



C/2026/3227

2.7.2026

Opinion of the European Economic and Social Committee

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

(COM(2025) 993 final – 2025/0422(COD))

(C/2026/3227)

Rapporteur-general: **David HAFNER**

Advisor	GREIL Franz (to the rapporteur-general)
Legislative procedure	EU Law Tracker
Referral	European Parliament, 19.1.2026 Council of the European Union, 27.3.2026
Legal basis	Articles 91 and 114 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2025) 993 final – 2025/0422 (COD) Summary of COM(2025) 993 final – 2025/0422 (COD)
Relevant Sustainable Development Goals (SDGs)	SDG 8 – Decent work and economic growth SDG 9 – Industry, innovation and infrastructure SDG 11 – Make cities and human settlements inclusive, safe, resilient and sustainable SDG 12 – Responsible consumption and production
Section responsible	Single Market, Production and Consumption
Adopted in section	11.2.2026
Adopted at plenary session	18.3.2026
Plenary session No	604
Outcome of vote (for/against/abstentions)	179/3/3

1. RECOMMENDATIONS

THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE (EESC):

1.1. stresses the strategic importance of the European automotive sector for industrial value chains, employment and innovation across the Union, and underlines in this context the importance of strengthening production capacities and technological leadership in Europe in line with the Union's *Made in Europe* industrial objectives;

1.2. underlines that regulatory simplification in the automotive sector must remain fully consistent with the Union's climate objectives and the agreed pathway to the decarbonisation of road transport and notes that electrification is currently the leading technological route for achieving emission reductions in the sector. However, differences in propulsion technology do not justify differentiated levels of safety, health protection or enforcement obligations;

1.3. in that context, expressly welcomes the Commission's stated commitment to deliver simplification and cost savings without undermining the protection of human health, the environment and the safety performance of vehicles, and stresses that this principle must guide the assessment of all proposed exemptions;

1.4. welcomes the creation of the new M1e subcategory for electric vehicles as an industrial policy measure supporting small vehicle production in Europe, and calls for a coherent approach in the treatment of light commercial vehicles (N1);

1.5. emphasises the central role of the digital tachograph in ensuring road safety, the well-being of employees and compliance with EU social legislation, including cabotage rules, and considers the statements in the proposal estimating administrative costs to be two to four hours per month to be factually unsubstantiated;

1.6. rejects the promotion of small, electrically powered commercial vehicles through exemptions from tachograph obligations and considers that such exemptions must be proportionate, clearly limited to vehicles used exclusively for internal company activities and not apply to vehicles engaged in the commercial carriage of goods on behalf of third parties;

1.7. calls on the EU legislator to clarify and align the legal framework governing tachograph obligations, including recent amendments extending tachograph requirements to certain vehicles between 2,5 and 3,5 tonnes used in cross-border commercial transport, and stresses that regulation in this area must remain sustainable and technology-neutral;

1.8. underlines the need for coherence across the automotive package, including related measures concerning speed limitation devices, and refers in this context to the Committee's opinion ⁽¹⁾ on the exemption for N2 electric vehicles from speed-limiter requirements;

1.9. welcomes the elements in the proposal aimed at improving interoperability between vehicles, charging infrastructure and the electricity grid, and calls for regulatory coherence between the type-approval framework, the Renewable Energy Directive III (RED III) ⁽²⁾ and the Battery Regulation ⁽³⁾ in order to allow smart and bidirectional charging functionalities (V2G) and improve network stability.

2. EXPLANATORY NOTES

Arguments in support of recommendation 1.4

2.1. The creation of the M1e subcategory can help strengthen European production of small electric vehicles and support employment in the automotive value chain. At the same time, a coherent regulatory approach is required for comparable vehicle categories, including light commercial vehicles (N1), in order to avoid fragmentation within the automotive package.

⁽¹⁾ EESC opinion on 'Exemption for N2 electric vehicles from speed-limiter requirements' (OJ C, C/2026/3241, 2.7.2026, ELI: <http://data.europa.eu/eli/C/2026/3241/oj>).

⁽²⁾ Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (OJ L 328, 21.12.2018, p. 82, ELI: <http://data.europa.eu/eli/dir/2018/2001/oj>).

