



Council of the European Union
General Secretariat

Brussels, 26 January 2024

**Interinstitutional files:
2023/0052 (COD)**

WK 1073/2024 ADD 2

REDACTED DOCUMENT ACCESSIBLE TO
THE PUBLIC (14.04.2025). ONLY MARGINAL
PERSONAL DATA HAVE BEEN REDACTED.

LIMITE
TRANS
CODEC
JAI
DAPIX
ENFOPOL
CATS
COPEN

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 5532/24
N° Cion doc.:	ST 6792/23 + COR 1+ ADD 1 + ADD1 COR1
Subject:	Proposal for a Directive of the European Parliament and of the Council amending Directive (EU) 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences - 4 column document - Comments from Finland

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

25.1.2024

Proposal for a Directive of the European Parliament and of the Council amending Directive (EU) 2015/413 facilitating cross-border exchange of information on roadsafety-related traffic offences - Presidency compromise proposals for comments - WK 1015/2024 INIT

Finland's comments on latest Presidency compromise proposals

Line 191 (deadline traffic offence notice, compromise proposal on page 2)

The compromise proposal is acceptable for us. The proposed deadlines, which concern the competent authorities of the Member State of the offence, are considered sufficient.

Lines 132 and 136 (deadline mutual assistance, compromise proposal on page 2)

The compromise proposal is acceptable for us. Finland is pleased to note that it has been taken into account in the proposal that the cases may vary in complexity. Gathering the information is the most time-consuming step. It is a good solution that the Member State of registration or residence shall gather the requested information without undue delay. The one month –deadline to respond from the day that the Member State of registration or residence has the necessary information is acceptable.

Line 34

The proposed additions in the Draft Agreement are good and clarifying if Article 5b will be reinstated.

Line 78a

The proposed additions in the Draft Agreement are good and clarifying if Article 5b will be reinstated.

Line 93g

The proposed additions in the Draft Agreement are good and clarifying if Article 5b will be reinstated.

Lines 97 – 99e, 122b, 216a

The text in the Draft Agreement is ok for us.

Line 100

The proposed additions in the Draft Agreement are good and clarifying if Article 5b will be reinstated. It is important that privately owned or operated entity's cannot have access to VRD exchange.

Line 171

We agree with the Draft Agreement Proposal. In Finland sending the notice is clearly the responsibility of the competent authority only.

Line 183, 214, 216, 216a

Although Finland is not keen to reinstate article 5b and the related lines, we can accept the Draft Agreement proposals if this is needed to reach an agreement with the Parliament. As stated in the Draft Agreement proposal, concerned persons should not be subject to privately owned or operated entity's charges related to legal and administrative expenses incurred by administering these proceedings. Only the authorities of Member States should have the right to charge proportionate administrative fees. The private entities should also not be empowered with any initial procedures like sending the traffic offence notice or related follow-up procedures.