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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 Latvia

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

Comments by Latvia[1]

(1/2) 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

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Latvia in general supports the aim of the proposal on periodic roadworthiness tests - to improve road safety in the EU by promoting sustainable mobility and facilitating the free movement of persons and goods within the EU.

However, Latvia cannot support the proposal in its current wording, as the it does not ensure practical implementation of harmonised requirements and, at the same time, significantly increases the administrative and financial burden. At its original wording, the proposal also does not take sufficiently into account the different situations of the Member States.

Latvia confirms commitment to pragmatic work to ensure that the ultimate end result allows to reach the defined goals!

- Latvia's comments on the proposals for amendments to **Directive 2014/45/EU**:

Conducting a roadworthiness test abroad

Latvia supports the base requirement that a vehicle must undergo roadworthiness test in its country of registration (**Article 4(2)**). Latvia does not object to the voluntary possibility for a Member State to agree on the performance of roadworthiness tests in another Member State (**Article 4(4)**).

Latvia cannot support the proposed solution for the temporary roadworthiness tests carried out abroad and the obligation for Member States to recognise them (**Article 4(3)**). In Latvia's opinion, a temporary roadworthiness test certificate may serve as a permit for a vehicle only in case where (1) it has expired abroad and (2) in order to return to the country of registration to carry out the roadworthiness test there.

Consequently, the proposed 6-month period is seen as disproportionately long. In addition, the different situations in Member States should be considered, in particular – the rights of a Member State to require the registration of a vehicle registered in another (Member) State if the vehicle is used in its territory for a certain extended period. For example, in Latvia, the payment of taxes and penalties is controlled during the roadworthiness test, therefore, introduction of a temporary roadworthiness certificate should provide for the possibility for Member States not to recognise the validity of such a certificate if the owner of the vehicle has failed to fulfil his/her obligations with the State (and thus *inter alia* – has resulted in a negative financial impact on the budget of that State).

Thus, **Latvia could support** the introduction of a temporary roadworthiness certificate, the term of which does not exceed 2 months, provided that the temporary roadworthiness certificate is issued only after the approval of the Member State of vehicle registration for fulfilment of obligations towards the State. In addition, Latvia proposes to stipulate in the regulation that it is permitted to issue a temporary certificate **only in cases** where significant or dangerous deficiencies or damages **are not** detected during the technical inspection, as well as in cases when a vehicle is used for a long time in another European Union Member State, that the conditions of the national legislation of the relevant Member State, in particular - on the re-registration - have been respected.

Information from vehicle manufacturers (Article 4(5) and (6))

Latvia **supports** the obligation for vehicle manufacturers to provide information free of charge for roadworthiness testing purposes. At the same time, Latvia expresses serious concerns that if this obligation is not included in Regulation (EU) 2018/858 as a mandatory obligation for the vehicle manufacturer (Article 13), a conflict of laws and regulations arises, which may lead to situation where the requirement is not fulfilled. It is of particular importance to ensure legal clarity as the information provided by vehicle manufacturers is precondition to ensure compliance with the requirements of the Directive concerning the verification of electronic systems by means of an OBD scanner, in particular the electronic security systems set out in GROUP 10 of Annex I.

[1] Latvia's national position is still in the development stage, so these written comments are to be considered preliminary and provisional.

Odometer readings (Article 4(6), Annex I, point 7.11 "Odometer, if available")

Latvia **supports** the mutual exchange of odometer readings between Member States and their publication, that has generally justified itself as an effective tool to combat manipulation. Latvia, using the EUCARIS data exchange platform, already exchanges and receives information on odometer readings from several Member States (e.g. Estonia, the Netherlands, Belgium, Slovakia, Finland). In Latvia, the available mileage history is publicly available.

By making it mandatory to record odometer readings for car repair companies, **we are concerned** about the set and quality of the large amounts of odometer data that require significant investments to implement and administer. E.g. for one vehicle during a single year, taking into account seasonality and maintenance schedule, e.g. when replacing tyres or replacing engine oil, in addition to the data recorded during the roadworthiness test, the odometer reading would be recorded at least 3 times. Accordingly, the amount of data and the risk of human error would increase several times.

