Council of the European Union
General Secretariat

Interinstitutional files:
2025/0097 (COD)

Brussels, 17 September 2025

WK 11707/2025 ADD 6

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12271/1/25 REV 1
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 Slovakia

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

SK comments on Roadworthiness Package

SK would like to thank the Presidency for the work on the proposals. We would thank the Presidency for including also some of SK comments into the text.
SK would like to use this opportunity to provide additional written comments and to reiterate some of our previously raised comments that we believe would further improve the text or its clarity.

PTI Directive

Article 2

- **Article 2 para 1 letter a):** To improve clarity of the text, we propose listing the exact subcategories of vehicles (as defined in regulation 168/2013) instead of adding the criterion of engine capacity.
- **Article 2 para 1:** On tractor categories: The letter „b „ means that these are tractors over 40 km/h, so the **addition** "with a maximum design speed exceeding 40km/h" **is redundant**, we suggest **deletion**.
- To improve clarity of the text, we suggest deleting the word "**mainly"** from the phrase „the use of which ~~**mainly**~~ takes place on public roads". Current formulation could be understood that if these tractors are used mainly off public road**s** (e.g. in fields, forests) and on public roads only sporadically, then the PTI obligation would not apply to them.
- **Article 2 para 2: We propose adding a new indent, to allow for MS to exclude trolleybuses** from **the scope of the directive 2014/45/EU**. As explained, it is not feasible in praxis as trolleybus overhead line does not lead to the testing centre.

Article 4

- **Article 4 para 4:** Slovakia has **serious reservations regarding conducting temporary PTIs** in MS **other than MS of registration for period of 6 months**. The level of inspections differs significantly, and Slovakia has serious concerns about possible PTI tourism, as the rules in Slovakia are strict. As a compromise, **we suggest listing in the text specific situations**, when there is a possibility to conduct PTI test in MS other than the MS of registration.
- **Article 4 para 5:** it would be more practical and beneficial if vehicle manufacturers provide information into a single (Commission) repository.

Article 4a

- **Article 4a para 1:** In Slovakia, we have a register where odometer data is recorded. Every service facility performing repairs records this data continuously. **We do not understand why period of up to 3 months for recording is necessary**. Every service facility, whether authorized or independent, records this separately. We think there is no reason for manufacturers or manufacturer representatives to record it on behalf of authorized services. Manufacturer representatives, who are importers, do not have this information. We believe it is necessary to simplify this so that each service records the data separately.
- **Article 4a para 1:** We would like to repeat our suggestion to **add also other situations and actors** to record odometer readings. Insurance companies record odometer data after carrying out vehicle inspections. Professional car dealers record odometer data, as well as rental companies, court experts etc. Such an adjustment doesn't bring increased costs.
  In SK suppliers of information systems for services have adjusted the systems in a way that the system itself sends this data to the service station after accepting the order, without any burden for the service station.
- **Article 4a para 4:** We do not see much added value, we suggest deleting this para. Could create unnecessary administrative burden.

Article 5

- **Article 5 para 1 letter (a): SK cannot support the provision on increased periodicity**. We consider **current periodicity (4-2-2) to be sufficient.** There is no need for making the rules for category M1 stricter.

- **Article 5 para 1 letter (c):** We propose **deleting the phrase** „*the use of which mainly takes place on public roads* “, as we consider it redundant.
- **Article 5 para 1 last subparagraph:** As we **have serious reservations regarding the temporary PTIs in other MS**, we do not support this provision.

Article 8

- **Article 8 para 1:** We suggest using the same harmonised codes as in the (Directive 1999/37/EC) on Vehicle registration documents. The annex II (to Directive 2014/45/EU) should be amended accordingly. This would provide for more clarity and consistency. *Note: the Working Party working on the End-of-Life Vehicles proposal has similarly added harmonised codes based on the Directive on Registration Documents to the template certificate of destruction.*
- **Article 8 para 1a**: It is not clear from the text, how the exchange of information works. It should be further specified in the text, that this is via Move-Hub. If MS of registration does not receive this information, the vehicle should be considered as not having undergone PTI.
- We would like to point out that in Slovakia **we have a separate PTI register,** and it is not possible to record it in the vehicle register.
- **Article 8 para 3:** Re-registration and recognition of the roadworthiness certificate - the provision is missing a text, that the roadworthiness certificate does not have to be recognised, if the competent authority considers that the vehicle has defects. This would reflect judgement of Court of Justice C-*326/17*).
- **Article 8 para 3:** The last subparagraph (the last two sentences on the specimen of certificates) should be changed into a separate paragraph 3a as it does not follow the introductory part of paragraph 3.
- **Article 8 para 9:** The deadline for the Commission to issue implementing act should be shorter, to create transitional period for MS to apply implementing acts. Same goes for the IAs in art. 16.

Article 9

- **Article 9 para 3:** we suggest deleting the last sentence: „The new certificate shall be issued by the competent authority that requested the suspension. “. It should be possible to carry out a new PTI also by another testing centre, not just the authority that requested the suspension.

Article 16

- **Article 16 para 2:** we suggest **shorten the deadline for EK to issue IAs** – as it is the same deadline as the one for the transposition by the MS.

Article 22: It is not clear from the text what will the Commission do and by when.

RSI Directive

- Article 4a para 1: on remote sensing – SK does not support the 30 % threshold, as it is too excessive. Secondly, in case of introduction of remote sensing, there is no need to keep records of compliant vehicles.
- Article 4a para 3: the 45 days deadline is unclear. The obligation to undergo PTI must be notified to the vehicle owner, an official letter must be delivered to the owner, that is why setting a fixed deadline is problematic.

Article 3: If Member States need to connect to MOVE-HUB, **the details of which will depend on implementing acts**, the transposition period of two years is too short. We suggest minimum three years.