Council of the European Union
General Secretariat

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Interinstitutional files:
2025/0096 (COD)
2025/0097 (COD)

Brussels, 07 August 2025

WK 10061/2025 ADD 12

LIMITE

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WORKING DOCUMENT

From: To:	General Secretariat of the Council Working Party on Land Transport
N° Cion doc.:	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 - Comments from Hungary

Delegations will find, attached, comments from **Hungary** on the above-mentioned proposal.

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Guidelines to be followed

Please kindly provide your contributions in the table below.

Drafting suggestions: you may use '**track changes**' or formatting (for example **bold-underline** for additions and ~~strike-through~~ for deletions, **where necessary, in a different colour**).

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments on … .docx**

Thank you for your cooperation!

Commission proposal	Drafting suggestions	Comments/ Questions
General comments		
2025/0097 (COD)		
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		
(Text with EEA relevance)		

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THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,		
Having regard to the Treaty on the Functioning of the European Union, and in particular Article 91(1) thereof,		
Having regard to the proposal from the European Commission,		
After transmission of the draft legislative act to the national parliaments,		
Having regard to the opinion of the European Economic and Social Committee[1],		
Having regard to the opinion of the Committee of the Regions[2],		
Acting in accordance with the ordinary legislative procedure,		
Whereas:		
(1) Provisions regarding roadworthiness testing have been part of Union legislation for decades. They are however subject to gradual harmonisation. Union law to that effect was last		

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1 OJ C , , p. .
2 OJ C , , p. .

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revised in 2014 with the "Roadworthiness Package"[3]. To improve enforcement, consecutive revisions of those rules gradually extended the scope of vehicles to be tested and the scope of the harmonised rules, including those on roadside inspections and vehicle registration documents. They specified and updated the required test methods, procedures and related documents to reflect technological progress.		
(2) Directive 2014/45/EU sets out the minimum content and frequency of testing for each vehicle category, except for motorcycles, where Member States have a broader discretion. That Directive also sets out minimum requirements for the independence of testing centres and training of inspectors, testing equipment, and 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 State.		

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[3] 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, ELI: http://data.europa.eu/eli/dir/2014/45/oj), 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, ELI: http://data.europa.eu/eli/dir/2014/47/oj) and Directive 2014/46/EU of the European Parliament and of the Council of 3 April 2014 amending Council Directive 1999/37/EC on the registration documents for vehicles (OJ L 127, 29.4.2014, p. 129, ELI: http://data.europa.eu/eli/dir/2014/46/oj).

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(3) Directive 2014/47/EU complements 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 with the aim of inspecting 5% of the Union fleet each year. Those inspections include an initial roadside inspection and, if deemed necessary by the inspector, a more detailed technical roadside inspection. The items tested in the detailed inspections are the same as those tested at periodic tests and may also include the inspection of cargo securing. Where a major or dangerous deficiency is found during a roadside inspection, the Member State where the inspection took place is required to notify the Member State of registration in order to enforce the repair of the vehicle that has been suspended from traffic.		
(4) Due to rapid technological progress, some of the current rules for testing vehicles have become outdated and should be amended to adapt them to newer technologies and vehicles. The testing framework should further contribute to reducing emissions from transport and to accelerating and benefiting from digitalisation in the transport sector. The framework should also be better adapted to developments in evolving vehicle technology, fleet composition and testing methods.		

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(5) The digital transition is one of the Union's priorities. In the context of updating the current rules on testing vehicles, it is also important to harmonise, simplify and digitalise administrative procedures and to remove the remaining barriers to free movement. These barriers include the non-recognition of periodic technical inspections conducted in Member States other than the Member State of registration. This can impede the free movement of people within the Union and their right to take up residence in a Member State other than the one where the vehicle is currently registered.		
(6) Some of the current emission test methods are inadequate for testing vehicles with modern air pollutant emission control technology and low baseline emissions. There is also potential to further reduce pollutant emissions through more appropriate tests and checks. Applying the best available test methods would help Member States reach stricter air quality standards, namely the limit values for the protection of human health set by Directive (EU) 2024/2881 of the European Parliament and of the Council[4], especially for fine particulate matter and nitrogen oxides (NO_X).		

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[4] Directive (EU) 2024/2881 of the European Parliament and of the Council of 23 October 2024 on ambient air quality and cleaner air for Europe (recast), (OJ L, 2024/2881, 20.11.2024, ELI: http://data.europa.eu/eli/dir/2024/2881/oj).

