



EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
Single Market Enforcement
Notification of Regulatory Barriers

Message 301

Communication from the Commission - TRIS/(2025) 1085

Directive (EU) 2015/1535

Notification: 2025/0142/DK

Request for supplementary information from the Commission.

Request for supplementary information - Demande d'informations complémentaires - Žádost o doplňující informace - Ersuchen um ergänzende Informationen - Искане за допълнителна информация - Žádost o dodatečné informace - Anmodning om supplerende oplysninger - Αίτηση συμπληρωματικών πληροφοριών - Solicitud de información complementaria - Lisateabe edastamise palve - Lisätietopyyntö - Zahtjev za dodatne informacije - Kiegészítő információ kérése - Domanda di informazioni complementari - Prašymas pateikti papildomos informacijos - Papildu informācijas pieprasījums - Talba għal tagħrif addizzjonali - Verzoek om aanvullende inlichtingen - Prošba o uzupeľnienie informacjii - Pedido de informações complementares - Solicitare de informații suplimentare - Žiadosť o ďalšie informácie - Zahteva za dodatne informacije - Begäran om kompletterande upplysningar - Iarraidh ar fhaisnéis fhorlíontach

MSG: 20251085.EN

1. MSG 301 IND 2025 0142 DK EN 16-06-2025 15-04-2025 COM INFOSUP COM 16-06-2025

2. Commission

3. DG GROW/E/3 - N105 04/63

4. 2025/0142/DK - T40T - Urban and road transport

5.

6. Within the framework of the notification procedure under Directive (EU) 2015/1535 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services, the Danish authorities notified to the Commission on 13 March 2025 the draft "Legislative decree on testing with and of self-driving units" (hereinafter, the "notified draft").

In order to allow the Commission services to complete their analysis under the relevant provisions of EU law, the Danish authorities are kindly invited to reply to the following request for supplementary information:

1. In the context of the recommendation to use the 'Guideline on a uniform EU-wide procedure for the subjects of pre-type approval assisted (ADAS) and automated vehicle (ADS) testing and recognition of testing approvals among member states', drafted within the Commission working group dedicated to Automated and Connected Vehicles and available at the following link:

<https://circabc.europa.eu/ui/group/4273d650-b8a9-4093-ac03-18854fbba4b5/library/632b00fa-2d34-4977-844f-fa3c42ed59ae/details>, the Commission services would like to know if the Danish authorities have already verified the compatibility of the proposed national law with those Guidelines.

2. According to Chapter 3, paragraph 6 of the notified draft technical regulation:

"A self-driving unit may not exceed a prescribed maximum speed of 6 km per hour, subject to Paragraph 2.

Paragraph 2. The Danish Road Safety Agency may allow a higher maximum speed if it is necessary for the performance of a specific test and if driving at the higher speed can be carried out safely and without undue inconvenience to other road users."

Given that the majority of self-driving units operate with a speed higher than 6 km/h, it is likely that most testing permits would be issued pursuant to the exception from the general principle. In view of the above considerations, the Commission services would like to know if there is a specific reason for the introduction of such a restrictive requirement



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on the speed of the self-driving vehicles.

The Danish authorities are kindly invited to reply by 5 May 2025.

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