acea

February 2026

Automotive Omnibus

Proposed Amendments

AUTOMOTIVE OMNIBUS

ACEA AMENDMENT PROPOSAL: INTRODUCTION

ACEA acknowledges the work that the European Commission has dedicated to the complex task of translating opportunities for regulatory simplification into legislative proposals. The Commission's proposal for an Automotive Omnibus includes measures that solve problems faced by the industry today, problems linked to the complexity and to the sheer volume of European automotive regulations.

With this document, ACEA recommends amendments to the Automotive Omnibus, Regulation (EU) 2025/0422 (COD), and its annexes. The first and most extensive set of amendments targets inconsistencies in Euro 7 emissions requirements for both light-duty and heavy-duty vehicles. The second set aims at refining and consolidating the benefits of a small car subcategory. The third consists of a single amendment that clarifies the obligations of vehicle manufacturers with regards to vehicle-to-grid charging technology.

The European motor industry remains under unprecedented pressure from shifting trade relations, from increased foreign competition, and from the rapid enforced changes associated to the reduction in carbon emissions. In this context, we must note that the adjustments proposed in the Automotive Omnibus are modest in contrast to the political will for simplification expressed by the European Commission in 2025. These targeted changes do not pave the way to a simplification of regulatory processes or type approval procedures. Punctual efforts may solve some of today's problems, but the absence of more ambitious measures means that the impact of the Automotive Omnibus will be limited. We risk witnessing repetitions of the type of problem it intends to address.

In the spirit of more durable regulatory simplification, ACEA wishes to once again bring attention to its proposal for a simplified regulatory framework released in December 2024. Our proposal highlights three measures: the grouping of regulatory requirements into batches, the application of new automotive regulations to new vehicle types only, and the establishment of a task force within the European Commission to check for the consistency and the impact of new legislation affecting the industry. The application of these concrete measures would transform regulatory simplification from a project into a habit – a habit that will help secure the competitiveness of our vehicle industry.

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Low temperature emissions testing for light-duty vehicles

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
(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 dedicated low temperature laboratory requirement during type-approval where applicable***.
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.

Commission proposal 2025/0422 (COD)

Annex I

Text proposed by the Commission	*Amendment*
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;	

Test requirements	Tests and requirements for emission type-approval	Tests at conformity of production	Tests at in-service conformity
Laboratory test of low temperature for emissions	***Declaration***	Not required	Optional

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 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.

Commission proposal 2025/0422 (COD)

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

Annex I	*Amendment to Annex I of the Omnibus*

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***
	II	***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 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.

Commission proposal 2025/0422 (COD)

Annex I

ANNEX I

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

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 Annex I of the Omnibus

ANNEX I

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 low temperature emission test, the reference for the declaration of compliance is UN Regulation No 83 (***)***	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.

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

Justification:

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.

Commission proposal 2025/0422 (COD)

Annex I of the Automotive Omnibus

Text proposed by the Commission

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

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 exhaust emissions, OBFCM*** and SOH monitors of battery durability

Table 2

Test requirements	Tests and requirements for emission type-approval	Tests at conformity of production	Tests at in-service conformity		Tests at market surveillance	
Relevant actor	Granting type-approval authority	Granting type-approval authority	Granting type-approval authority	Commission and recognised third parties	Market surveillance authorities	Commission and recognised third parties
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	Audits or optional testing	Required	Optional	Optional	Optional

Amendment

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

Table 1

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

Table 2

Test requirements	Tests and requirements for emission type-approval	Tests at conformity of production	Tests at in-service conformity		Tests at market surveillance	
Relevant actor	Granting type-approval authority	Granting type-approval authority	Granting type-approval authority	Commission and recognised third parties	Market surveillance authorities	Commission and recognised third parties
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	Audits or optional testing	Required ***for gaseous pollutants, PM, PN*** and SOH monitors of battery durability	Optional ***for gaseous pollutants, PM, PN*** and SOH monitors of battery durability	Optional ***for gaseous pollutants, PM, PN*** and SOH monitors of battery durability	Optional ***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.

Brake emission limits for light & heavy-duty vehicles

Commission proposal 2025/0422 (COD)

Annex I of the Automotive Omnibus

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

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

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

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})	***3mg/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:

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 brake particle emission limits for M_2, M_3, N_2 and N_3 vehicles applicable from 2035 must also be set on the assumption of powertrain technologies that are not merely PEV and also with respect to heavy-duty vehicle categories used in urban and sub-urban duty cycles where the impact of brake particle emissions may be higher, for example compared to heavy-duty vehicle primarily operated over long-haul motorway duty cycles. However, in that respect, the rapid increase in the use of electrified heavy-duty vehicles across the EU in urban and sub-urban driving conditions must also be considered when the Commission looks at brake particle emission limits on a cost-benefit basis.

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

Declared limit values in certificate of conformity for light-duty vehicles

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
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.	

Optional in-service compliance testing by manufacturers required by type-approval authorities

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
2. Tests to demonstrate compliance with the requirements of this Regulation shall be performed by manufacturers and national authorities as specified in Annex V. Tests to demonstrate compliance with the requirements of this Regulation may be performed by the Commission and recognised third parties as specified in Annex V. Where a test is specified as optional in Tables 1, 3, 5, 7, 9 and 11 of Annex V, the approval authority may request that the specified test is performed.	2. Tests to demonstrate compliance with the requirements of this Regulation shall be performed by manufacturers and national authorities as specified in Annex V. Tests to demonstrate compliance with the requirements of this Regulation may be performed by the Commission and recognised third parties as specified in Annex V.
Justification: Currently the legal text is unclear if type-approval authority can demand manufactures to perform optional ISC tests as defined under Tables 1, 3, 5, 7, 9 and 11 of Annex V. Removing this requirement provides legal stability on which ISC tests are optional for the manufactures and which ISC tests are optional for the type approval authorities. The amendment is a simplification, increases costs predictability and increases planning security for the manufacturers.	

Freezing of the utility factor

Commission proposal 2025/0422 (COD)

Annex I of the Automotive Omnibus

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

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. 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. ***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.

Justification:

Reducing the utility factor (UF) would abruptly reduce the regulatory CO_2 value of plug-in hybrids (PHEVs), undermining existing industrial investments and market planning for electrified portfolios. Regulators should keep the UF stable to provide predictable signals while other tools (incentives, infrastructure) scale up.

The UF methodology relies on usage datasets and OBFCM concepts that are still evolving. Freezing the UF avoids locking in estimations based on incomplete/methodologically immature data and gives time to roll out robust on-board data collection and validation. Real-world electric use by PHEV drivers depends on charging availability, incentives and consumer behaviour.

