

## **EXPLANATORY MEMORANDUM FOR EUROPEAN UNION LEGISLATION/DOCUMENTS WITHIN THE SCOPE OF THE UK/EU WITHDRAWAL AGREEMENT AND THE WINDSOR FRAMEWORK**

12207/25, C(2025)4842 final

12209/25, C(2025)4852 final

**COMMISSION DELEGATED REGULATION (EU) 2025/1455 of 23.7.2025 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**

**COMMISSION DELEGATED REGULATION (EU) 2025/1871 of 23.7.2025 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**

Submitted by the Department for Transport, 19 November 2025

### **SUBJECT MATTER**

#### Commission Delegated Regulation (EU) 2025/1455

1. The term ‘L-category vehicles’ covers a wide range of vehicle types with two, three and four wheels, e.g. two- and three-wheel mopeds, two- and three-wheel motorcycles, motorcycles with sidecars and quadricycles such as on-road quads or quadrimobiles.
2. The framework for regulating the approval of L-category vehicles is set out in Regulation (EU) No 168/2013 of the European Parliament and of the Council of 15 January 2013 on the approval and market surveillance of two- or three-wheel vehicles and quadricycles. The framework was amended by Regulation (EU) 2024/2847 (the “Cyber Resilience Act”) to introduce a new requirement to protect L-category vehicles against cyberattacks.
3. UN Regulation No 155 is an international regulation on cyber security for road vehicles. It sets requirements for manufacturers to assess and mitigate cyber security threats at an organisational level and throughout the vehicle design process by developing a cyber security management system, and was recently updated to include L-category vehicles.
4. Commission Delegated Regulation (EU) No 44/2014 supplements Regulation (EU) No 168/2013 by setting the technical requirements for L-category vehicle construction. The amendment made by Commission Delegated Regulation (EU) 2025/1455 is to clarify that the cyber security requirements referred to are those set by UN Regulation No 155.

#### Commission Delegated Regulation (EU) 2025/1871

5. An eCall system automatically contacts the emergency services in the event of a serious road accident. Regulation (EU) 2015/758 of the European Parliament and of the Council mandates fitting of eCall systems to cars and light duty commercial vehicles, with a phased implementation across new and existing vehicle types. The technical requirements for eCall systems were laid down in Commission Delegated Regulation (EU) 2017/79.

6. Regulation (EU) 2025/1871 amends Delegated Regulation (EU) 2017/79 to make the technical requirements and test procedures technology neutral, to improve the structure of the tests and to include additional test for the back-up power supply (if fitted) and the secondary vehicle power supply.

## **SCRUTINY HISTORY**

7. These delegated acts have not been subject previously to formal UK Parliamentary scrutiny procedures, though the underlying policy objectives and technical requirements have been scrutinised as part of the UK's domestic law-making process for vehicle type approvals.
8. The Department for Transport previously submitted Explanatory Memorandum 7055/24 on 24 April 2024 on Commission Delegated Regulation (EU) 2024/1180 of 14.2.2024 amending Regulation (EU) 2015/758 of the European Parliament and of the Council as regards the standards relating to eCall.
9. Regulation (EU) 2015/758 was subject to scrutiny by the Parliamentary Select Committees as EU proposal 12683/13, COM(13)316. A European Commission report about the Commission's use of delegated acts under this legislation was subject to scrutiny as EU document 10101/20, COM(20)359.

## **MINISTERIAL RESPONSIBILITY**

10. The Secretary of State for Transport has responsibility for vehicle type approval requirements.

## **INTEREST OF THE DEVOLVED GOVERNMENTS (DGs)**

11. Type approval is a reserved matter, but UKG will continue to discuss matters where relevant with each of the devolved administrations.

## **LEGAL AND PROCEDURAL ISSUES**

### **i) Application under the Windsor Framework:**

12. Commission Delegated Regulation (EU) 2025/1455 would apply to Northern Ireland under Article 13(3) of the Windsor Framework as it amends Delegated Regulation (EU) No 44/2014 which is a supplementary measure adopted under the same legal basis as Regulation (EU) No 168/2013, which is listed in Annex 2 of the Framework.
13. Commission Delegated Regulation (EU) 2025/1871 would apply to Northern Ireland under Article 13(3) of the Windsor Framework as it amends Regulation (EU) 2015/758, which is listed in Annex 2 of the Framework, and Regulation (EU) 2017/79, a supplementary measure adopted under the same legal basis of that act.

### **ii) EU Legal Base:**

#### Commission Delegated Regulation (EU) 2025/1455

14. Article 290 of the Treaty on the Functioning of the European Union, Article 18(3) of Regulation (EU) No 168/2013 of the European Parliament and of the Council of 15 January 2013 on the approval and market surveillance of two- or three-wheel vehicles and quadricycles.

