



Opinion of the European Economic and Social Committee

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

(COM(2025) 999 final – 2025/0424 (COD))

(C/2026/3241)

Rapporteur: **Miroslav HAJNOŠ**

Legislative procedure	EU Law Tracker: 2025/0424 (COD)
Referral	European Parliament, 12.1.2026 Council of the European Union, 11.2.2026
Legal basis	Article 91(1) and 304 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2025) 999 final Summary of COM(2025) 999
Relevant Sustainable Development Goals (SDGs)	SDG 11 – Sustainable cities and communities SDG 13 – Climate action
Section responsible	Transport, Energy, Infrastructure and the Information Society
Adopted in section	9.3.2026
Adopted at plenary session	18.3.2026
Plenary session No	604
Outcome of vote (for/against/abstentions)	205/1/3

1. RECOMMENDATIONS

THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE (EESC)

1.1. **takes note** of the Commission proposal to amend Directive 92/6/EEC ⁽¹⁾ in order to exempt certain N2 electric vehicles (e-vans between 3,5 and 4,25 tonnes) from the obligation to install and use speed limitation devices.

1.2. **recognises** that certain regulatory barriers may unintentionally hinder the uptake of light electric commercial vehicles and slow down the transition towards zero-emission mobility; however, stresses that the proposed exemption should include clear safety requirements in order to avoid the risk of more road casualties.

1.3. **underlines, however**, that the objective of the proposed exemption is that it will reduce the administrative burden and costs for business within the framework of the Automotive Omnibus package ⁽²⁾. The EESC underlines that regulatory simplification should not come at the expense of established road safety standards or the protection of drivers and vulnerable road users, including cyclists and pedestrians.

⁽¹⁾ Council Directive 92/6/EEC of 10 February 1992 on the installation and use of speed limitation devices for certain categories of motor vehicles in the Community (OJ L 57, 2.3.1992, p. 27, ELI: <http://data.europa.eu/eli/dir/1992/6/oj>).

⁽²⁾ https://transport.ec.europa.eu/transport-themes/action-plan-future-automotive-sector/automotive-package_en.

1.4. **acknowledges** with interest the broader debate surrounding the implementation of the Automotive Omnibus package. The EESC emphasises that the consequences of the Omnibus deregulation packages (of which this exemption is a part) are meeting with considerable resistance from public organisations such as trade unions, environmental associations and road safety organisations.

1.5. **stresses** that the proposed initiative must remain fully consistent with the objectives of the EU common transport policy, and fit in with the road safety framework. The EESC points out that, in 2012, the Commission advocated fitting speed limiters to N1 vehicles, on the grounds that the speed and increasing weight of a vehicle are relevant to road safety. In the interests of technology-neutral and simple regulation, this position must be revisited ⁽³⁾. It is important not to undermine the objectives of road safety policy, which requires structural monitoring of the effects of this initiative, if it were to be accepted. We are in real danger of not reaching our EU 2030 road safety targets. ETSC tracks progress in an annual report – which last year showed ‘only’ a ‘-2 %’ reduction, the year before only ‘-1 %’ ⁽⁴⁾.

1.6. **emphasises** the importance of zero-emission commercial vehicles for achieving EU climate objectives, especially in urban distribution and service delivery.

1.7. **calls on the Commission** to keep the exemption, if accepted, conditional for the time being. The conditionality should be linked to an evaluation after a certain period of time. This evaluation should include the following elements:

- Evaluation of impact on road safety data.
- Measurable environmental impacts.
- Sales results of N2 e-vans from the exempted category.

This opinion complements EESC opinion on ‘Motor vehicles/Simplifying technical requirements and testing’ in that both relate to proposed amendments to Directive 92/6/EEC.

2. EXPLANATORY NOTES

Arguments in support of recommendation 1.1

2.1. Electric vans play an increasingly important role in urban logistics, last-mile delivery and regional service operations. However, due to the weight of battery systems, many electric vans exceed the 3,5-tonne threshold and are therefore classified as category N2 vehicles. The greater vehicle mass directly affects kinetic energy and stopping distance, which may result in higher collision severity, particularly in mixed urban traffic environments. Even where operational use resembles that of lighter N1 vehicles, these physical characteristics remain relevant for road safety assessment, and the EESC takes a cautious view of this proposed exemption.

Arguments in support of recommendation 1.2

2.2. According to the Commission, this classification in some cases results in **disproportionate administrative and financial burdens**, which could hinder the adoption of zero-emission vehicles. The simplification measures also aim to align regulatory conditions for electric vans with those applicable to comparable internal combustion vehicles, thereby ensuring a level playing field for operators and SMEs.

⁽³⁾ https://road-safety.transport.ec.europa.eu/eu-road-safety-policy_en.

⁽⁴⁾ <https://etsc.eu/19th-annual-road-safety-performance-index-pin-report/>.

- 2.3. The EESC recommends the following boundaries for this exemption, if accepted, for N2 electric vans:
- 100 % electric (not hybrid);
 - must remain fully subject to the existing EU type-approval and vehicle safety framework;
 - must be equipped with other safety systems such as Intelligent Speed Assistance (ISA) ⁽⁵⁾ and Advanced Driver Assistance Systems (ADAS) in line with requirements of the GSR 2019/2144.