Any UF update should be coordinated with parallel policies (incentives, infrastructure roll-out) to ensure intended CO_2 savings are realised.

Regulation (EU) 2017/1151

Annex XXI, Appendix 5

Table A8. App 5/1: Parameters for the Determination of Fractional UFs (As Applicable)

Parameter	Value
dnea (*)	800 km
dneb (*)	2 200 km
dnec (*)	4 260 km
C1	26,25
C2	– 38,94
C3	– 631,05
C4	5 964,83
C5	– 25 095
C6	60 380,2
C7	– 87 517
C8	75 513,8
C9	– 35 749
C10	7 154,94
(*) The value to be applied shall be that corresponding to the emission characters EA, EB and EC as specified in Table 1, Appendix 6 to Annex I.'.	

Amendment

Table A8. App 5/1: Parameters for the Determination of Fractional UFs (As Applicable)

Parameter	Value
dnea (*)	800 km
dneb (*)	2 200 km
dnec (*)	**2 200** km

Justification:

The parameter d_{nec} = 2200 km for Off-Vehicle Charging Hybrid Electric Vehicles (OVC-HEVs) for the determination of the fractional Utility Factor (UF) ensures a consistent and legally certain application of the WLTP methodology for charge-depleting range assessment.

This amendment is intended to ensure regulatory consistency and uniform approach for all manufacturers required to comply with Euro 6e-bis-FCM before mandatory transition to Euro 7

according to Article 21 of EU 2024/1257 (i.e. vehicles of categories M2 & N2, small volume manufacturers)

Freezing the UF is essential to preserve the climate contribution and industrial role of PHEVs at a critical stage of the transition. PHEVs already deliver tangible CO_2 reductions—particularly in urban areas and in markets with limited charging infrastructure—and benefit from rapidly improving electric range and charging performance. Further tightening would prematurely weaken a technology that remains a meaningful component of a diversified, technology-neutral decarbonisation pathway.

A downward adjustment of the UF would abruptly reduce the regulatory CO_2 value of PHEVs, undermining existing industrial investments, product planning cycles and electrified portfolio strategies. The European automotive sector is already under structural pressure, and additional regulatory tightening would risk devaluing multi-billion-euro investments, disrupting supply chains—especially SMEs—and weakening Europe's global competitiveness vis-à-vis markets pursuing multi-technology strategies.

Regulatory predictability is crucial. Freezing the UF provides stable signals to industry while complementary measures—such as charging infrastructure deployment, electricity price incentives and consumer support schemes—are scaled up. Real-world electric driving shares depend primarily on charging availability, affordability and user behaviour rather than intrinsic technical limitations of PHEVs.

Moreover, the UF methodology relies on usage datasets and OBFCM concepts that are still evolving. Freezing the UF avoids locking in adjustments based on incomplete or methodologically immature data and allows time for more robust on-board data collection, validation and policy alignment.

Any future revision of the UF should therefore be coordinated with parallel policies to ensure that intended CO_2 savings are effectively realised in practice. A freeze safeguards climate ambition, technology neutrality, industrial resilience and regulatory coherence.

Euro 7: Heavy Duty Engines and Vehicles (M2, N2, M3, N3) Regulation (EU) 2024/1257 AND Regulation (EU) 2018/858

Moratorium on the application of Euro 7 for heavy-duty vehicles

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	[…] '(x) Article 10(6), Article 10(7) and Article 10(8) are replaced by the following: 6. With effect from 29 May ***2033,*** approval authorities shall, in the case of new types of vehicles of category M_2, M_3, N_2 or N_3 and new types of trailers of category O_3 or O_4 which do not comply with this Regulation, refuse to grant EU emission type-approval or national emission type-approval to such new types of vehicles and trailers on grounds relating to CO_2 and pollutant emissions, fuel and electric energy consumption or battery durability. 7. With effect from 29 May ***2034***, national authorities shall, in the case of new vehicles of category M_2, M_3, N_2 or N_3 and new trailers of category O_3 or O_4, which do not comply with this Regulation, consider certificates of conformity to be no longer valid for the purposes of registration and shall prohibit the registration, sale or entry into service of such new vehicles and trailers on grounds relating to CO_2 and pollutant emissions, fuel and electric energy consumption, energy efficiency or battery durability. 10. With effect from 1 July ***2036***, national authorities shall, in the case of new vehicles of category M_2, M_3, N_2 or N_3 constructed by small-volume manufacturers, which do not comply with this Regulation, consider certificates of conformity to be no longer valid for the purposes of registration and shall prohibit the registration, sale or entry into service of such new vehicles on grounds relating to CO_2 and pollutant emissions, fuel and electric energy consumption, energy efficiency or battery durability.' '(x) Article 11(2) is replaced by the following:

	2. With effect from 29 May 2033, Member States shall prohibit the sale or installation of a system, component or separate technical unit intended to be fitted on a vehicle of category M2, M3, N2 or N3, or on a trailer of category O3 or O4 approved under this Regulation, where the system, component or separate technical unit is not type-approved in accordance with this Regulation.' '(x) The second paragraph of Article 20(1) is replaced by the following: Regulation (EC) No 595/2009 is repealed with effect from 1 July ***2036***.' '(x) The second paragraph of Article 20(2) is replaced by the following: Regulations (EU) No 582/2011 and (EU) 2017/2400, as well as Implementing Regulation (EU) 2022/1362 are repealed with effect from 1 July ***2036***.' '(x) The third paragraph of Article 21 is replaced by the following: It shall apply from 29 May ***2033*** for new types of vehicles of categories M_2, M_3, N_2 or N_3, O_3 and O_4 and components, systems and separate technical units intended for vehicles of categories M_2, M_3, N_2 or N_3, O_3 or O_4 type-approved under this Regulation and from 29 May ***2034*** for new vehicles of categories M_2, M_3, N_2 or N_3, O_3 and O_4 and components, systems and separate technical units for those vehicles.' '(x) The fifth paragraph of Article 21 is replaced by the following: It shall apply from 1 July 2030 for vehicles of categories M1 and N1, constructed by small-volume manufacturers and from 1 July ***2036*** for vehicles of categories M_2, M_3, N_2 or N_3, O_3 and O_4 constructed by small-volume manufacturers.'
<u>Justification:</u> The billions of Euros being put aside for Euro 7 engine and vehicle development is a major distraction from the efforts of the EU heavy-duty industry to move rapidly and effectively to decarbonise heavy-duty goods and passenger transport vehicles. Other EU regulations and policies are incentivising, either financially or via operational restrictions, the push to zero emission heavy-duty vehicles and it is the intention of the heavy-duty industry to help deliver the	

decarbonisation of new heavy-duty goods and passenger transport vehicles as long as other supporting policies and measures deliver in parallel. A five-year moratorium on the date of application of heavy-duty Euro 7, as foreseen in Regulation (EU) 2024/1257 is therefore proposed to allow industry to invest where it makes most sense to achieve future EU climate targets and CO2 reduction targets imposed on industry, but that does not mean the Commission should slow down the preparation and delivery of necessary implementing acts for heavy-duty Euro 7 in order to give industry the maximum lead-time to balance efforts on decarbonisation with efforts towards heavy-duty Euro 7.

