



EUROPEAN DATA PROTECTION SUPERVISOR

The EU's independent data
protection authority

Opinion 10/2025

on the Proposal to amend 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

The European Data Protection Supervisor (EDPS) is an independent institution of the EU, responsible under Article 52(2) of Regulation 2018/1725 ‘With respect to the processing of personal data... for ensuring that the fundamental rights and freedoms of natural persons, and in particular their right to data protection, are respected by Union institutions and bodies’, and under Article 52(3)‘... for advising Union institutions and bodies and data subjects on all matters concerning the processing of personal data’.

Wojciech Rafał Wiewiórowski was appointed as Supervisor on 5 December 2019 for a term of five years.

*Under **Article 42(1)** of Regulation 2018/1725, the Commission shall ‘following the adoption of proposals for a legislative act, of recommendations or of proposals to the Council pursuant to Article 218 TFEU or when preparing delegated acts or implementing acts, consult the EDPS where there is an impact on the protection of individuals’ rights and freedoms with regard to the processing of personal data’.*

This Opinion relates to the Proposal for a Directive 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 Union¹. This Opinion does not preclude any future additional comments or recommendations by the EDPS, in particular if further issues are identified or new information becomes available. Furthermore, this Opinion is without prejudice to any future action that may be taken by the EDPS in the exercise of his powers pursuant to Regulation (EU) 2018/1725. This Opinion is limited to the provisions of the Proposal that are relevant from a data protection perspective.

¹ COM(2025) 180 final

Executive Summary

On 24 April 2025, the European Commission issued a 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 Union² ('the Proposal').

The Proposal aims to amend Directive 2014/45/EU and Directive 2014/47/EU in order to further improve road safety in the EU, contributing to sustainable mobility and facilitating the free movement of people and goods in the EU.

The EDPS notes that the Proposal would mainly entail processing of non-personal data, as specified in the two annexes to the Proposal. As exchanging information on vehicle registration certificates and roadworthiness certificates may nevertheless involve processing of personal data, the EDPS welcomes that the Proposal recalls the need to ensure that any personal data processing necessary for its implementation complies with the data protection framework of the Union. The EDPS also welcomes that the Proposal indicates that verification techniques not requiring transmission of personal data on individual certificates should be used for the verification of roadworthiness certificates, which is in line with the principle of data protection by default.

Given the subject matter and the provisions of the Proposal, which do not raise specific issues having regard to the protection of personal data, the EDPS does not have specific comments or recommendations on the Proposal.

² COM(2025) 180 final

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THE EUROPEAN DATA PROTECTION SUPERVISOR,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC ('EUDPR')³, and in particular Article 42(1) thereof,

HAS ADOPTED THE FOLLOWING OPINION:

1. Introduction

1. On 24 April, the European Commission issued a 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 Union⁴ ('the Proposal').
2. The objective of the Proposal is to revise the following two Directives⁵:
 - 1) Directive 2014/45/EU of the European Parliament and of the Council on periodic roadworthiness tests for motor vehicles and their trailers⁶; and
 - 2) Directive 2014/47/EU of the European Parliament and of the Council on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union⁷.
3. The objectives of the revision are to⁸:
 - 1) ensure the consistency, objectivity, quality of roadworthiness testing of today's and tomorrow's vehicles;
 - 2) significantly reduce tampering and improve the detection of defective vehicles with faulty or tampered safety and emission control systems, as well as tampered odometers;

³ OJ L 295, 21.11.2018, p. 39.

⁴ COM(2025) 180 final.

⁵ COM(2025) 180 final, p. 1.

⁶ Directive 2014/45/EU of the European Parliament and of the Council of 3 April 2014 on periodic roadworthiness tests for motor vehicles and their trailers and repealing Directive 2009/40/EC, OJ L 127 29.4.2014, p. 51.

⁷ Directive 2014/47/EU of the European Parliament and of the Council of 3 April 2014 on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union and repealing Directive 2000/30/EC, OJ L 127 29.4.2014, p. 134.

⁸ COM(2025) 180 final, p. 3.

- 3) improve electronic storage and the exchange of relevant vehicle identification and status data to address the problem of insufficient data availability and facilitate mutual recognition by enforcement authorities.
4. The Proposal is accompanied by two annexes, specifying the amendments to Annex I to Directive 2014/45/EU and the amendments to Annex II to Directive 2014/47/EU respectively.
5. The present Opinion of the EDPS is issued in response to a consultation by the European Commission of 30 April, pursuant to Article 42(1) of EUDPR. The EDPS welcomes the reference to this consultation in Recital 39 of the Proposal. In this regard, the EDPS also positively notes that he was already previously informally consulted pursuant to recital 60 of EUDPR.

2. General remarks

6. The Sustainable and Smart Mobility Strategy⁹ called for adjustments to the roadworthiness legislative framework to ensure a vehicle's lifetime compliance with emission and safety standards. The Proposal aims to amend the Directive 2014/45/EU and the Directive 2014/47/EU in order to further improve road safety in the EU, contributing to sustainable mobility and facilitating the free movement of people and goods in the EU¹⁰.
7. Directive 2014/45/EU sets out the minimum content and frequency of testing for each vehicle category (except for motorcycles), as well as the content of the roadworthiness certificate. The validity of that certificate, as well as any other proof of testing, is to be recognised by Member States for the purposes of free circulation and re-registering a vehicle already registered in another Member State¹¹.
8. Directive 2014/47/EU complements the Directive 2014/45/EU by requiring Member States to carry out roadside inspections on heavy commercial vehicles above 3.5 tonnes, including buses, lorries, and their trailers. Those inspections include an initial roadside inspection and, if deemed necessary by the inspector, a more detailed technical roadside inspection¹².
9. The EDPS observes that the Proposal would mainly entail processing of non-personal data, as specified in the two annexes to the Proposal. As noted by the Explanatory Memorandum¹³, however, rules on the protection of personal data would apply to exchanging information on vehicle registration certificates and roadworthiness certificates, as well as related vehicle registration data, in particular Regulation (EU) 2016/679 (General Data Protection Regulation)¹⁴. In this regard, the EDPS notes that Article 8(9)(b) of the Proposal would empower the Commission to adopt implementing acts containing the

⁹ COM(2020) 789 final.

¹⁰ COM(2025) 180 final, p. 3.

¹¹ Recital 2 of the Proposal.

¹² Recital 2 of the Proposal.

¹³ COM(2025) 180 final, p. 4.

¹⁴ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance), OJ L 119, 4.5.2016, p. 1.

technical specifications and rules for the purpose of ensuring the ensuring the protection and security of personal data.

10. Against this background, the EDPS welcomes that recital 20 of the Proposal recalls the need to ensure that personal data processing for the implementation of this Directive complies with the data protection framework of the Union, in particular the GDPR. The EDPS also welcomes that the Proposal indicates that verification techniques not requiring transmission of personal data on individual certificates should be used for the verification of roadworthiness certificates. This is in line with the principle of data protection by default¹⁵, which requires from the controller the implementation of appropriate technical and organisational measures ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed.

3. Conclusion

11. Given the subject matter and the provisions of the Proposal, which do not raise specific issues having regard to the protection of personal data, the EDPS has no further comments on the Proposal.

Brussels, 17 June 2025

(e-signed)

Wojciech Rafał WIEWIÓROWSKI

¹⁵ Article 25 GDPR.