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(7) The number of fatalities and serious injuries on Union roads remains at an unacceptably high level, with 20 400 deaths in 2023. Therefore, further action is required in order to reach the targets for road safety set out in EU road safety policy framework 2021-2030[5].		
(8) Testing the roadworthiness of motorcycles has clear benefits for road safety. This has also been demonstrated by the number of Member States that already include motorcycles in their roadworthiness testing systems. As a result, the current possibility of an opt-out for motorcycles with an engine capacity above 125 cm^3 is no longer appropriate, and periodic testing should be mandatory for such vehicles without exception.		
(9) According to the feedback received from Member States and industry representatives, the current legal requirements aiming to ensure that the technical data needed to carry out periodic technical inspections are available to testing centres have proven to be ineffective. It is therefore necessary to specify that a minimum set of information should be made available free of charge and without undue delay to the competent authorities, which should then ensure		

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[5] SWD(2019) 283 final https://transport.ec.europa.eu/system/files/2021-10/SWD2190283.pdf.

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that the testing centres authorised by them also have the required access.		
(10) The Member State of registration should recognise a temporary roadworthiness certificate issued by another Member State for a period of up to six months, provided that the subsequent periodic technical inspection is conducted in the Member State of registration. That will contribute to facilitating the free movement of people while respecting the basic requirement that vehicles are generally to be tested in the Member State of registration.		
(11) For the same reason, a Member State of registration should be able to choose to recognise roadworthiness certificates issued by another Member State. If it does so, it should inform the other Member States and the Commission. The roadworthiness certificates concerned should be considered by all Member States as equivalent to certificates issued by the Member State of registration.		
(12) To combat fraud related to the mileage of used vehicles, recording odometer readings is included in periodic roadworthiness testing. However, the effectiveness of the measure has been limited because the first test is only carried out four years after the first registration in most Member States and only every two years after that in many of them. To further tackle		

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odometer fraud, Member States should ensure that odometer readings are taken whenever a service provider carries out maintenance or repair work on a vehicle and that the readings are recorded in a national database or register. Member States should make those readings available in an anonymised format to inspectors, the competent authorities and the holder of the registration certificate. In addition, Member States should require manufacturers to transmit the odometer readings of connected vehicles every three months. In order to enable consumers to detect odometer fraud before purchasing a vehicle, Member States should also inform consumers of the availability of odometer history to the holder of the registration certificate, in particular in the context of vehicle sales. To enhance the availability of statistics on vehicle use without additional reporting burden on national administrations, Member States should make the odometer readings available, in an anonymised form, to the national statistical institutes and to the Commission (Eurostat).		
(13) Although electric vehicles, including hybrid electric vehicles, have been in circulation for many years, and their numbers have been steadily increasing, there are no harmonised rules on the roadworthiness testing of the high-voltage systems of such vehicles, resulting in Member States developing different test protocols. To ensure the safe operation of such		

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vehicles throughout their useful life and avoid conflicting testing practices in the Member States, relevant test items should be included in the minimum requirements for the contents of and recommended methods for testing.		
(14) Regulation (EU) 2019/2144 of the European Parliament and of the Council[6] requires the installation of a variety of advanced driver assistance systems, designed to avoid crashes and reduce casualties and severe injuries. However, the expected benefits will not be achieved if these systems deteriorate over time or are subject to tampering. Therefore, those new electronic systems should be included in periodic and roadside inspections to ensure that they deliver their expected safety benefits. To ensure the safe operation of automated vehicles and the testing of electronic safety systems throughout their useful life, relevant items to be tested should be included in the minimum requirements concerning the contents of and recommended methods for testing set out in the respective Annexes to Directives 2014/45/EU and 2014/47/EU.		

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[6] Regulation (EU) 2019/2144 of the European Parliament and of the Council of 27 November 2019 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/858 of the European Parliament and of the Council and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009 of the European Parliament and of the Council and Commission Regulations (EC) No 631/2009, (EU) No 406/2010, (EU) No 672/2010, (EU) No 1003/2010, (EU) No 1005/2010, (EU) No 1008/2010, (EU) No 1009/2010, (EU) No 19/2011, (EU) No 109/2011, (EU) No 458/2011, (EU) No 65/2012, (EU) No 130/2012, (EU) No 347/2012, (EU) No 351/2012, (EU) No 1230/2012 and (EU) 2015/166 (OJ L 325, 16.12.2019, p. 1, ELI: http://data.europa.eu/eli/reg/2019/2144/oj).

