Toyota Motor Europe – Position Paper on the Automotive Omnibus

The Automotive Omnibus proposal is a positive attempt toward simplifying the regulatory framework. However, in its current form **it falls short of delivering the needed reduction in administrative burdens** or provide the clarity and coherence needed for predictable, cost-effective implementation—particularly as OEMs navigate a difficult industry transition and intensifying global competition.

Gaps and inconsistencies in several provisions risk introducing new compliance burdens, legal uncertainty, and unintended consequences for manufacturers and consumers. **Toyota Motor Europe (TME) therefore sees further refinement as essential** and proposes targeted amendments to ensure a complete, consistent, and workable set of rules (full technical detail and proposed amendments in the Annex).

2024/1257 – Euro7

1. Low-temperature emissions test: legal & environmental certainty

TME proposes re-introducing the Type 6 requirements and Euro6 Type6 test limits, as originally intended in Euro7 co-decision., while replacing the test with a manufacturer declaration of conformity in order to reduce testing burden. This preserves environmental protection rules, provides legal certainty, ensures enforceability, and avoids duplicate testing.

2. PHEV Utility factor - predictability

Maintaining the Euro 6e-bis UF is crucial for predictability and tech neutrality. Without it, a mathematical change in the UF would administratively reclassify PHEVs, despite Toyota models already delivering strong e-drive performance and real-world use by private users across the EU near WLTP requirements. Policy should instead focus on incentives that encourage EV-mode driving. PHEVs remain an important transitional technology for consumers, the supply chain, and fleet renewal. Further limiting technological options would slow the transition and delay emissions reductions.

3. Various administrative corrections

- Annex I: Align 2035 Brake particle limits breakdown per powertrain with the new CO2 proposal, i.e. not only BEV, but also separate limits for PHEV, HEV, ICE
- Annex V: Removing CO2/ OBFCM from ISC, as already covered by ISV
- Article 4(2): Clarification of RDE-related lifetime obligations

2018/858 – Whole Vehicle Type Approval

1. M1E vehicle class & regulatory freeze – ensure technology neutrality

The M1E category should remain technology-neutral, as well as linked to a regulatory freeze, as considered by the Commission in the justification of the proposal. These changes are essential to preserve affordable hybrid options and support efficient development of multi-powertrain platforms (HEV, BEV, PHEV), to be developed based on common regulatory requirements. This remains independent from any super-credit decisions under the CO_2 framework. A N1E category based on 4.5 m length should also be considered.

2. Vehicle to Grid (V2G) – Targeted empowerment for Grid codes certification

We support integrating grid-code certification into WVTA to reduce market fragmentation and enable V2G deployment. However, the proposed delegation of powers is overly broad. The empowerment in Article 2 should be limited strictly to grid-code certification to prevent the unwarranted inclusion of RED III Article 20a provisions in the WVTA framework, as these are neither justified nor aligned with existing legislation.

Toyota Motor Europe NV/SA
Bourgetlaan 60
1140 Evere, Belgium

RPR/RPM 0441 571 714 – Ger.Arr.Brussel – Arr.Jud.Bruxelles

Summary of Toyota in Europe

Toyota is significant contributor to the EU. We have invested more than 12 bn euros in our European manufacturing business since 1971 and over 12 bn in European supply chain for 2024, and we plan to continue contributing to European society. We employ over 25,000 people in the region, including in our 8 manufacturing sites and indirectly support thousands more in our supply chain and distribution business. In 2024 we sold over 1.2 Mio vehicles in the region and Toyota is the 2nd brand in the European market. 77% of cars we sell in Europe are made here.

AUTOMOTIVE OMNIBUS – amendments proposed by Toyota

Regulation of the European Parliament and of the Council amending Regulations (EC) No 561/2006, (EU) 2018/858, (EU) 2019/2144 and (EU) 2024/1257 of the European Parliament and of the Council as regards the simplification of technical requirements and testing procedures for motor vehicles and repealing Council Directive 70/157/EEC and Regulation No 540/2014 of the European Parliament and of the Council

