

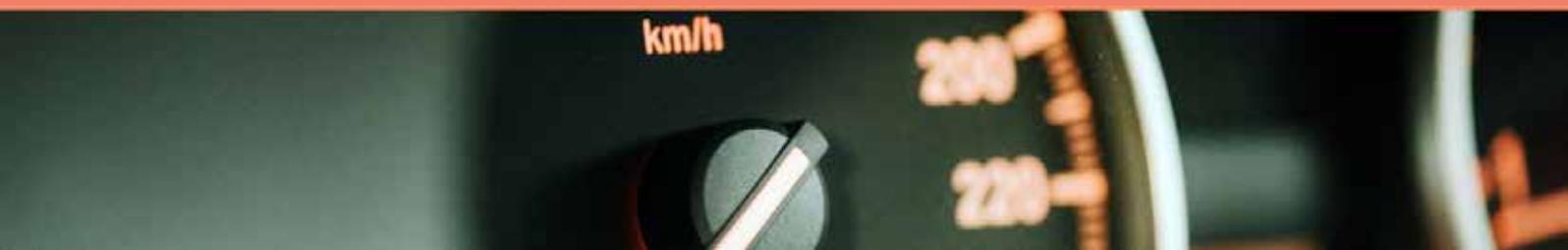
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Gómez-Acebo & Pombo

Newsletter

*AUTOMOTIVE
AND SUSTAINABLE
MOBILITY*

No. 29



Ainara Rentería Tazo

Director: Head of the Automotive and Sustainable Mobility Sector
Partner of Gómez-Acebo & Pombo Abogados

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Legislation

Spain

Decision of the Directorate-General for Legal Certainty and Certification, of 21 October 2025, approving the general-purpose template contracts for chattel referred to in Article 10(1) of the Ordinance on the Chattel Instalment Sale Registry, approved by Order of 19 July 1999, and authorising the Central Chattel Registry's digitalisation

This Decision, among other measures, updates and approves the official general-purpose template contracts for chattel (sale A-V.1; instalment sale A-V.2; mortgage F; capital lease with option to purchase L-1; and lease R) provided for in the Ordinance on the Chattel Instalment Sale Registry, and authorises the Central Chattel Registry to digitise the official general-purpose template contracts and their electronic completion. In addition, the electronic filing of official template-based contracts through the private electronic network of the Society of Registrars is included, and confidentiality and authenticity measures are approved to guarantee the security of the registry information.

Order ITU/1175/2025, of 23 October (BOE 25/10/2025), amending Order ITU/831/2024, of 2 August, laying down the conditions of aid for the development of highly efficient and decarbonised manufacturing facilities, as part of the PERTE for Industrial De-

carbonisation, within the framework of the Recovery, Transformation and Resilience Plan, and announcing aid for the year 2024

Order ITU/1175/2025, of 23 October, amends Order ITU/831/2024 to adapt the aid scheme for highly efficient and decarbonised manufacturing facilities of the PERTE for Industrial Decarbonisation to the PRTR framework and to the governance required for REPowerEU investments under Component 31.

Additional obligations are incorporated, including the following: promoting employment in Spain; contributing to the strategic and digital autonomy of the EU by prioritising EU-based suppliers for sensitive equipment, systems and software; and enhanced MRR compliance, including EU institution controls, audit trails and document retention, fraud and conflict of interest prevention, DNSH and climate and digital labelling.

Decision of the Directorate-General for Industrial Strategy and Small and Medium-sized Enterprises, of 3 November 2025, publishing the list of European standards that have been ratified during the month of October 2025 as Spanish standards

Among the European standards that have been granted the status of Spanish UNE standards

is UNE-EN 17184:2024/AC:2025 on Intelligent Transport Systems, eSafety and eCall High Level Application Protocols (HLAP) using IMS packet-switched networks.

Update on the explanatory note to Royal Decree 214/2025 creating the Carbon Footprint Register and publication of reduction plans

The explanatory note of December 2025 on Chapter IV of Royal Decree 214/2025, of 18 March, creating the carbon footprint register, clarifies Article 11 on the obligation to calculate the carbon footprint and draw up a reduction plan.

Firstly, it defines as obligors those companies subject to non-financial reporting in accordance with Article 49(5) of the Code of Commerce (CCom) and 262(5) of the Companies Act (LSC), which is currently applicable—according to Act 11/2018—to companies with more than 250 employees or that exceed the thresholds of €20 million in assets or €40 million in annual turnover for two financial years.

The obligation under Article 11 includes two elements: *a)* the annual calculation of the organisation's carbon footprint and *b)* the preparation of an emissions reduction plan.

The plan must contain a quantified target for a period of five years or more, measures to achieve it and alignment with the Paris Agreement and climate neutrality by 2050 (Regulation (EU) 2021/1119, referring the target to the total footprint—with the possibility of breaking it down by scope—). If a group already has a plan with a minimum five-year horizon in place, it may continue with it if it meets the requirements of Royal Decree 214/2025.