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(15) While road transport contributes to significant shares of harmful air pollutant emissions in particular NO_X and fine particles, the current testing methods for exhaust emissions are not adapted to more recent vehicles and technologies. Commission Recommendation (EU) 2023/688[7] was a first step in harmonising particle number measurement during roadworthiness testing. In the interests of public health, environmental protection and fair competition, the relevant items to be tested during periodic technical inspections set out in the annexes to Directives 2014/45/EU and 2014/47/EU should now include particle number measurement and the measurement of NO_X.		
(16) Older vehicles tend to have more defects, are more frequently involved in crashes, and represent a higher proportion of high-emitting vehicles. Inspecting older cars and light commercial vehicles annually can contribute significantly to reducing crashes and harmful emissions. Cars and light commercial vehicles should therefore be inspected annually at the latest after 10 years from the date of first registration.		

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[7] Commission Recommendation (EU) 2023/688 of 20 March 2023 on particle number measurement for the periodic technical inspection of vehicles equipped with compression ignition engines, (OJ L 90, 28.3.2023, p. 46, ELI: http://data.europa.eu/eli/reco/2023/688/oj).

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(17) Furthermore, since light commercial vehicles are used more intensively than private cars, often in densely populated areas, they should be inspected for emissions annually after one year from the date of first registration.		
(18) In addition to scheduled periodic technical inspections, vehicles should also be subject to a roadworthiness test if the safety or environmental systems and components of the vehicle have been significantly altered or modified. This includes cases where there is a change of vehicle category or emission levels, for example following the installation of a particle filter or when a vehicle is converted to run on an alternative fuel.		
(19) To facilitate the digital transition and to reduce costs for testing centres, roadworthiness certificates should be issued in a standardised electronic format. A paper printout of the roadworthiness certificate should also be issued to the person who presented the vehicle for testing upon request. Member States should accept both formats when the ownership of the vehicle is changed or when the vehicle is re-registered in another Member State. For similar reasons, the report of the more detailed roadside inspection should be issued in electronic format.		
(20) It should be ensured that personal data processing for the implementation of this		

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Directive complies with the data protection framework of the Union, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council[8]. In line with the principle of data protection by default, verification techniques not requiring transmission of personal data on individual certificates should be employed for the verification of roadworthiness certificates.		
(21) To provide for adequate follow-up of deficiencies where a vehicle fails a periodic technical inspection due to one or more major deficiencies in a Member State other than the Member State of registration, the result of the test and the deadline for the subsequent test should be notified to the Member State of registration and recorded in the vehicle register. The deadline for the subsequent test should be no more than two months and should take place in either Member State. In addition, when a vehicle has failed the periodic technical inspection due to one or more dangerous deficiencies, to avoid immediate risks to road safety or the environment, the Member State or competent authority should be able to decide that the vehicle in question is not to be used on public roads and request the Member State of registration to suspend the vehicle's authorisation for use in road traffic, until the		

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[8] 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 (OJ L 119, 4.5.2016, p. 1, ELI: http://data.europa.eu/eli/reg/2016/679/oj).

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deficiencies are rectified. The suspension should be recorded in the vehicle register of the Member State of registration.		
(22) Tampering or manipulating any component of a vehicle should be considered to be a major or dangerous deficiency and therefore should be punishable by effective, proportionate, dissuasive and non-discriminatory penalties.		
(23) The current requirements set out in Directives 2014/45/EU and 2014/47/EU for Member States to cooperate with each other when implementing those Directives do not enable Member States to check a vehicle's legal and technical status in cross-border situations. To ensure greater effectiveness, including in such situations, Member States should assist one another in implementing the Directive more systematically. Therefore, it is necessary to set out rules on the exchange of information and vehicle data to allow Member States to consult each other's vehicle registers and roadworthiness databases, including the content of roadworthiness certificates and technical roadside inspection reports.		
(24) For the exchange of information on vehicles registered in the Union, the MOVE-HUB message exchange platform has been developed by the Commission to interconnect		