Brake emission limits for heavy-duty vehicles *(similar amendment also for light-duty vehicles)*:

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*Article 4* […] '(x) Article 18(5) is replaced by the following: 5. By 31 December 2027, the Commission shall submit to the European Parliament and to the Council a report on brake particle emissions reviewing measuring methods and the state of the art, with a view to the adoption of the delegated acts referred to in Article 15(2), point (a), on the level of the second stage emission limits set out in Tables 5, 6 and 7 of Annex I. By 31 December 2029, the Commission shall adopt a delegated act, as referred to in Article 15(2), point (a), regarding the level of brake emission limits for vehicles of category M_2, N_2, M_3 and N_3 set out in Table 8 of Annex I.'
Justification: This amendment is related to the amendment to Table 8 of Annex I with regard to the brake particle emission limits for category M_2, N_2, M_3 and N_3 vehicles applicable from 2035.	

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;’; (2) Annex V is amended in accordance with Annex I to this Regulation.	*ARTICLE 4* […] ‘(X) ARTICLE 21 IS REPLACED BY THE FOLLOWING: **ENTRY INTO FORCE AND APPLICATION** This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*. It shall apply from 29 November 2026 for new types of vehicles of categories M_1 and N_1 and components, systems and separate technical units intended for vehicles of categories M_1 or N_1 type-approved under this Regulation and from 29 November 2027 for new vehicles of categories M_1 and N_1 and components, systems and separate technical units for those vehicles. It shall apply from 29 May 2033 for new types of vehicles of categories M_2, M_3, N_2, N_3, O_3 and O_4 and components, systems and separate technical units intended for vehicles of categories M_2, M_3, N_2, N_3, O_3 or O_4 type-approved under this Regulation and from 29 May 2034 for new vehicles of categories M_2, M_3, N_2, N_3, O_3 and O_4 and components, systems and separate technical units for those vehicles. It shall apply from 1 July 2028 for new types of C_1 class tyres, from 1 April 2030 for new types of C_2 class tyres and from 1 April 2032 for new types of C_3 class tyres. Brake emission limits shall apply from 29 May 2034 for the registration, sale or entry into service of vehicles of categories M_2, M_3, N_2 and N_3 and from 1 July 2036 for the registration, sale or entry into service of vehicles of categories M_2, M_3, N_2 and N_3 constructed by small-volume manufacturers. It shall apply from 1 July 2030 for vehicles of categories M_1 and N_1, constructed by small-volume manufacturers and from 1 July 2031 for

	vehicles of categories M_2, M_3, N_2 and N_3 constructed by small-volume manufacturers. However, Article 11(3) shall apply from 28 May 2024.'
Justification: Brake emission limits - see justification to the Amendment of Regulation (EU) 2024/1257, Annex I, table 6, 7 and 8 below.	

Commission proposal 2025/0422 (COD)
Article 4
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.
Amendment to Article 4 and Annex I of the Omnibus
Article 4 […] '(x) Table 6, Table 7 and Table 8 of Annex I are amended in accordance with Annex I to this Regulation.' **ANNEX I** Annex V to Regulation (EU) 2024/1257 is amended as follows: […] 'Annex I to Regulation (EU) 2024/1257 is amended as follows: (1) Table 6, Table 7 and Table 8 of Annex I to Regulation (EU) 2024/1257 are replaced by the following: 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})	3mg/km per vehicle				
Brake particle number emissions (PN)					

Table 7: Euro 7 brake particle emission limits in standard driving cycle applying from 29 May 2034, 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 29 May 2034, 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:

(a) Focus heavy-duty brake emissions on 2034/2035:

The development of a new heavy-duty brake cycle under the GRPE PMP group is delayed and this will make it very difficult for heavy-duty vehicle manufacturers to gain experience of using a new test method for regulatory purposes. The safety critical nature of heavy-duty vehicle brake systems for all the different types of heavy-duty vehicles for the EU market requires a long development process that will be very difficult to achieve for 2030.

HDV brake emissions can start to be measured as from when the brake component test procedure has been completed and verified under the mandate of PMP (GRPE) in the UNECE (see Article 15(2)(a) of Regulation (EU) 2024/1257) and technical procedures have been agreed to calculate a brake component test result into a heavy-duty vehicle result. This will then allow a monitoring step to go ahead to gain technical experience and data to establish, no later than 31 December 2029, regulatory limits for heavy-duty vehicles applicable from 2035.

Possible limits for heavy-duty vehicle brake particle emissions from 2034 (as per the moratorium) shall also be evaluated on the basis of environmental impact that can be justified on a cost-benefit basis, also in consideration of the rapid increase in the use of electrified heavy-duty vehicles across the EU in urban and sub-urban driving conditions, where one may expect particle emissions to be of concern (not for heavy-duty vehicles primarily used for motorway long-haul goods/passenger transportation).

Hence, Tables 6 and 7 (heavy-duty brake emissions from 2030 and from 2030 to 2034) are deleted as a concept but replaced via the justification below.

(b) Change focus of brake emission tables to reflect opportunity for ICE:

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 6 therefore is changed and now addresses category M_1 and N_1 vehicles from 2035.

Possible brake particle emission limits for M_2, M_3, N_2 and N_3 vehicles applicable from 2024/2035 must also be set on the assumption of powertrain technologies that are not merely PEV and also with respect to heavy-duty vehicle categories used in urban and sub-urban duty cycles where the impact of brake particle emissions may be higher, for example compared to heavy-duty vehicle primarily operated over long-haul motorway duty cycles. However, in that respect, the rapid increase in the use of electrified heavy-duty vehicles across the EU in urban and sub-urban driving conditions must also be considered when the Commission looks at brake particle emission limits on a cost-benefit basis. Table 6 is therefore changed to address category M_2 and N_2 vehicles from 2034/2035 and Table 7 is changed to address category M_3 and N_3 vehicles from 2034/2035.