and Annexes

AMENDMENTS TO REGULATION (EU) 2024/1257

Regulation (EU) 2024/1257	
Recital (17)	
Text proposed by the Commission	*Amendment*
(17) Manufacturers of category M1 and N1 vehicles are required to perform laboratory tests of engines in low-temperatures pursuant to Annex V to Regulation (EU) 2024/1257. As the temperature conditions of the laboratory test of low temperature for emissions are covered by the gaseous pollutant and PN in road testing Real Driving Emissions test, demonstrating emission compliance at low temperature conditions (at -7 °C) is covered by having to comply to the Real Driving Emissions requirements (from -7 °C to 38 °C). Therefore, to reduce costs for manufacturers related to the specific requirements laid down Annex V to Regulation (EU) 2024/1257, it is appropriate to remove that dedicated low temperature laboratory requirement as such removal will not compromise environmental standards ensured by the Real Driving Emissions test.	(17) Manufacturers of category M1 and N1 vehicles are required to perform laboratory tests of engines in low-temperatures pursuant to Annex V to Regulation (EU) 2024/1257. Therefore, to reduce costs for manufacturers related to the specific requirements laid down Annex V to Regulation (EU) 2024/1257, it is appropriate to **declare compliance to the that dedicated low temperature laboratory requirement during type-approval where applicable.**

Toyota Motor Europe NV/SA
Bourgetlaan 60
1140 Evere, Belgium

RPR/RPM 0441 571 714 – Ger.Arr.Brussel – Arr.Jud.Bruxelles

Justification:

Regulation (EU) 2024/1257 (Euro 7) was adopted with the clear legislative intent to largely carry over the Euro 6 framework for light-duty vehicle exhaust emissions, except where explicitly modified or where new requirements were introduced. This continuity is reflected in the retention of Euro 6 limit values in Annex I and of the WLTP and RDE test procedures in Annex III.

Under Euro 6, low-temperature exhaust emissions are addressed through a dedicated laboratory test at –7 °C (Type 6), including specific emission limit values defined in UN Regulation No. 83. In the current Euro 7 legal text, however, the low-temperature test is only listed as "required" in Annex V, while the corresponding test procedure and legally binding emission limit values are not transposed. This creates a regulatory gap: a formal testing obligation exists without defined limit values, undermining legal certainty and disrupting alignment with both Euro 6 and the relevant UN framework.

The European Commission's Automotive Omnibus proposal deletes the mandatory Type 6 test at type-approval. While this contributes to simplification and cost reduction, it would, in the absence of explicit legal reference values, structurally weaken the Euro 7 framework compared to Euro 6 with regard to low-temperature emission control. This situation appears to result from an unintended omission rather than a deliberate policy choice to relax environmental protection.

The proposed amendment therefore clarifies that the dedicated low-temperature laboratory test is no longer required at type-approval, while maintaining the underlying legal obligation to comply with low-temperature emission limits as carried over from Euro 6. Compliance would be demonstrated through a manufacturer declaration of conformity, ensuring that low-temperature emission performance remains legally enforceable, aligned with international regulations, and subject to market surveillance, without duplicating physical testing.

Regulation (EU) 2024/1257

Annexes, Annex V, points 1 and 2 (see already table proposed after, maybe this is not necessary)

<table>
<tr><td>Text proposed by the Commission</td><td colspan="4">Amendment</td></tr>
<tr><td rowspan="3">Annex V to Regulation (EU) 2024/1257 is amended as follows:

(1) in table 1, the entry for 'Laboratory test of low temperature for emissions' is deleted;

(2) in table 2, the entry for 'Laboratory test of low temperature for emissions' is deleted;</td><td>Test requirements</td><td>Tests and requirements for emission type-approval</td><td>Tests at conformity of production</td><td>Tests at in-service conformity</td></tr>
<tr><td>Laboratory test of low temperature for emissions</td><td>Declaration</td><td>Not required</td><td>Optional</td></tr>
<tr><td colspan="4"></td></tr>
<tr><td colspan="5">Regulation (EU) 2024/1257 (Euro 7) was intended to largely carry over the Euro 6 framework for light-duty exhaust emissions, as reflected in the retention of Euro 6 limit values in Annex I and of the WLTP and RDE procedures in</td></tr>
</table>

Annex III. Under Euro 6, low-temperature emissions are regulated through the –7 °C Type 6 test with binding limit values laid down in UN Regulation No 83. In Euro 7, however, this test is listed as "required" in Annex V without transposing the corresponding procedure and limit values, creating a regulatory gap and legal uncertainty.