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Member States' national electronic registers[9]. The platform currently hosts the interconnection of road transport undertaking registers (ERRU), driving licence registers (RESPER), professional driver training registers (ProDriveNet), tachograph driver card registers (TACHOnet), and the notification of vehicle roadside inspection failures (RSI)[10].		
(25) The functionalities of the MOVE-HUB should be extended to enable the necessary exchange of information and vehicle data for the purposes of Directives 2014/45/EU and 2014/47/EU. Member States should therefore connect their electronic systems containing information on roadworthiness certificates and odometer history to MOVE-HUB. The exchange of information and data through the MOVE-HUB should be operational within one year after the adoption of the corresponding implementing acts pursuant to Article 16 of Directive 2014/45/EU and Article 18a of Directive 2014/47/EU.		
(26) Crises brought about by serious events, occurring inside or outside the Union, may significantly disrupt the operation of its roadworthiness system. During times of crisis,		

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[9] Commission Implementing Regulation (EU) 2016/480 of 1 April 2016 establishing common rules concerning the interconnection of national electronic registers on road transport undertakings and repealing Regulation (EU) No 1213/2010 (OJ L 87, 2.4.2016, p. 4. ELI: http://data.europa.eu/eli/reg_impl/2016/480/oj).

[10] Commission Implementing Regulation (EU) 2017/2205 of 29 November 2017 on detailed rules concerning the procedures for the notification of commercial vehicles with major or dangerous deficiencies identified during a technical roadside inspection (OJ L 314, 30.11.2017, p. 3, ELI: http://data.europa.eu/eli/reg_impl/2017/2205/oj).

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Member States should be able to extend the validity of roadworthiness certificates, including temporary roadworthiness certificates. Subject to the Commission's authorisation, Members States should be allowed to extend the administrative validity of expiring roadworthiness certificates and temporary roadworthiness certificates by six months. Where the crisis persists, it should be possible to further extend the validity.		
(27) Given the increased number of light commercial vehicles in circulation within the Union, to promote a level playing field for commercial operators across the Union and to further improve their safety and environmental performance, light commercial vehicles should also be subject to roadside inspections.		
(28) For roadside inspections, the screening of the exhaust emissions of large numbers of vehicles by using remote sensing equipment is an effective measure for identifying high-emitting vehicles. It increases detection rates significantly compared to mandatory test methods. Member States should therefore use remote sensing equipment systematically to screen large shares of the vehicle fleet in real on-road conditions. One single remote sensing measurement indicating high emissions above the legal limits could be related to various factors, such as temporary acceleration or a cold		

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engine. However, multiple measurements systematically indicating significantly higher-than-average emissions could indicate a faulty emission control system or unauthorised modifications, such as tampering. Since such defects and modifications generate excessive emissions that pose risks to human health and the environment, they should be repaired, and any tampering should be sanctioned.		
(29) As a result, such screening by remote sensing should form part of each Member State's roadside inspection system. For the screening to be effective, each Member State should screen the equivalent of at least 30% of its registered fleet of motor vehicles, including cars and motorcycles. On the basis of that remote sensing data, Member States should check the exhaust emissions and the noise level of any vehicle that is suspected to emit more than double the average level of similar vehicles, or more than 3 dB above the average level. That check could be carried out in a roadside inspection immediately after a remote sensing measurement or in a roadworthiness testing centre in the Member State of registration. For vehicles registered in another Member State, the competent authority where the remote sensing measurement took place should notify the measurement result and the result of any subsequent roadside inspection to		

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the competent authority of Member State of registration.		
(30) Directive 2014/47/EU specifies a minimum share of heavy commercial vehicles to be tested at the roadside each year in the Union but sets no target at Member State level, with the result that it is difficult to ensure the enforcement of that minimum share. To ensure that roadside inspections of commercial vehicles contribute to improved road safety and reduced air pollution across the Union, each Member State should carry out a total number of initial technical roadside inspections every year, corresponding to at least 5% of the total number of heavy commercial vehicles registered in their territory.		
(31) To promote digital transformation and to reduce costs in the transport sector, Member States should require their competent authorities to accept electronic evidence of roadside inspections.		
(32) Given that inadequate or dangerous cargo securing can pose a serious threat to road safety and to the environment, inspections of cargo securing should be a mandatory part of roadside inspections in all Member States.		
(33) To ensure uniform conditions for the implementation of this Directive, implementing		

