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WORKING DOCUMENT

From: To:	General Secretariat of the Council Working Party on Land Transport
N° Cion doc.:	ST 8255/25 + ADD 1 ST 8259/25 + ADD 1 - 4
Subject:	Proposal for a Directive of the European Parliament and of the Council amending Directive 2014/45/EU on periodic roadworthiness tests for motor vehicles and their trailers and Directive 2014/47/EU on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union Proposal for a Directive of the European Parliament and of the Council on the registration documents for vehicles and vehicle registration data recorded in national vehicle registers and repealing Council Directive 1999/37/EC - Comments from Finland

Delegations will find, attached, comments from **Finland** on the above-mentioned proposals.

MINISTRY OF TRANSPORT AND COMMUNICATIONS

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Written Comments on the Roadworthiness Package from Finland

This document points out the main concerns in a nutshell for Finland in RWP. We wish that the coming 1st compromise text will take into account our proposals and comments.

1. **Opt-out to PTI for motorcycles should be retained**

   We wish to keep the current provisions in PTI-directive's Article 2 seventh intend and it should not be deleted as proposed. Therefore in the coming compromise proposal Article 1 point subpoint (b) of the Commission's proposal should be deleted, i.e. keep text from current directive.

   Article 1 point subpoint (b) of the Commission's proposal:

   "…

   ~~(b) in paragraph 2, the seventh indent is deleted;~~

   …"

   Justification is summarized in our comments in document WK 9412/2025 INIT.

2. **NOx-testing should not to be introduced in PTI**

   Many Members States have raised concerns regarding NOx-testing from an operational point-of-view and we share these concerns. We understand that the technology for NOx-testing as such is nearly "there", but we don't see that it's possible to incorporate NOx-test to PTI. Therefore we prefer, that NOx-tests in (it's totally) in PTI or Commission's related to it should not be included in the compromise text.

   As a compromise a review clause with adequate timetable could be discussed. Especially comprehensive testing in freezing conditions and studies from an operational point-of-view must be conducted before NOx-testing can be implemented. In general, it's important that new tests are technically, legally an operationally on a solid base. Only then the full benefits are realized without unnecessary burden and cost.

3. **RSI targets and remote sensing**

   We have a critical position regarding the RSI-targets of 5% and 2% and also the 30% for remote sensing. We see that the targets should not be set up per member state by counting basically the amount of initial RSIs. This is not to say that we do not see the importance of RSI, but we see that these national targets would in fact steer inspections towards initial RSIs and reduce the amount of extensive RSIs in Finland. The Finnish Police, who in Finland performs the RSIs, would have to allocate their resources according to these targets and the real effect on road safety is not necessarily positive.

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As a compromise a “follow-up-scheme” could focus on reporting the result i.e. the effectiveness on road safety of RSI and not the amount of RSIs made.

Remote sensing cannot be obligatory in the final text on any aspect.

4. Odometer readings

We see that more extensive database and exchange of data on odometer readings is beneficial, if the potential buyer of a vehicle gets the information before buying a vehicle.

We see, that it is not possible to have odometer readings a fault in PTI and those provisions should be removed or made voluntary for a Member State to implement (i.e. removed). There could be very arbitrary situations from the perspective of a citizen, if an illogical odometer reading, due to past owners’ actions perhaps, prevents a PTI.

5. Mobile certificates

We have a positive position towards developing mobile/digital certificates in general and the use of the EUDI Wallet scheme. We are very glad that the Commission has reacted on our comments in the WP. We can assist and help to solve all issues regarding the development of digital certificates during the following proceedings. Clarification is needed to unleash the full potential of digitalization and also to have a better understanding of application dates.