Council of the European Union
General Secretariat

Interinstitutional files:
2023/0134 (COD)

Brussels, 03 November 2025

WK 14239/2025 ADD 5

LIMITE

TRANS
ENV
FIN
CODEC

PUBLIC

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: To:	General Secretariat of the Council Working Party on Land Transport
N° Cion doc.:	13259/25 + ADD 1
Subject:	Amended proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 1999/62/EC, Council Directive 1999/37/EC and Directive (EU) 2019/520 as regards the CO2 emission class of heavy-duty vehicles with trailers and clarifying and simplifying certain provisions - Comments from Slovakia

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

SK written comments on the Eurovignette proposal 31.10.2025

In general, the Slovak Republic does not support the *Amended proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 1999/62/EC, Council Directive 1999/37/EC and Directive (EU) 2019/520 as regards the CO_2 emission class of heavy-duty vehicles with trailers and clarifying and simplifying certain provisions*.

The proposed changes would entail disproportionately high financial costs for Member States to implement them, would have a significant technical impact on individual national toll systems, as well as on the introduction and operation of toll collection control systems, with an ambiguous positive impact on carriers operating in the road freight transport sector.

The proposed measures would require fundamental changes to the systems for detecting, identifying, and classifying vehicles subject to tolls. It should also be noted that national toll collection authorities and EETS (European Electronic toll Service) providers currently do not have the access to specific data on trailers, which, moreover, can be changed at any time by transport operators when carrying out journeys.

The Slovak Republic is concerned that the proposed measures would significantly complicate and disrupt the systemic and operational architecture of road charging in the form of tolls within the EU.

Including the impact of trailers on CO_2 emissions from road trains in the toll charging system would significantly complicate the pricing of the resultant toll rates, and their further structuring would contribute to a lower level of clarity, transparency, and comprehensibility for transport operators.

The Slovak Republic considers the proposal to be insufficiently mature for Member States to assess it meaningfully, and given the technical complexity of this issue, will recommend to the European Commission firstly to set up an expert working group composed of representatives of national toll collection authorities, representatives of EETS providers, and other relevant actors from the automotive industry, which would properly examine all aspects and potential implementation and operational risks of the proposed amendment and, alternatively, propose that it prepare a comprehensive and in-depth technical analysis assessing the feasibility of the proposed provisions.

Furthermore, the Slovak Republic has reasonable doubts about the effectiveness of the proposed amendment in terms of achieving climate targets. We believe that including the impact of trailers on CO_2 emissions from heavy goods vehicle combinations in the toll system has no relevant impact on the decarbonisation of the road freight transport sector and that it is desirable to seek other, more targeted mechanisms and instruments to achieve the declared climate targets.

PUBLIC