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powers should be conferred on the Commission to specify: (a) the set of technical information and data necessary for roadworthiness testing that must be made available to the competent authorities, (b) interoperability features and security measures applicable to the QR codes introduced on roadworthiness certificates, (c) the necessary features and requirements for the format and content of the information and data to be exchanged, and (d) the format in which the data on periodic testing and roadside inspections are to be communicated. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council[11].		
(34) In order to achieve the objectives of this Directive, in particular to adapt the annexes to Directives 2014/45/EU and 2014/17/EU to any technical, operational or scientific developments, the power to adopt acts in accordance with Article 290 TFEU should be delegated to the Commission to (a) specify the methods for the PN measurement of positive ignition engines and for the NO_X measurement of compression and positive ignition engines; and (b) set the common limits for exhaust or noise emissions or both that should be used to identify high-emitting vehicles. It is of particular importance that the Commission carry		

[11] Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission's exercise of implementing powers (OJ L 55, 28.2.2011, p. 13, ELI: http://data.europa.eu/eli/reg/2011/182/oj).

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out appropriate consultations during its preparatory work, including at expert level, and that those consultations be conducted in line with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making[12]. In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council should receive all documents at the same time as Member States' experts, and their experts should systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.		
(35) The objectives of this Directive, namely, to improve road safety, facilitate the free movement of persons and reduce pollutant emissions cannot be sufficiently achieved by the Member States acting alone as national rules governing those vehicle checks would lead to diverging requirements. Consequently, such objectives are better achieved at Union level by laying down minimum common requirements and harmonised rules concerning periodic technical inspections and technical roadside inspections of vehicles circulating within the Union. Therefore, the Union may adopt measures, in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union. In accordance with the		

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[12] OJ L 123, 12.5.2016, p. 1, ELI: http://data.europa.eu/eli/agree_interinstit/2016/512/oj.

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principle of proportionality as set out in that Article, this Directive does not go beyond what is necessary in order to achieve those objectives.		
(36) Although data on the operation of roadworthiness testing regimes is available at national level, such data is not available at Union level. That lack of data hampers the analysis and evaluation of the roadworthiness testing system. To address those shortcomings, Member States should, in the implementation of Directive 2014/45/EU, report regularly to the Commission key data on the number of testing centres in each Member State, the total number of vehicles inspected per category, the areas checked, the items failed, and information on roadworthiness tests conducted on vehicles registered in another Member State. On roadside inspections, the current reporting obligations on Member States should be reduced and simplified, with less frequent reporting required.		
(37) To minimise the administrative burden while ensuring the usefulness of the reported information, Member States should report on the implementation of Directives 2014/45/EU and 2014/47/EU every three years.		
(38) The roadworthiness system has a direct impact on road safety, noise and emissions and should therefore be reviewed periodically. On the basis of the input from Member States'		

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authorities, the Commission should report to the European Parliament and Council on the effectiveness of the provisions of Directive 2014/45/EU, including those on the scope, frequency of testing and recognition of temporary roadworthiness certificates, and Directive 2014/47/EU, including that on remote sensing.		
(39) The European Data Protection Supervisor was consulted in accordance with Article 42(1) of Regulation (EU) 2018/1725 and delivered an opinion on [DD/MM/YYYY].		
(40) In accordance with the Joint Political Declaration of 28 September 2011 of Member States and the Commission on explanatory documents[13], Member States have undertaken to accompany, in justified cases, the notification of their transposition measures with one or more documents explaining the relationship between the components of a directive and the corresponding parts of national transposition instruments. With regard to this Directive, the legislator considers the transmission of such documents to be justified.		
(41) Directive 2014/45/EU and 2014/47/EU should therefore be amended accordingly,		

[13] OJ C 369, 17.12.2011, p. 14.

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HAVE ADOPTED THIS DIRECTIVE:		
Article 1		
Amendments to Directive 2014/45/EU		
Directive 2014/45/EU is amended as follows:		
(1) Article 2 is amended as follows:		
(a) in paragraph 1, the sixth indent is replaced by the following:		
'– two- or three-wheel vehicles – vehicle categories L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm^3, or with a maximum continuous rated or net power above 11 kW;		
– wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b and T4.3b the use of which mainly takes place on public roads with a maximum design speed exceeding 40km/h.';		
(b) in paragraph 2, the seventh indent is deleted;		

