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Newsletter

AUTOMOTIVE AND SUSTAINABLE MOBILITY

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CONTENTS

Legislation 4

- European Union 4

— Opinion of the European Economic and Social Committee on the Proposal for a Regulation 4

— Regulation (EU) 2026/1738 of the European Parliament and of the Council of 8 July 2026 4

— Commission Implementing Regulation (EU) 2026/1554 of 9 July 2026 5

— Opinion of the European Economic and Social Committee on the Proposal for a Regulation of the European Parliament 6

— Commission Regulation (EU) 2026/1791 of 23 July 2026 amending and correcting Regulation (EU) 2017/1151 6

— Commission Implementing Decision (EU) 2026/1907 of 29 July 2026 7

— UN Regulation No 100 7

— Commission Delegated Regulation (EU) 2026/1214 of 9 June 2026..... 7

— Commission Delegated Regulation (EU) 2026/1753 of 13 July 2026 8

— Proposal for a Council Recommendation on regulatory sandboxes to support innovation and a future-proof regulatory framework 8

- Spain 9

— Royal Decree 609/2026, of 22 July 9

— Royal Decree 611/2026, of 22 July..... 9

— Amendment to the Alcobendas City Council Mobility Ordinance 10

Case Law..... 11

- Spain 11

— Provincial Court of the Balearic Islands (Fifth Chamber) Judgment no. 483/2026 of 23 July..... 11

Public consultation 12

- European Union 12

— Chips Act 2.0 12

- News 12

— 2030 Commercial Vehicle and Bus Roadmap 12



LEGISLATION

EUROPEAN UNION

Opinion of the European Economic and Social Committee on the 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

The Opinion, published on 2 July 2026, in the Official Journal of the European Union ('OJEU'), analyses a European Commission proposal aimed at simplifying the technical requirements and type-approval procedures for vehicles without reducing safety, health, and environmental protection standards. The main recommendations of the European Economic and Social Committee (EESC) are to strengthen production capacities and technological leadership in Europe in line with the Union's industrial objectives, as well as to deliver simplification and cost savings without undermining the protection of human health, the environment and the safety performance of vehicles.

The EESC 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) to ensure that the sector's package of measures remains coherent. Finally, it highlights the potential of batteries to store renewable electricity through bidirectional charging.

Regulation (EU) 2026/1738 of the European Parliament and of the Council of 8 July 2026 on circularity requirements for vehicle design and on management of end-of-life vehicles

The Regulation, published on 24 July and with effect from 1 September 2028, establishes a European strategy to enhance the transition of the automotive industry to a circular economy, regulating both vehicle design and end-of-life management. It seeks to reduce the industry's negative environmental impact in order to reach the climate-neutrality goal by 2050.

The Regulation will apply to vehicles of categories M1 and N1, as well as those in categories M2, M3, N2, N3, and O at the end of their useful life, and to special-purpose vehicles during their useful life and at the end-of-life phase. Excluded are, among others, vehicles produced in small series, L-category vehicles, vehicles designed and constructed for use by the armed services, civil defence, fire services, forces responsible for maintaining public order and emergency medical services, as well as vehicles of historical and special cultural interest.

Among the key new design requirements, every vehicle of a type approved on or after 1 September 2032, must be reusable or recyclable to a minimum of 85 % by mass and reusable or recoverable to a minimum of 95 % by mass. As from that same date, the plastic contained in new vehicle types must contain a minimum of 15% plastic recycled by weight from post-consumer plastic waste, rising to 25% as from 2036; furthermore, at least 20% of that target must come from end-of-life vehicles. The Commission must set the minimum percentages for recycled steel and aluminium by 30 September 2028. Furthermore, it is provided that, from 1 September 2032, each vehicle placed on the market shall have a Digital Circularity Vehicle Passport.

Furthermore, the Regulation stipulates that, as from 1 September 2029, manufacturers must prepare a circularity strategy and update it every five years, and provide waste management operators, publishers of technical information and repair and maintenance operators with standardised and non-discriminatory access to information enabling the removal, replacement, repair, and reuse of certain parts and components, including batteries. Furthermore, as from that same date, producers shall have extended producer responsibility for the vehicles that they make available on the market for the first time within the territory of a Member State, including covering the costs of their collection and depollution.

Finally, Delivery of an end-of-life vehicle to an authorised treatment facility or a collection point shall be free of charge for the last owner of a vehicle unless the end-of-life vehicle lacks any of the essential vehicle parts. Thus, reuse and recovery targets of 95% and reuse and recycling targets of 85% are set starting in 2030, while a plastic recycling target of 30% is added starting in 2032. In addition, binding criteria are established to distinguish between a used vehicle and an end-of-life vehicle. As from 1 September 2031, only used vehicles that are not end-of-life vehicles and that are roadworthy at the date of lodging the export declaration may be exported, unless have been recognised as vehicles of special cultural interest.

