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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	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 Portugal

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

Amended proposal for a DIRECTIVE 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 - COM(2025)589

Comments from PT

PT would like to highlight that the On-Board Unit (OBU) solution currently in use within the national toll systems does not allow users to register the trailer class. Should this become a requirement, and technologically feasible in the future, it would entail a significant financial effort for toll operators, toll service providers and users.

The registration of the trailer class with a toll service provider would require a number plate recognition system and an administrative procedure that could prove difficult to manage, given the flexibility of trailers being attached to different vehicles. PT also considers that this solution would lead to challenges in terms of enforcement.

Considering the above, and in line with the comments made by other Member States, PT expresses concern about the impact of the proposed change on the toll systems of the Member States, in particular regarding the administrative burden and financial costs that its implementation would represent for toll operators, toll service providers, and users.