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(2) Article 3 is amended as follows:		
(a) the following point (6a) is inserted:		
'(6a) 'connected vehicle' means any vehicle with a device installed which is designed to allow a wireless connection or communication with external devices, vehicles, networks or services;';		**HU:** We note that in the case of the proposed definition of "connected vehicle," it is not clear how and based on which official documents a vehicle is identified as such; therefore, we consider it necessary to clarify this in the Directive.
(b) point (10) is replaced by the following:		
'(10) 'approval' means a procedure whereby a Member State certifies that a vehicle satisfies the relevant administrative provisions and technical requirements referred to in Regulations (EU) No 167/2013, (EU) No 168/2013 and (EU) 2018/858;';		
(c) point (12) is replaced by the following:		
'(12) 'roadworthiness certificate' means a roadworthiness test report issued by the competent authority or a testing centre;';		
(d) the following point (12a) is inserted:		
(12a) 'temporary roadworthiness certificate' means a roadworthiness certificate issued by the competent authority, or a testing centre established in a Member State other than the		

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Member State of registration of the vehicle in accordance with Article 4(3);’;		
(3) Article 4 is replaced by the following:		
‘Article 4		**HU** proposes to clarify how many temporary roadworthiness certificate can be issued one after another since the current proposal sets out only that the next periodic roadworthiness test is to be carried out in the MS of registration, however it does not set a limit to the amount of temporary roadworthiness certificates. This might lead to holders using this as a legal loophole and avoid the re-registration of their vehicle in the MS where it is regularly used. HU would also welcome further harmonisation of the roadworthiness certificate be it temporary or periodic. We propose further harmonisation of not only of the elements but also of the document itself. Especially with the introduction of the temporary roadworthiness test carried out by a MS other than the MS of registration it would be essential that the roadworthiness certificate would be easily understood by all enforcement authorities across Europe as it is the case for the driving licence and the registration certificate.

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		HU finds it also essential that the terminology used by the VRD and the PTI proposal are aligned and clarified. The PTI proposal sets out that the "result" of the temporary roadworthiness test is to be registered in the national vehicle register, while at other places the PTI directive is using the term "results" (in plural). The VRD proposal sets out that the "outcome" (instead of "result" or "results" used by the PTI) of the "mandatory" roadworthiness test shall be registered in the national vehicle register. At the same time the PTI proposal does not use the term "mandatory" roadworthiness test anywhere.
Responsibilities		
1. Each Member State shall ensure that vehicles registered in its territory are periodically tested in accordance with this Directive.		
2. Without prejudice to paragraphs 3 and 4, roadworthiness tests shall be carried out by the Member State of registration of the vehicle, by a public body entrusted with that task by that Member State or by bodies or establishments designated and supervised by that Member		

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State, including authorised public or private bodies.		
3. In the case of M_1 vehicles, roadworthiness tests may also be carried out in a Member State other than the Member State of registration of the vehicle. The result of such roadworthiness test shall be included on a temporary roadworthiness certificate, which shall be valid for six months. The competent authority shall communicate the result of the test to the Member State of registration, which shall record it in the national vehicle register. However, unless the Member State of registration recognises roadworthiness certificates issued by the Member State concerned in accordance with paragraph 4, the subsequent roadworthiness test shall take place in the Member State of registration of the vehicle.		**HU** considers it necessary to clarify the issue of how many temporary roadworthiness certificates can be issued, as the proposal does not contain any limitation in this regard; it only stipulates that the next periodic roadworthiness test must take place in the Member State of registration. HU notes the absence of provisions regarding the format and data content of the temporary roadworthiness certificate. To facilitate data exchange between Member States and ensure the smooth operation of cross-border road traffic and road vehicle inspections, we consider it necessary to establish clear rules on the format and data content of the temporary roadworthiness certificate. HU considers it essential to resolve the inconsistencies between the PTI and VRD proposals and to ensure consistent use of terminology. The PTI proposal requires the recording of the result of the temporary roadworthiness certificate (using the term "result" instead of the plural "results" used elsewhere) in the national vehicle register. In contrast, the VRD proposal mandates the recording in the vehicle register of data concerning the outcome (using the term "outcome" instead of "result" or "results") of

