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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
N° Cion doc.:	ST 8255/25 + ADD 1
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 - Further revised presidency compromise = Comments from Latvia

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

Proposal by Latvia (working document 12271/3/25 REV 3)

(1/2) 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

PUBLIC

- Latvia's comments on the proposals for Article 8 point 1a paragraph 2 to proposed amendments of **Directive 2014/45/EU**:

Temporary roadworthiness certificates

Latvia's position on the temporary roadworthiness tests is outlined in our previous comments, the latest with the most outstanding position – in doc. WK 12678/2025 ADD 7 of 01/10/2025. The proposal outlined below addresses two outstanding aspects – where the working group discussions has not identified contrary views. Namely, Latvia proposes to include in the Directive clear wording that the temporary roadworthiness certificate is directly linked with return to the country for registration to carry out the regular roadworthiness test and not to travel the Europe or even the territory of the Member States of registration throughout the period of the temporary certificate.

Main justification: Article 4 para 1 that defines the obligation (shall) of each Member State to ensure that vehicles registered in its territory are periodically tested in accordance with this Directive.

Proposal for Article 8 point 1a paragraph 2:

Unless the Member State of registration recognises roadworthiness certificates issued by the Member State concerned in accordance with Article 4 paragraph 3, the subsequent roadworthiness test shall take place in the Member State of registration of the vehicle; the EU temporary roadworthiness certificate shall contain information to that effect. **In case of cross-border traffic, the EU temporary roadworthiness certificate can only be used to return to the Member State of registration of the vehicle with expired validity of roadworthiness certificate issued by the Member State of registration. After return to the Member State of registration of the vehicle using an EU temporary roadworthiness certificate, the vehicle shall be brought for regular technical inspection without undue delay.**

- Technical points raised last week on the Annex I of the Registration documents file (doc. 12452/2/REV2 ADD1)

2 (e) P.2 – LV considers it necessary to specify, which indicator for power to use - "*Maximum net power at fuel level", "Consolidated maximum net power at vehicle level"* or another clearly defined parameter;

2 (e) V.7 – LV considers it necessary to specify, which testing method is to be used, namely - WLTP. Presently in practice NEDC values are registered, that is not in line with the acquis and creates challenges for data exchange between Member States.