authority
Swedish Transport Agency	Type approval authority
the Danish Road Traffic Authority	Type approval authority
Toyota Motor Europe	Vehicle manufacturer (OEMs)

Transport & Environment / T&E (European Federation for Transport and Environment AISBL)	Non-governmental organisation (NGO)
Transport and Logistic Netherlands	Business Association
Transportowy Dozór Techniczny	Type approval authority (Poland)
TyresEurope	Business Association
Verband der Automobilindustrie e.V.	Business Association
Volkswagen Group	Vehicle manufacturer (OEMs)
Volvo Car Corporation	Vehicle manufacturer (OEMs)
Zentralverband Karosserie- und Fahrzeugtechnik (ZKF) and AIRC (Association Internationale des Réparateurs en Carrosserie)	Business Association

Organisations that provided detailed proposals for the Omnibus:

European Automobile Manufacturers' Association (ACEA)

German Association of the Automotive Industry (VDA)

European Association of Automotive Suppliers (CLEPA)

Honda

European Association of Motorcycle Manufacturers (ACEM)

BMW

European Tyre and Rubber Manufacturers Association