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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 the Czech Republic

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

COMMENTS OF THE CZECH REPUBLIC ON THE ROADWORTHINESS PACKAGE

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The Czech Republic acknowledges the need to revise this decade-old legislation, particularly in light of technological advancements in vehicle development and the ongoing digitalization of the sector.

In general, we welcome the objectives of the proposal; however, we wish to raise several points for consideration during the negotiations. In addition to the technical comments already submitted, we have identified the following main concerns:

- **Annual inspections for M1 and N1 vehicle categories older than 10 years**

We consider this proposal unnecessarily burdensome. While road safety remains a priority for us, there is no evidence that such vehicles contribute significantly to serious accidents due to technical defects.

Moreover, this measure could disproportionately affect residents in regions with limited access to public transport. Additionally, these vehicles typically have low annual mileage, operate infrequently on main roads, and have a low accident rate.

- **Annual emissions testing for N1 vehicles from the date of registration**

We do not consider the proposed measure beneficial, particularly for new vehicles, which are maintained under warranty in accordance with manufacturer guidelines. In such cases, the manufacturer is responsible for any defects, and owners are generally motivated to keep their vehicles in good condition.

We also find the measure unsystematic, as it singles out the N1 category for more frequent emissions testing beyond the standard technical inspections. For N1 vehicles, we consider it sufficient that emissions testing be conducted within the timeframes of periodic technical inspections, as is the case for other categories.

- **Mandatory remote sensing of emissions and noise**

The proposed new Article 4a would require the use of remote sensing technology to screen the noise and exhaust emissions to identify potentially high-emitting vehicles, covering at least 30% of the fleet annually, followed by exceptional emissions and noise measurements. However, the proposal lacks clarity on the technology to be used and its reliability.

This may impose a disproportionate burden on individuals and public authorities without guaranteeing the intended results.

We could support the use of such technology for the pre-selection of vehicles, as described in Article 4a(2)(a), whereby suspicious vehicles are immediately subjected to a roadside technical inspection. However, we do not support Article 4a(2)(b), which calls for exceptional follow-up measurements based on potentially unreliable methods.

In this context, we also question the justification for requiring automatic emissions and noise screening of at least 30% of the fleet.

- **Odometer readings**

We find the obligation for all vehicle repair and maintenance providers to record odometer readings (Article 4a(1)) to be administratively burdensome and susceptible to circumvention.

Such a requirement may create significant financial, personnel, and administrative burdens for affected businesses and for public authorities tasked with oversight and enforcement. Furthermore, it is unclear who would guarantee the accuracy of the recorded data.

We therefore suggest narrowing the scope of the regulation in order to maintain proportionality. Odometer readings should be recorded only during inspections at official technical inspection stations.

At the same time, we consider the recording of odometer readings at testing centers beneficial, as it contributes to the detection of odometer manipulation.

- **Registration documents**

We support the digitization of vehicle registration documents and agree with the mandatory issuance of electronic vehicle registration certificates.

However, we consider it inappropriate to require certain data—such as the operator's email address or the expiry date of a current roadworthiness certificate —to also appear on the paper version of the certificate.

Moreover, some data required (such as the country where the vehicle was registered for the first time or the presentation of customs documents when exporting the vehicle outside the EU) are not currently accessible to our registration authorities. Therefore, we would prefer the removal of these requirements.

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