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Gómez-Acebo & Pombo

Newsletter

AUTOMOTIVE AND SUSTAINABLE MOBILITY

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Legislation

Spain

State Secretariat for Industry Decision, of 24 June 2025, publishing the Agreement with the Spanish Association of Car and Lorry Manufacturers for the implementation of Spain's 2030 Auto Project

The Decision publishes the Agreement of 20 June 2025 signed between the Central General Government, through the Ministry of Industry and Tourism (MINTUR), and the Spanish Association of Car and Lorry Manufacturers (ANFAC). This Agreement creates a framework for collaboration between both parties to engage in strategic reflection and prepare Spain's 2030 Auto Project. The process will include the production of a Strategy and Roadmap. Spain's Auto Project includes an analysis of the current automotive sector and the mobility market and a detailed analysis of Spain's industrial value chain, including the global positioning of the Spanish automotive industry.

***Sociedad Estatal de Promoción Industrial y Desarrollo Empresarial, Entidad Pública Empresarial* (State-Owned Industrial Promotion and Business Development Company, Public Corporation) Decision, of 29 September 2025, making a call for applications for grants for projects promoting the electric and connected vehicle value chain within the Recovery, Transformation and Resilience Plan in 2025**

The call for applications for grants aimed at promoting the electric and connected vehicle value chain, within the Strategic Project for Economic Recovery and Transformation in the electric and connected vehicle sector (PERTE VEC), was open between 14 and 24 October. The grants under the call amount to €400 million, of which €250 million will be awarded in the form of loans and €150 million in the form of subsidies. The loans will have an interest rate of 2.844% with a repayment and grace periods of 10 years and three years, respectively. The grants will be awarded per investment plan, which may consist of one or more projects, submitted in a single application per industrial establishment. Investment plans must be focused on one of the ECV value chain's aspects, such as original equipment manufacturing (OEM); industrial research, experimental development and innovation (R&D&I) in batteries or fuel cells, and other essential components adapted to ECVs.

Grantees may be companies with a distinct legal personality that meet the requirements set out in Article 7 of Order ICT/736/2023 of 5 July, and engaged in the, inter alia, manufacture of motor vehicles, manufacture of bodies for motor vehicles and trailers and semi-trailers; manufacture of spare parts and accessories for motor vehicles, motorcycles, or any other activity listed in Schedule I to the call for applications. The activities covered by the grants must be carried out in the national territory. The applicant is understood to be carrying out an industrial activity if it has done so in the last two years up to 24

October 2025 (application deadline) or if the shareholders and/or management team can prove this length of experience at a comparable industrial production level, pilot plant or experimental scale.

Opinion issued by the Transport and Sustainable Mobility Committee on the Sustainable Mobility Bill, approved at the Lower House Plenary Sitting on 8 October 2025

Opinion issued by the Transport and Sustainable Mobility Committee on the Sustainable Mobility Bill, approved at the Lower House Plenary Sitting on 8 October 2025 with 174 votes in favour, 170 against and 4 abstentions. The approval of this Bill is key to ensuring access to the Recovery, Transformation and Resilience Plan's European funds, which amount to nearly €10 billion. If approved by the Upper House in accordance with the terms of the Opinion, the Bill would be enacted on the day following its publication in the Official Journal of Spain.

Among other aspects, the Bill includes:

- Digitalisation as one of the guiding principles in the actions of public authorities, dedicating a chapter to it, together with the promotion of “open data” in the field of transport and mobility.
 - A commitment to promoting rail transport for passengers and goods (including the implementation of rail motorways and a system of discounts on rail charges to support the modal shift from road to rail transport) and the adoption of measures to reduce domestic flights when there is a train alternative of less than two and a half hours, “except in cases of connections to airports linking to international routes”.
 - Presentation of a Government study within 12 months of entry into force — which will include a consultation with the devolved regions — that will analyse the need to update Spain's Driver and Vehicle Licensing Agency's environmental labels to address deficiencies in terms of pollutants and include emissions as an additional criterion. In this regard, among other aspects, current zero labels include hybrid vehicles with an electric range of more than 40 km. By introducing additional criteria, the aim is to make the classification fairer and, for example, to require hybrids with an electric range of less than 90 km to have their label reviewed.
- In addition, among many other issues, this Bill creates, as a new feature, the obligation to draw up sustainable commuting plans for company and national public-sector body workplaces with more than 200 employees or 100 per shift (compared to 500 or 250, respectively, as set out in the text presented by the Government). This obligation must be fulfilled within 24 months of entry into force.
- Monitoring of the plans shall be carried out and reflected in a specific report. Failure to comply with the obligation to have a plan or to produce the monitoring report within the established deadlines “when this harms the mobility system” will constitute a minor breach, punishable with a fine of between €101 and €2,000. These plans must:
- Be negotiated with the statutory body of worker representatives (or, failing that, by an ad hoc joint consultative committee).
 - Take into account, among other things, the sustainable mobility plan of the local authority in whose territory the workplace is located.



