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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 Sweden

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

Written comments from SE regarding the Road Worthiness Package, 2025-10-14

Sweden welcomes many of the changes proposed in the compromise REV 3, published on October 3rd. However, Sweden has 3 main remaining concerns.

- **Odometer readings (article 4a in 2014/45)**

SE still do not support article 4a since it still imposes provisions on matters that do not have a causal link to either road safety or environment. SE believes that it is sufficient to require that PTI centres register the odometer readings and that those are shown in the PTI certificate history.

- **NOx (section 8 in annex I)**

SE is opposed to imposing any strict requirements with measurement and limit values for NOx emissions. There are too many uncertainties about the method in general, and especially how it works in cold climates. It is not possible for us to limit NOx emission tests to certain time of the year.

- **Electronic safety systems (section 10 in annex I)**

SE would like to thank the presidency for limiting the number of checks in this section. However, we still cannot support the section since there are still too many checks with low deemed effect on road safety. Any checks in this area should be introduced gradually and with clear requirements for evaluating effect and cost, so that we do not end up controlling systems unnecessarily to a high cost.

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