Overall, the new regulation establishes a framework covering the entire vehicle life cycle — from design and manufacturing to final treatment as waste — with the aim of promoting the reuse of components, increasing recycling and reducing the consumption of raw materials.

Commission Implementing Regulation (EU) 2026/1554 of 9 July 2026 laying down rules for the application of Regulation (EU) 2024/1679 of the European Parliament and of the Council as regards the collection and submi-

ssion to the Commission of urban mobility data per urban node in the fields of sustainability, safety and accessibility

The Implementing Regulation, which entered into force on 30 July 2026, establishes the geographical coverage of the data that the Member States collect for each of their respective urban nodes within the trans-European transport network and sets the indicators to be used for collecting that data — such as urban mobility data — which Member States must submit every four years. The annex contains the list of urban mobility indicators and data collection methods, distinguishing between horizontal, sustainability, safety and accessibility aspects. Furthermore, Member States must establish the geographical coverage of each urban node on the basis of local administrative units.

Opinion of the European Economic and Social Committee on the Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2019/631 as regards CO_2 emission performance standards for new light duty vehicles and vehicle labelling and repealing Directive 1999/94/EC

On 22 July 2026, the EESC's Opinion on the Proposal for a Regulation analysing the revision of European CO_2 emission standards for passenger cars and light commercial vehicles was published in the OJEU. In its Opinion, the EESC supports the goal of road transport decarbonisation and the transition to zero-emission vehicles, but considers it necessary to adapt the regulation to safeguard competitiveness, employment and innovation in Europe.

The EESC welcomes the adoption of a technology-neutral approach. While it acknowledges the central role of electrification in the decarbonisation of road transport, it considers its impact to be limited, as the use of low-carbon steel credits and sustainable 'Made in the EU' renewable fuel credits can only offset up to 10% of the overall emissions reduction target. The Opinion also calls for the introduction of flexibility measures to meet the 2030 emissions targets.

Finally, several amendments to the European Commission's legislative proposal are proposed, such as bringing forward the recognition of credits for sustainable renewable fuels and low-carbon steel — provided they are made in the EU — from 2035 to 2030, and further strengthening the emissions calculation methodology.

Commission Regulation (EU) 2026/1791 of 23 July 2026 amending and correcting Regulation (EU) 2017/1151 as regards emission type-approval procedures for light passenger and commercial vehicles for end dates of Euro 6 vehicles and certain specific technical requirements

The Regulation, published on 24 July 2026, in the OJEU, amends and corrects Regulation (EU) 2017/1151 as regards emission type-approval procedures for light passenger and commercial vehicles. The Regulation align the Worldwide Harmonised Light-duty Vehicles Test Procedure methodology laid down in Regulation (EU) 2017/1151 with UN Regulation No 154 and No 168 regarding vehicles running on hydrogen, in particular regarding CO_2 emission measurement. In addition, it corrects certain technical errors and sets the dates of registration dates

applicable to various categories of Euro 6 vehicles.

Commission Implementing Decision (EU) 2026/1907 of 29 July 2026 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 2024

Published in the OJEU on 5 August 2026, the Implementing Decision specifies, for each manufacturer or pool of manufacturers, the values referring to the average specific emissions of CO_2 for new passenger cars and light commercial vehicles registered in the EU, as well as the specific emissions target they must meet, in accordance with Regulation (EU) 2019/631.

In Annexes I and II, the Decision sets the performance targets for manufacturers and pools of manufacturers of new passenger cars and new light commercial vehicles, respectively, for the calendar year 2024, including manufacturers that registered fewer than 1,000 vehicles, and analyses the total number of registrations, the average test mass, the average mass in running order, CO_2 savings from eco-innovations, average specific emissions of CO_2, specific emissions targets, the error margin, and the distance to target.

UN Regulation No 100 — Uniform provisions concerning the approval of vehicles with regard to specific requirements for the electric power train

The Regulation, published in the OJEU on 17 August 2026, establishes uniform provisions for the type-approval of vehicles with regard to the safety requirements of their electric power trains. Its scope of application covers vehicles in categories M, N, and O, as well as the safety of rechargeable electrical energy storage systems (REESS) and the installation of an approved REESS in the vehicle.

The Regulation sets out the safety requirements applicable to vehicles, particularly regarding protection against electric shock, protection against direct and indirect contact, insulation resistance, and protection against the water effects. It also regulates requirements concerning the installation of the RESS, warnings to the driver, the prevention of accidental or unintended vehicle movement, and the determination of hydrogen emissions during charging procedures. In addition, it establishes a set of REESS test procedures, including vibration, thermal shock, fire resistance, and thermal propagation, to ensure the safety of electric vehicles.