- Include mobility solutions that prioritise active mobility and the mobility of persons with disabilities or reduced mobility; public transport; high-occupancy mobility that involves less occupation of public space; and, with regard to private vehicles, the promotion of low-emission technologies, among others.
- Include measures on training in mobility, road safety and accident prevention when commuting.

Obligated entities that have plans in place when the law comes into force or that adopt them will have a period of three months — from the date of entry into force or adoption, respectively — to communicate them to the competent authority designated by the relevant devolved region for their incorporation into the Integrated Mobility Data Space (EDIM), which will include a register of plans and their most relevant parameters and indicators, as determined.

The plan may also include, among other things, carbon footprint offsetting for polluting mobility that could not be tackled.

To prevent a sustainable commuting plan from resulting in greenwashing, it must reflect the reality of the entity. On the basis of our experience in sustainability, the definition of best practices and taking into account the IDAE (Spanish Institute for Energy Diversification and Saving) Guide, it is particularly important to carry out

a diagnosis of the company to understand its reality, including the mobility habits of its employees through specific surveys. Subsequently, the definition of objectives (specific, measurable, relevant and achievable within a given period of time) will be instrumental in avoiding these greenwashing risks. So too will be, among other things, the establishment of measures and indicators to measure the level of compliance with the objectives.

The Opinion approved at the plenary sitting also includes a (new) twenty-second additional provision whereby the Government must, within three months of enactment, implement by way of regulations a plan to renew the Spanish vehicle fleet, to encourage the purchase of new zero-emission or low-emission vehicles and the voluntary withdrawal of old vehicles. The implementing regulations will include as criteria for action a National Plan for the Renewal of the Spanish Vehicle Fleet, which will supplement the incentive plans for the purchase of electric vehicles; the withdrawal and replacement of older vehicles of all types; and support for the purchase of Euro 6d-compliant second-hand or used vehicles.

On 23 September, the Lower House's Transport and Sustainable Mobility Committee approved the Committee Working Paper on the Bill with 20 votes in favour, 17 against and no abstentions. The Bill was thus approved. We will closely monitor the progress of the Bill in the Upper House.

European Union

Commission Delegated Regulation (EU) 2025/1122 of 5 June 2025 amending Regulation (EU) 2019/2144 of the

European Parliament and of the Council to take into account regulatory developments concerning amendments

to UN Regulations Nos 25, 34, 79, 100, 117, 127 and 152, and the new UN Regulations Nos 167, 169 and 171 adopted by the World Forum for Harmonization of Vehicle Regulations of the United Nations Economic Commission for Europe

Since 1 September, Commission Delegated Regulation (EU) 2025/1122 has been in force, amending Annexes I and II to Regulation (EU) 2019/2144 of the European Parliament and of the Council (Regulation 2019/2144) to incorporate updates and adapt it to the provisions of UN Regulations adopted by the World Forum for Harmonization of Vehicle Regulations of the United Nations Economic Commission for Europe (UNECE) (WP.29).

Annex I to Regulation 2019/2144 includes a list of UN Regulations relating to type approvals. Annex II to Regulation 2019/2144 contains a list of requirements applicable to manufacturers and tyres.

Thus, the following are included in Annex I of Regulation 2019/2144, among others:

- The 02 series of amendments to UN Regulation No 152, which extends the provisions for the advanced emergency braking system to avoid or mitigate the severity of an impact with a pedestrian and a bicycle respectively (the original wording of Regulation No 152 covered collisions with a passenger car only).
- The 04 series of amendments to UN Regulation No 127, for the enlarged head impact zone to improve the pedestrian safety performance of motor vehicles in case of a collision.
- References to the new Regulations adopted by UNECE WP.29:

- UN Regulation No 167 — Uniform Provisions Concerning the Approval of Motor Vehicles with regard to their Direct Vision [2024/1065].
- UN Regulation No 169 — Uniform Provisions Concerning the Approval of Event Data Recorders (EDR) for Heavy-Duty Vehicles [2024/1218], and
- UN Regulation No 171 — Uniform provisions concerning the approval of vehicles with regards to Driver Control Assistance Systems [2024/2689]. In addition, reference to Regulation No. 171 is included in Annex II to Regulation 2019/2144 so that vehicles fitted with these systems comply with its provisions.