⁽³⁾ Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC (OJ L 191, 28.7.2023, p. 1, ELI: <http://data.europa.eu/eli/reg/2023/1542/oj>).

Arguments in support of recommendation 1.5 and 1.6

2.2. Regulation (EC) No 561/2006 ⁽⁴⁾ and Regulation (EU) No 165/2014 ⁽⁵⁾ aim to improve the working conditions of drivers, enhance road safety and ensure a level playing field in the internal market and to protect law-abiding companies. The digital tachograph is the main enforcement instrument for monitoring compliance with driving and rest time rules and for verifying compliance with cabotage and social legislation in cross-border transport.

2.3. The Commission's assumption that the administrative burden linked to tachograph obligations amounts to approximately two to four hours per month requires careful scrutiny. This estimate does not reflect operational practice and therefore cannot serve as a sufficient justification for weakening enforcement obligations. In practice, it typically only takes a few minutes to download a driver card each time and this has to be done at intervals of up to 28 days in accordance with EU rules. The effective time required for data retrieval and archiving is therefore significantly lower than the assumptions used as a basis in the impact assessment. Moreover, the Commission's own staff working document ⁽⁶⁾ refers to an estimated time of approximately 50 minutes per month for tachograph operation, which further illustrates the inconsistency of assumptions regarding the higher administrative burden.

2.4. The Commission estimates cumulative compliance cost savings to be in the range of EUR 0,6 to 2,2 billion for the period 2027–2029. At the same time, the Commission has estimated the annual societal costs of road crashes in the Union to be approximately EUR 280 billion ⁽⁷⁾. In this context, even small negative effects on enforcement and fatigue-related safety may raise serious proportionality concerns.

2.5. Vehicles engaged in the commercial carriage of goods on behalf of third parties operate in sectors exposed to cross-border competitive pressure and therefore require effective and uniform monitoring. A distinction based on propulsion does not alter the operational characteristics of such vehicles in traffic and does not justify differentiated enforcement obligations. Exemptions must therefore be proportionate and strictly limited to vehicles used exclusively for internal company activities.

Arguments in support of recommendation 1.7

2.6. Recent amendments to the EU legal framework, in particular Regulation (EU) 2020/1054 ⁽⁸⁾, have extended tachograph requirements to certain vehicles between 2,5 and 3,5 tonnes when used in cross-border commercial transport. It is essential that the current proposal does not create inconsistencies or legal uncertainty within the existing enforcement framework. Clear alignment with the established *acquis* is necessary to safeguard road safety, ensure legal clarity for operators and control authorities and maintain fair competition in the internal market. Regulatory obligations in this area should remain technology-neutral and based on objective operational criteria rather than type of propulsion.

⁽⁴⁾ Regulation (EC) No 561/2006 of the European Parliament and of the Council of 15 March 2006 on the harmonisation of certain social legislation relating to road transport and amending Council Regulations (EEC) No 3821/85 and (EC) No 2135/98 and repealing Council Regulation (EEC) No 3820/85 (OJ L 102, 11.4.2006, p. 1, ELI: <http://data.europa.eu/eli/reg/2006/561/oj>).

⁽⁵⁾ Regulation (EU) No 165/2014 of the European Parliament and of the Council of 4 February 2014 on tachographs in road transport, repealing Council Regulation (EEC) No 3821/85 on recording equipment in road transport and amending Regulation (EC) No 561/2006 of the European Parliament and of the Council on the harmonisation of certain social legislation relating to road transport (OJ L 60, 28.2.2014, p. 1, ELI: <http://data.europa.eu/eli/reg/2014/165/oj>).

⁽⁶⁾ SWD(2025)1056 final.

⁽⁷⁾ SWD(2019) 283 final.

⁽⁸⁾ Regulation (EU) 2020/1054 of the European Parliament and of the Council of 15 July 2020 amending Regulation (EC) No 561/2006 as regards minimum requirements on maximum daily and weekly driving times, minimum breaks and daily and weekly rest periods and Regulation (EU) No 165/2014 as regards positioning by means of tachographs (OJ L 249, 31.7.2020, p. 1, ELI: <http://data.europa.eu/eli/reg/2020/1054/oj>).