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

OBM and OBM monitoring for PM and ammonia (NH_3):

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*Article 4* […] '(x) Article 6(6)(a) is replaced by the following: 6. The OBM systems installed by the manufacturer in these vehicles shall be capable of: (a) monitoring and registering exhaust emissions of NOx on a periodic basis from vehicles of categories M_2, M_3, N_2 and N_3 and of NOx and PM from vehicles of categories M_1 and N_1 and detecting exceedances of at least 2,5 times the relevant exhaust emission limit values set out in Annex I;'
Justification: Unlike for light-duty vehicles, there is no PM emission limit under RDE conditions for heavy-duty vehicles in Annex I Table 2, the reason being the alignment with the ISC-PEMS test conditions under Euro VI (the co-legislators agreed to carry-over into Euro 7). The light-duty OBM implementing Regulation (EU) 2025/1706 bases OBM monitoring on the PM limit in Annex I Table 1 of Regulation (EU) 2024/1257 (the Table I limits are established for RDE conditions). The same principle must apply for heavy-duty OBM. There is no limit on which to base HDV OBD according to a 2.5 threshold, there is therefore no scope to (a) provide OBM with respect to PM and, (b) no mandate for the Commission to artificially establish a surrogate PM limit, even at a high level under the assumption that high level might correlate with the respective PN RDE limit in Annex I Table 2 - there is no correlation between PM and PN. Regarding "NOx on a periodic basis", this is being proposed because OBM monitoring of NOx on a continuous basis using window-based calculations, puts a significant strain on ECU computational capacity and greatly increases data transfer needs from the cloud. By requesting a simplified NOx monitoring approach through periodic (not continuous) monitoring (for example once a drive cycle for each 1000km drive) under specific non-abusive driving and environmental conditions, the same environmental benefit can be achieved at much lower cost. 94% of EU ammonia emissions come from agriculture for a wide range of uses and that sector is also the primary source of secondary particles – ammonia is not an environmental issue for road transport and does not warrant the complexity and cost of OBM monitoring and data transmission. Light-duty vehicles, having a far higher EU market share than heavy-duty vehicles, are not required to limit or monitor for ammonia.	

Commission proposal 2025/0422 (COD), Recital (19)	
Text proposed by the Commission	*Amendment to Recital (19) of the Omnibus*
(19) Regulation (EU) 2024/1257 introduces on-board monitoring (OBM) systems and on-board fuel and electric energy consumption monitoring (OBFCM) devices, which are aimed at facilitating ***real-time*** compliance checks, harmonisation efforts, lifecycle oversight, reduced testing expenses, and streamlined enforcement measures. In order to efficiently receive, process, and store OBM and OBFCM data it is necessary to clarify that the empowerment of the Commission to adopt implementing measures also covers the adoption of methods and requirements necessary for the monitoring compliance of vehicle types.	(19) Regulation (EU) 2024/1257 introduces on-board monitoring (OBM) systems and on-board fuel and electric energy consumption monitoring (OBFCM) devices, which are aimed at facilitating compliance checks, harmonisation efforts, lifecycle oversight, reduced testing expenses, and streamlined enforcement measures. In order to efficiently receive, process, and store OBM and OBFCM data it is necessary to clarify that the empowerment of the Commission to adopt implementing measures also covers the adoption of methods and requirements necessary for the monitoring compliance of vehicle types.
Justification: OBM is not real time compliance. OBM data is transmitted at intervals.	

On-board fuel consumption monitoring

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*ARTICLE 4* […] '(X) ARTICLE 21 IS REPLACED BY THE FOLLOWING: *ARTICLE 21* **ENTRY INTO FORCE AND APPLICATION** This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*. It shall apply from 29 November 2026 for new types of vehicles of categories M_1 and N_1 and components, systems and separate technical units intended for vehicles of categories M_1 or N_1 type-approved under this Regulation and from 29 November 2027 for new vehicles of categories M_1 and N_1 and components, systems and separate technical units for those vehicles. It shall apply from 29 May 2033 for new types of vehicles of categories M_2, M_3, N_2, N_3, O_3 and O_4 and components, systems and separate technical units intended for vehicles of categories M_2, M_3, N_2, N_3, O_3 or O_4 type-approved under this Regulation and from 29 May 2034 for new vehicles of categories M_2, M_3, N_2, N_3, O_3 and O_4 and components, systems and separate technical units for those vehicles. It shall apply from 1 July 2028 for new types of C_1 class tyres, from 1 April 2030 for new types of C_2 class tyres and from 1 April 2032 for new types of C_3 class tyres. OBFCM shall apply from 29 May 2034 for the registration, sale or entry into service of vehicles of categories M_2, M_3, N_2 and N_3 and from 1 July 2036 for the registration, sale or entry into service of vehicles of categories M_2, M_3, N_2 and N_3 constructed by small-volume manufacturers. Before 29 May 2034, OBFCM shall be a monitoring phase for vehicles of categories M_2, M_3, N_2 and N_3.

	It shall apply from 1 July 2030 for vehicles of categories M_1 and N_1, constructed by small-volume manufacturers and from 1 July 2036 for vehicles of categories M_2, M_3, N_2 and N_3 constructed by small-volume manufacturers. HOWEVER, ARTICLE 11(3) SHALL APPLY FROM 28 MAY 2024.'
Justification: The OBFCM Regulation (EU) 2025/2161 leaves many questions unresolved that still require clarification. In its initial phase, the regulation introduces accuracy requirements for diesel powertrains without a prior monitoring period to evaluate the technical capability of the accuracy requirements. This effectively demands the development of an entirely new measurement approach for which no field experience exists. Given the very ambitious timeline, there is insufficient time to properly design, develop, and validate OBFCM accuracy measures in a robust and reliable manner. The application of OBFCM requirements must be moved to a later date aligned with the request for a 5-year moratorium that is preceded by a proper monitoring phase of at least 3 years.	

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*ARTICLE 4* […] '(x) Article 20 is replaced by the following: *'ARTICLE 20* **REPEAL** 1. Regulation (EC) No 715/2007 is repealed with effect from 1 July 2030. Regulation (EC) No 595/2009 is repealed with effect from 1 July 2036. References to Regulations (EC) No 715/2007 and (EC) No 595/2009 shall be construed as references to this Regulation and shall be read in accordance with the correlation table set out in Annex VI to this Regulation. 2. Regulation (EU) 2017/1151 is repealed with effect from 1 July 2030. Regulations (EU) No 582/2011 and (EU) 2017/2400, as well as Implementing Regulation (EU) 2022/1362 are repealed with effect from 1 July 2036. Regulation (EU) xxx/2026 amending Regulation (EU) No 582/2011 as regards the emissions type-approval of heavy-duty vehicles with on-board fuel and energy consumption monitoring devices for vehicles of categories M_2, M_3, N_2 and N_3 in the Regulation 582/2011 is repealed with effect from from [*to add date that is before the date of entry into force*].'
Justification: The amendment above intends to apply heavy-duty vehicle OBFCM in the Euro 7 stage but at a later date after a reasonable period of monitoring addressing the real performance of OBFCM. The application of OBFCM under the Euro VI framework is unwarranted and this amendment will repeal the amendment to Regulation (EC) 582/2011 which the Commission pushed through regulatory committee without full appreciation of the complications of OBFCM. That push was also against the intention of the co-legislators to carry forward into Euro 7 the test procedures from Euro VI and not introduce new technical measures into Euro VI that would add cost and burden on manufacturers for a short remaining period of Euro VI validity and opportunity to recover at least some investments.	

