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WK 14724/2025 ADD 1

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12271/6/25 REV 6
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 Ireland

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

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General Comments

Ireland welcomes the updated draft from the Presidency and, subject to some final points for further consideration, confirm that we would be in a position to broadly support the latest compromise.

We would also take this opportunity to thank the PRES for the inclusion of several amendments which have addressed some of our previous comments, in particular

- we welcome the further flexibility introduced in the recitals and Article 4a to facilitate the recording of odometer data by alternative providers. We would hold the view that odometer readings for all vehicle types should be captured at periodic roadworthiness tests for the purposes of identifying odometer fraud, but would understand that the current text does not preclude us from introducing this at a national level;
- we welcome also the PRES clarifications around ADAS systems included in the Annex, where we are now satisfied with the distribution of the tests, the focus on mandatory items from GSR, and allowing other tests to be included only where the specific equipment is fitted or required; we also thank the PRES for retaining the point 5.3.2.1 on Damping Efficiency.

Our final remaining comments and outstanding points of concern on both PTI and RSI Directives are outlined below.

Directive 2014/45/EU

NOx Testing

- In relation to NOx and PN testing, Ireland welcomes the intention to specify the methodology by implementing acts. However, while Ireland is in favour of testing for NOx emissions at PTI inspections, we would hold a strong concern that this updated PRES proposal has changed the initial testing focus from M1 and N1 vehicles to HDVs. We note that the studies presented at the RWEF on 30th Sept focussed on M1 and N1 vehicles, where the technology has been proven.

As this is a new test procedure to be included at PTI, there are significant practical implementation issues to overcome in real world conditions. The proposal to drive for 5 minutes prior to testing, raises even more significant practical challenges for HDVs than for M1 and N1 vehicles and does not correspond with details shared at the RWEF in respect of HDVs and the average time required for bringing the vehicle up to required engine temperature.

It is our view therefore that the proposed text as currently drafted, is not implementable at present. We suggest that this should be implemented on a phased basis initially, for **M1 and N1** vehicles, as originally intended.

Annex 0.3 - Recall Campaign

- Ireland is in favour of linking voluntary recall notifications to PTI inspections. The onus, however, should always remain with the vehicle manufacturer to notify the owner, and we would like to seek some further reassurance regarding any possible transfer of risk to Member States. In this respect, we would like to clarify the meaning of the text provided:

“(a) Member States may verify the vehicle subject to an ongoing recall campaign where they have identified the deficiencies underlying the campaign as:...”

Our understanding is that in this instance, the only responsibility for the Member State is to determine if the defect, notified by the Vehicle Manufacturer to the market surveillance authority, warrants inclusion in a PTI and may result in a fail item, but that the Member State is not obligated to include it in a PTI test?

For full clarity, it may be beneficial to further specify via an additional Recital that, notwithstanding the proposed link between roadworthiness tests and recall campaigns as described in Recital 15c, that this link does not reduce or replace the obligation and onus for vehicle manufacturers to notify the owner of any such defects. Further, that there is also no transfer of potential risk to the Member State for any failure of the manufacturer to have done so, or for its non-inclusion at PTI.

- **Annex 1.2.2 – Efficiency**

This provision contains reference to R category vehicles which are not in scope of this Directive and should be removed.

- **Annex (1) 3 a) – typo**

*“(a) the inspection of the fitment includes the evaluation of any relevant diagnostic trouble codes made available **be by** the vehicle manufacturers in accordance with Article 4(5) and (6) and an examination of whether the fitted systems and components comply for example, with the following.”*

- **5.3.2 - Shock absorbers including electronic damping**

Ireland suggests including the wording “(if fitted)” to align with other methods of testing.

- **5.3.5 - Air suspension, including height levelling**

Ireland suggests including the wording “(if fitted)” to align with other methods of testing.

Amendments to Directive 2014/47/EU

- **Article 18(3) – Remote sensing follow-up with other Member States**

Clarification here would be good to ensure that Move-HUB is used as per Article 18a

Timeframes

- Timeframes for implementing all of the required IT changes will be significant and Ireland is of the view that 2 years will not be sufficient in general.

Thank you for your consideration