Latvia – in combination with support for the proposed increased frequency of roadworthiness tests (in which the odometer reading is compulsorily recorded) – would support a voluntary recording by the car repair companies. We would, however, see a benefit for compulsory approach in case of odometer replacement by a car repair company.

Even more, the input of odometer readings is mainly carried out manually and the factor of human error cannot be excluded, for example, when entering erroneously in addition to the reading of the digital odometer. Therefore, in case any mandatory requirements to register odometer readings in addition to roadworthiness tests are agreed on, it is necessary to define the validation of odometer readings and the procedure for administering erroneous data.

Latvia does not support the proposal to **assess the cause of non-conformity in point 7.11(a) of Annex I** "*Obviously manipulated (fraud) to reduce or misrepresent the vehicle's distance record*" **as a significant non-compliance** and to deny the vehicle participation in road traffic, because during the roadworthiness test it is not ascertainable whether the odometer has been manipulated, its repair or replacement has been carried out.

For example, in case where the odometer is changed due to a previously damaged part, the proposal would require to adjust the reading to ensure continuity of the previous readings. Thus, we would promote the service of rewinding/changing the odometer readings that Latvia cannot support as it is contrary to the aim to eliminate such services. In addition, manufacturers of several cars equip their cars with odometers with a specified maximum reading (e.g. 300 000 km) at which the odometer is to be replaced.

Latvia could support granting assessment of a minor defect or defect in the roadworthiness testing, while concentrating on other methods to combat odometer rewinding/alteration services, such as prohibition of such a service and taking action against its providers, incl. in form of penalties.

Periodicity (Article 5(1)(a))

Latvia supports vehicles of categories M1 and N1 to undergo roadworthiness tests every year when they reach the age of 10. We do not oppose the mandatory requirement to carry out emission controls on vehicles of category N1 every year.

Time limit for roadworthiness testing (Article 5(1), last subparagraph)

Latvia does not support the proposal that Member States must compulsorily add the maximum period of temporary roadworthiness test period to the time limit for the roadworthiness test. In such a case, the time limit for the next test may exceed the maximum periodicity laid down in the Directive and thus be contrary to the argument that more frequent inspections guarantee that safe vehicles complying also with ecological standards participate in the road traffic.

Latvia strongly believes that time limit for roadworthiness testing must be determined from the moment the vehicle has passed the roadworthiness test. In addition, as outlined previously - the purpose of the temporary roadworthiness test shall be to bring the vehicle to the country of registration for a full-fledged roadworthiness test.

Initiation of roadworthiness tests ahead of time (Article 5(3))

Latvia does not support the proposed deletion of a number of essential conditions requiring to subject a vehicle to a roadworthiness test, for example, after an accident or upon reaching a mileage (160 000 km) in which the vehicle's essential systems have reached the limit of depreciation.

For example, a mileage of 160 000 km is in line with the Directive's objective of more frequent roadworthiness tests after reaching a certain age or depreciation. Given that the depreciation of a vehicle is characterised not only by its age (which is already respected by more frequent inspections after the age of 10) but also by mileage, it is essential to maintain the mileage requirement in the Directive, which Member States can use as a successful tool for determining the regularity of roadworthiness tests and achieving higher vehicle safety and ecological results. On the other hand, if a vehicle has been seriously damaged in a road accident, in order to ensure that the vehicle returns to road traffic in a safe condition and that repairs have been carried out appropriately, it is essential to carry out a technical inspection or equivalent inspection.

Definition of electric powered motorcycles (Article 2(1), Article 5(2), Article 6(3))

A uniform classification of motorcycles, tricycles and quadricycles in the Union is already established in line with the requirements of Regulation (EU) 168/2013, which also includes electrically powered motorcycles. In order to clearly achieve the objective of the Directive, Latvia would support the use of category L vehicle categories and sub-categories set out in Annex I to Regulation (EU) 168/2013 "Classification of vehicles" in the proposal.

Recognition of engine emission and noise measurements carried out during roadworthiness tests carried out during roadworthiness testing (Article 6(4))

Please note that an indispensable prerequisite for such recognition is the immediate exchange of information and the possibility to validate the result and time of the measurement performed. Accordingly, such information should be included in the common electronic data exchange platform. Latvia supports the introduction of information exchange and harmonisation at Union level.