Commission proposal 2025/0422 (COD)

ANNEX I

ANNEX I

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

[…]

Amendment to Annex I of the Omnibus

ANNEX I

[…]

‘(x) in Table 3, the entry for OBFCM (on-board measurement of fuel and electric energy consumption, as well as payload) is replaced by the following:

OBFCM (on-board measurement of fuel and electric energy consumption, as well as payload)	Declaration	Not required	Required

‘

‘(x) in Table 4, the entry for OBFCM (on-board measurement of fuel and electric energy consumption, as well as payload) is replaced by the following:

OBFCM (on-board measurement of fuel and electric energy consumption, as well as payload)	Declaration	Not Required	Required	Optional	Optional	Optional

‘

Justification:

In Annex V of Regulation (EU) 2024/1257 it appears that OBFCM shall be approved separately from the other vehicle related tests. This could drive additional testing even though OBFCM compliance under Euro VI is declared by the manufacturer without testing obligation. In case of RDE testing for type approval, in-service conformity or market surveillance OBFCM accuracy assessment can be included as part of the regular testing procedure. OBFCM shall not cause the need to establish vehicle level testing for conformity of production.

Simplification of the criteria for heavy-duty battery durability

Commission proposal 2025/0422 (COD)
Article 4 and ANNEX I
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;’; (2) Annex V is amended in accordance with Annex I to this Regulation. **ANNEX I** Annex V to Regulation (EU) 2024/1257 is amended as follows: […]
Amendment to Article 4 and Annex I of the Omnibus
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: […] ‘(x) Annex II is amended in accordance with Annex I to this Regulation’ **ANNEX I** Annex V to Regulation (EU) 2024/1257 is amended as follows: […] ‘Annex II to Regulation (EU) 2024/1257 is amended as follows: (1) Table 3 is replaced by the following: Table 3: Euro 7 Minimum performance requirements (MPR) for battery durability for vehicles of categories M_2

Battery Energy Based MPR	For this category of vehicle, up to a main lifetime of AA km or BA years or energy throughput CA, whichever comes first	For this category of vehicle, above the main lifetime of AA km or BA years or energy throughput CA and up to whichever comes first of the addition lifetime of DA km or EA years or energy throughput FA
OVC-HEV	[…]	[…]
PEV	[…]	[…]

(2) Table 4 and Table 5 are added, as follows:

Table 4: Euro 7 Minimum performance requirements (MPR) for battery durability for vehicles of categories N_2, $N_3 \leq 16t$, $M_3 \leq 7.5t$ (maximum mass)

Battery Energy Based MPR	For these categories of vehicles, up to a main lifetime of AB km or BB years or energy throughput CB, whichever comes first	For these categories of vehicles, above the main lifetime of AB km or BB years or energy throughput CB and up to whichever comes first of the addition lifetime of DB km or EB years or energy throughput FB
OVC-HEV	[…]	[…]
PEV	[…]	[…]

Table 5: Euro 7 Minimum performance requirements (MPR) for battery durability for vehicles of categories $N_3 > 16t$ and $M_3 > 7.5t$ (maximum mass)

Battery Energy Based MPR	For these categories of vehicles, up to a main lifetime of AC km or BC years or energy throughput CC, whichever comes first	For these categories of vehicles, above the main lifetime of AC km or BC years or energy throughput CC and up to whichever comes first of the addition lifetime of DC km or EC years or energy throughput FC
OVC-HEV	[…]	[…]
PEV	[…]	[…]

‘

Justification:

Apply the UNECE GTR25 procedure and with minimum performance criteria based on distance (km), time (years) **or energy throughput** requirements adapted that are more suitable for the design and use of heavy-duty vehicles, particularly because batteries would not be only used for motive propulsion but also to power working or other devices installed on heavy-duty vehicles.

The proposal is therefore to replace Table 3 with three tables that relate and align to the specific vehicle categories of Table 1 of Annex IV but to leave open the distance and time criteria because the values in Annex IV relate to durability of exhaust pollution control. It is not yet clear what

distance and time values are applicable for heavy-duty battery use cases. However it is clear that energy throughput must be included. The open values shall be defined in the relevant Commission implementing act, as referred to by Article 18(4) - see amendment below.

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*Article 4* […] '(x) Article 18(4) is replaced by the following: 4. By 31 December 2027, the Commission shall submit to the European Parliament and to the Council a report on battery durability reviewing the state of the art, as a basis for a review, for the various vehicle categories in Tables 3, 4 and 5 of Annex II to this Regulation, of the main and additional lifetime periods and energy throughput and the minimum performance requirements, with a view to the adoption of the delegated acts referred to in Article 15(2), point (c).'
<u>Justification:</u> The amendment to Annex II Table 3 on minimum performance requirements for heavy-duty batteries leaves open for review appropriate distance/time and energy throughput criteria as well as the minimum performance requirements. The amendment simply ensures those open issues are part of the COM review foreseen by end-2027.	

Commission mandate to make a proposal for the approval of range-extenders

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*Article 4* […] '(x) The following new point is added to Article 14(4): (w) additional methods to type approve a category M_2, N_2, M_3 or N_3 OVC-HEV vehicle with serial hybrid architecture.'
Justification: The current legislative framework for heavy-duty emissions makes it impossible to type-approve a small engine (e.g. a light-duty engine) for use as a range extender in heavy-duty vehicles. This is hindering the deployment of Extended Range Electric Vehicles (EREVs) that do not use a heavy-duty compliant engine. Although serial hybrids are recognized in VECTO for CO_2, the inability to type-approve under Euro VI or Euro 7 a small engine for use in a heavy-duty vehicle means that no CO_2 value can actually be derived from such a solution, meaning that even vehicles type-approved through exemptions will not count towards manufacturers' compliance with the CO_2 standards and customers are prevented access to a CO_2-beneficial technology. In general, the implementing acts under Euro VI (Regulation (EU) 582/2011) lack any consideration of electrified powertrains (anything from stop/start to BEV with a Range Extender ICE) meaning a heavy-duty compliant engine is currently required for type approval of an electrified powertrain. Opportunity must be taken to introduce additional suitable and pragmatic regulatory changes in heavy-duty Euro 7 implementing acts, also supporting electrified powertrains not using heavy-duty compliant engines, with a focus on minimising regulatory burden and promoting a proven CO_2-reducing technology, e.g. introduce additional pathways for type-approval and CO_2 certification of light-duty engines or generator sets for use in heavy-duty hybrid vehicles.	

