Council of the European Union
General Secretariat

PUBLIC

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12271 2025 INIT
N° Cion doc.:	ST 8255 2025
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 - Comments from Sweden

Delegations will find attached comments from Sweden on the above-mentioned document.

Written comments from Sweden regarding the Road Worthiness Package, 2025-09-08 (focus on compromise proposal doc 2025/0097 (COD)

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This document presents Swedish positions regarding the compromise proposal 2025/0097 (COD). It also high-light some of SE:s main concerns in the proposal as a whole. For a full presentation on the Swedish positions so far, we refer to the document sent in by Sweden on July 18th.

Comments regarding compromise proposal in directive 2014/45/EU

Article 3, definitions:

SE anticipates that the definition of "connected vehicle" might cause uncertainty in the implementation since there are no specific regulation where a "connected vehicle" is defined and standrdised. We do not see that the proposed adjustment to the definition in the compromise proposal makes it clearer than before.

Article 4, responsibilities:

SE supports the compromise proposal that technical specifications on what technical information the vehicle manufacturers must make available should be decided upon by implementing acts.

SE considers the compromise proposal regarding data transfer to be a step in the right direction. It is positive that it must not be authorities that handles the data. However, we do not fully understand the meaning of a "trust center" and would like to see further revision of this part of the article. Technical information could be sent? directly to the PTI entities according to current regulation 2019/621/EU. Why could not that be used?

Article 8 and 10, road worthiness certificate

SE supports the suggested changes in the compromise proposal.

Comments regarding compromise proposal in directive 2014/47/EU

Article 3, definitions:

SE supports the inclusion of the new definitions, zero-emission and high-emitting vehicle, but would like the definitions themselves to be more clearly explained/ defined to avoid misunderstanding and different interpretations.

Article 4a:

SE takes note of the suggested amendments in the compromise proposals but still have strong concerns regarding including remote sensing in the directive. We are still scrutinising the proposal and have many questions regarding the costs.

Article 5:

SE supports the compromise proposal that 1 % of the light commercial vehicles should be checked.

Comments regarding compromise proposal in annexes

Section 1 in annex I on breaking systems

SE would like to delete the wording "where applicable by means of reference values" since it is not compatible with our current methods that we use in Sweden.

Section 5 in annex I on checks on tyres

SE does not support the compromise proposal to check the tyres in regards of the age, since it is the condition and not the age that should be checked.

Annex 4 on competence provisions

SE supports the compromise proposal

Other main concerns in the whole proposal

SE is in strong support of the possibility to perform PTI in another EU member state and get a temporary certificate for at least 6 months.

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 in 2014/45/EU 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.

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

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

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SE considers that point 7.11 in annex I on odometer readings raises some concerns. We do not understand how an odometer showing the wrong values can be corrected for instance.

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 is checked continuously, and that is done by the diagnostic systems.

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