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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 Austria

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

- Annex I

· 1.2.2.: The new method of only checking whether all wheels lock up does not seem sufficient. On the one hand, roller brake test benches do not allow locking, and on the other hand, tires can lock even at significantly low braking values, e.g., if they are old and hardened.

4.14.: Many of the proposed test items (especially measurements on the high voltage system) require disassembling of the vehicle, which is not suitable for PTI or RSI (4.14.4.3., 4.14.5.2., 4.14.5.3.). Testing of the high voltage system should focus on visual inspections combined with the use of the electronic vehicle interface. The charging cable is no mandatory equipment.

5.3.2.1.: Since there are no test devices available capable of reliably determine the condition of shock absorbers, the footnote (X)2 shall remain in the text.

· 8.1.1.: It is not yet clear whether all test centers ~~have~~ fulfil the necessary ~~equipment~~ requirements in terms of a test area of suitable size to carry out noise measurements on L-class vehicles. This can be particularly difficult in urban areas. Since there is a risk that there will no longer be enough testing centres available for the assessment of vehicles of class L, the mandatory noise measurement is objected.

· 8.2.2./8.2.2.3./8.2.3.3.: There is currently no known method for measuring NOx that would be suitable for regular technical inspections. Either the equipment and devices required are far too expensive, or the accuracy and reproducibility are insufficient, meaning that too many false positives could be detected. Obligatory NOx-measurement for PTI is objected.

8.2.2.1.: It is not clear yet if PN measurement is suitable for SI engines since technology (both on vehicles and on measurement devices) differs significantly from CI engines.

· 8.2.3.2.: For vehicles with compression ignition engines (diesel engines) where opacity measurement (as opposed to particle number measurement) is to be used, it must remain possible to omit this opacity measurement if an OBD readout is performed instead. This measurement procedure (opacity measurement) is so outdated that it cannot detect defective particulate filters in Euro 5 and Euro 6 vehicles. On the other hand, these measurements frequently cause engine damage in AT.

· 10 “Electronic Safety Systems”: ~~Still being analyzed. However,~~ The test items should in no case go beyond the systems required in the context of type approval. Test methods should – in addition to standard diagnostic devices – only require standard tools and no expensive special equipment. The combination of these test items into the new group 10, which belong to other groups, disrupts the systematics of the catalogue of systems to be tested and leads to additional work and an increase in the complexity of the vehicle inspection. We suggest to move the new items into the relevant groups where other items of the relevant systems are listed.