- The 04 series of amendments to UN Regulation No 117 concerning the approval of tyres with regard to their wet grip in worn state. The fitting on a vehicle in use of new tyres approved as complying with the 02 and 03 series of amendments to UN Regulation No 117 will be allowed until 6 January 2029.

Commission Recommendation (EU) 2025/1710 of 30 July 2025 on a voluntary sustainability reporting standard for small and medium-sized undertakings

The main objective of the voluntary standard set out in Annex I to the Recommendation is (i) to make it easier for non-listed SMEs and micro-undertakings to report sustainability information in response to information requests received from financial institutions, large companies and other stakeholders; (ii) to reduce the need to respond to separate requests for information from individual counterparties; and (iii) to facilitate access to sustainable finance and help SMEs to better understand and monitor

their own sustainability performance, thereby improving resilience and competitiveness¹. This Recommendation constitutes an “intermediary solution” until a voluntary standard based on the voluntary sustainability reporting standard for non-listed SMEs (VSME standard) developed by the European Financial Reporting Advisory Group (EFRAG) is adopted.

The Commission recommends that i) financial institutions, financial market participants, insurance undertakings, credit institutions and other undertakings seeking sustainability information from SMEs limit as far as possible their requests to the information contained in Annex I to the Recommendation, and (ii) non-listed SMEs and micro -undertakings that wish to voluntarily report sustainability information should do so in accordance with the VSME standard set out in Annex I. In addition, Annex II to the Recommendation provides practical guidance that SMEs and micro-undertakings may use when applying the standard set out in Annex I.

Commission Implementing Decisions (EU) 2025/792 of 24 April 2025 and 2025/1786 of 9 September 2025 on the publication of a list indicating certain CO₂ emissions values per manufacturer as well as average specific CO₂ emissions of all new heavy-duty vehicles registered in the Union pursuant to Regulation (EU) 2019/1242 of the European Parliament and of the Council for the reporting period of the years 2022 and 2023, respectively

The Commission Implementing Decisions report the average specific CO₂ emissions of all new heavy-duty vehicles registered in the Union

from all manufacturers in the reporting periods 2022 and 2023, which amount to 48.8 g/tkm and 46.7 g/tkm, respectively. These figures represent an improvement on the reporting period 2021, when emissions amounted to 52.3 g/tkm.

This value has been calculated by applying the formula of Annex I, point 2.7, to Regulation (EU) 2019/1242 of the European Parliament and of the Council of 20 June 2019 setting CO₂ emission performance standards for new heavy-duty vehicles and amending Regulations (EC) No 595/2009 and (EU) 2018/956 of the European Parliament and of the Council and Council Directive 96/53/EC (Regulation (EU) 2019/1242).

Regulation (EU) 2019/1242 defines the “reporting period” as “the period from 1 July of a given year to 30 June of the following year”. Under this Regulation, starting from 1 July 2020, “the Commission shall determine for each manufacturer the average specific CO₂ emissions in g/tkm for the preceding reporting period”.

Regulation (EU) 2019/1242 sets CO₂ emission performance standards and reporting obligations for those emissions and fuel consumption of new heavy-duty vehicles. The Regulation contains phased targets for reducing the average CO₂ emissions of the fleet, “other than special purpose vehicles, off-road vehicles and off-road special purpose vehicles”. Thus, CO₂ emissions must be reduced by 15% for the reporting period between 2025 and 2029 compared to the values of the reporting period of the year 2019.

On 9 September, the European Parliament adopted its negotiating position

¹ Communication from the Commission, recital 8.

on the Proposal for a Regulation of the European Parliament and of the Council on circularity requirements for vehicle design and on management of end-of-life vehicles, amending Regulations (EU) 2018/858 and 2019/1020 and repealing Directives 2000/53/EC and 2005/64/EC (COM(2023)0451 — C9-0308/2023 — 2023/0284(COD))

On 9 September, the European Parliament adopted its negotiating position on the proposed Regulation concerning circularity requirements for vehicle design and the management of end-of-life vehicles (ELVs), position with which it will enter into trilogue negotiations. If these negotiations reach a provisional agreement, it must be put to a vote in the relevant committees. If adopted, it will be resubmitted to the plenary for consideration.

