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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 Italy

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

Italian Position on the Legislative Package Proposed by the European Commission

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ROADWORTHINESS PACKAGE

- Proposal for a Directive of the European Parliament and of the Council on vehicle registration documents and vehicle registration data recorded in national vehicle registers, and repealing Council Directive 1999/37/EC. COM(2025) 179

- 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. COM(2025) 180

Italy acknowledges that the legislative proposals are, in their general structure, consistent with the principles of proportionality and subsidiarity. However, certain specific elements appear to raise concerns with respect to the full application of the principle of proportionality. The following observations are therefore submitted:

1. Technical inspections in a Member State other than the State of registration (Article 1, point 3 – amendment to Article 4 of Directive 2014/45/EU)

The proposal introduces the possibility of carrying out periodic technical inspections in a Member State other than the one where the vehicle is registered. Italy believes that this option could be extended to commercial vehicles (categories N1, N2, and N3), given that such vehicles are subject to annual inspections. This is particularly relevant in light of the increased cross-border mobility of commercial vehicles following the transposition of Directive (EU) 2022/738 on the use of hired vehicles without drivers for goods transport.

2. Recording of odometer readings by service providers other than inspection centres (Article 1, point 4 – new Article 4a)

Extending the obligation to record odometer readings to any service provider performing repair or maintenance work for payment appears excessively burdensome. In particular, for vehicles over 3.5 tonnes – already subject to annual technical inspections – the requirement would be redundant and of limited practical utility, especially in the case of interim repairs.

3. Increased frequency of inspections for vehicles over 10 years old (Article 1, point 5 – amendment to Article 5 of Directive 2014/45/EU)

The proposal introduces annual technical inspections for cars and light commercial vehicles over 10 years old. While the objective of enhancing road safety and controlling emissions is appreciated, this amendment would entail additional financial burdens for citizens, businesses, and public

administrations. A careful assessment of the cost-effectiveness of such a measure is necessary, particularly in light of the potential impact on vulnerable groups.

4. Annual emissions testing for light commercial vehicles (category N1)

The requirement for annual emissions testing for N1 vehicles from the date of first registration is considered excessive. These vehicles are typically in good condition during the first years of use, including with regard to emission control systems. Italy suggests exempting such vehicles from this obligation during the first four years after registration. Annual testing could then apply from the fifth year onward.

5. Data exchange between national authorities (Article 1, point 9 – new Article 16 of Directive 2014/45/EU)

To avoid duplication of existing systems, Italy recommends ensuring that the interconnection of vehicle registration databases and technical inspection databases with the MOVE-HUB platform developed by the European Commission is complementary to the existing EUCARIS system, which already enables such data exchange and is currently used by Italy and 31 other countries.

6. Remote sensing of emissions (Article 2, point 1 – amendment to Article 1 of Directive 2014/47/EU)

The mandatory use of remote sensing for at least 30% of the registered vehicle fleet represents an undue restriction on Member States' discretion in organising inspection activities. Italy considers that the goal of improving fleet quality should be pursued in a flexible manner, allowing Member States to define their own strategies and methods to reach such objectives.

7. Transposition

Italy highlights the need to allow for a longer transposition period than that currently proposed by the European Commission, in order to ensure an effective and sustainable implementation at national level.

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