The Commission's Automotive Omnibus proposal removes the mandatory Type 6 test at type-approval to simplify and reduce costs. Without clarification, this would unintentionally weaken the Euro 7 framework compared to Euro 6. The amendment therefore maintains the Euro 6 low-temperature limits (UNR83) while replacing the physical test by a manufacturer declaration of conformity, as already reflected in Implementing Regulation (EU) 2025/1706 (Figure I.2.3). This preserves environmental protection and international alignment, ensures legal certainty and market surveillance, and achieves simplification by avoiding unnecessary duplicate testing.

The proposed amendment therefore clarifies that the dedicated low-temperature laboratory test is no longer required at type-approval, while maintaining the underlying legal obligation to comply with low-temperature emission limits as carried over from Euro 6. Compliance would be demonstrated through a manufacturer declaration of conformity, ensuring that low-temperature emission performance remains legally enforceable, aligned with international regulations, and subject to market surveillance, without duplicating physical testing.

Toyota Motor Europe NV/SA
Bourgetlaan 60
1140 Evere, Belgium

RPR/RPM 0441 571 714 – Ger.Arr.Brussel – Arr.Jud.Bruxelles

Regulation (EU) 2024/1257

Annexes, Annex I , new table 10 Euro 7 low temperature emission limit for the carbon monoxide and hydrocarbon tailpipe emissions after a cold start test

Text proposed by the Commission	*Amendment*

Table 10 Euro 7 low temperature emission limit for the carbon monoxide and hydrocarbon tailpipe emissions after a cold start test

Test temperature 266 K (-7 °C)			
Vehicle category	Class	Mass of carbon monoxide (CO) L1 (g/km)	Mass of hydrocarbons (HC) L2 (g/km)
M_1	-	15	1,8
N_1	I	15	1,8
	II	24	2,7
	III	30	3,2

Justification:

Regulation (EU) 2024/1257 (Euro 7) was adopted with the intention to ensure continuity with the Euro 6 framework for light-duty vehicle exhaust emissions, except where explicitly amended. Under Euro 6, low-temperature emissions after a cold start (Type 6 test at –7 °C) were subject to specific and legally binding limit values for carbon monoxide (CO) and hydrocarbons (HC), defined in both EU and UN legislation. These limits constituted an essential safeguard for controlling emissions under cold ambient conditions, when combustion and after-treatment systems are least effective and pollutant formation is highest.

In the current Euro 7 Regulation, the obligation to address low-temperature emissions is not accompanied by corresponding numerical limit values in the main body of the law, creating a regulatory gap and legal uncertainty for type-approval authorities, manufacturers and market surveillance. The introduction of a new Table 10 in Annex I reinstates explicit CO and HC limit values at –7 °C, aligned with those applied under Euro 6 and UN Regulation No. 83, and tailored to the relevant vehicle categories and mass classes (M1 and N1).

This amendment therefore constitutes a technical correction rather than a new policy measure. It restores legal clarity and enforceability of low-temperature emission requirements, ensures continuity and international harmonisation, and prevents an unintended weakening of environmental protection compared with Euro 6. By codifying these limit values directly in Annex I, the Regulation provides a clear reference for compliance assessment

Toyota Motor Europe NV/SA
Bourgetlaan 60
1140 Evere, Belgium

RPR/RPM 0441 571 714 – Ger.Arr.Brussel – Arr.Jud.Bruxelles

and market surveillance, while supporting the simplification objectives of the Automotive Omnibus by allowing streamlined demonstration of conformity without introducing additional or more stringent technical requirements.

Regulation (EU) 2024/1257

Annex III, Table 1

Table 1: Conditions for testing compliance of vehicles of categories M1 and N1 with exhaust emission limits with any market fuel and lubricant within the specifications issued by the manufacturer

Laboratory exhaust emission measurement	Real Driving Emission (RDE) measurement
For all exhaust emission tests conducted using the Worldwide Harmonized Light Vehicles Test Procedure (WLTP) chassis dynamometer test cycle, UN Regulation No 154 (*) shall apply. The provisions in respect of Level 1A (4-phase WLTP) shall apply.	For RDE tests conducted on the road, UN Regulation No 168 (**) shall apply, with emissions evaluation fulfilled with respect to the 4-phase WLTP.