#### Commission Delegated Regulation (EU) 2025/1871

15. Article 5(8) and (9) and Article 6(12) of Regulation (EU) 2015/758 of the European Parliament and of the Council.

#### **iii) Voting Procedure:**

16. The delegated regulations will enter into force if no objections are expressed by the Council or European Parliament within two months of notification or if, before the expiry of that period, the Council and European Parliament both inform the Commission that they will not object. That period can be extended by two months at the initiative of the Council or the European Parliament.

#### **iv) Timetable for adoption and implementation:**

17. Commission Delegated Regulation (EU) 2025/1455 entered into force on 18 November 2025.
18. Commission Delegated Regulation (EU) 2025/1871 entered into force on 17 November 2025.

### **POLICY AND LEGAL IMPLICATIONS**

19. As noted above, Regulation (EU) 2025/1455 and Regulation (EU) 2025/1871 would apply to Northern Ireland under Article 13(3) of the Windsor Framework as they amend or replace existing legislative acts listed in Annex 2 of that Framework or supplementary measures adopted under the same legal basis of those acts.
20. The proposals are not expected to produce regulatory divergence between Northern Ireland and Great Britain for the reasons explained below.
21. The new requirements will not affect unfettered access arrangements that allow for Qualifying Northern Ireland Goods to move freely from Northern Ireland into Great Britain.
22. The Government is not aware of any implications from these proposals with regards to Northern Ireland's participation in the UK's Free Trade Agreements or with its participation in UK Common Frameworks.
23. There are no legal implications arising from these proposals.

#### Commission Delegated Regulation (EU) 2025/1455

24. This EU proposal would amend Commission Delegated Regulation (EU) No 44/2014 which was made under the powers conferred upon the Commission in Regulation (EU) No 168/2013. Regulation (EU) No 168/2013 is listed in Annex 2 of the Windsor Framework and this proposal would therefore apply in Northern Ireland under Article 13(3) of the Windsor Framework.
25. The overall aim of this proposal is to put in place robust standards to mitigate and manage cyber security threats. As vehicle connectivity and automation increases, stringent regulation is required to protect against cyber-security threats.
26. In 2021, the UK and the EU signed up to UN Regulation No 155. Originally only passenger and commercial vehicles were in scope but it was subsequently expanded to include L-category vehicles, it therefore follows that these standards should be incorporated into the type-approval requirements for L-category vehicles.

27. Currently the GB interim approval scheme for L-category vehicles is dynamically aligned with EU requirements; as such the EU proposals are not expected to produce any regulatory divergence between Great Britain and Northern Ireland. The Department for Transport is developing proposals for a full approval scheme for L-category vehicles and expects to incorporate UN Regulation No 155 into the type approval requirements for Great Britain, subject to the outcome of a public consultation.
28. In addition, under the 1958 UNECE agreement, contracting parties are obligated to accept vehicles and components type approved against a UN regulation they have signed up to, even if issued by another contracting party, or if it is not yet mandated in domestic law. As a contracting party to that agreement, the UK already accepts passenger and commercial vehicles approved to UN Regulation No 155 onto our roads.

Commission Delegated Regulation (EU) 2025/1871

29. These proposals would amend Regulation (EU) 2015/758 which is in Annex 2 of the Windsor Framework. They would also amend Commission Delegated Regulation (EU) 2017/79 which supplements and was made under the powers conferred upon the Commission in Regulation (EU) 2015/758. Both of those regulations therefore apply in Northern Ireland under the Windsor Framework.
30. The proposals are intended to ensure the eCall requirements reflect the latest technological developments and provide a clearer, more effective testing framework. In response to the EU's proposals, the GB type approval framework for passenger and goods vehicles was recently amended with respect to eCall to prevent regulatory divergence between the GB and EU scheme, including by recognising EU component approvals. This EU regulation is therefore not expected to create any divergence between the type approval regimes in Great Britain and Northern Ireland.

## **CONSULTATION**

31. The Devolved Governments have been consulted during the production of this explanatory memorandum. The automotive industry and relevant experts were consulted by the Commission during the development of this proposal. The UK Government has held informal discussions with UK industry stakeholders as part of its assessment of potential amendments to the GB scheme.

## **FINANCIAL IMPLICATIONS**

32. These Regulations are not expected to have any financial implications for the United Kingdom.

A handwritten signature in blue ink, appearing to read 'Simon Lightwood', with a long horizontal flourish extending to the right.

Simon Lightwood MP  
Parliamentary Under-Secretary of State  
**Department for Transport**