Council of the European Union
General Secretariat

PUBLIC

Interinstitutional files:
2025/0096 (COD)
2025/0097 (COD)

Brussels, 18 July 2025

WK 10061/2025 INIT

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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 Sweden

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

Written comments from Sweden regarding the Road Worthiness Package

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General

SE supports that rules need to be adapted to today's vehicle fleet, but that the costs of the proposals are in proportion to the benefits.

Swedish positions regarding the proposal are presented below, divided into the three directives included in the package.

SE is still scrutinizing some parts of the proposal.

New directive vehicle registration documents (COM 179):

SE supports the requirement for the introduction of mobile registration certificates.

SE prefers to use for this purpose EUCARIS that is already used by registration authorities in Europe.

Directive on periodic Roadworthiness tests 2014/45/EU (COM 180)

Article 4

SE supports the introduction of the possibility to inspect vehicles in other EU MS. We consider the time of 6 months to be well balanced and would not like to see the time shortened.

SE would like to inquire on why this possibility is limited to vehicle in category M1.

SE supports the possibility for mutual recognition of inspections between MS in bilateral agreement.

Artikel 4a

SE is hesitant/sceptical to the proposed introduction of extensive control of odometer readings. The article extends the obligation to record odometer readings beyond PTI centres and would impose new costs.

SE questions if the proposal in new article 4a falls within the scope of the directive, as it concerns inspections carried out by others than PTI:s and the checks are not directly linked to the vehicle safety- or emission status.

Article 5

SE does not support EU inspection interval for vehicles older than 10 years to be more frequent than 14 months. In Sweden inspection intervals applied to vehicles older than ten years is 14 months, and our assessment is that this represents a good level of control.

SE supports the introduction of an obligation to inspect vehicles that are modified.

SE is wondering whether the exhaust emissions tests should be carried out every year following their date of first registration and as a separate inspection. We have a scrutiny reservation on this proposal.

SE is wondering about the consistency of "appropriate intervals" versus what is written in Article 5, paragraph 4, "not exceeding the intervals laid down in paragraph 1".

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Article 8

SE supports the proposals in article 8 and especially that detailed rules will be laid down in implementing acts.

Article 9

SE supports the proposal to exchange information between MS but prefers usage of EUCARIS for that purpose.

SE would like for it to be clarified on how the lifting of a driving ban received in another country is to be handled, as it is not specified in the text.

SE is hesitant/sceptical to proposed penalties for tampering of vehicle's components, since we see some practical and legal difficulties associated with this.

Article 16

SE prefers the usage of EUCARIS

Article 17

SE strongly advocates for that methods and threshold levels for new emission tests (PN and NOx) should be specified via implementing acts.

Directive on roadside inspections 2014/47/EU (COM 180)

Article 1, 4 and 4a

SE is hesitant/sceptical to the proposed introduction of requirement to use remote sensing technology to measure emissions. We have questions regarding the maturity of the technology, as well as its availability, accuracy and costs. Furthermore, the requirement to control 30% of traffic using this technology appears unrealistic.

Article 2 and 5

SE supports that light vehicles are included in the scope of the directive. SE would like for it to be **clarified** if the 2 % targets refer only to light vehicles in commercial traffic. SE would also like for it to be **clarified** if the 2 % targets would include vehicles registered but in current use (parked vehicle).

SE supports the proposal to check 5% of the vehicle fleet in each EU MS.

Article 6

SE supports the introduction of a risk rating system. But a minor clarification is needed related to mixed usage of "may" and "shall" in the text.

SE has a scrutiny reservation on the proposal to include load securing in the scope of the directive.

Article 13

SE has a scrutiny reservation on the proposal to include load securing in the scope of the directive.

Article 14

SE does not support the proposal in full. SE would like to see that these provisions are limited to tampering of the vehicle's safety and environmental equipment. It does not seem well-balanced to impose the same penalties, no matter the severity of the manipulation.

Article 18 and 18a

SE supports the proposals but prefers usage of EUCARIS for that purpose.

Article 20

SE supports the suggested changes.

Article 21

SE strongly advocates for that methods and threshold levels for new emission tests should be specified via implementing acts.

Article 24

SE supports the suggested changes.

Annex 1 to 2014/45

SE is still analysing the proposal on how electronic safety systems checks should be carried out.

Section 1

SE has a question regarding braking systems checks. SE does not apply ISO 21069 standard and uses a method of extrapolating for checks of brake force. Would that still be possible to continue with?

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Section 4

SE does not support proposal regarding alignment of headlamps (4.1.2) since we consider that the proposed threshold values might be blinding.

SE supports the inclusion of checks of high-voltage systems.

Section 7

SE has some questions regarding checkpoint (7.11) on vehicle odometer. According to answers from the Commission to EU MS questions, there are ways to correct incorrect odometer, but we still do not see how this can be done and how this control will apply in practice.

Section 8

SE strongly advocates for that methods and threshold levels for new emission tests (PN and NOx) should be specified via implementing acts. The details for new measurement equipment also need to be clear.

SE has a scrutiny reservation for the parts that deal with additional emission measurements for motorcycles.

SE is wondering whether the limit value of 1,000,000 in section 8.2.3.1 applies to vehicles up to Euro 5a or including Euro 5a.

SE is wondering about the appropriateness of the limit value of 250,000 and which Euro class should be covered by it. SE sees a risk that there will be many failures with problems that are difficult to remedy.

SE has a scrutiny reservation regarding NOx checks.

Section 10

SE does not support additional checks of electronic safety systems as they are numerous (62 items) and this entails significant additional costs and the safety benefits of checking them in PTI and RSI can be questioned. These systems must be checked continuously, and that is best done via the vehicles diagnostic systems.

Annex 3 to 2014/45

SE requests more specific information on two additional measuring requirements.

Annex 4 to 2014/45

SE supports the addition of competence requirements regarding high-voltage systems.

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