As we reported in the Automotive and Sustainable Mobility Newsletter No. 26 (See the following [link](#)), the Commission's proposal includes, among others, buses and lorries within the scope of the future Regulation. The plenary of the European Parliament has endorsed this proposal. Thus, buses and lorries (and their trailers) will be subject to the requirements for the collection of end-of-life vehicles, their delivery

to authorised treatment facilities, and their decontamination. In addition, three years after the entry into force of the Regulation, the provisions on extended producer responsibility will apply to them, which must cover, among other things, the costs of collection and treatment at the end of the life of these vehicles.

The plenary also set a target of 20% (compared to 25% in the Commission's proposal) of recycled plastic content, by weight, in each new type of vehicle approved under Regulation (EU) 2018/858.

This target would start to apply six years after the entry into force of the Regulation. The target increases to 25% within 10 years of its entry into force, but is conditional on the availability and affordability of recycled plastic. In addition, this plastic must come from “post-consumer plastic waste streams attributed via a chain of custody in accordance with standard ISO 22095:2020” and 15% must consist of “plastics recycled from end-of-life vehicles in the vehicle type concerned”. The plenary has also stipulated that manufacturers may use pre-consumer waste to meet up to 50% of each of these plastic targets. If these terms are maintained, compliance will be a challenge for the sector in view of the limited supply of recycled plastics suitable for cars.

News

The EU plans to adopt a new regulation to stimulate demand for zero-emission corporate vehicles

The public consultation on the adoption of a new EU Regulation aimed at stimulating demand for zero-emission corporate vehicles was open from

25 July to 8 September. The initiative highlighted the need for rapid decarbonisation of road transport, as well as the need for manufacturers to ‘increase sales of zero-emission vehicles in order to remain competitive’. The initiative also seeks to increase the availability of these zero-emission vehicles on the second-hand market.

On 12 September, the third meeting of the Strategic Dialogue on the Future of the European Automotive Industry took place

On 12 September, the third Strategic Dialogue on the Future of the European Automotive Industry was held, launching new initiatives for the sector. The Commission and key industry representatives signed a Memorandum of Understanding on the sidelines of the Dialogue to promote synergies between different innovation and research programmes. This Memorandum brings together, among others, associations focused on zero-emission road transport, connected, cooperative and automated mobility, and battery value chain innovation. Innovation is one of the key areas of the Industrial Action Plan for the European Automotive Sector. The European Connected and Autonomous Vehicles Alliance (ECAVA) has also been launched to establish a shared industrial agenda, with its first meeting scheduled for the end of October.

As we reported in the Automotive and Sustainable Mobility Newsletter No. 27 (See the following [link](#)), the process of reviewing Regulation (EU) 2019/631, setting CO₂ emission performance standards for new passenger cars and for new light commercial vehicles (Regulation (EU) 2019/631), is underway, as envisaged by the Regulation for 2026. The European Commission proposed in the Industrial Action Plan for the European Automotive Sector to accelerate work on this review. The deadline for

submitting contributions to the public consultation launched on this topic was 10 October.

Review of the Car Labelling Directive: Directive 1999/94/EC relating to the availability of consumer information on fuel economy and CO₂ emissions in respect of the marketing of new passenger cars

From 7 July to 10 October, a consultation was launched on the review of the Car Labelling Directive (Directive 1999/94/ relating to the availability of consumer information on fuel economy and CO₂ emissions in respect of the marketing of new passenger cars). The current wording of the Directive states that its purpose is to ensure that this information is provided to consumers so that they can make an informed choice between new passenger cars offered for sale or lease. The review could lead to an extension of its scope. The EU's objective is to support the deployment of zero-emission vehicles. The initiative aims to review the content of the label to provide information on zero-emission vehicles. See our comments on this in the section on the Sustainable Mobility Bill [[link](#) to title above]). The questions in the public consultation focused on harmonisation; label information; means of information transfer and digital tools; and the extension of the scope of the Directive. Article 15(6) of Regulation 2019/631 provided for a review of this Directive to be carried out by 31 December 2024 at the latest.

