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WORKING DOCUMENT

From: To:	General Secretariat of the Council Working Party on Land Transport
N° Cion doc.:	ST 8255/25 + ADD 1 ST 8259/25 + ADD 1 - 4
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 Proposal for a Directive of the European Parliament and of the Council on the registration documents for vehicles and vehicle registration data recorded in national vehicle registers and repealing Council Directive 1999/37/EC - Comments from Slovakia

Delegations will find, attached, comments from **Slovakia** on the above-mentioned proposals.

SK Comments on the Annexes of the PTI Directive

- **4.1.1**

1. We propose adding electronic vehicle interface to the method as a new reason for failure has been added - d) System indicates failure for example via the electronic vehicle interface.

2. We suggest to recategorize the assessment of the deficiency letter a). The malfunction of any light source of the headlamps cannot be a minor mistake, as their function is to sufficiently illuminate the road in front of the vehicle.

Should this deficiency be kept, we suggest the following wording for a major deficiency: "*a) Defective or missing light source and/or seriously affected visibility.*"

- **4.2.1**

The current wording is unclear we suggest changing to:

„(a) Defective light source. Up to 1/3 of the light sources of a lamp are defective or missing. A mandatory lamp is defective or missing and/or has seriously affected visibility.„

- **5.3.2.1**

We do not agree with the efficiency testing of damping, as we do not know the details of equipment that the control stations would need to be equipped with.

- **10.48**

It is currently not possible to fully diagnose the eCall system due to a lack of specific information from vehicle manufacturers or their representatives.

It is also unclear how to evaluate an eCall system that is an approved part of a vehicle but no longer functions due to outdated hardware – specifically, a 2G/3G module that is no longer supported by network operators. Although the vehicle has not been modified and remains in its approved design, and the eCall system itself is not damaged, it no longer operates because it cannot connect to current networks.

- **8.2.1 Exhaust emissions control equipment**

8.2.1 letters f) and g): method: Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface (OBD or OBM read-out)

The current proposal does not contain a description of the control mechanism. It is nearly impossible to detect modifications of the control unit software via the OBD. Mandatory CIN and CVN marking along with the availability of corresponding lists for vehicles from individual manufacturers, would be beneficial. Without these measures, this point is practically impossible to implement.

If we introduce the control of SCR catalysts, in addition to NOx measurement and electronic control, a physical inspection of the SCR part of the system as well as of the consumer reagent should be introduced in point 8.2.1. This would allow to predict the presence of devices according to letter h). At a minimum, checks on the presence and quality of the reagent as in point 8.2.1 (i) of the draft revision of Directive 2014/47/EU, should be included. **Therefore, we propose to introduce this assessment from the Annex of Directive 2014/47 also in Directive 2014/45.**

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"i) Insufficient reagent, if applicable - assessment "B""

We propose to add the following deficiencies to the visual check in point 8.2.1:

- the charging, lubrication, or glow indicator signals a malfunction,
- the particulate filter warning device shows that the filter is full,
- the warning device for a malfunction in the particulate filtration system or the SCR system is activated.

- **8.2.2** (Note: there is an explanation in the footnote of the Directive 2014/45. Such footnote is missing in this proposal)

In the proposal, individual testing procedures are based on emission standards (previously, they were based on the date of first registration). The date of first registration is still used for defining limit values of gaseous emissions, etc. (The proposal, however, does not contain a footnote specifying the relevant dates, which makes it impossible, for example, to determine for which vehicles the proposed new CO limits (0.2% / 0.1%) apply.)

We propose to simplify and introduce the measurement of particle number and NOx emissions from the same emission standards, and alternatively based on the date of first registration.

We propose to introduce the obligation of the particle number and NOx measurement from Euro VI, 6d-TEMP and newer, if this figure is not available, then for the first time registered after XX.XX.XXXX (so that it would be after the aftersales 6c)

- **8.2.3** (Note: there is an explanation in the footnote of the directive 2014/45. Such footnote is missing in this proposal)

It would be appropriate to simplify and introduce test procedures for measuring the particle number and NOx from the same emission class and alternatively according to the date of first registration.

We propose to introduce the obligation of the particle number and NOx measurement from Euro VI, 6d-TEMP and newer, if this figure is not available, then for the first time registered after XX.XX.XXXX (so that it would be after the aftersales 6c)

According to vehicle preparation procedure in 8.2.3.3. the vehicle shall be warmed up for at least 5 min. by driving or by an equivalent method, and the measurement shall be performed within following 3 minutes. We consider such measurement as almost impossible in the conditions of stationary workplaces located in urban areas.

- **Electronic safety systems (group 10)**

Some deficiencies are undetectable in the current state (insufficient information from vehicle manufacturers/representatives), e.g. *c) Software version or - integrity incorrect*.

Also, if it is necessary to evaluate the DTC, the assessment of deficiencies, whether it is a minor, major or dangerous deficiency, it will be very subjective due to lack of information from vehicle manufacturers/representatives.

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