Crankcase emissions

Commission proposal 2025/0422 (COD)

Article 4 and Annex I Annex V, Table 3 & Table 4

Article 4

Amendments to Regulation (EU) 2024/1257

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

(1) 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;’;

(2) Annex V is amended in accordance with Annex I to this Regulation.

ANNEX I

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

[…]

Amendment to Annex I of the Omnibus

ANNEX I

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

[…]

‘(x) In Table 3, the entry for Crankcase emissions is replaced by the following:

Crankcase emissions	Check installation of closed crankcase system or apply declared crankcase emission factor (**)	Not required	Optional

‘

‘(x) In Table 4, the entry for Crankcase emissions is replaced by the following:

Crankcase emissions	Check installation of closed crankcase system or apply declared crankcase emission factor	Not re-quired	Not re-quired	Not re-quired	Not re-quired	Not required

‘

‘(x) In Table 7, the entry for Crankcase emissions is replaced by the following:

Crankcase emissions	Check installation of closed crankcase system or declared crankcase emission factor	Not required	Not required

‘

‘(x) In Table 8, the entry for Crankcase emissions is replaced by the following:

Crankcase emis-sions	Check installation of closed crankcase system or declared crankcase emission factor	Not required	Not required	Not required

‘

Justification:

Heavy-duty engines require crankcase ventilation for pressure control (to prevent excessive pressure buildup that may lead to oil leak and seal failure) and for component protection (to keep turbos, intercoolers, and intake systems clean from crankcase oil contamination). There are two options for modern heavy-duty engines - closed crankcase ventilation (CCV) or open crankcase ventilation (OCV). CCV routes crankcase into the exhaust while OCV (preferred in heavy-duty applications) vent to air (via filtration of oil mist) because they are simple and inexpensive to maintain and avoid a number of risks associated CCV that can lead to coking on turbocharger surfaces.

In Annex V, the engine manufacturer is responsible for crankcase emissions and, in the case of vehicles (Tables 3 and 4) crankcase emissions at type-approval are addressed by simply checking if an engine has CCV or, if not, to “check routing to the tailpipe”. Conformity of production is not required, and in-service compliance or market surveillance tests are optional.

In the case of engines (Tables 7 and 8), crankcase emissions at type-approval are addressed by simply checking if an engine has CCV or, if not, to “check routing to the tailpipe”. Conformity of production is not required, and in-service compliance or market surveillance tests are optional.

For tests in the hands of the manufacturer, such provisions may be addressed, but routing (from the engine crankcase) to the tailpipe for optional in-service conformity or market surveillance tests using vehicles taken from customers (or rented) is not a simple matter for authorities.

This amendment addresses a complicated problem with a pragmatic and simplified solution with the details to be addressed in the relevant implementing act.

For example:

At the time of type-approval of the heavy-duty engine type using a particular fuel, in the case of an engine with OCV, crankcase emissions are measured over the same regulatory cycle as for exhaust emissions and a crankcase (as per definition) emission factor is derived and declared by the engine manufacturer [and recorded in the engine type-approval documentation]. The declared factor would provide a [mg/kWh] figure for crankcase emissions. At the conclusion of the Real Driving Emissions (RDE) test (which is for gaseous pollutants and PN) and after calculation of the

RDE emission results to compare against the applicable RDE limit, the crankcase emission factor would be applied to the applicable RDE result, the combination of which must be below the applicable RDE emission limit. The details would be laid out by COM in the relevant implementing act.

Alignment of Euro 7 with heavy-duty CO2

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*Article 4* […] '(x) Article 10(8) is replaced by the following: 8. By way of derogation from paragraph 7 of this Article, until 30 June 2030, national authorities shall allow for vehicles of category M_2 or M_3, for which there is a 90 % zero-emission target as from the reporting period of the year 2030 in accordance with Regulation (EU) 2019/1242, the registration, sale or entry into service of new vehicles, which do not comply with this Regulation but have a valid emission type-approval in accordance with Regulation (EC) No 595/2009.'
Justification: Article 10(8) of Regulation (EU) 2024/1257 was included to provide relief to M_2 and M_3 buses and coaches by permitting the sale, registration and entry into service of Euro VI M_2 and M_3 vehicles during the transition to 100% zero emission vehicles. Article 10(8) assumed the 100% target would be from the reporting period 2030 (that starts as from 30 June 2030), but Regulation (EU) 2024/1610 set the 100% ZEV target for urban buses in the reporting period 2035-2039. The aim of this amendment is therefore to correct an error that occurred between the alignment of the intention of Article 10(8) of Regulation (EU) 2024/1257 and the later agreement of Regulation (EU) 2024/1610. The relief intended to be provided by Article 10(8) is still very much needed to avoid that limited engineering and financial resources are diverted to internal combustion engine development for such M_2 and M_3 vehicle categories while the political push of the heavy-duty vehicle CO_2 regulation (and the Clean Vehicles Directive) is towards 100% ZEV urban buses.	

Commission proposal 2025/0422 (COD)

Article 4 and Annex I Annex V, Table 3 & Table 4

Article 4

Amendments to Regulation (EU) 2024/1257

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

(1) 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;’;

(2) Annex V is amended in accordance with Annex I to this Regulation.

ANNEX I

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

[…]

Amendment to Annex I of the Omnibus

ANNEX I

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

[…]

‘(x) In Table 3, the entry for CO2, emissions, fuel and electric energy consumption, zero-emissions and electric range determination of a vehicle, is replaced by the following:

CO2, emissions, fuel and electric energy consumption, zero-emissions and electric range determination of a vehicle	Licence to operate the VECTO simulation tool, components certification.	For components. VECTO usage check (four times a year).	Not required

‘

Justification:

In Annex V Table 3, it says that manufacturers should carry-out ISC for “CO2, emissions, fuel and electric energy consumption, zero-emissions and electric range determination of a vehicle”. To note that conformity does not apply for CO2 (there are no CO2 limits to assess conformity), but in-service verification does apply (according to another regulation of DG CLIMA).

Therefore, in the case of ISC, the entry in the respective box in Table 3 must be “Not Required”.

