Council of the European Union
General Secretariat

PUBLIC

Interinstitutional files:
2025/0097 (COD)

Brussels, 15 October 2025

WK 13196/2025 ADD 6

LIMITE

TRANS
CODEC
ENV
MI

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

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 Austria

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

AT comments to compromise text of 9 October

PUBLIC

PTI Directive

Art. 4 (4): We are of the opinion that N1 vehicles should not be subject to temporary roadworthiness tests.

Art. 4(5): We support the changes in paragraph 5. However, we would welcome clarification that the manufacturer must also transmit the required data directly to the centralised data centre upon instruction from the competent authority.

Recital (9): The term in brackets should read: “the competent authorities or centralised data centres tasked by the authorities **of one or more Member States** with managing access to that information” to clarify that not every MS has to have its own data centre and two or more MS can use the same data centre.

Art. 4a(1): We do not agree with the new version of paragraph 1 and strongly support the version of the previous compromise text. We do not support mandatory odometer readings by other operators than PTI stations. we support the new paragraph 2 and that smaller service operators are not obliged to record odometer readings.

Art. 5(1)(c): Inclusion of category T5 contributes to clarity and is supported. Maybe a recital clarifying that vehicles type-approved according to previous Directives classified as T5 are considered to fall under the scope of this Directive could be an option.

Art. 8(1a): Provided that communication within ten days is ensured by connecting the national databases and systems to MOVE-HUB, this ten-day deadline can be accepted.

Art. 9(2) & (3): It should not be mandatory to store this data in the vehicle register. MS shall be obliged to store and provide the necessary data but should be able to decide where to store it. Directive 1999/37/EC does not specify where to store the data and it should not be specified with the amendment to that Directive.

Art 16/Recital 23: We welcome the inclusion of the rules on the exchange of data of the electronic COC according to Regulation (EU) 2018/858. However, we would appreciate such clarification in the text, too, and not only in the recitals.

Art. 17: The delegation of powers for adapting point 3 of Annex I in the third indent goes too far in this form. It should be defined in which cases and for what purpose the list of test items, methods, reasons for failure and assessment of deficiencies should be adapted.

RSI Directive

We welcome and support the new text!

Annexes

Rearrangement of the items under proposed group 10 into the original relevant groups is supported. Items should be limited to the mandatory items according to Regulations (EU) 2018/858 resp. (EU) 2019/2144.

0.3.: The new item is supported. We would prefer a major deficiency instead of a dangerous deficiency (or the possibility of a major deficiency in addition to minor and dangerous deficiencies).

1.2.2.: The new method of only checking whether all wheels lock up does not seem sufficient. On the one hand, roller brake test benches do not allow locking, and on the other hand, tires can lock even at significantly low braking values, e.g., if they are old and hardened.

8.1.1. The deletion of mandatory noise measurement for category L is supported.

8.2.2. Obligatory NOx-measurement for PTI is objected.

8.2.3. We consider it necessary that the exemption from opacity measurements for vehicles of emission classes 5a and V without particle filters remains in place.

Section II table 1: Vehicles of category M1 may have a gross vehicle weight of more than 3 500 kg and should be included in the respective lines, not only in section 4 but also in section 2 of the table.

PUBLIC