The deadline for the annual calculation of the carbon footprint and the emissions reduction plan is indicated as coinciding with the deadline established for the submission of the non-financial statement (EINF), six months after the end of the financial year.

Sustainable Mobility Act 9/2025 of 3 December

The Sustainable Mobility Act 9/2025 of 3 December (LMS) has been definitively approved and came into force on 4 December 2025, the day after its publication in the Official Journal of Spain.

This law is integrated into the European Green Deal and the Recovery, Transformation and Resilience Plan (PRTR), promoting multimodal, automated and less polluting transport. According to its explanatory notes, the LMS establishes the conditions for a sustainable, fair and inclusive mobility system, placing people at the centre, with objectives of social and territorial cohesion, efficiency and emission reduction, and providing authorities with instruments to plan and coordinate multimodal and digitised mobility policies. It recognises the right to sustainable mobility and establishes guiding principles such as safety, cohesion, energy efficiency, respect for the environment, transparency and participation.

This law creates the General System for Sustainable Mobility, along with the Territorial Forum for Sustainable Mobility, in which the general governments will participate together with the Higher Council for Sustainable Mobility, attached to the Ministry of Transport and Sustainable Mobility. This new system will have two tools: *a)* the Sustainable Mobility Guidance Document (DOMOS), which provides guidance, methodological recommendations and best

practice guidelines for the design, content, indicators and evaluation of plans, including areas such as active mobility, urban logistics, shared mobility and mobility impact assessment; and b) the Integrated Mobility Data Space (EDIM).

The State Strategic Mobility Planning Instrument (IPEEM) is created, integrated into the General Sustainable Mobility System, which coordinates the DOMOS and the EDIM. The Territorial Forum will issue a mandatory report on the IPEEM, ensuring consistency between strategic guidance, data and implementation. State infrastructure planning must comply with the IPEEM criteria and the assessment procedures established in Act 9/2025.

Likewise, the new regulation requires municipalities with more than 20,000 and less than 50,000 inhabitants to approve a simplified sustainable mobility plan within one year of its entry into force, with a review at least every six years, without prejudice to regional regulations. These plans must include measures on urban distribution of goods and cooperate with neighbouring municipalities to ensure uniform criteria, with a triennial follow-up report on the implementation and evaluation of measures.

On the other hand, the obligation to have plans for large centres of activity is established. The Ministry of Transport and Sustainable Mobility and the Ministry of Employment will establish, following a report from the Territorial Forum, the criteria for identifying large centres of activity that are required to have a plan, setting applicable quantifiable milestones. These centres must approve their plan within 18 months of the publication of the criteria, with a five-year review and the appointment of a mobility manager, and must coordinate with the applicable municipal plan. The EDIM will keep a specific record of these plans and their relevant indicators.

With regard to sustainable mobility plans for commuting to work (sustainable commute plans), within 24 months of entry into force, companies and public sector entities with workplaces of more than 200 workers or 100 per shift must have a commute plan, negotiated with the statutory body of worker representatives (or, if there is no such body, an ad hoc joint consultative committee). There are open calls for applications for state aid to encourage these plans in companies with workplaces with more than 100 workers or 50 per shift.

As for the penalty system, according to this law, providing false information to the EDIM, repeatedly failing to send mandatory data, and misusing personal data constitute, among other things, serious infringements punishable by fines of €2,001 to €6,000. and a minor infringement punishable by a fine of €101 to €2,000 for failure to comply with the obligation to have a commute plan and/or to prepare the follow-up report on time, when this causes harm to the mobility system, or for not sending or sending late the required data when this causes serious harm.

In addition, the new LMS regulates a controlled testing space (sandbox) for pilot mobility projects, promotes open data on services and infrastructure, the multimodal National Access Point and the multimodal digital ticket, and introduces energy optimisation obligations in terminals and facilities, reserved lanes, promotes electrification in ports and airports with objectives consistent with AFIR and FuelEU Maritime for the reduction of emissions, prioritises alternative fuels, green corridors and electricity supply to aircraft on the ground.

Sustainable Mobility Plans

With the entry into force of the Sustainable Mobility Act (see section on the Sustainable

Mobility Act 9/2025 of 3 December), the devolved regions are empowered to approve their transport and mobility planning instruments, which must be consistent with the DOMOS, while municipalities with between 20,000 and 50,000 inhabitants must approve a simplified mobility plan within one year of the entry into force of the LMS, with a review at least every six years. The Mobility Plans for Commuting to Work (commute plans) drawn up by companies that are obliged to do so must be coordinated with these regional and municipal plans.

In recent months, for example, the following sustainable mobility plans have been published:

- **Bay of Cadiz Metropolitan Transport Plan.** By Decision of 30 September 2025, the Bay of Cadiz Metropolitan Transport Plan (PTMBC) was adopted, following its approval by Decree 152/2025 of 24 September
- **Almería Area Metropolitan Transport Plan.** Decree no. 162/2025, of 28 October, approving the Almería Area Metropolitan Transport Plan (Sustainable Mobility Plan), has been published in the Official Journal of the Regional Government of Andalusia.
- **Córdoba Area Metropolitan Transport Plan,** published by Decree no. 204/2025 of 2 December.
- **Oviedo Sustainable Urban Mobility Plan 2026-2035** was finally approved on 2 December 2025.

