



Council of the European Union
General Secretariat

Brussels, 07 November 2025

**Interinstitutional files:
2025/0097 (COD)**

WK 14724/2025 ADD 3

LIMITE

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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 Sweden

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

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Written comments from SE regarding the Road Worthiness Package, 2025-11-07

Sweden thanks the Presidency for providing the latest compromise proposal. Sweden supports most of the proposed changes. Our remaining concerns and proposals are the following.

- **Regarding and electronic safety systems (section 10 in annex I).**

SE still would like to limit the checks to mandatory systems and would like to highlight previous comments in document WK 13196/2025 ADD 4 (submitted in Delegates Portal on 2025-10-14).

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

SE would like to highlight previous comments in document WK 13196/2025 ADD 4 (submitted in Delegates Portal on 2025-10-14) and WK 14316 2025 ADD 9 (submitted in Delegates Portal on 2025-10-29).

- **Regarding NOx and PN (article 6 on 2014/45, article 10 in 2014/47 and section 8 in annex I)**

SE supports the introduction of NOx measurements on compression ignition vehicles in two phases (as proposed in WK 14316 2025 ADD 9 (submitted in Delegates Portal on 2025-10-29)).

SE does not support the inclusion of NOx measurements on positive ignition vehicles. The current methodology with measurement of carbon monoxide and air fuel ratio (lambda value) are fully justified to address also NOx emissions. These methods have been used for many years and are well known by testing centres.

SE maintains that the limit value for PN checks on compression ignition vehicles should be 1 000 000 rather than 250 000.

- **Article 4 (6) on responsibilities**

PRES proposal	SE proposal
Amendment to directive 2014/45/EU	
Article 4 (6)	Article 4 (6)

The Commission shall adopt implementing acts to specify the set of technical information necessary for roadworthiness testing of the items to be tested, on the use of the recommended test methods, and to establish detailed rules concerning the data format, and the procedures for accessing the relevant technical information, **ensuring that the information allows to clearly identify the vehicle and the resulting list of factory-fitted options.** Such technical information may include, in particular, instructions and data on the use of the electronic vehicle interface, diagnostic trouble codes, **the identification of the correct** and software versions **and their integrity,** and descriptions and illustrations of warning indicators or tell-tales.

Those implementing acts shall take into account the conditions and measures for access to OBD information established in accordance with Annex X, Appendix 4 to Regulation (EU) 2018/858 as implemented by manufacturers; however, the provision of technical information shall be free of charge.

Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).

The Commission shall **amend** ~~adopt~~ implementing acts **2019/621/EU** to **add** ~~specify~~ the set of technical information necessary **useful** for roadworthiness testing of the items to be tested, on the use of the recommended test methods, and to establish detailed rules concerning the data format, and the procedures for accessing the relevant technical information, **ensuring that the information allows to clearly identify the vehicle and the resulting list of factory-fitted options.** Such technical information may include, in particular, instructions and data on the use of the electronic vehicle interface, diagnostic trouble codes, **the identification of the correct** and software versions **and their integrity,** and descriptions and illustrations of warning indicators or tell-tales.

Those amendments of the implementing acts shall take into account the conditions and measures for access to OBD information established in accordance with Annex X, Appendix 4 to Regulation (EU) 2018/858 as implemented by manufacturers; however, the provision of technical information shall be free of charge.

Those **amendments of the** implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).

	<p><i>Justification:</i></p> <p><i>The Commission was given the mandate to propose implementing acts on the same subject already in the 2014/45/EU article 4 (3). The result of that is the regulation 2019/621/EU. This regulation took significant time and labour for the Commission and Member States. The regulation would benefit from an update regarding the set of technical information and the issue of cost, which in the directive 2014/45/EU, article 4 (3) refer to principle laid down by regulation EC 715/2007 and regulation EC 595/2009, now replaced by references to 2018/858/EU. It is therefore proposed to make use of work already done.</i></p> <p><i>It is also proposed that the word “necessary” is replaced by the word “useful”. The reason is that it could be interpreted that the roadworthiness inspection cannot be performed without this information but at the same time the requirement contains, not a mandatory requirement to manufacturer to deliver this information, but the words “may” and “recommended” are used in the text.</i></p>
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- **Regarding inspection of brake performance point 3 in annex I.**

To not have to exchange brake test equipment for heavy duty vehicles on all tests centers we propose to change/add the expression” or equivalent” to point 3 d) in annex 1.

- d) the inspection of the performance and efficiency is a metrological inspection of a component or system for compliance with, or achievement of, specified limit values, which may also include calculation, such as the following:
- testing the brakes on a brake tester and calculating the efficiency (where applicable by means of reference values **or equivalent**);
 - activation of a safety system and evaluating sensor values and/or measuring the performance with external test equipment.