(*)UN Regulation No 154 — Uniform provisions concerning the approval of light duty passenger and commercial vehicles with regards to criteria emissions, emissions of carbon dioxide and fuel consumption and/or the measurement of electric energy consumption and electric range (WLTP), 02 series of amendments.

(**)UN Regulation No 168, Original version.

Amendment

Table 1: Conditions for testing compliance of vehicles of categories M1 and N1 with exhaust emission limits with any market fuel and lubricant within the specifications issued by the manufacturer

Laboratory exhaust emission measurement	Real Driving Emission (RDE) measurement
For all exhaust emission tests conducted using the Worldwide Harmonized Light Vehicles Test Procedure (WLTP) chassis dynamometer test cycle, UN Regulation No 154 (*) shall apply.	For RDE tests conducted on the road, UN Regulation No 168 (**) shall apply, with emissions evaluation fulfilled with respect to the 4-phase WLTP.

The provisions in respect of Level 1A (4-phase WLTP) shall apply. **For low temperature emission test, the reference for the declaration of compliance is UN Regulation No 83 (***)**	

(*)UN Regulation No 154 — Uniform provisions concerning the approval of light duty passenger and commercial vehicles with regards to criteria emissions, emissions of carbon dioxide and fuel consumption and/or the measurement of electric energy consumption and electric range (WLTP), 02 series of amendments. **For OVC-HEVs the parameter dnec for the determination of the fractional UF according to Appendix 5 of Annex B8 to UN Regulation No 154 shall be replaced with the parameter dnx equal to 2200 km.**

(**)UN Regulation No 168, Original version.

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

Justification:

The explicit specification of the parameter d_{nx} = 2200 km for Off-Vehicle Charging Hybrid Electric Vehicles (OVC-HEVs) for the determination of the fractional Utility Factor (UF) ensures continuity in the Utility Factor values, at the level of Euro6e-bis.

For the low temperature test, simplification is achieved by replacing type-approval testing with a manufacturer's declaration. However, for this declaration clarity is required that the basis of compliance is that carried over from Euro 6, i.e. the type-6 test described in UN Regulation No 83.

Regulation (EU) 2024/1257

Annexes, Annex V, table 1, table 2

Text proposed by the Commission

Test requirements	Tests and requirements for emission type-approval	Tests at conformity of production	Tests at in-service conformity
Gaseous pollutants, PM, PN, CO2 emissions, fuel consumption (OBFCM), electric energy consumption and electric range (battery	Required test for all fuels for which the type-approval is granted	Required for exhaust emissions and OBFCM	Required for exhaust emissions, OBFCM and SOH monitors of battery durability

durability) (WLTP at 23 °C)			

Amendment

Test requirements	Tests and requirements for emission type-approval	Tests at conformity of production	Tests at in-service conformity
Gaseous pollutants, PM, PN, CO2 emissions, fuel consumption (OBFCM), electric energy consumption and electric range (battery durability) (WLTP at 23 °C)	Required test for all fuels for which the type-approval is granted	Required for exhaust emissions and OBFCM	**Required for gaseous pollutants, PM, PN** and SOH monitors of battery durability

Justification:

Commission Implementing Regulation (EU) 2025/1706 explicitly acknowledges that CO_2 emissions and fuel/energy consumption, including OBFCM, are already comprehensively regulated under the In-Service Verification (ISV) framework. For light-duty vehicles this is established under Regulation (EU) 2023/2866, which provides continuous in-use monitoring of CO_2 and energy consumption through OBFCM and related verification procedures. In line with Article 10(2) of Regulation (EU) 2025/1706, harmonisation requirements ensure that these parameters are subject to a dedicated and coherent ISV regime, avoiding duplication with Euro 7 in-service conformity testing.

Moreover, CO_2 emissions are not subject to Not-To-Exceed (NTE) limits, neither under the Euro 7 pollutant emission framework nor under the CO_2 standards legislation for light-duty vehicles. Compliance with CO_2 requirements is ensured through fleet-average targets and in-service monitoring, not through individual vehicle NTE limits. Consequently, additional ISC testing for CO_2 under Euro 7 would be redundant and inconsistent with the existing regulatory architecture already recognised in Implementing Regulation (EU) 2025/1706.