Roadworthiness test certificate in electronic form (Article 8)

Latvia **generally supports** the introduction of the electronic roadworthiness certificate, however, it is necessary to set an objective and gradual deadline for implementation. Accordingly, after entry into force of the regulatory enactment developed by the European Commission, in which the technical specifications of the requirements of the electronic roadworthiness certificate are specified, incl. its validation by *QR code*, provide Member States sufficient time to identify and anticipate the necessary funding and development time to meet the requirements. Latvia could support a deadline of at least 1 year for the introduction of an electronic roadworthiness test certificate from the moment the regulatory framework developed by the European Commission enters into force.

Deadline for entry into force of delegated acts

Latvia expects concrete, specific and well-defined conditions in this package of proposals, as well as clear deadlines for their implementation. Latvia could support the package of the proposal for technical inspections if the development of laws and regulations is mandated to the European Commission, for example, for the development of technical specifications for the introduction of electronic roadworthiness certificates **(Article 8(9))**, the introduction of a data exchange platform **(Article 16(2**)), the development of new emission testing methods and requirements for engines (NOx, particulate matter (PN)) **(Article 17)** their implementation is determined gradually within objectively justified and discussed implementation deadlines.

Imposition of penalties for manipulated vehicle systems.

Latvia **does not support** the mandatory imposition of penalties in vehicle roadworthiness tests for manipulated vehicle systems **(Article 9(4) of Directive 2014/45/EC**) and roadworthiness tests **(Article 14(4) of Directive 2014/47/EC**). The roadworthiness test methods used in roadworthiness testing and control ensure that the appropriate or inappropriate operation of a system is assessed, and not the causes of its malfunctioning or the fact of manipulation. In order to prove the fact of tampering, an in-depth investigation and partial dismantling of the vehicle or the removal of parts is required, which is contrary to roadworthiness testing and roadworthiness control methods used, where such operations are not provided for and as provided for in Article 6(2) EC of Directive 2014/45/EC and Section 2, paragraph 5, of Annex II to Directive 2014/47 EC, respectively).

MOVE-HUB information exchange system (Article 16)

The proposal requires Member States to ensure the interconnection of their national vehicle registers and vehicle roadworthiness certificate electronic systems through the MOVE-HUB platform. At the same time, the vehicle registration authorities of the Member States have been developing, maintaining and using the EUCARIS data exchange platform on their own for many years, which we consider to be the most efficient and appropriate platform for this type of data exchange. The EUCARIS platform is currently used voluntarily and actively by 17 Member States in the context of vehicle re-registration.

In view of the fact mentioned in point 4 (Budgetary implications) of the explanatory part that the impact on the EU budget is mainly related to the extension of the functionality of the IT Data Exchange System (MOVE-HUB) in the context of the revision of the RWP (Roadworthiness Package), we consider it necessary to focus on the main arguments in favour of using the EUCARIS platform:

1. Proven effectiveness - EUCARIS has been successfully used to support re-registration for many years. Its data formats and content are harmonised in all Member States and aligned with the electronic certificate of conformity (eCoC).
2. Existing infrastructure - all EU vehicle registration authorities are already connected to EUCARIS, as its use is mandatory in a number of EU regulations and directives, including international transport monitoring, such as: Directives 2015/413/EC, 2024/3237/EC, Council decisions 2008/615/JHA, 2008/616/JHA, and Council Regulation 2018/1541.
3. The necessary functionality is already available:
    - Reporting process on vehicle re-registration and disposal in another Member State: EUCARIS service VHRNotification already provides a proven solution for electronically structured notification of vehicle re-registration;
    - eCoC data exchange: EUCARIS provides eCoC data exchange, which is essential for accurate and efficient vehicle re-registration.
6. Cost-effectiveness and readiness - for most Member States already using the EUCARIS platform, improving the existing system to support the technical inspection package is significantly more beneficial than introducing a new system such as MOVE-HUB.
7. Avoiding unnecessary complexity - the introduction of a second system (MOVE-HUB + EUCARIS) would increase the volume of testing, implement complex further necessary changes and require data conversion between systems, thereby increasing the risk of data loss or loss of quality.
8. Concerns about compliance with the requirements of the General Data Protection Regulation (GDPR) - MOVE-HUB's centralized architecture raises concerns about compliance with the requirements of the General Data Protection Regulation (GDPR) as it provides for all requests and responses to be sent through a single HUB server, while EUCARIS operates on a decentralized model where requests and responses are sent from country to country, ensuring the data sovereignty of Member States.