Order TED/1477/2025, of 17 December, approving the conditions for the incentive programme for the installation of publicly accessible charging infrastructure for light electric vehicles

in Spain (MOVES Charging Corridors Programme), within the framework of the Recovery, Transformation and Resilience Plan, financed by the European Union -Next GenerationEU and Order TED/1478/2025, of 17 December, establishing the conditions for the incentive programme for light vehicle fleet electrification projects (MOVES Fleets Plus Programme), within the framework of the Recovery, Transformation and Resilience Plan, financed by the European Union-Next GenerationEU

Orders TED/1477/2025 and TED/1478/2025, of 17 December, establish the conditions for the *MOVES Charging Corridors* and *MOVES Fleets Plus* programmes, both funded by the European Union-NextGenerationEU. Their objectives include the decarbonisation of the economy through investment in green infrastructure, to transition from fossil fuels to a renewable energy system, minimising waste generation through the installation of publicly accessible charging infrastructure for light electric vehicles and their electrification, with the ecological transition being one of the four cross-cutting themes of the Plan.

Order TED/1477/2025 seeks to ensure full cross-border connectivity along major roads and allow electric vehicles to move throughout the European Union; and Order TED/1478/2025 seeks to improve the efficiency of the vehicle fleet through fleet renewal, particularly last-mile urban delivery fleets, with the gradual incorporation of electric vehicles and other technological advances.

In addition, the extracts from the Decisions of 18 December 2025 establish the first calls for the *MOVES Charging Corridors* and *MOVES Fleets Plus* programmes, through which incen-

tives will be granted for the installation of publicly accessible charging infrastructure for light electric vehicles and the electrification of these vehicles, both within the framework of the Recovery, Transformation and Resilience Plan (PRTR) and financed by the European Union-NextGenerationEU.

Applications for aid under these calls may be submitted from 30 December 2025 for the *MOVES Fleets Plus* programme and from 23 December 2025 for the *MOVES Charging Corridors* programme, both until 10 February 2026.

Order ITU/1521/2025, of 22 December, establishing the conditions for comprehensive aid for the decarbonisation of the manufacturing industry as part of the PERTE for industrial

decarbonisation within the framework of the Recovery, Transformation and Resilience Plan

One of the fundamental objectives is to harmonise the criteria that should guide the granting of public support for the promotion and general coordination of scientific and technical research in the industrial sector. For the effective application of these criteria, it is necessary to ensure equal opportunities in access to public resources intended to encourage such investments anywhere in the country. The aid provided for in this order will have a temporary scope in accordance with the applicable European legislation. Decisions to grant aid must be published and notified before 30 June 2026; and, in terms of geographical scope, the activities eligible for aid will cover the entire national territory.

European Union

Commission Implementing Regulation (EU) 2025/2146 of 22 October 2025 imposing a definitive anti-dumping duty on imports of bicycles originating in the People's Republic of China as extended to imports of bicycles consigned from Indonesia, Malaysia, Sri Lanka, Tunisia, Cambodia, Pakistan and the Philippines, whether declared as originating in these countries or not, following an expiry review pursuant to Article 11(2) of Regulation (EU) 2016/1036 of the European Parliament and of the Council C/2025/7012 OJ L, 2025/2146, 23.10.2025

Commission Implementing Regulation (EU) 2025/2146 maintains a definitive anti-dumping

duty on imports of non-motorised bicycles originating in China, extended to imports from Indonesia, Malaysia, Sri Lanka, Tunisia, Cambodia, Pakistan and the Philippines, following an expiry review pursuant to Article 11(2) of Regulation (EU) 2016/1036. The Commission concludes that dumping continued during the investigation period and that its expiry would likely lead to the continuation or recurrence of injury to the Union industry.

The product concerned comprises bicycles and other non-motorised cycles (including delivery tricycles, but excluding unicycles). The duty is extended to shipments from Indonesia, Malaysia, Sri Lanka, Tunisia, Cambodia, Pakistan and the Philippines, whether declared as originating in those countries or not, with lists of

exceptions by company in the operational annex to the Regulation itself.

The application of the individual duty rates specified for the companies mentioned in the Regulation and the exemptions from extensions of the measures after anti-circumvention investigations will be conditional upon the presentation to the Member States' customs authorities of a valid commercial invoice, on which shall appear a declaration dated and signed by an official of the entity issuing such invoice, identified by their name and function.

Commission Delegated Regulation (EU) 2025/1871 of 23 July 2025 amending Regulation (EU) 2015/758 of the European Parliament and of the Council as regards the standards relating to eCall and amending Delegated Regulation (EU) 2017/79 as regards the technical requirements and test procedures for approval of motor vehicles equipped with 112-based eCall in-vehicle systems C/2025/4852 OJ L, 2025/1871, 28.10.2025

Regulatory references to new versions of European eCall standards are updated and requirements are introduced to ensure the functioning of the system with back-up power supply and its verifiability during periodic roadworthiness tests.

