

Brussels, 30 September 2026

To: Permanent Representations of the EU-27

Members of the TRAN, ENVI and IMCO Committees of the European Parliament

**Joint letter on the Automotive Omnibus: Preserving simplification while accelerating Europe's transition to electric mobility**

Dear Colleagues of the Permanent Representations of the EU-27,

Dear Members of the TRAN, ENVI and IMCO Committees of the European Parliament,

We, the undersigned organisations representing Europe's electric mobility ecosystem, welcome the European Commission's efforts through the Automotive Omnibus to simplify the regulatory framework and strengthen the conditions for a competitive European automotive and mobility sector.

The Automotive Omnibus, if well designed, can strengthen the conditions for investment and innovation across the wider electric mobility value chain, from vehicles and charging infrastructure to energy systems and fleet operators.

Europe's transition to zero-emission mobility is a major industrial and economic opportunity. Capturing its full potential will depend on creating the right market conditions: making electric vehicles more affordable and widely available, accelerating the electrification of commercial fleets, ensuring that regulation remains credible and grounded in real-world evidence, and enabling electric vehicles to contribute to a more flexible and resilient energy system.

Against this background, we encourage policymakers to preserve the key elements of the Commission's proposal that can directly support these objectives, while maintaining its overall simplification approach. In particular, we call for action across four priorities:

1. **Preserve regulatory credibility and predictability:** Attempts to reverse the update of the utility factor for plug-in hybrid electric vehicles (PHEVs) through the Omnibus must be rejected. The upcoming update to the utility factor, based on real-world data collected through the Commission's On-Board Fuel Consumption Monitoring (OBFCM) framework, is an important step towards ensuring that regulatory requirements reflect how vehicles are actually used. We support maintaining the 2027 update, providing the regulatory certainty and level playing field needed to support investment, innovation and the continued development of the electric vehicle market.
2. **Increase affordability and consumer choice:** The proposed dedicated category for small electric vehicles can support the development and availability of a wider range of models, expanding access and sustaining market growth across Europe. We therefore support retaining a simple, yet restrictive framework to actually stimulate the availability of small and affordable electric vehicles placed on the market, avoiding any criteria that would expand the purpose beyond its original aim to democratise battery electric vehicles (BEVs).
3. **Provide a level playing field for battery-electric vans:** Commercial fleets can play a central role in scaling zero-emission mobility, while providing businesses with

opportunities to reduce operating costs and improve energy efficiency. The Automotive Omnibus should support the continued deployment of electric vans by providing a regulatory framework that reflects the specific characteristics of battery-electric vehicles. In this context, we support retaining the proposed 4.25-tonne derogation for battery-electric N2 vehicles, which recognises the additional weight of electric powertrains and helps maintain a level playing field.

4. Establish a clear and harmonised framework for V2G-ready vehicles: Vehicle-to-grid (V2G) technology can enable electric vehicles to provide flexibility to Europe's electricity system and make better use of the growing number of batteries connected to the grid. The Automotive Omnibus should maintain the empowerment for the Commission to establish a harmonised EU type-approval framework for V2G-ready vehicles, ensuring interoperability with recharging infrastructure through common communication protocols and harmonised compliance verification. The framework should focus on vehicle technical readiness and interoperability, without extending into electricity-market regulation or grid operation. Participation in V2G services should remain voluntary for vehicle owners.

These measures would help ensure that simplification and electrification reinforce one another. They would provide businesses across the electric mobility value chain with greater certainty to invest and create the conditions for electric vehicles to become an increasingly integrated part of Europe's energy system.

We therefore encourage the European Parliament and Member States to build on the Commission's proposal by maintaining and strengthening these elements as the Automotive Omnibus progresses. A coherent approach can provide the investment certainty needed to scale electric mobility, strengthen Europe's industrial competitiveness and reduce dependence on imported fossil fuels, thereby strengthening its energy security and resilience.

Europe's competitiveness and its transition to zero-emission mobility are not competing objectives. With the right regulatory framework, they can and should reinforce one another. The Automotive Omnibus is an opportunity to create the conditions for Europe to lead in the transition to electric mobility.

Yours sincerely,

*The undersigned organisations*