While Commission has outlined that the proposal does not envisage mandatory use of the MOVE-HUB system instead of the EUCARIS platform that Latvia would ne be in position to support, the areas outlined above will be particularly important to be addressed during future work on the proposal.

Roadworthiness test and roadside inspection data report to the European Commission (Article 20a of Directive 2014/45 EU and Article 20 of Directive 2014/45 EU)

Taking into account that Article 16 of Directive 2014/45 EU introduces a single information platform in which Member States ensure the availability of roadworthiness testing and roadworthiness control data to the European Commission, **Latvia does not support** data overlapping and wasteful use of resources by performing double work in data processing, for example, the data specified in Article 20a(d) and (e) of Directive 2014/45 EU are already available to the European Commission. In addition, Latvia sees a need to review the first reporting periods, which should be determined only after the definition of the conditions and development of software. Otherwise, a situation may arise when the necessary data in a certain form is not available to the Member Sate at all.

We would also like to draw attention to the fact that the EUCARIS system is already being used as a successful solution for the exchange of data between Member States and the creation of a new system entails additional costs and financial burdens.

Crisis regulation (Article 22(4))

Latvia would prefer not to create such regulation, because by postponing/extending the term of roadworthiness tests, there is a constrainedly demand for a large number of vehicles to undergo roadworthiness tests at the same time. In a crisis situation, technical inspection stations may be permanently closed, while at the end of the crisis, it is necessary to increase the number of technical inspection stations and their permeability. As previous experience during Covid shows that countries that used this opportunity were later unable to ensure the availability of the roadworthiness test service in the existing network of testing stations (queues formed for months, problems with the quality of service). Also, in the event of a crisis, taking into account previous experience, Latvia sees action at level of Member States to develop and adopt effective crisis management solutions, while at the European Union level to be guided by common crisis management framework.

A similar condition is provided for in the Directive on driving licences amending Regulation (EU) 2018/1724 of the European Parliament and of the Council and Directive (EU) 2022/2561 of the European Parliament and of the Council and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012.

New test methods (NOx, PN, etc.)

Latvia **supports** the introduction of new test methods, such as NOx emission control, testing of electric cars, testing of electronic safety systems, for which the European Commission has not yet developed test and measurement criteria, as well as conditions for testing equipment and their calibration.

At the same time, it is important that the deadlines for implementation are set gradually, thus not causing sharp increase in the price of roadworthiness tests and without increasing the financial burden. In particular, a reasonable period should be set within which the European Commission, by involving experts performing technical inspections and manufacturers of measuring equipment into working groups, should develop the test methodology and requirements for equipment, while a reasonable time limit should be set for their implementation in roadworthiness tests after the entry into force of these requirements.

Experience with introduction of particulate matter measurement shows that, in general, it took more than 15 years to implement the test, when measuring equipment suitable for technical inspection purposes was available on the market. In addition, given that the above methods are made mandatory for all Member States, the implementation period should also include sufficient time for equipment manufacturers to be able to meet the requests of all Member States for the supply of the necessary equipment.

The **proposal of Latvia** would be to set a deadline acceptable to all within which testing stations should be equipped with the aforementioned equipment after the approval of the measurement method and in discussions with the Member States (Annex III, points 16 and 17).

Shock absorbers test bench (Annex I, point 5.3.2.1)

Latvia is opposed to the mandatory inclusion of a test on the effectiveness of shock absorbers in the roadworthiness test. That test method does not give a credible result to base the assessment on during the roadworthiness test. In addition, the installation of such a test bench on the roadworthiness test line requires significant redevelopment work and investment, which will unduly increase the cost and financial burden of roadworthiness.