It is considered necessary to lay down provisions allowing the extension of type-approvals granted before 1 January 2027 to 112-based eCall systems. From 1 January 2028, in the case of new vehicles type-approved after 31 March 2018 in accordance with Regulation (EU) 2015/758, which do not comply with the standards set out in Article 1, national authorities shall consider the certificates of conformity

to be no longer valid for the purposes of Article 48(1) of Regulation (EU) 2018/858, and national authorities shall refuse to grant new type approvals for those vehicles, systems or separate technical units that do not comply with the technical requirements to enable periodic roadworthiness tests in accordance with Annex VII to Delegated Regulation (EU) 2017/79.

Opinion of the European Economic and Social Committee — Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions — Industrial Action Plan for the European Automotive Sector

The European Economic and Social Committee (EESC) supports the ambition of the Commission's Action Plan to ensure a competitive and sustainable future for the automotive industry in Europe, acknowledging its strategic importance in terms of employment and industrial added value. It supports the climate objectives of the Green Deal and the transition to zero-emission mobility, making them conditional on robust social and economic measures that ensure a fair transition. The opinion calls for a comprehensive European strategy based on investment in skills, innovation, infrastructure and the circular economy, with a specific focus on SMEs. The EESC also believes that social dialogue and the active involvement of workers will be key to the success of the transformation process.

The EESC emphasises the need for a coordinated European industrial strategy to address the structural challenges facing the entire automotive supply chain. Among the recommendations made, it recommends speeding up the deployment of charging infrastructure for elec-

tric vehicles to prevent disparities in access to sustainable mobility.

The EESC proposes turning digitalisation into a competitive advantage for the European automotive industry through roadmaps and investment programmes, organising industrial collaboration (e.g. the proposed European Connected and Autonomous Vehicle Alliance), developing common computing platforms, AI solutions and the of standards and regulations for testing and deploying connected and autonomous vehicles. It also calls for the acceleration of an ‘Auto Data Act’ opening up access to in-vehicle data in a fair, secure and effective way and the deployment of critical digital infrastructure.

With regard to clean mobility, given that electric vehicles (EVs) accounted for 22,3 % of new car registrations in Europe in 2023 and given the barriers in terms of price, network and infrastructure, the EESC advocates financial and non-financial incentives to stimulate demand, solutions aimed at reducing the divide between citizens supported by the Social Climate Fund and the ETS2, and an affordable EU EV platform. It calls for scaling up the financing for recharging infrastructure, swift implementation of the Alternative Fuels Infrastructure Regulation, transparent tariffs and interoperability, and reinforcing of smart grids to mitigate the risk of overloading existing energy infrastructure. It proposes strengthening the circular economy (eco-design, recycling, lifecycle assessment), the “right to repair” and consumer information tools.

On the other hand, the Opinion warns that demand for workers will decline due to lower labour intensity and restructuring, while highlighting the shortage of workers with digital skills, but stresses that new jobs will be created in the electromobility value chain. It proposes anti-

cipating and managing change, establishing reskilling and upskilling programmes with a special focus on regions and SMEs, harmonising micro credentials and creating a SURE 2.0 fund to support furlough schemes to keep workers on board during periods of downtime.

Finally, to restore competitiveness, the EESC proposes making a robust use of trade defence instruments and strengthening regional industrial ecosystems for key technologies (e.g. batteries, chips, software, AI). It advocates adjusting energy costs, standardising hardware and software platforms and battery packs, attracting foreign direct investment conditional on technology transfer and integration into local value chains, and enhancing administrative efficiency and simplification with lead times for new regulations that are in line with the product cycle of new cars. It also proposes promoting exports and pursuing new trade agreements (e.g. Mercosur), reducing the cost gap with China, and supporting friend-shoring strategies for critical supply chains.

Commission Delegated Regulation (EU) 2025/1455 of 23 July 2025 amending Delegated Regulation (EU) No 44/2014 as regards laying down technical requirements and testing procedures regarding the protection of L-category vehicles against cyberattacks C/2025/4842 OJ L, 2025/1455, 29.10.2025

This Delegated Regulation incorporates into EU legislation the reference to UN Regulation No 155 on cyber security and cyber security management system.

Its scope covers categories L1e, L2e, L3e, L4e, L5e, L6e and L7e, with the exception of certain L1e category vehicles designed to pedal.

Thus, L-category vehicles must demonstrate compliance with the cybersecurity rules under UN Regulation No. 155 (including its cybersecurity management system) under the terms of the new Annex XVIII incorporated into Delegated Regulation (EU) No 44/2014, with the exception of excluded L1e category vehicles designed to pedal. The new Annex XVIII is incorporated with the “requirements applying to the protection of vehicles against cyberattacks”, which defines the concept of “type of vehicle with regard to cybersecurity” and requires that categories L1e—L7e (except L1e vehicles designed to pedal referred to in Article 3, point (94)(b), of Regulation (EU) No 168/2013, shall meet all the relevant requirements of UN regulation No 155.