Arguments in support of recommendation 1.8

2.7. Regulatory simplification within the automotive package should remain coherent across related road safety instruments. Exemptions affecting tachograph obligations should not create inconsistencies with other safety-related requirements, including measures concerning speed limitation devices. Consistency across instruments supports legal clarity and enforcement effectiveness.

Arguments in support of recommendation 1.9

2.8. Improving interoperability between vehicles, charging infrastructure and the electricity grid supports innovation, grid resilience and the integration of renewable energy sources. In order to allow smart and bidirectional charging functionalities (V2G), regulatory coherence between the type-approval framework, Directive (EU) 2018/2001 (RED III) and Regulation (EU) 2023/1542 (Battery Regulation) is necessary to avoid regulatory gaps and fragmentation.

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

Amendment 1

linked to recommendation 1.5

Text proposed by the European Commission	EESC amendment
Recital 7 To reduce unnecessary costs for vehicle manufacturers and operators, many of them being small and medium-sized companies, the requirement of tachograph installation for battery-electric light commercial vehicles with a weight below 4,25 tonnes should be removed.	Recital 7 To reduce unnecessary costs for vehicle manufacturers and operators, many of them being small and medium-sized companies, the requirement of tachograph installation for battery-electric light commercial vehicles with a weight below 4,25 tonnes that are not used for the commercial transport of goods on behalf of third parties should be removed.

Reason

To stipulate that tachographs should only be mandatory for vehicles and companies whose main business is the commercial transport of goods and passengers, such as freight and courier services. Vehicles belonging to companies that require tachographs for internal operations for other business purposes, such as tradesmen's vehicles, should be exempt from this requirement.

Amendment 2

linked to recommendation 1.6

Text proposed by the European Commission	EESC amendment
Recital 5 To improve the working conditions of drivers, road safety and fair competition, Regulations (EC) No 561/2006 and (EU) No 165/2014 of the European Parliament and of the Council[43] require the installation of a tachograph in goods vehicles with a weight above 3,5 tonnes. However, Article 3(2) of Regulation (EU) No 165/2014 allows	Recital 5 To improve the working conditions of drivers, road safety and fair competition, Regulations (EC) No 561/2006 and (EU) No 165/2014 of the European Parliament and of the Council[43] require the installation of a tachograph in goods vehicles with a weight above 3,5 tonnes and Regulation (EU) 2020/1054 requires this in vehicles

Text proposed by the European Commission	EESC amendment
Member States to exempt from that requirement the vehicles mentioned in Article 13(1) and (3) of Regulation (EC) No 561/2006.	between 2.5 and 3.5 tonnes when used for cross-border commercial goods transport. However, Article 3(2) of Regulation (EU) No 165/2014 allows Member States to exempt from that requirement the vehicles mentioned in Article 13(1) and (3) of Regulation (EC) No 561/2006.
[43] Regulation (EU) No 165/2014 [...].	[43] Regulation (EU) No 165/2014 [...].

Reason

In its recital, the Commission does not reflect the entire legal situation, as commercial vehicles under 3,5 tonnes in cross-border traffic will already require a tachograph from this year onwards. This serves to ensure compliance with driving and rest times and to monitor cabotage, in order to guarantee fair competition for law-abiding companies.