Latvia supports that test method remains voluntary (marked with an (X)) as in the current version of the Directive.

Particulate matter control (PN) (Annex I, point 8.2.3.1)

Latvia **does not support** the established particulate matter concentration limit value of 250 000 1/cm3. *European Commission Recommendation (EU) 2023/688 on particulate matter measurement for the periodic roadworthiness testing of vehicles equipped with compression-ignition engines* sets a limit of 1 000 000 1/cm3. Such a limit value is used by Latvia and other Member States, and in our assessment is currently more suitable for roadworthiness testing needs, taking into account the different climatic

conditions in the Member States (especially in the winter period, when technically compliant emission control equipment does not work with maximum efficiency under the influence of low temperatures), the technical capabilities, specifications and accuracy of the currently available measuring equipment. **Latvia would support** the use of the limit value of 1 000 000 1/cm3 set out in the European Commission Recommendation (EU) 2023/688.

Control of electronic safety systems (GROUP 10 of Annex I)

In Latvia, since 2016, during the technical inspection, the control of electronic systems has been carried out using an OBD scanner. Taking into account the experience gained during this time using OBD readers with the latest updates from leading manufacturers of diagnostic equipment (BOSCH, AVL), the most significant problem is identification of the failure status. Namely, whether the failure in the system is active or passive. The proposal does not provide an explanation or proposal for a solution to this problem.

Latvia **is concerned** about the full reliance on the information provided by manufacturers on the parameters of these systems in order to assess them appropriately and, in case of non-compliance, to prevent the vehicle from participating in road traffic, given that manufacturers are already required to provide information in accordance with the requirements of Commission Implementing Regulation (EU) 2019/621, however is not always provided.

Control of high-voltage systems for electric vehicles (Annex I, paragraph 4.14 with sub-paragraphs)

Taking into account the complex structure of electric cars and the high hazard risks of the high-voltage electrical system, the inspection of their components is visually ineffective and, in some cases - even impossible, since access to them is possible by dismantling parts (covering panels, protective elements, etc.) or even partially disassembling the vehicle. In addition, visually detectable damage to high-voltage components is dangerous to human life and in such cases further technical control of the vehicle should be stopped immediately.

Thus, in Latvia's opinion, in order to be able to test this system in a safe and efficient way during the roadworthiness, a specially designed inspection facility is required for such technical inspection purposes that quickly and efficiently informs whether a specific component (battery, electric motor, high-voltage wires, etc.) has passed the test or not. Similarly, as with the development and implementation of emission testing methods for new engines in the roadworthiness test, Latvia considers that also in this case it is necessary to set gradual deadlines for the mandatory introduction of this test in roadworthiness testing, providing for a reasonable period of time from the moment when testing equipment suitable for roadworthiness testing purposes is available on the market.

In addition, given that all Members States will need such equipment, the implementation period should also include sufficient time for equipment manufacturers to be able to meet the requests of all Member States for the supply of the necessary equipment.

- Latvia's position on the proposals for amendments to **Directive 2014/47/EU**:

Remote measurements of engine emissions and noise levels "remote sensing" (Article 4a)

Latvia does not support the proposed requirement to carry out a mandatory remote sensing of emissions and noise levels in 30% of motor vehicles registered in a Member State. In this case, the objective set is aimed at the acquisition of quantitative statistical data, which requires large investments in technical support and data processing, but does not provide an effective return, i.e., that these non-compliant vehicles are not used in road traffic in the future.

Latvia believes that this test method should achieve qualitative performance indicators rather than quantitative, similar to using risk rating data, which serves as an indicator to carry out a detailed inspection of the vehicle. For example, this remote sensing method allows for more efficient identification in road traffic of vehicles that do not comply with environmental standards, which are immediately subjected to technical control on the road where the testing is carried out and on the basis of which the vehicle is prohibited from participating until it is brought into the appropriate technical order.

Furthermore, it is appropriate to introduce such a test method at the time when testing NOx and particulate matter is carried out during roadworthiness testing, thus applying consistent emission standards requirements for both roadside inspection and roadworthiness testing.

Technical inspection of vehicles of category N1 on the road (Article 5(2))

Latvia **supports** the inclusion of vehicles of category N1 in the technical control on the road and the setting of an amount of 2% of vehicles of this category registered in a Member State for annual performance.