Regulation (EU) 2024/1257

Annex I, Euro 7 emission limits, Table 8

Table ***8***: Euro 7 brake particle emission limits in standard driving cycle applying from 1 January 2035 ***for all powertrain technologies, by vehicle category***

Emission limits	***Vehicles of categories M_1 and N_1***	***Vehicles of categories M_2 and N_2***	***Vehicles of category M_3 and N_3***

Brake particle emissions (PM10)	***3 mg/km per vehicle***		
Brake particle number emissions (PN)			

Amendment

Table ***6***: Euro 7 brake particle emission limits in standard driving cycle applying from 1 January 2035***, by powertrain technology, following the review specified in Article 18(5)***

Emission limits	***Vehicles of categories M_1 and N_1***				
Powertrain technology	***PEV***	***OVC-HEV***	***NOVC-HEV***	***FCV/FCHV***	***ICEV***
Brake particle emissions (PM_{10})	***3 mg/km per vehicle***				
Brake particle number emissions (PN)					

Table 7: Euro 7 brake particle emission limits in standard driving cycle applying from 1 January 2035, by powertrain technology, following the review specified in Article 18(5)

Emission limits	***Vehicles of categories M_2 and N_2***				
Powertrain technology	***PEV***	***OVC-HEV***	***NOVC-HEV***	***FCV/FCHV***	***ICEV***
Brake particle emissions (PM_{10})					
Brake particle number emissions (PN)					

Table 8: Euro 7 brake particle emission limits in standard driving cycle applying from 1 January 2035, by powertrain technology, following the review specified in Article 18(5)

Emission limits	***Vehicles of categories M_3 and N_3***				
Powertrain technology	***PEV***	***OVC-HEV***	***NOVC-HEV***	***FCV/FCHV***	***ICEV***
Brake particle emissions (PM_{10})					
Brake particle number emissions (PN)					

Justification:

Toyota Motor Europe NV/SA
Bourgetlaan 60
1140 Evere, Belgium

RPR/RPM 0441 571 714 – Ger.Arr.Brussel – Arr.Jud.Bruxelles

The application of a 90% target for the light-duty CO2 regulation means there will be ICE and hybrid-ICE vehicles available post-2035. The limit of 3 mg/km was set only on the assumption that all new light-duty vehicles would be PEV as from 2035 and cannot apply for all M_1 and N_1 powertrain technologies. Table 8 therefore needs a complete overhaul.

Possible limits for M_2, M_3, N_2 and N_3 vehicles must also be set on the assumption of powertrain technologies that are not merely PEV.

This amendment is related to the review in Article 18(5) of Regulation (EU) 2024/1257.

Regulation (EU) 2024/1257	
Article 4 paragraph 2	
Text proposed by the Commission	*Amendment*
2.Manufacturers shall design, construct and assemble vehicles to comply with this Regulation, including complying with the emission limits set out in Annex I under the conditions set out in Annex III and respecting the values declared in the certificate of conformity and in the type-approval documentation for the lifetime of the vehicle, as set out in Table 1 of Annex IV. Those vehicles shall be designated as 'Euro 7' vehicles.	2.Manufacturers shall design, construct and assemble vehicles to comply with this Regulation, including complying with the emission limits set out in Annex I under the conditions set out in Annex III and if applicable respecting the **declared maximum RDE** values in the certificate of conformity and in the type-approval documentation for the lifetime of the vehicle, as set out in Table 1 of Annex IV. Those vehicles shall be designated as 'Euro 7' vehicles.

Justification:

Under the Euro 7 framework, legally binding exhaust emission compliance is ensured through the emission limit values laid down in Annex I and the applicable laboratory (WLTP) and on-road (RDE) test procedures defined in Annex III. The Certificate of Conformity (CoC) and type-approval documentation contain a wide range of declared parameters, of which most are not subject to lifetime compliance obligations, for example the colour of the vehicle.

For RDE, the declared maximum values in the CoC represent the vehicle-specific on-road performance envelope against which conformity and in-service compliance are assessed. Limiting the lifetime compliance obligation to these declared maximum RDE values ensures legal clarity and enforceability, as these are the only CoC parameters directly linked to the application of Not-To-Exceed (NTE) limits and conformity factors under real driving conditions.

The amendment therefore avoids creating an open-ended obligation to respect all declared CoC values over the vehicle lifetime, some of which are informative or type-approval-specific and not intended to be enforceable in use. By explicitly referring only to the declared maximum RDE values, the provision remains consistent with the regulatory architecture of Euro 7, focuses on parameters relevant for in-service emission control, and ensures proportionate and legally certain enforcement.