Definition of non-methane organic gases (NMOG)

<table>
<tr><td colspan="2">Commission proposal 2025/0422 (COD)</td></tr>
<tr><td>Article 4</td><td>Amendment to Article 4 of the Omnibus</td></tr>
<tr><td>Article 4

Amendments to Regulation (EU) 2024/1257

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

(1) 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;’;

(2) Annex V is amended in accordance with Annex I to this Regulation.</td><td>Article 4

[…]

‘(x) Article 3(20) is replaced by the following:

(20) ‘non-methane organic gases’ or ‘NMOG’ means, in the case of diesel-fuelled vehicles, CNG-fuelled vehicles, LNG-fuelled vehicles, LPG-fuelled vehicles and hydrogen fuelled vehicles, Non-Methane Hydrocarbons (NMHC) and in the case of vehicles using oxygenated fuels the sum of non-oxygenated and oxygenated hydrocarbons, excluding methane, emitted from the tailpipe;’</td></tr>
<tr><td colspan="2">NMOG is a limit value for heavy-duty Euro 7 but measuring all emission species that are classified under NMOG (e.g. alkanes, alkenes, alkynes, alcohols, aldehydes, ketones) is not cost-effective and totally unnecessary for the primary heavy-duty engine diesel technology. A simplified approach, for example following the EPA2027 heavy-duty engine rule, should be adopted for Euro 7. In the case of diesel, CNG, LNG or LPG engines, the US EPA simply treats NMOG as NMHC. The EU market is practically at zero for heavy-duty vehicles using oxygenated fuels.

The Regulation (EU) 2024/1257 definition of NMOG is (a) unrepresentative of the EU heavy-duty market and (b) restrictive to adopting a simplified approach on NMOG like how the US EPA addresses NMOG, at least for diesel engines. If diesel engines are forced to measure NMOG for no other reason that the definition of NMOG says so, it will add costs and complexity to heavy-duty Euro 7, beyond the intention of the co-legislators to base tests on Euro VI.</td></tr>
</table>

Consideration of formaldehyde as a new emission limit

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*Article 4* […] '(x) Article 15(1) is replaced by the following: 1. The Commission shall be empowered to adopt delegated acts in accordance with Article 16 in order to take into account technical progress to amend this Regulation as follows: (a) Article 5 by introducing additional options and designations based on innovative technologies for manufacturers; (b) setting out special rules for small-volume manufacturers for vehicles of categories M2, M3, N2 and N3 under Articles 3 and 8; (c) where appropriate, setting out emission limits for formaldehyde from vehicles of categories M_2, M_3, N_2 and N_3 that are not fuelled by diesel (including B100 and paraffinic fuels), in Table 2 of Annex I, following and based on the review in accordance with Article 18(6); (d) Tables 4 and 5 of Annex III, as regards the test conditions, based on data collected when testing 'Euro 7' brakes or tyres; (f) setting out durability multipliers in Table 2 of Annex IV based on data collected when testing exhaust emissions of vehicles of categories M2, M3, N2 and N3 and a report on the durability of heavy duty vehicles submitted to the European Parliament and Council in accordance with Article 18(3); (g) Annex V, as regards the application of test requirements and declarations.'
Justification: Article 15(1)(c) empowers COM to adopt a delegated act setting out limits for formaldehyde for heavy-duty vehicles on the basis of a review done by end-2027 (see Article 18(6)). Formaldehyde is an issue only for alcohol fuels and practically all EU heavy-duty vehicles are fuelled by diesel or diesel-like fuels such as B100 or paraffinic fuels (XTL) for which formaldehyde is not an emission worth any consideration), Such a review and proposal so late impacts industry certainty for the heavy-duty Euro 7 dates. It should be made clear now, and for simplification, that any limit set for formaldehyde by such a late review will not apply to heavy-duty diesel engines. Also, Table 2 of Annex III is specifically for vehicles of categories M_2, N_2, M_3 and N_3, does not need to be stated in Article 15 as well.	

With the movement towards electrified heavy-duty vehicles, it appears unnecessary to retain Article 15(1)(d) that would review the test conditions for heavy-duty vehicle pollutant emissions. This is a matter of simplification and also maintains the intention of HDV Euro 7, i.e. that it should build on existing test methods in Euro VI and UN Regulation No. 49.

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*Article 4* […] '(x) Article 18(6) is replaced by the following: 6. By 31 December 2027, the Commission shall conduct a review on the appropriateness of setting out a specific limit for formaldehyde emissions in respect of vehicles of categories M_2, M_3, N_2 and N_3, based on the expected use of non-diesel-like fuels that would lead to an increase in formaldehyde emissions, with a view to the possible adoption of the delegated act referred to in Article 15(1), point (c).'
<u>Justification:</u> Article 15(1)(c) empowers COM to adopt a delegated act setting out limits for formaldehyde for heavy-duty vehicles on the basis of a review done by end-2027 (see Article 18(6)). Formaldehyde is an issue only for alcohol fuels and practically all EU heavy-duty vehicles are fuelled by diesel for which formaldehyde is not an emission worth any consideration), Such a review and proposal so late impacts industry certainty for the heavy-duty Euro 7 dates. It should be made clear now, and for simplification, that any limit set for formaldehyde by such a late review will not apply to heavy-duty diesel engines.	

Simplification of the introduction of Euro 7 implementing acts

Commission proposal 2025/0422 (COD)	
Article 4	*Amendment to Article 4 of the Omnibus*
Article 4 Amendments to Regulation (EU) 2024/1257 Regulation (EU) 2024/1257 is amended as follows: (1) 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;'; (2) Annex V is amended in accordance with Annex I to this Regulation.	*Article 4* […] '(x) Article 14(3) is replaced by the following: 3. The Commission may adopt implementing acts setting out procedures and testing methodologies, administrative provisions, procedures and methodologies for amending and extending emission type-approvals and data access, documentation requirements and templates for emission type-approval, conformity of production, in-service conformity and market surveillance, for all of the following: […]' '(x) Article 14(4) is replaced by the following: 4. The Commission may adopt implementing acts for the emission type-approval, in-service conformity, conformity of production and market surveillance, to lay down the following: […]' '(x) Article 14(8) is replaced by the following: 8. By 29 May 2025 the Commission shall adopt for vehicles of categories M1 and N1, as referred to in paragraph 3, point (a), the following implementing acts, where deemed necessary: […]' '(x) Article 14(9) is replaced by the following: 9. By 29 November 2026, the Commission shall adopt, for vehicles of categories M2, M3, N2 and N3, as referred to in paragraph 3, points (b) and (c), respectively, and their engines, as well as for trailers of categories O3 and O4, the following implementing acts, where deemed necessary: […]'
<u>Justification:</u> In Article 14 (Procedure and tests) there are many instances where the European Commission "shall adopt implementing act(s)" and these instances cover a wide range of issues that could be streamlined by giving the European Commission some flexibility to act, or not to act if latest data and information suggest no action is needed.	

