



Council of the European Union  
General Secretariat

Brussels, 07 November 2025

---

---

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

---

---

WK 14724/2025 ADD 5

**LIMITE**

**TRANS  
CODEC  
ENV  
MI**

*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:	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 Italy

---

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

---

WK 14724/2025 ADD 5

**LIMITE**

**EN**

**Italian Comments on the Revised Presidency Compromise Proposal for  
“Roadworthiness Package”**

First of all, Italy would like to thank the Danish Presidency for the effort made in order to reach a compromise. We still have some concerns about the current text that we hope can be considered when drafting the revised proposal.

Please find below the main challenging points and relevant proposals that should be included.

**Doc. ST 12271/6/25**

Amendment to Directive 2014/45/EU

Article 4

*Responsibilities*

Paragraph (4) should be applied to all categories of vehicles and not only to category M1 and N1.

Justification: For international traffic transport operators use vehicles of category N2, N3, M2 and M3. Therefore, the extension to these categories would ease the work for transport operators and reduce the cost of transport for citizens.

Article 4a

*Recording of odometer readings*

In paragraph (1) delete from the first sentence the following words: “...and from repairers authorised by vehicle manufacturers when they carry out repair or maintenance work on such a vehicle.”

Justification: Collecting data from places other than PTI station is challenging since the central database is to be updated and repairers have to be connected to it. These change in the IT network would be costly and time consuming. Moreover, considering only some repairers – i.e. those authorized by vehicle manufacturers – would introduce a potential market distortion in the market of repairers and a loophole in the legislation (e.g. people that want to fraud would use repairs outside vehicle manufacturers network).

Article 5

*Date and frequency of testing*

In paragraph (1) letter (a) delete the last sentence.

Justification: There is no evidence of environmental benefit with the introduction of emission test after two years from the first registration of vehicle’s category N1. For sure, this provision would introduce new costs for citizens and enterprises.

### Article 3

Only 3 years from the date to entry into force is not enough to implement the directive.  
At least 5 years are needed.