Control of securing of cargo (Article 13(1))

Latvia **supports** the proposal on control of cargo strengthening on the road, which in Latvia is the competence of the State Police.

(2/2) 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

Latvia generally supports the proposal which aims to improve road safety in the EU by promoting sustainable mobility and facilitating the free movement of persons and goods within the EU. However, Latvia considers that the **proposal needs to be improved** so that it is clear, accurate and strives as effectively as possible to achieve the intended objective.

The text of the proposal does not include the transnational data exchange platform **EUCARIS**, which has been used by majority of EU Member States for many years to exchange vehicle roadworthiness and roadside inspection data, technical data, their statuses, odometer readings and other vehicle-related information. Latvia believes that the use of the above-mentioned information exchange platform will allow to significantly reduce the costs of Member States.

Definitions (Article 2)

Latvia **draws attention** to the fact that in order to ensure the correct transposition into national legislation, the list of definitions included in Article 2 should be revised, as the proposal itself includes a number of concepts that are not explained in Article 2 (e.g. there is no definition of the following terms, which are used further in the text of the Directive: owner, cancellation of registration), as well as inconsistency in the use of certain terms used.

Article 2(6) of the proposal includes a definition of *holder of the registration certificate*. In the process of re-registration, an important role is also played by the owner of the vehicle. Article 2(7) of the proposal includes the definition of "suspended", while the text of the proposal contains the definition of "de-registration", which is not included in the list of definitions.

The text of the proposal places great emphasis on authorisation to participate in road traffic, but we consider it necessary to place additional emphasis on authorisation for re-registration – for example, in cases relating to pledged, stolen, exported vehicles, etc. Latvia considers that it would be necessary to include clear and unambiguous definitions - vehicle owner, vehicle scrapped / cancellation, re-registration blocked.

Paper registration documents/certificates (Article 4(4))

Latvia considers it necessary to clarify the requirement in Article 4(4) concerning the possibility for Member States to decide to print a QR code on paper vehicle registration certificates issued by them. The QR code must make it possible to verify the authenticity of the information indicated on the registration certificate. In the case of the registration certificate of the Republic of Latvia, it is planned to use a QR code for numbering documents and it would be necessary to understand in advance whether the certificate in paper form may contain several QR codes intended for different purposes.

Information exchange system MOVE-HUB (Article 15)

Identical as on the proposals for amendments to Directive 2014/45/EU (outlined above).

Common reporting process for re-registration and disposal of a vehicle in another Member State

In accordance with Article 10(3) and (4) of Directive 1999/37/EU, after re-registration of a vehicle, Member States are obliged to inform the authorities of the Member State of previous registration

without undue delay. In view of the common EU course towards the digitalisation of processes, we believe that this notification process should be carried out in a structured, digital format, for example through a data exchange platform. Currently, Member States face difficulties in handling these notifications effectively, as they are often received in inconsistent formats such as Excel spreadsheets, paper form, etc. A single digital approach would significantly improve the speed, accuracy and reliability of this communication.

Please be informed that the structured digital re-registration notification service via the EUCARIS platform has already been implemented in 7 Member States.

In addition, Latvia draws attention to the fact that in paragraphs 48 and 25(3) of the preamble to the *Proposal for a Regulation of the European Parliament and of the Council on circulation requirements for the design and management of end-of-life vehicles, amending Regulations (EU) 2018/858 and 2019/1020 and repealing Directives 2000/53/EC and 2005/64/EC (ELU framework)*, it is intended to provide that, in the case of end-of-life vehicle that has been issued a certificate of liquidation in one Member State is registered in another Member State, the competent authorities of the vehicle registration of the Member State in which the certificate was issued, must inform the relevant vehicle registration authorities of the Member State in which the vehicle is registered that a certificate of liquidation has been issued for the vehicle in question. Latvia considers that it would be appropriate to use the same approach in the above-mentioned reporting process - the report is sent in a structured, digital format using a data exchange platform.

