



Simplification of technical requirements and testing procedures for motor vehicles (Automotive Omnibus)

COM (2025) 993

Executive Summary

On the content of the proposal:

This proposed regulation is part of the EU's Omnibus initiative. The aim is to reduce the administrative burden on businesses by implementing changes to existing EU regulations as a package. The proposal includes changes to the technical requirements for motor vehicles, which are intended to support the automotive industry, but which will also affect workers and consumers. For example, electric commercial vehicles with a gross vehicle weight of up to 4.5 tonnes are to be exempted from the requirement to have a control device to monitor driving and rest periods, as well as a speed limiter. Furthermore, EU type-approval legislation is to introduce a new subcategory, the 'small electric vehicle' (M1E), with a maximum length of 4.2 metres, which will be subject to 'Made in Europe' requirements. Simplifications are also planned for the charging of electric vehicles, as well as for emissions testing and noise measurement of engines.

Key points:

- Ensure mandatory installation of monitoring devices and speed limiters in commercial transport: There must be no simplification at the expense of road safety and the well-being of workers.
- Bidirectional charging of electric cars: Simplifications must ensure that the vehicle battery can be used as a mobile storage unit.
- Small electric vehicles: 'Made in Europe' rules must be designed to achieve their objectives.

AK's position

On the key provisions of the proposal:

Tachograph (amendment to (EU) 561/2006)

AK emphasises that the digital tachograph in commercial vehicles is the primary tool for ensuring compliance with driving and rest periods for professional drivers. It guarantees fair competition for companies that adhere to existing rules. This also applies to small commercial vehicles with a gross weight of 2.2 tonnes or more, which will require a digital tachograph for cross-border transport from 1 July 2026. It should be noted that precarious working conditions, with many bogus self-employed workers, are particularly prevalent among delivery drivers and courier and express services.

Against this backdrop, it is scandalous that the European Commission intends to create an exemption to promote the sale of electric commercial vehicles – at the expense of road safety and decent working conditions. AK also criticises specific claims made by the Commission. For example, the time a company needs to download data from a tachograph is said to be between two and four hours per month (COM(2025) 993, p. 10). It should be clarified here that reading a device takes a maximum of five minutes every 28 days, and a combined download every 90 days (mass storage and driver card) can be carried out in 20 minutes on a computer whilst doing other tasks.

From an industrial policy perspective, the Commission's proposal to allow Member States to exempt electrically powered commercial vehicles in category N1 with a gross vehicle weight between 3.5 and 4.5 tonnes from the tachograph requirement makes even less sense. In AK's view, the European automotive industry requires uniform conditions within the EU internal market in order to ramp up production of small electric commercial vehicles.

AK therefore calls on the Council and the European Parliament to establish a provision that is both practicable and socially sustainable, as well as propulsion-neutral. This should be formulated such

that Article 13(1)(f) of Regulation (EU) No 561/2006 stipulates that all commercial vehicles with a gross vehicle weight of 2.2 tonnes or more require a tachograph if they carry out commercial transport on behalf of third parties. However, in AK's view, an exemption from the tachograph requirement is possible for companies carrying out transport within their own business operations ('craftsmen's rule'). Similarly, the tachograph should not be made mandatory for motorhomes.

Speed limiters (amendment to (EU) 2019/2144)

The amendment proposed by the European Commission provides that electric commercial vehicles with a gross vehicle weight of less than 4.25 tonnes should also be exempt from the requirement to have a speed limiter. However, this approach to treating fossil-fuel and electric commercial vehicles in category N1 in the same way is equally misguided. Physically, impact energy is calculated as mass (vehicle weight) multiplied by the square of the speed. Speed limiters therefore significantly improve road safety and protect workers from penalties if they are pressured by companies to exceed speed limits due to time constraints. AK reminds the Commission that, in 2012, it actively advocated for a mandatory speed limiter requirement for these vehicles for good reasons. AK maintains that safety standards should not be compromised for the sake of a minor reduction in the burden on companies.

Practical simplifications for charging electric vehicles / bidirectional charging (amendment to (EU) 2018/858)

AK welcomes the objective of preparing electric vehicles for bidirectional charging and services such as 'vehicle-to-grid', as well as the Commission's corresponding mandate. Such services enable the vehicle battery to be used as storage for households and businesses, smoothing out peak loads and thereby stabilising the electricity grid. Unfortunately, workable solutions are still being hindered by conflicting EU regulations, such as (EU) 2018/2001 (RED III) and (EU) 2023/1542 (Battery Regulation), as well as a lack of provisions in

type-approval legislation that would oblige car manufacturers to provide for bidirectional charging functionality. In the interests of consumers, it goes without saying that warranty and liability provisions relating to vehicle batteries must be taken into account accordingly.

New sub-category 'small electric vehicle' (amendment to (EU) 2018/858)

AK welcomes the plan to introduce the new vehicle sub-category M1E in type-approval, with a maximum vehicle length of 4.2 metres and an electric motor. This is intended to create incentives, in line with the 'Made in Europe' principle, for the production of affordable A/B-class battery electric vehicles in Europe. Unfortunately, the Commission's proposal contains few concrete details. Subject to the final criteria in the 'Industrial Acceleration Act', it is worth mentioning that only small passenger cars should be covered by this 'Made in Europe' provision, but not small delivery vehicles in category N1. Furthermore, a 'small electric vehicle' should be defined not only by the parameter 'length of 4.2 metres', but also by width, height, kerb weight and consumption figures. If the Commission's proposal were to stand, for example, the average Golf model would not meet this criterion, whereas the Abarth 500e with 155 hp would.

Low-temperature testing (amendment to (EU) 2024/1257)

AK advocates retaining a separate low-temperature test on the test bench. A deletion, as proposed by the Commission, would make it impossible to measure carbon monoxide and hydrocarbons. Given that many European car manufacturers have still not been penalised by supervisory authorities and courts for using illegal defeat devices in the 'diesel scandal' more than ten years later, this would send an incomprehensible signal.



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About us

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