Amendment 3

linked to recommendation 1.9

Text proposed by the European Commission	EESC amendment
Recital 11	Recital 11
As battery electric vehicle's technology is evolving at a fast pace and the number of electric vehicles on the market is increasing, interoperability between vehicles, the charging infrastructure and the electricity grid is becoming increasingly critical.	As battery electric vehicles' technology is evolving at a fast pace and the number of electric vehicles on the market is increasing, interoperability between vehicles, the charging infrastructure and the electricity grid is becoming increasingly critical.
A harmonised approach to interoperability at Union level is essential to avoid fragmentation of certain technical requirements which are being developed outside of the vehicle type-approval framework, notably as regards the implementation of the revised Network Codes (a network code on demand connection established by Commission Regulation (EU) 2016/1388[48] and a network code on requirements for grid connection of generators established by Commission Regulation (EU) 2016/631[49]).	At the same time, the batteries in electric vehicles offer great potential for temporarily storing electricity from renewable energies through bidirectional charging when it is not needed by businesses and households.
Therefore, to ensure battery electric vehicle's harmonised capabilities and enable interoperable vehicle-to-grid services, vehicles will need to meet certain technical requirements. Therefore, to ensure interoperability between vehicles, the charging infrastructure and the electricity grid, the empowerment should be provided in Regulation (EU) 2018/858 for the Commission to set out technical	A harmonised approach to interoperability at Union level is essential to avoid fragmentation of certain technical requirements which are being developed outside of the vehicle type-approval framework, notably as regards the implementation of the revised Network Codes (a network code on demand connection established by Commission Regulation (EU) 2016/1388[48] and a network code on requirements for grid connection of generators established by Commission Regulation (EU) 2016/631[49]). For the purpose of bidirectional charging, Directive (EU) 2018/2001 (RED III) and Article 14 of Regulation (EU) 2023/1542 (Battery Regulation) require vehicles to record data that manufacturers have to make available.
	Therefore, to ensure battery electric vehicles' harmonised capabilities and enable interoperable vehicle-to-grid services, vehicles will need to meet certain technical requirements. Therefore, to ensure interoperability between vehicles, the charging infrastructure and the electricity grid, Regulation (EU) 2018/858 should empower the Commission to set out technical requirements as regards

Text proposed by the European Commission	EESC amendment
requirements as regards the communication and hardware interface 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.	the communication and hardware interface 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, while ensuring consistency with the requirements of RED III and the Battery Regulation.
[48] [...].	[48] [...].
[49] [...].	[49] [...].

Reason

This amendment is an initiative to encourage bidirectional charging in order to close the regulatory gap between type approval of electric vehicles and the requirements of the Battery Regulation ((EU) 2023/1542 (Article 14) and Directive (EU) 2018/2001 (RED III)), which require vehicles to record data that manufacturers have to make available. Currently, there is no technical requirement in the type-approval framework for vehicles to record and communicate such data.

Amendment 4

linked to recommendation 1.5

Text proposed by the European Commission	EESC amendment
<i>Article 1</i>	<i>Article 1</i>
Amendments to Regulation (EC) No 561/2006	Amendments to Regulation (EC) No 561/2006
Article 13(1) of Regulation (EC) No 561/2006 is modified as follows:	Article 13(1) of Regulation (EC) No 561/2006 is modified as follows:
(1) the following point (fa) is inserted:	(1) the following point (fa) is inserted:
‘(fa) vehicles used for the carriage of goods and propelled by means of electricity, the maximum permissible mass of which, including the mass of a trailer or semi-trailer, exceeds 3,5 tonnes but does not exceed 4,25 tonnes; ’;	‘(fa) vehicles used for the transport of goods within a radius of 100 km from the location of the company which are exclusively used for internal activities of the company and are powered by natural gas, liquefied petroleum gas or electricity and whose maximum permissible weight, including the weight of a trailer or semi-trailer, does not exceed 7,5 tonnes. Vehicles belonging to companies that are used exclusively for the commercial transport of goods on behalf of third parties are exempt from this provision; ’;

Reason

The amendment makes a clear distinction between vehicles for the carriage of goods. All transport vehicles carrying out transport on behalf of third parties must have a tachograph, regardless of their total weight. This is necessary because it is not possible to distinguish between national and cross-border transport, and distinguishing between a total weight of less than and more than 3,5 tonnes causes problems in practice. This ensures that cabotage regulations can be monitored and that fair competition is guaranteed for law-abiding companies. Companies that use vehicles exclusively for internal transport activities should continue to be exempted from the tachograph requirement by a Member State.

Amendment 5

linked to recommendation 1.9

Text proposed by the European Commission	EESC amendment
<i>Article 2</i> Amendments to Regulation (EU) 2018/858 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 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.’	<i>Article 2</i> Amendments to Regulation (EU) 2018/858 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 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. These legal acts also cover the technical requirements of Directive (EU) 2018/2001 (RED III) and Regulation (EU) 2023/1542 (Battery Regulation), which allow and support smart and bidirectional charging functions.’

Reason

See Amendment 3 to recital 11.

Brussels, 18 March 2026.

The President
of the European Economic and Social Committee
 Séamus BOLAND