



Council of the European Union  
General Secretariat

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**Interinstitutional files:  
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WK 14724/2025 ADD 4

**LIMITE**

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#### **WORKING DOCUMENT**

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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 Finland

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

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WK 14724/2025 ADD 4

**LIMITE**

**EN**



# Written Comments on the latest compromise text of PTI and RSI Directives from Finland (7.11.2025)

As a reaction to the discussions in WP on Road Transport on the 6<sup>th</sup> of November and to Germany's written comments in the document WK 14724/2025 ADD 2 we would like to present the following:

## NOx testing

We can support the approach presented by Germany in the document WK 14724/2025 ADD 2.

We could accept a mandatory NOx testing requirement if it is limited exclusively to Euro 7 vehicles. Such a limitation would mitigate the challenges associated with testing in colder climates, as Euro 7 vehicles will be designed with enhanced readiness for emission testing. This would not fully remove all our practical concerns, but we see that it could be implementable if details are addressed in the following implementation acts.

The implementing regulations on NOx should explicitly take into account the practical feasibility of vehicle operation and emissions testing under ambient temperatures below  $-10^{\circ}\text{C}$ . This consideration is particularly relevant for northern Member States, where such conditions prevail for extended periods during the year.

Furthermore, we would like to ensure that vehicle manufacturers (i.e. OEMs) make all Alternative Emission Strategies (AESs) accessible for Periodic Technical Inspection (PTI) purposes. This would facilitate a better understanding of the functioning of exhaust after-treatment systems under conditions that fall outside the Real Driving Emissions (RDE) framework. We kindly propose that this aspect be considered for inclusion as a recital.

The timetable and order of implementation of NOx testing should reflect the EU-type approval timetables of Euro 7 vehicles and the PTI intervals of the first Euro 7 vehicles or a longer time if it is seen necessary.

We believe this would help to implement the testing under varying conditions in all Member States.

## N1-vehicles' emission testing

We still do not really see the need for the emission check so soon for new vans.

Many of these vans still have a warranty, when they are years old and we are wondering, if there really is any motivation for manipulation of exhaust after treatment systems by the owner or holder of the vehicle?

However, a longer interval than one or two years would be better and easier to accept.

## RSI targets

We suggest that the N1/van RSIs may be limited nationally to vans that are in commercial use and not all vans.