

To: Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy
Teresa Ribera, Executive Vice-President for a Clean, Just and Competitive Transition,
Commissioner for Competition
Apostolos Tzitzikostas, European Commissioner for Sustainable Transport and Tourism
Wopke Hoekstra, European Commissioner for Climate, Net Zero and Clean Growth
Jessika Roswall, European Commissioner for Environment

CC: Kristian Schmidt, EU Road Safety Coordinator
Claire Depré, Head of Unit Road Safety, DG MOVE
Mark Nicklas, Head of Unit Mobility, DG GROW

27 November 2025

Upcoming Automotive Omnibus Package, 10 December: promoting smaller, cleaner, affordable 'built-in-Europe' cars – but not at the expense of decades of progress in vehicle safety

Dear Executive Vice-Presidents Séjourné and Ribera,
Dear Commissioners Tzitzikostas, Hoekstra and Roswall,

We are writing to express our views on the creation of a new "M1e" or "M0" category of passenger vehicles, ahead of the expected EC launch on the 10th of December.

We recognise the potential value of a sub-category 'M1e' promoting smaller, lighter, fully electric vehicles, if it does not weaken safety.

We do not support however creating a new "M0" category of passenger vehicles at this stage because the market and safety implications of adding a class below the current passenger vehicle category are not yet well understood. A study for the European Commission on a potential new M0 category has not yet been published.

At present, the European Union is off track to meet its target to cut road deaths and serious injuries by half by 2030. Higher EU standards for new vehicles is one of the few tools the European Commission has to impact road safety directly.

The Small Affordable Cars Initiative must be governed by thresholds which ensure the car is actually small. In our view, a well-defined M1e category, with clear upper limits on mass (not more than 1.5t), length, width, as well as a defined safe bonnet height and a top speed limit of 120km/h, could encourage the development of compact but safe electric vehicles. Engineering vehicles to these specifications could provide ample scope for cost-savings.

We recognise that such a framework could also inspire smarter approaches, allowing cities and governments to incentivise smaller, safer and more sustainable vehicle designs more easily. A 'built-in-Europe' requirement could also ensure local production to supply this induced demand rather than just encouraging cheap imports from low-cost countries.

However, the signatories strongly warn against any move to strip out or freeze safety standards for this new category. The following principles must apply:

1. No dilution of existing EU vehicle safety rules. All technologies required under the General Safety Regulation (GSR 2) – such as advanced emergency braking, intelligent speed assistance, lane keeping, and occupant and pedestrian / cyclist protection requirements – must continue to apply in full.
2. No freeze on type-approval standards. Locking the EU into today's requirements would prevent adaptation to new technologies and hinder future improvements in safety and environmental performance.
3. Avoid consumer and market harm. Vehicles built to lower standards would perform poorly in independent consumer testing (e.g. Euro NCAP), damaging public confidence and the reputation of European manufacturers.
4. Protect EU innovation and suppliers. Weakening safety obligations would disadvantage Europe's high-tech safety systems industry – one of the continent's global strengths.

In conclusion, we support innovation that leads to the promotion of smaller, cleaner, affordable vehicles – but not at the expense of decades of progress in vehicle safety. We are counting on you to provide assurances that vehicle safety standards would not be undermined, today or in the future within the Small Affordable Cars Initiative.

Yours sincerely,

Antonio Avenoso
Executive Director, European Transport Safety Council

Laurianne Krid
CEO, European Cyclists' Federation

William Todts
Executive Director, Transport & Environment