Commission Delegated Regulation (EU) 2025/1535 of 29 July 2025 supplementing Regulation (EU) 2024/2847 of the European Parliament and of the Council with regard to an exclusion from the application of that Regulation for certain products with digital elements falling within the scope of Regulation (EU) No 168/2013 of the European Parliament and of the Council C/2025/5059 OJ L, 2025/1535, 29.10.2025

This Delegated Regulation establishes that products with digital elements falling within the scope of Regulation (EU) No 168/2013 are excluded from the application of the Cyber Resilience Regulation (Regulation (EU) 2024/2847).

However, L1e category vehicles designed to pedal (Article 3(94)(b) of Regulation (EU) No 168/2013) are exempt from this exclusion and remain subject to the Cyber Resilience Regulation.

Directive (EU) 2025/2205 of the European Parliament and of the Council of 22 October 2025 on driving licences, amending Regulation (EU) 2018/1724 of the European Parliament and of the Council and Directive (EU) 2022/2561 of the European Parliament and of the Council, and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012 PE/44/2025/INIT DO L, 2025/2205, 5.11.2025

This Directive updates the European driving licence framework to adapt it to “sustainable, inclusive, smart and resilient” mobility, including digitalisation, ecological transition and technological developments in transport.

The Directive replaces the previous framework (Directive 2006/126/EC) and repeals Regulation (EU) No 383/2012, establishing a renewed driving licence regime with an emphasis on road safety, reduced administrative burdens and improved interoperability between Member States. In particular, the Directive establishes a harmonised system comprising physical and digital (mobile) driving licences, with rules of equivalence between the two formats and without imposing one format as a prerequisite for obtaining the other. The mobile driving licence will become the default format, preserving the right of citizens to request the physical licence or both through a single application, and will be integrated into European digital identity wallets.

Member States must adopt and publish the transposition measures, in general, by 26 November 2028, applying them from 26 November 2029, but earlier specific deadlines are envisaged for certain obligations with adoption and application from 26 November 2027.



Council Decision (EU) 2025/2234 of 27 October 2025 on the position to be taken on behalf of the European Union in the 197th session of the World Forum for Harmonization of Vehicle Regulations of the United Nations Economic Commission for Europe ST/13746/2025/ADD/1 DO L, 2025/2234, 7.11.2025

Article 1 of this Decision establishes that the Union's position in WP.29 will be to vote in favour of the proposals listed in the Annex to the Decision itself. The Decision also authorises the Union's representatives to agree to "minor changes" to the draft decision without further decision of the Council.

The Annex includes, among others, proposals on: electromagnetic compatibility, safety-belts, devices for indirect vision, lighting and light-signalling devices, emissions, electric vehicles (UN Regulation No 100), hydrogen and fuel cell vehicles (UN Regulation No 134), WLTP (UN Regulation No 154), software updates (UN Regulation No 156) and driver control assistance systems (UN Regulation No 171, DCAS), as well as proposals on battery durability for electrified heavy-duty vehicles through a new UN global technical regulation (GTR).

Commission notice — Guidelines on the application of the EU general product safety legislative framework by businesses C/2025/7699 OJ C, C/2025/6233, 21.11.2025

On 21 November 2025, the European Commission issued a notice on guidelines for the application by businesses of Regulation (EU) 2023/988 on general product safety (GPSR), applicable from 13 December 2024, establishing a general framework to ensure that only

safe non-food consumer products are placed or made available in the EU.

The GPSR applies to products and sales channels (including online ones) unless specific sectoral rules exist, acting as a 'safety network' for risks not covered by Union harmonisation legislation. Exclusions include, among others, medicinal products, food, feed, certain transport equipment operated by a service provider, aircraft covered by Regulation (EU) 2018/1139 and antiques.

According to the Commission's notice, a product is safe if, under normal or reasonably foreseeable conditions of use (including the actual duration of use), it either does not present any risk or only presents the acceptable minimum risks compatible with the product's use, including risks to mental health and any environmental risk insofar as it entails a risk to the health and safety of consumers, thereby being consistent with a high level of protection of the health and safety of consumers.

The notice also sets out the different obligations in relation to the product of the manufacturer, importer, distributor, fulfilment service provider, responsible person in the EU and providers of online marketplaces.

With regard to possible accidents, when a dangerous product exists or an accident occurs that results in an individual's death or in serious adverse effects on that individual's health and safety, corrective measures must be taken immediately, consumers must be informed, and the authorities of the Member States concerned must be notified via the Safety Business Gateway, which links to the Safety Gate Rapid Alert System. The Safety Gate publishes alerts on dangerous products and contains a list of relevant contacts of market surveillance authorities.



REPORT FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT on progress towards implementing the European Declaration on cycling COM/2025/566 final

The European Declaration on Cycling is a joint political statement, signed by the European Parliament, the Council and the European Commission on 3 April 2024, which recognises cycling as one of the most sustainable, accessible and inclusive, low-cost and healthy forms of transport and recreation. The Declaration outlines eight principles and 36 political commitments to unlock the potential of cycling in the EU as a sustainable, accessible and inclusive mode of transport and leisure.