Commission Delegated Regulation (EU) 2026/1214 of 9 June 2026 amending Regulation (EU) 2024/1257 of the European Parliament and of the Council as regards conditions for testing compliance with brake particle emission limits

Published on 3 September 2026, the Delegated Regulation adopted by the European Commission has amended Regulation (EU) 2024/1257 as regards conditions for testing compliance with brake particle emission limits. The main change involves replacing, for light-duty vehicles in categories M1 and N1 and Euro 7ext vehicles, the reference to UN Global Technical Regulation No 24 with a reference to UN Regulation No 179 on the Laboratory Measurement of Brake Emissions for Light-Duty Vehicles.

Among other advances, it incorporates a more harmonised test environment, the testing of new technologies such as brakes equipped with passive or active emission-reduction filters, and the calculation of brake emissions for the entire vehicle. The amendment entered into force on 23 September 2026.

Commission Delegated Regulation (EU) 2026/1753 of 13 July 2026 amending Regulation (EU) 2018/858 on the updating of type-approval requirements regarding batteries, emissions, and performance of electric vehicles

The Regulation, published on 24 September 2026, amends Regulation (EU) 2018/858 to take into account regulatory and technological developments in the type-approval of Euro 7 vehicles, specifically regarding electric vehicle range in laboratory and power determination, as well as brake particle emission measurements and testing and in-vehicle battery minimum performance measurement and testing. It also incorporates technical requirements of on-board devices for the monitoring and recording of fuel and energy consumption and mileage of certain heavy-duty vehicles, and for determining and recording the payload or total weight thereof.

Furthermore, it is established that the requirements regarding low-temperature tests for electric vehicle (EV) range in labs, electrified vehicle system power determination, in-vehicle battery durability, and brake particle emissions shall apply to vehicles in categories M1 and N1 and to "Euro 7ext" vehicles. In addition, the list of UN Regulations recognised as equivalent for the purposes of EU type approval is updated, and specific Euro 7 requirements are established for the type-approval of special-purpose vehicles.

Proposal for a Council Recommendation on regulatory sandboxes to support innovation and a future-proof regulatory framework

On 9 September 2026, the European Commission presented the proposal for a Council Recommendation on common principles on regulatory sandboxes. Among the sectors where these sandboxes are already in use, the document cites mobility: the Industrial Action Plan for the European automotive sector addresses these to boost the commercialisation of autonomous vehicles.

The objective of the proposed Council Recommendation is to contribute to an environment where innovation and regulation drive growth, competitiveness, and resilience across the EU, and it notes that a common understanding could facilitate the development of innovative solutions across the internal market and reduce regulatory barriers resulting from divergent national approaches to experimentation.

Among other issues, the proposal recommends that Member States specify the conditions under which experimentation is allowed — such as duration, risk assessment, and safeguards — and establish the conditions for participation, including eligibility criteria, liability for any damage caused to third parties, and intellectual property protection. In addition, it encourages the creation of cross-border regulatory sandboxes and provides for authorities to issue, upon request from a regulatory sandbox participant, an exit report with the aim of accelerating the conformity assessment, standardisation or national market approval of the innovations.

SPAIN

Royal Decree 609/2026, of 22 July, regulating the direct granting of subsidies for the purchase of electric and electrified vehicles (Auto+Programme)

The Royal Decree, which took effect on 24 July 2026, regulates the Auto+ Programme, a subsidy scheme designed to promote the purchase of electric and electrified vehicles in Spain. It was enacted in the context of European and national goals for the decarbonisation and electrification of the transportation sector.

The programme, in effect until 31 December 2030, incentivises the purchase in Spain of electric and electrified vehicles with a ZERO label and proposes a strategy based on three pillars: industrial, economic-social, and environmental. The subsidies are intended, on the one hand, for individuals who do not engage in economic activity, with a maximum of one vehicle per beneficiary, and, on the other hand, for natural and legal persons that engage in economic activity, with a maximum of ten vehicles per company and three per individual. Beneficiaries must retain ownership of the vehicle for at least two years and comply with various obligations.

The subsidy is calculated using a points system based on various criteria, including the type of electric vehicle, its price, and the country of origin of both the vehicle and its battery.

The deadline for submitting applications is 31 December 2026.

Royal Decree 611/2026, of 22 July, on promoting the decarbonisation of the transportation sector and the use of renewable fuels, amending various related royal decrees

The Royal Decree aims to promote the decarbonisation of transportation by increasing the use of renewable fuels and reducing greenhouse gas emissions, thereby incorporating the requirements of Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources.

