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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12271/3/25 REV 3 ST 12452/2/25 REV 2
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 Italy

Delegations will find, attached, comments from **Italy** on the above-mentioned documents.

Italian comments on the "Roadworthiness package" compromise proposals

ST 12271/3/25 REV 3 and ST 12452/2/25 REV 2

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Italy wishes to thank the Presidency for the work carried out in order to progress on this file. We believe that the latest compromise texts represent progress in the right direction, and we could endorse the Presidency's efforts to bring the Roadworthiness Package to a general approach, provided that some amendment requests of particular importance to us are duly taken into account.

Referring to document ST 12271/3/25 REV 3, Italy proposes the following change:

- Directive 2014/45

Article 1, letter (a)

Delete the words "…for commercial road haulage purposes." This specification creates complexity and uncertainty in identifying which vehicles are subject to PTI, with possible implications for road safety. We consider that the wording "…the use of which mainly takes place on public roads" is sufficient to determine whether a vehicle is registered or not.

Article 4a (1)

Delete the obligation to collect data outside the PTI. In particular, delete the words:

"…and from repairers authorised by vehicle manufacturers when they carry out repair or maintenance work on such a vehicle. Member States shall also require vehicle manufacturers or their representatives to transmit the odometer readings of connected vehicles which they have produced every three months starting from the date of first registration of the vehicle."

Article 5 (1), letter (c)

Delete the words "…for commercial road haulage purposes." This specification creates complexity and uncertainty.

Article 16 (1), letter (b)

Add the following sentence at the end:

"The European Commission shall develop the MOVE-HUB to collect data in such a way that Member States may continue to use their own applications or third-party applications, including the European Vehicle and Driving Licence Information System (EUCARIS), with no further obligation."

This addition is consistent with recital (25).

Article 16 (2)

More time is required to implement the new requirements; therefore, we propose extending the implementation period to 4 years.

- Directive 2014/47

No critical issues identified.

Referring to document ST 12452/2/25 REV 2, Italy has the following requests:

Article 15 (2)

Add the following sentence at the end:

“The European Commission shall develop the MOVE-HUB to collect data in such a way that Member States may continue to use their own applications or third-party applications, including the European Vehicle and Driving Licence Information System (EUCARIS), with no further obligation.”

This addition is consistent with recital (20).

Article 15 (4)

Additional time is required to implement the new requirements. We therefore propose extending the implementation period to 4 years.

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