In urban planning, Regulation (EU) 2024/1679 requires 431 urban areas to adopt a Sustainable Urban Mobility Plan (SUMP) by 2025, including requirements to ensure continuity of cycle paths, secured bike parking facilities in the vicinity of railway stations and the development of multimodal connections by 2030.

In health and inclusion, EU4Health and Horizon Europe actions (2025 call) are activated and measures to increase the affordability of cycling (reduced VAT rates, purchase premium schemes and support from the Social Climate Fund) are recommended with national and local examples. Infrastructure priorities include cycle logistics, safe bicycle parking solutions, charging infrastructure in buildings and workplaces, infrastructure to transport bikes on trains and overall safety of the cycling infrastructure.

In multimodality, from June 2025, procurement procedures for new and major upgraded trains must include a requirement for at least four dedicated spaces for the carriage of assembled (not just folded) bicycles, with the possibility of

setting a higher minimum or exempting urban/suburban rail passenger services. In terms of data, the ‘Cycling Counts’ study identifies over 900,000 km of cycle paths and lanes network at EU level and calls for standardised metadata practices.

In short, according to the report, there has been greater progress in infrastructure, investment and policies, with challenges remaining in safety, theft, climate adaptation and systematic data gathering, and a call to take full advantage of EU funding, enabling “more sustainable, accessible, affordable, safer and healthier mobility, generating high added value for the EU and its economy”.

COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT pursuant to Article 294(6) of the Treaty on the Functioning of the European Union concerning the position of the Council on the adoption of a Directive amending Directive 2013/11/EU on alternative dispute resolution for consumer disputes, as well as Directives (EU) 2015/2302, (EU) 2019/2161 and (EU) 2020/1828, following the discontinuation of the European Online Dispute Resolution Platform

The aim of the Commission’s proposal is, among other things, to extend the material and geographical scope of the Directive, to incentivise traders to participate in alternative dispute resolution (ADR) by introducing an obligation to reply to ADR enquiries within a specific timeframe, to strengthen assistance to consumers in cross-border disputes by creating alternative dispute resolution contact points, to alleviate the administrative burden on the actors involved in the process and to make a digital information tool available to consumers.



The aim is to extend the material scope to cover contractual disputes linked to the pre-contractual phase, contracts for the supply of digital content and services, and contracts where the consumer does not pay a price, removing the extension to non-contractual obligations initially proposed. At the territorial level, traders from third countries are included when there is a joint request for the procedure by the trader and the consumer and the trader directs activities towards one or more Member States, with the possibility for Member States to impose additional conditions.

The Commission accepted the Council's position, emphasising that the revision will provide EU consumers with an out-of-court dispute resolution process adapted to the digital age and in line with the political agreements reached with the Parliament.

Proposal for a DECISION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Decision (EU) 2015/1814 as regards the market stability reserve for the buildings, road transport and additional sectors

On 27 November 2025, the European Commission presented a proposal for a Decision of the European Parliament and of the Council amending Decision (EU) 2015/1814 on the market stability reserve (MSR) applied to the emissions trading system for the buildings, road transport and additional sectors (ETS2).

The stated purpose of the MRV is to mitigate the risk of supply and demand imbalances associated with the start of the ETS2 and to make it more resistant to market shocks, avoiding undue price impacts and preserving the economic incentives to reduce emissions, with the aim of improving liquidity, reducing volatility and enhancing price predictability of initial price levels.

The proposal introduces three main changes: a) the clause whereby allowances not released from the market stability reserve (MSR) would no longer be valid on 31 December 2030 is removed, in order to improve long-term predictability; b) the "injection rate mechanism" is adjusted so that, if the total number of allowances in circulation (TNAC) is between 210 and 260 million, the release from the REM would be gradual, avoiding the "threshold effect"; and c) the excessive price control mechanism is strengthened by adding a top-up mechanism of 20 million allowances when Article 30h(2) of Directive 2003/87/EC is triggered (threshold of EUR 45 per tonne, applicable twice within a period of 12 months).

In the words of the European Parliament, strengthening the stability of the carbon market in ETS2, which covers road transport, pursues a more orderly and predictable price path for regulated agents and fuel consumers, which is key to planning decarbonisation investments and compensation measures in the mobility ecosystem.

Case law

European Union

Case T-1024/23: Judgment of the General Court of 3 September 2025 — London EV v Commission OJ C, C/2025/5328, 13.10.2025

On 3 September 2025, the General Court of the EU delivered its judgment in Case T-1024/23 (London EV Co. Ltd v Commission), answering the question of whether “special purpose” vehicles (including wheelchair accessible vehicles) fall within the scope of Regulation (EU) 2019/631 and, therefore, whether they can benefit from participation in the pooling mechanism provided for in Article 6. London EV Co. Ltd, a manufacturer of wheelchair-accessible electric taxis, sought the annulment of Commission Implementing Decision (EU) 2023/1623, specifying the values relating to the performance of manufacturers and pools of manufacturers of new passenger cars and new light commercial vehicles for the calendar year 2021 and the values to be used for the calculation of the specific emission targets from 2025 onwards. The Commission only considered one of the applicant’s vehicles to fall within the scope of Regulation (EU) 2019/631, excluding the others because they were registered as special purpose vehicles.

