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| **Clause**  **Paragraph** | **Page** | **Comment** | **Proposal** |
| Annex XX  Appendix I  Clause 5  First dash | Pg 115/140 (EN version)  Pg 121/149 (ES version) | Present text in Spanish:  *Obligatoriamente, mediante un indicador visible desde el exterior de la estación de carga y capaz de suministrar todos los datos legalmente relevantes de la transacción con caracteres de una altura mínima de 4 mm.*  Present text in English:  *Mandatorily, by means of an indicator visible from outside the charging station and capable of providing all the legally relevant transaction data in characters at least 4 mm high.*  Currently, there is no DC meter on the market that complies with the requirement that all legally relevant data of the transaction are shown on the display in characters at least 4 mm high.  This is a requirement that is not even included in the current MID Directive (see the requirement in section 10.2 of Annex I Essential Requirements):  *The indication of any result shall be clear and unambiguous and accompanied by such marks and inscriptions necessary to inform the user of the significance of the result. Easy reading of the presented result shall be permitted under normal conditions of use. Additional indications may be shown provided they cannot be confused with the metrologically controlled indications.*  Therefore, even in the case of AC charging stations using MID meters, it could happen that the meter does not comply with the new requirement of the ICT Order.  Therefore, we assess that the inclusion of this additional requirement to the European legislation may lead to two possible situations:   1. Manufacturers of charging points may only purchase meters, designed for the purpose, which display kWh at a size of 4mm or larger.   This in itself may constitute a barrier to the free movement of goods within the EU. See an example in the Annex of a meter with LME certificate from France and VDE-ER-E-2418-3-100 Eichrecht-2020 certificate from Germany, which would not comply with this requirement and therefore could not be installed in Spain.   1. Duplicate the values displayed on the meter screen and copy them to the charger screen, with the added effort of secure data encryption that this will entail.   This would also represent a barrier to the free movement of goods, as it is a technical requirement that would only apply in Spain.  Therefore, we consider that the requirement is unnecessary, contrary to the MID Directive and should therefore be amended to align the text with the MID requirement. | Proposal in Spanish:  Obligatoriamente, mediante un indicador visible desde el exterior de la estación de carga y capaz de suministrar todos los datos legalmente relevantes de la transacción ~~con caracteres de una altura mínima de 4 mm~~. Los datos presentados deben ser de fácil lectura en condiciones de uso normales.  Proposal in English:  *Mandatorily, by means of an indicator visible from outside the charging station and capable of providing all the legally relevant transaction data ~~in characters at least 4 mm high~~. Easy reading of the presented result shall be permitted under normal conditions of use.* |

**Annex**

As stated in the comment, manufacturers of charging points will only be able to purchase meters that display kWh in characters at least 4 mm high.

This in itself may constitute a barrier to the free movement of goods in the EU.

An example of this is the following DC meter, specific for electromobility and certified in France and Germany. In this example the bottom line has a character height of 4.5mm and the first 2 lines, also legally relevant, of 3mm.

The current requirement of the Order may mean that meters like this can no longer be used for charging stations in Spain.