Harmonised and clear set of data to be recorded (Article 6)

The process of exchanging vehicle re-registration data still requires greater harmonisation between Member States. In order to ensure uniform and effective implementation, it is essential to establish a minimum set of data with clearly defined and unambiguous elements. Structured data exchange is essential to ensure consistency, transparency and efficiency in the cross-border registration process.

European vehicle registration authorities have been cooperating on this issue for several years and, thanks to cooperation in the working groups of the European Association of Vehicle Registration Authorities (EReg association), have produced a report [2]setting out the recommended minimum set of data elements to be exchanged between registration authorities.

Latvia **supports** the proposal that, in addition to Article 6(2), the European Commission may adopt implementing acts setting out the relevant data covered by the second subparagraph of paragraph 1. Latvia points out that this dataset should serve as a standard for cross-border data exchange in the context of vehicle re-registration. It shall include the relevant data obtained from the certificate of conformity in electronic format as set out in Article 37 of Regulation (EU) 2018/858. In order to ensure consistency and interoperability, the definitions of those data elements should be fully consistent with those used in the electronic certificate of conformity (eCoC) as set out in Article 2 of Implementing Regulation (EU) 2021/133. The eCoC file is an important part of a dataset that contains detailed technical information about the vehicle. The exchange of a dataset and an eCoC file improves the accuracy and efficiency of re-registration.

Latvia **considers** that it would be necessary to adopt the above-mentioned and recommended minimum dataset as a standard, not to include an accurate dataset in the legislation in order to ensure flexibility, as well as to create a dedicated forum for the management of the dataset, similar to the case of eCoC.

Clear definition of vehicle registration certificate entries (Annex I to Directive 199/37/EU)

In Latvia's view, Annex I is incomplete and **cannot be supported in the current version**. The definitions of the data contained in the vehicle registration certificate must be clear and unambiguous so that they can be used at international level. At present, not all the data listed in Annex I are clear and unambiguous. For example:

- V.7 CO_2 – it is not specified which test method was used to measure CO_2 . This could be "NEDC", "WLTP" or another method.
- P.2 maximum motor power (kW) - for fully electric vehicles, no specific power is indicated. This could be "MaxNetPowerElectricEngFuel" (Maximum Net Fuel Level),

[2]Source: https://www.ereg-association.eu/media/2742/final-report-topic-group-xxi-proposal-on-the-registration-of-vehicle-data.pdf

"MaximumNetPowerElectricEngine" (Consolidated Maximum Net Power at Vehicle Level) etc.

The definitions of the technical data of the vehicle shall comply with the definitions set out in the eCoC as provided for in Implementing Regulation (EU) 2021/133.

Vehicle software updates, conversions and modifications (Article 6)

Article 6(c) of the proposal obliges Member States' registration authorities to keep in their registers information on any significant changes to vehicle safety or environmental protection systems and components. Latvia points out that, taking into account the rapid development of technologies, manufacturers already have the opportunity to influence the operation of the above-mentioned systems with the help of software updates. Therefore, we see that software updates of this kind could be equated to a vehicle modification process.

Consequently, we see it necessary to include an obligation for vehicle manufacturers to inform registration authorities of planned software updates and their results carried out on vehicles already registered in cases where these updates have a significant impact on vehicle safety or environmental protection systems. This applies, for example, to changes in vehicle emission levels, maximum power - environmental protection, or in systems such as autonomous driving systems (ADS) and driver assistance systems (ADAC) - safety.

Period of storage of vehicle registration data after re-registration (Article 10(5))

Latvia **does not support** the Article 10(5) requirement that data in national vehicle registers should be kept for up to 12 months after the "registration" of the vehicle ("the term de-registration" does not appear in Article 2 of the proposal). We consider that the one-year retention period is too short, especially for investigations into VAT fraud involving vehicles, where historical data is essential. There are currently serious problems with the availability of data in countries where a one-year retention period already applies. Valuable information is often lost, making it difficult to detect fraud effectively.

A recent survey by the European Association of Vehicle Registration Authorities (EReg association) shows that almost all Member States keep vehicle registration data for at least five years, and most for around ten years after 'registration'. Latvia considers it necessary to extend the minimum retention period in order to ensure that authorities have sufficient access to historical data for control and fraud prevention purposes.