Mandatory decarbonisation targets are established for the various modes of transportation, such as road, rail, and maritime transport, as well as sub-targets for the incorporation of renewable fuels, advanced biofuels, biogas, renewable fuels of non-biological origin, and advanced bio alcohols. Furthermore, the Royal Decree establishes the renewable electricity credit mechanism, governing its creation, the participating entities, and the requirements and conditions for issuing these credits. It also defines the sustainability criteria and greenhouse gas emission reduction criteria for biofuels, bioliquids, and biomass fuels, as well as the system for guarantees of origin for renewable gases.

The Royal Effect will take effect on 1 January 2027, with the exception of Chapter I of Title IV, concerning the sustainability and greenhouse gas emission reduction characteristics applicable to renewable fuels of non-biological origin, low-carbon fuels, and recycled carbon fuels; and Schedule I, which refers to the list of eligible feedstocks for the production of biogas for transportation and advanced biofuels, which entered into force on 24 July 2026.

Amendment to the Alcobendas City Council Mobility Ordinance

Published in the Official Journal of the Region of Madrid on 31 July 2026, the amendment to the Alcobendas Mobility Ordinance revises and updates the current text to bring it into line with current legislation, incorporating changes related to the Low-Emission Zone, the use of helmets, parking for motorcycles, bicycles, and personal mobility vehicles, charging of electric vehicles, reserved parking spaces, and parking permits for people with reduced mobility.

The Ordinance establishes the creation and management of the Low-Emission Zone within the municipality of Alcobendas, imposing restrictions on access, traffic, and parking to improve air quality and reduce gas emissions. It also regulates the conditions for the use and parking of bicycles, personal mobility devices, and other vehicles; parking spaces reserved for various uses; provisions for people with reduced mobility; as well as the penalty system and violations related to mobility, parking, and the use of municipal public spaces.



CASE LAW

SPAIN

Provincial Court of the Balearic Islands (Fifth Chamber) Judgment no. 483/2026 of 23 July

The Provincial Court of the Balearic Islands ruled on an appeal in a case concerning a vehicle financing contract in which, at first instance, the early termination clause had been held void.

The Court holds that this clause reproduces Article 10(2) of the Chattel Instalment Sale Act 28/1998 and is therefore exempt from the assessment of unfairness, pursuant to Article 1(2) of Directive 93/13/EEC, as it does not constitute an autonomous contractual provision but rather *"the mere incorporation of a statutory provision into the contract"*. This provision was interpreted in the Judgment of the Court of Justice of the European Union of 30 April 2014 (Case C-280/13, Barclays Bank), a legal principle that was adopted in the Judgment of the Supreme Court of 7 September 2015 (Supreme Court Judgment no. 3828/2015). The Provincial Court holds that the doctrine regarding mortgage loans does not apply to this special regime; therefore, it allows the appeal and orders the borrowers, jointly and severally, to pay 9,937.64 euros, plus the agreed-upon interest and the costs of the first instance trial.



PUBLIC CONSULTATION

EUROPEAN UNION

Chips Act 2.0

The Chips Act, in effect since September 2023, has driven significant investments and support measures for the European semiconductor sector. The review scheduled for 2026 (the Chips Act 2.0) aims to strengthen the EU's technological sovereignty and resilience by reducing its dependence on third countries for advanced chips. The initiative seeks to address the insufficient manufacturing capacity for cutting-edge semiconductors, strengthen European competitiveness in conventional chips, and improve understanding of supply chains. Additionally, the impact assessment will analyse various regulatory options to promote investment, innovation, job creation, and the development of a robust European industrial base. The initiative has been made available for public consultation to gather feedback from stakeholders on the review of the Chips Act.

NEWS

2030 Commercial Vehicle and Bus Roadmap

In September 2026, the Spanish Association of Automobile and Truck Manufacturers (ANFAC) published an update to its 2030 Commercial Vehicle and Bus Roadmap in response to the need to readjust the national strategy in a scenario where the decarbonisation targets set by the EU have begun to diverge from the operational and economic reality of the Spanish market.

According to the Roadmap, the transition will only be viable if three fundamental conditions are met: the availability of functional, affordable, reliable, and efficient vehicles; the availability of publicly accessible charging and refuelling infrastructure in sufficient quantity and quality; and, finally, a policy framework that facilitates the transition. For this reason, the Roadmap

expands upon the "España Auto 2030" Plan and proposes six lines of action: market stimulation, the development of publicly accessible charging infrastructure, the adaptation of European legislation, connectivity and automation, support for the manufacturing industry, and a coherent mobility model.

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