Therefore, in Article 14 the words, “shall adopt implementing acts”, would be replaced by “may adopt implementing acts”. The obligations under Articles 14(8) and 14(9) then become dependent on whether implementing acts or issues within implementing acts are deemed necessary.

Small Car Subcategory

Creation of a small commercial vehicle subcategory

Regulation (EU) 2025/0422 (COD), Annex II	
Article 1	*Amendment*
(1) in Annex I, Part A, the following point 2.4 is inserted after point 2.3.1.: ‘2.4. Small electric vehicle: 2.4.1. Small electric vehicle means a pure electric vehicle that belongs to category M1, having a length not exceeding 4.2 metres. For this subcategory of vehicles, the letter ‘E’ shall be added as suffix to letter and numeral identifying the vehicle category (M1).’.	(1) in Annex I, Part A, the following point 2.4 is inserted after point 2.3.1.: ‘2.4. Small electric vehicle: 2.4.1. Small electric vehicle means a pure electric vehicle that belongs to category M1, having a length not exceeding 4.2 metres. For this subcategory of vehicles, the letter ‘E’ shall be added as suffix to letter and numeral identifying the vehicle category (M1). ***2.4.2 Small commercial electric vehicle means a pure electric vehicle that belongs to category N1, having a length not exceeding 5.0 metres.*** ***For this subcategory of vehicles, the letter ‘E’ shall be added as suffix to letter and numeral identifying the vehicle category (N1).’.***
Justification: This amendment creates a small electric van category to support the electrification of this segment, which is hampered by high costs and is lagging behind that of other vehicle categories. ACEA must also highlight that it stands by its original position to limit the length of M1E passenger vehicles to 4.35 metres, a length that would increase affordability for a more meaningful number of small car buyers and support the industry’s efforts to lower CO2 emissions.	

Regulation (EU) 2025/0422 (COD), Annex II	
Article 1	*Amendment*
(1) in Annex I, Part A, the following point 2.4 is inserted after point 2.3.1.: '2.4. Small electric vehicle: 2.4.1. Small electric vehicle means a pure electric vehicle that belongs to category M1, having a length not exceeding 4.2 metres. For this subcategory of vehicles, the letter 'E' shall be added as suffix to letter and numeral identifying the vehicle category (M1).'.	(1) in Annex I, Part A, the following points 2.4 and 2.5 are inserted after point 2.3.1.: '2.4. Small electric vehicle: 2.4.1. Small electric vehicle means a pure electric vehicle that belongs to category M1, having a length not exceeding 4.2 metres. For this subcategory of vehicles, the letter 'E' shall be added as suffix to letter and numeral identifying the vehicle category (M1). ***2.5. Small commercial vehicle*** ***2.5.1 Small commercial vehicle means a commercial vehicle which belongs to category N1, having a length not exceeding 5.0 metres.***
Justification: A dedicated small commercial vehicle subcategory will help alleviate the burden on SMEs that have to bear the high costs of small vans. Its independence from powertrain technology will allow vehicle architectures with multiple powertrain options to meet consistent regulatory requirements. ACEA must also highlight that it stands by its original position to limit the length of M1E passenger vehicles to 4.35 metres, a length that would increase affordability for a more meaningful number of small car buyers and support the industry's efforts to lower CO2 emissions.	

Regulatory pause

Regulation (EU) 2025/0422 (COD), Annex II	
Article 1	*Amendment*
(1) in Annex I, Part A, the following point 2.4 is inserted after point 2.3.1.: '2.4. Small electric vehicle: 2.4.1. Small electric vehicle means a pure electric vehicle that belongs to category M1, having a length not exceeding 4.2 metres. For this subcategory of vehicles, the letter 'E' shall be added as suffix to letter and numeral identifying the vehicle category (M1).'.	(1) in Annex I, Part A, the following point 2.4 is inserted after point 2.3.1.: '2.4. Small electric vehicle: 2.4.1. Small electric vehicle means a pure electric vehicle that belongs to category M1, having a length not exceeding 4.2 metres. For this subcategory of vehicles, the letter 'E' shall be added as suffix to letter and numeral identifying the vehicle category (M1). ***2.4.2 Until 1 January 2036, new and existing vehicle types in the subcategory shall comply with the type approval requirements defined in this Regulation applicable on 31 December 2025. Additions to the provisions of Annex II applicable from 1 January 2026 or later shall not be mandatory for the type approval of whole vehicles in the subcategory.***
Justification: By enshrining in law the Commission's commitment to a regulatory freeze, we create certainty that will help manufacturers plan for and invest in the development of small vehicles. The single most influential factor behind the current lack of profitability of small passenger vehicles is the continued proliferation of regulatory mandates for complex and expensive vehicle systems. A regulatory pause will facilitate long-term planning and encourage a resurgence of the category.	

Smart Charging

Regulation (EU) 2025/0422 (COD), Article 2	
Article 2	*Amendment*
Regulation (EU) 2018/858 is amended as follows: (1) in Article 5, the following paragraph 4 is inserted: '4. The Commission is empowered to adopt delegated acts in accordance with Article 82 supplementing this Regulation by laying down technical requirements as regards the communication and hardware interface of pure electric vehicles (PEV) and offvehicle 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.' (2) Annexes I and II are amended in accordance with Annex II to this Regulation.	Regulation (EU) 2018/858 is amended as follows: (1) in Article 5, the following paragraph 4 is inserted: '4. The Commission is empowered to adopt **implementing** acts in accordance with Article 82 supplementing this Regulation by laying down, where appropriate, technical requirements **relating to communication and hardware interface with regard to EU harmonized grid connection network 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.** (2) Annexes I and II are amended in accordance with Annex II to this Regulation.
Justification: The communication and physical interconnection of pure electric vehicles (PEV) and off-vehicle charging hybrid electric vehicles (OVC-HEV) with the charging 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 network 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, network code compliance would be verified during vehicle type approval, indirectly ensuring ISO 15118_20 compatibility and offering a pragmatic, balanced compromise between regulatory objectives and technical feasibility for manufacturers.	

ABOUT THE EU AUTOMOBILE INDUSTRY

- 13.6 million Europeans work in the auto industry (directly and indirectly), accounting for 6.9% of all EU jobs
- 8.1% of EU manufacturing jobs – some 2.5 million – are in the automotive sector
- Motor vehicles are responsible for €414.7 billion of tax revenue for governments across key European markets
- The automobile industry generates a trade surplus of €93.9 billion for the European Union
- The turnover generated by the auto industry represents over 8% of the EU's GDP
- Investing €84.6 billion in R&D per year, automotive is Europe's largest private contributor to innovation, accounting for 34% of the EU total

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