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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 Portugal

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

Comments from Portugal about doc. ST 12271/25

PT notes that the present compromise proposal does not address our concerns as regards the roadworthiness testing for motorcycles, as it retains the Commission proposal in Article 1, point 1, subpoint b). We would therefore like to recall that PT wishes to maintain the provision currently in force (article 2, no. 2, indent 7 of Directive 2014/45/EU), which gives MS the possibility to exclude motorcycles from the scope of application.

As previously informed, PT considers that the present framework, which allows Member States to apply an opt-out for motorcycles over 125 cm^3, provides the necessary flexibility to accommodate national specificities and allows for an evidence-based approach tailored to each Member State's road safety context and administrative capacity, without jeopardising road safety.

As to the compromise text, Portugal largely agrees with the changes introduced by PRES DK.

Periodic roadworthiness testing (Directive 2014/45/EU)

We are though concerned about how communications will be made, particularly as regards the transmission of electronic roadworthiness certificates (foreseen under article 8, no. 1a), odometer readings (records made by test centres, providers of repair / maintenance services and vehicle manufacturers, as provided for in Article 4a, nos. 1 and 2), as well as the provision of technical information by vehicle manufacturers to Member States' competent authorities / trust centres (as foreseen in Article 4, no. 5), and its timely reception by Member States' competent authorities.

We understand that communications among MS and MS / authorised testing centres will take place through MOVE-HUB. However, as mentioned in previous comments, these interconnections require considerable investments and IT developments from MS, which have not been accounted for yet.

Technical roadside inspection (Directive 2014/47/EU)

We maintain our position as regards the percentage of vehicles to be screened on the road for emissions. We believe that 30% of the vehicles registered in the country, as proposed in recital 29 and under article 4a, no. 1, is very high, requiring major investments in infrastructure, equipment and human resources.

We also have some questions / concerns as regards the operation, calibration, certification, etc of technology used for remote sensing.