It considered that Article 2(3) provides that special purpose vehicles are excluded from the Regulation, so as not to increase the burden on manufacturers of wheelchair accessible vehicles. London EV Co. Ltd could not include its vehicles in the pooling mechanism provided for in Article 6, as this only applies to manufacturers subject to emission targets. Nor was

the principle of equal treatment breached, as special vehicles are in a different situation from those in category M1, nor was the principle of proportionality breached, and the Commission satisfied the obligation to state reasons, as the decision was based on the Regulation and on official data.

In its ruling, the Court dismissed the appeal in its entirety, confirming that wheelchair-accessible vehicles are special vehicles and are excluded from the CO₂ emissions scheme.

ENVIRONMENT. Waste. Court of Justice of the European Union, First Chamber, Judgment of 23 October 2025, C-221/24

The Judgment of the CJEU of 23 October 2025 (joined cases C-221/24 and C-222/24; ECLI:EU:C:2025:818), gives a preliminary ruling on questions referred by the Svea hovrätt (Land and Environment Court of Appeal, Stockholm, Sweden) concerning the interpretation of Article 24(2)(c) and (d) of Regulation (EC) No 1013/2006 on shipments of waste and its compatibility with the right to property in Article 17(1) of the Charter of Fundamental Rights of the EU.

The CJEU clarified that Article 24(2)(c) and (d) of Regulation 1013/2006 apply alternatively, with point (d) being applied where point (c) is not applicable. The Court interpreted that take-back under point (c) requires the competent authority of the country of dispatch, where it discovers a shipment which it considers to be illegal, to recover or dispose of the waste taken back following such a shipment. This obli-



gation responds to objectives of general interest recognised by the European Union and to the need to protect the rights and freedoms of others: to ensure environmentally sound management and to prevent further illegal shipments. Returning the waste to the owner without treatment would pose a risk to the environment and human health.

Finally, it is understood that the obligation laid down in point (c) does not breach the right to property in Article 17(1) of the Charter of Fundamental Rights of the EU, as it is an objective also pursued by the Charter, insofar as its exercise may be subject to “restrictions which are justified by objectives of general interest pursued by the Union”, stating further that “the protection of the environment and human health is one of the objectives of general interest capable of justifying restrictions that may be imposed on the right to property”.

BANKING. Bank credit. SALE AND PURCHASE. Special sales and purchases. Commercial in nature. Supply contract. CONSUMERS AND USERS. Court of Justice of the European Union, Fourth Chamber, Judgment of 30 October 2025, C-143/23

The CJEU, in its Judgment of 30 October 2025, has given a preliminary ruling on questions referred by the Landgericht Ravensburg (Regional Court, Ravensburg, Germany) in case C-143/23 (KI and FA v Mercedes-Benz Bank/Volkswagen Bank) concerning the right of withdrawal in the context of a credit agreement linked to a vehicle purchase agreement.

The CJEU considers that the 14-day withdrawal period does not begin to run until the credit

agreement does not specify, in the form of a specific percentage, the interest rate applicable in the event of late payment at the time of conclusion of the agreement, and that is the case until such time as that information has been duly communicated to the consumer. Article 14(1) of Directive 2008/48/EC on consumer credit agreements precludes the creditor from validly relying on the consumer’s improper exercise of the right of withdrawal on the basis of the latter’s conduct where the reference, in the form of a specific percentage, of the interest rate applicable in the event of late payment at the time of conclusion of that contract was not included in the credit agreement and was not duly communicated at a later date. Furthermore, the same article precludes national legislation under which compensation for loss of value is calculated by deducting from the sale price charged by the dealer at the time of the vehicle’s purchase by that consumer the purchase price paid by the dealer at the time of the return of that vehicle when the method of calculation includes factors unrelated to the consumer’s use of that vehicle (commercial margins, resale costs, VAT), as this makes the exercise of the right of withdrawal impossible or excessively difficult in practice.

On the other hand, according to the CJEU, Article 14(1) of Directive 2008/48 does not preclude national legislation under which a consumer who, after withdrawing from a consumer credit agreement linked to a vehicle purchase agreement, is required to pay the interest provided for in that first agreement for the period between the payment of the loan funds to the seller of the financed vehicle and the date of return of the vehicle to the creditor or seller.

Public consultation and availability for objection

Spain

State

Public hearing and availability for objection concerning the draft Royal Decree amending the General Vehicle Regulations, approved by Royal Decree 2822/1998 of 23 December, to create the Light Personal Vehicle Register. Draft Royal Decree establishing the Regulations on compulsory civil liability insurance for light personal vehicles

Between 25 November and 3 December, the period for public participation in the draft Royal Decree amending the General Vehicle Regulations, approved by Royal Decree 2822/1998 of 23 December, to create the Register of Light Personal Vehicles was open.