Arguments in support of recommendation 1.3

2.4. Road safety organisations in particular have expressed concern that the consequences of this exemption for the safety of drivers and other vulnerable road users, such as cyclists and pedestrians, must be carefully considered. It requires a professional attitude on the part of drivers and the use of the aforementioned ISA and ADAS safety systems. Incidentally, even these systems cannot guarantee that the vehicle is completely safe. Speed limitation devices form part of a layered road safety framework, complementing vehicle safety technologies and driver responsibility. The possibility of removing this element should therefore be carefully evaluated within the broader safety architecture in order to avoid unintended systemic effects.

2.5. The EESC therefore advises the Commission to pay attention to the skills of professional drivers by means of specific safety awareness-raising efforts.

Arguments in support of recommendation 1.4

2.6. The Omnibus Packages include many deregulation measures that are not embraced with equal enthusiasm throughout European civil society. This has met with resistance from various interest groups. The safeguard in this proposal is part of such an Omnibus Package for the automotive industry. It is important to also take into account broader social resistance to the various Omnibus Packages from a wider perspective.

2.7. According to Commission estimates, the Automotive Omnibus package is expected to generate annual cost savings in excess of EUR 700 million for the industry, including savings linked to the removal of speed limiter requirements for certain e-vans. While these simplification measures aim to strengthen competitiveness and reduce administrative burdens, they should be carefully balanced against road safety objectives.

Arguments in support of recommendation 1.5

2.8. Monitoring road safety is crucial to achieving the objectives of the road safety regulation ⁽⁶⁾. The EESC supports the fact that the Commission has included in its proposal that drivers of exempt e-vans must be professional and experienced and to have the appropriate skills or be trained in them. All this is in accordance with the Driving Licence Directive (DLD 2006/126/EC) ⁽⁷⁾.

Arguments in support of recommendation 1.7

2.9. The EESC strongly recommends that the Commission introduce a review of this exemption if its amended proposal is accepted. This review could provide clarity on the intended effects of the measure. The aim is to create a level playing field for N2 electric vehicles weighing between 3,5 tonnes and 4,25 tonnes compared to lighter fossil fuel-powered vehicles, which fall into a different, more advantageous category (N1).

⁽⁵⁾ https://road-safety.transport.ec.europa.eu/eu-road-safety-policy/priorities/safe-road-use/safe-speed/archive/speeding/new-technologies-new-opportunities/intelligent-speed-adaptation-isa_en.

⁽⁶⁾ Regulation (EU) 2019/2144 of the European Parliament and of the Council of 27 November 2019 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/858 of the European Parliament and of the Council and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009 of the European Parliament and of the Council and Commission Regulations (EC) No 631/2009, (EU) No 406/2010, (EU) No 672/2010, (EU) No 1003/2010, (EU) No 1005/2010, (EU) No 1008/2010, (EU) No 1009/2010, (EU) No 19/2011, (EU) No 109/2011, (EU) No 458/2011, (EU) No 65/2012, (EU) No 130/2012, (EU) No 347/2012, (EU) No 351/2012, (EU) No 1230/2012 and (EU) 2015/166 (Text with EEA relevance) (OJ L 325, 16.12.2019, p. 1, ELI: <http://data.europa.eu/eli/reg/2019/2144/oj>).

⁽⁷⁾ Directive 2006/126/EC of the European Parliament and of the Council of 20 December 2006 on driving licences (OJ L 403, 30.12.2006, p. 18, ELI: <http://data.europa.eu/eli/dir/2006/126/oj>).

2.10. In addition, this evaluation could provide clarity on the environmental effects (lower emissions), the effects on road safety and the possible higher sales figures for N2 e-vans.

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1

linked to recommendation 1.1

Article 1 – Amendment to Directive 92/6/EEC

Text proposed by the European Commission	EESC amendment
Article 3(1) of Directive 92/6/EEC is replaced by the following: '1. Member States shall take the necessary measures to ensure that motor vehicles of categories N2 and N3, except those vehicles of category N2 propelled by means of electricity and with a maximum permissible mass between 3,5 and 4,25 tonnes , may be used on the road only if equipped with a speed limitation device set in such a way that their speed cannot exceed 90 kilometres per hour.'	Article 3(1) of Directive 92/6/EEC is replaced by the following: '1. Member States shall take the necessary measures to ensure that motor vehicles of categories N1 , N2 and N3 may be used on the road only if equipped with a speed limitation device set in such a way that their speed cannot exceed 90 kilometres per hour.'

Reason

Vehicles in category N1 are used not only for urban deliveries but also for cross-border transport within the internal market. Many of these vehicles are driven by bogus self-employed drivers who are exposed to relentless competition from platform work.

A speed limiter is a technical device that ensures that competitive advantages cannot be achieved through excessive speed, at the expense of road safety and the well-being of workers. A smart Regulation that creates a sustainable level playing field for freight transport must therefore apply to all delivery vehicles, regardless of their drive type.

Brussels, 18 March 2026.

The President
of the European Economic and Social Committee
Séamus BOLAND