Toyota Motor Europe NV/SA
Bourgetlaan 60
1140 Evere, Belgium

RPR/RPM 0441 571 714 – Ger.Arr.Brussel – Arr.Jud.Bruxelles

AMENDMENTS TO REGULATION (EU) 2018/858

Regulation (EU) 2018/858	
Article 5, insert paragraph 4	
Text proposed by the Commission	*Amendment*
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.	The Commission is empowered to adopt delegated acts in accordance with Article 82 supplementing this Regulation by laying down technical requirements as regards the communication and **hardware interface with respect to EU harmonized grid code compliance for new vehicle types** 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. **Where compliance requirements are based on harmonized technical standards, whether partially or fully, the delegated acts shall define the methodology for compliance verification.**
Justification: 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, is already indirectly guaranteed through the AFIR regulation. It is the grid code certification on EU level, not on national level, that is the missing link in ensuring interoperability and V2G readiness while avoiding regulatory duplication. Under this proposal, grid code compliance would be verified during vehicle type approval, indirectly ensuring ISO 15118 compatibility and offering a pragmatic, balanced compromise between regulatory objectives and technical feasibility for manufacturers. Therefore, the empowerment in Article 2 should be limited strictly to grid-code certification, in order to prevent, among other risks, the unwarranted inclusion of RED III Article 20a (3) provisions in the WVTA framework, as these are neither justified nor aligned with existing legislation.	

Regulation (EU) 2018/858	
Annex I, Part A, the following point 2.4 is inserted after point 2.3.1	
Text proposed by the Commission	*Amendment*
2.4. Small electric vehicle:	2.4. Small ~~**electric**~~ vehicle: 2.4.1. Small ~~**electric**~~ vehicle means a ~~**pure electric**~~ vehicle that belongs to category M1, having a length not

Toyota Motor Europe NV/SA
Bourgetlaan 60
1140 Evere, Belgium

RPR/RPM 0441 571 714 – Ger.Arr.Brussel – Arr.Jud.Bruxelles

2.4.1. Small electric vehicle means a pure electric vehicle that belongs to category M1, having a length not exceeding 4.2 metres. For this subcategory of vehicles, the letter 'E' shall be added as suffix to letter and numeral identifying the vehicle category (M1).	exceeding 4.2 metres, **or a vehicle that belongs to category N1, having a length not exceeding 5 metres** For this subcategory of vehicles, the letter 'E' shall be added as suffix to letter and numeral identifying the vehicle category (M1, **N1**).
Justification: This small vehicle category is meant to be linked to regulatory freeze or further simplification, in order to keep vehicles affordability. Effectively, most manufacturers develop various powertrain technologies (e.g. ICE, BEV, PHEV, HEV) on the same vehicle architecture. Therefore, except for BEV-only OEMs, the application of different regulation requirements per powertrain will render the regulation simplification efforts meaningless, as OEMs will have to keep developing vehicle platforms to fulfill all requirements. As conclusion, the small vehicle category definition in WVTA shall remain technology neutral, and the BEV linkage to CO2 super-credits should be addressed directly in the CO2 regulation, similar to the "made in EU" requirements. Additionally, higher price of e-vans also remain a main obstacle to electrification, especially for SMEs, hence the new category should also include N1 vehicles of a maximum length 5 m.	

Regulation (EU) 2018/858	
Article 5, paragraph 1	
Text proposed by the Commission	*Amendment*
	1. Vehicles, systems, components and separate technical units shall comply with the requirements of the regulatory acts listed in Annex II. **For vehicles of categories M1E and N1E, upon request of the manufacturer, amendments or new additions to the regulatory acts listed in Annex II, as well as any Annex II regulatory act requirements applicable from 1 January 2026, shall not be mandatory for new or existing whole-vehicle type-approvals for a period of ten years.**
Justification: This small vehicle category is meant to be linked to regulatory freeze or further simplification, in order to keep vehicles affordability.	

Toyota Motor Europe NV/SA
Bourgetlaan 60
1140 Evere, Belgium

RPR/RPM 0441 571 714 – Ger.Arr.Brussel – Arr.Jud.Bruxelles