The aim of the draft Royal Decree is the compulsory registration and identification of personal mobility vehicles to reinforce road safety and ensure regulatory consistency between traffic rules and the compulsory insurance regime recently established by Act 5/2025 of 24 July, which has outlined compulsory insurance for

light personal vehicles and created compulsory insurance and a specific public register, which requires the alignment of the traffic, certification and insurance regimes to avoid regulatory asymmetries and road safety risks.

On the one hand, the current Vehicle Register is renamed the 'National Vehicle Register', reinforcing its role as an administrative tool for identifying vehicles that require authorisation to drive, recording their technical and safety characteristics, registering relevant incidents, verifying the validity of compulsory insurance and acting as a national exchange point with other Member States. On the other hand, the Personal Light Vehicle Register (VMP) is created as a special or ancillary register, in which the registration of VMPs will be mandatory and the vehicle must display an identification label with the assigned number, in accordance with a new Annex XIX that regulates the processing and physical identification.

Manufacturers, importers and representatives must therefore certify personal mobility vehicle models at designated laboratories, with electronic communication of technical data to the register; the Directorate-General for Traffic will

define the certification maintenance process by way of a decision. To register a VMP, an official application form, fee, owner identification and technical documentation (manufacturer's

summary sheet and laboratory certification) will be required, and a digital registration certificate will be issued by the Directorate-General for Traffic.

European Union

Legislative initiative on CO₂ transportation infrastructure and markets

On 6 October 2025, the consultation period opened for a legislative initiative aimed at ensuring the development of competitive markets and transportation infrastructure for CO₂, for which an impact assessment will be carried out. The aim is to develop an internal market for CO₂ with harmonised and coordinated approaches across Member States, with a robust European CO₂ transport infrastructure being key. The consultation period was open until 9 January 2026.

Advanced Materials Act

The consultation period for the proposed Advanced Materials Act was open from 21 October 2025. This Act will propose measures for strategic autonomy in relation to advanced materials, which will help to reduce dependence on critical resources and boost the EU's competitiveness. The aim is to offer innovative solutions for a more efficient, sustainable and competitive industry. The consultation period was open until 13 January 2026.

Collection of data on urban mobility per urban node

The Commission is expected to adopt an implementing act for the Trans-European Transport

Network (TEN-T) Regulation, which entered into force on 18 July 2024, in the first quarter of 2026. This Regulation requires EU countries to collect and submit to the Commission urban mobility data in the fields of sustainability, safety and accessibility, with the first submission scheduled for 31 December 2027.

Vehicle emissions and safety: updates to the type approval of complete vehicles

On 19 November 2025, the period for submitting comments on the initiative for a draft Delegated Regulation amending Annex II to Regulation (EU) 2018/858 to update the requirements for EU type-approval of complete vehicles to incorporate technical and regulatory developments in both the EU and the UNECE was opened. The deadline for submitting comments was 17 December 2025.

The draft aims to update the requirements applicable to EU type-approval for vehicles produced in unlimited series and to introduce adjustments for small series vehicles and special purpose vehicles, in order to align the type-approval framework of Regulation (EU) 2018/858 with *a*) the evolution of emission requirements (Euro 7) and *b*) new automation and driver assistance functionalities and technologies, as well as updating UNECE equivalences, introducing adaptation margins for small manufacturers and certain configurations.

News

Statement from the Spanish Data Protection Agency on the connected V16 beacon, the device that vehicles must carry from January 2026

On 20 November 2025, the Spanish Data Protection Agency (AEPD) issued a statement on the connected V16 beacon, a device that vehicles must carry from January 2026 onwards to signal breakdowns or emergencies on the road.

The AEPD states that the V16 beacon has a visible light and automatically sends a warning once activated, sending the location of the stopped vehicle and a technical identifier of the device (not associated with any person or registration number and without any record linking the device to the user's identity) to traffic systems.

The AEPD also points out that the purchase of the device does not require the provision of personal data to any government agency, so the DGT would not have any knowledge of who purchases it. The legislation also establishes that these devices are intended exclusively for the visibility of the vehicle and the transmission of the location of the incident, prohibiting additional functionalities. The mandatory use of the V16 beacon is set out in Royal Decree 159/2021, amended by Royal Decree 1030/2022.

UN Decade of Sustainable Transport: A global commitment to people-first mobility (10 December 2025)

On 10 December 2025, a meeting was held at the United Nations headquarters with the aim of launching the first Decade of Sustainable Transport 2026-2035 to transform how people move, how goods flow, and how societies connect.

The approach emphasises that accessibility, safety, efficiency and user-friendliness are everyday needs, especially in regions with disparities in development levels and different connectivity challenges across diverse geographies, and that improved connectivity is a lever for regional integration, intra-regional trade and economic strength, with priority attention to landlocked developing countries.

For UNECE, sustainable transport is not only about systems — it is about people.

The Implementation Plan sets out a shared vision and six priority areas - from universal access and decarbonisation to resilient infrastructure, efficient logistics, people-centred cities and innovation.