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		the mandatory periodic roadworthiness test as well as the validity period of the roadworthiness certificate. Meanwhile, the PTI proposal does not use the term "mandatory periodic roadworthiness test" anywhere. Furthermore, the term "outcome" is identified in Annex II, point (7), and the validity period in point (8). The difference in terminology between the VRD and PTI proposals therefore creates the impression that the data to be transmitted after the roadworthiness test and mandatorily recorded in the vehicle register are not identical.
4. Member States may recognise a roadworthiness certificate, other than the temporary roadworthiness certificate referred to in paragraph 3, issued by a Member State other than the Member State of registration of the vehicle. In such cases, that roadworthiness certificate shall be considered equivalent to the roadworthiness certificate issued by the Member State of registration. Member States which decide to recognise a roadworthiness certificate issued by another Member State shall inform the Commission and the other Member States accordingly.		**HU:** We accept the optional possibility that Member States may recognize a roadworthiness certificate issued by a Member State other than the one in which the vehicle is registered.
5. The Commission shall adopt implementing acts to specify the set of technical information necessary for roadworthiness testing of the items to be tested, on the use of the recommended test methods, and to establish		

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detailed rules concerning the data format, and the procedures for accessing the relevant technical information. Such technical information may include, in particular, instructions and data on the use of the electronic vehicle interface, diagnostic trouble codes, and software versions, and descriptions and illustrations of warning indicators or tell-tales.		
Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).		
6. In accordance with the principles laid down in Regulation (EU) 2018/858, vehicle manufacturers shall make available the set of technical information referred to in paragraph 5 free of charge, and without undue delay, to relevant competent authorities, in a non-discriminatory manner and in a machine-readable format. Those competent authorities shall make that technical information available to the testing centres authorised by them.		
7. Member States shall ensure that the responsibilities for keeping a vehicle in a safe and roadworthy condition are set out in national law.’;		
(4) the following Article 4a is inserted:		

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‘*Article 4a*		**HU:** We support the harmonized extension within the European Union of the obligation to record the odometer readings of road vehicles to all service providers performing repair or maintenance work on vehicles for payment. The proposal contributes to the fight against odometer fraud and, through this, has a beneficial impact on road safety, environmental protection, and also serves to protect road vehicle users, especially purchasers of used vehicles. The proposal also includes a requirement for Member States to oblige vehicle manufacturers to transmit the odometer readings of connected vehicles every three months from the date of first registration of the vehicle. We consider it necessary to define how manufacturers should carry out the reading of the odometer of connected vehicles and the related data communication. Additionally, in our country, there are over 13,000 registered vehicle repair and maintenance workshops, and connecting them directly to a data collection system represents a significant challenge. This entails financial and administrative costs for both the operators concerned and the authorities due to the tasks related to odometer recording (administration, IT developments).
Recording of odometer readings		

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1. Each Member State shall take the measures necessary to enable the recording of odometer readings in a national database or in the national vehicle register. They shall require that, in addition to testing centres, any service provider who issues an invoice or other document in connection with any repair or maintenance work carried out on a vehicle, records the odometer reading in that database or national vehicle register when that work is carried out. Member States shall also require vehicle manufacturers to transmit the odometer readings of connected vehicles which they have produced every three months starting from the date of first registration of the vehicle.		
2. Member States shall make the odometer history of vehicles registered by them available to inspectors, to the holder of the registration certificate and to competent authorities in the Member States responsible for roadworthiness testing, vehicle registration, and vehicle approval.		
3. Member States shall take appropriate measures to inform potential buyers of second-hand vehicles, about the availability of odometer history referred to in paragraph 2.		
4. Member States shall also make available the odometer data stored in the national		

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databases and national vehicle registers referred to in paragraph 1, in an anonymised form including only the first 10 characters of the vehicle identification number, to the national statistical institutes and to the Commission (Eurostat) in accordance with Articles 17a and 17b of Regulation (EC) No 223/2009*.		
* Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities (OJ L 87, 31.3.2009, p. 164, ELI: http://data.europa.eu/eli/reg/2009/223/oj).’;		
(5) Article 5 is replaced by the following:		
‘Article 5		
Date and frequency of testing		

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1. Vehicles shall be subject to a roadworthiness test at least within the following intervals, without prejudice to the period of flexibility applied in Member States under paragraph 4:		
(a) vehicles of category M_1 and N_1: four years after the date on which the vehicle was first registered, and thereafter every two years until 10 years after the date on which the vehicle was first registered, and thereafter annually; however, vehicles of category N_1 shall also be subject to a roadworthiness test for the items listed in Section 8.2 of Annex I, one year after the date on which the vehicle was first registered, and thereafter annually;		**HU:** We do not support this amendment as it significantly increases the financial and administrative burdens on the owners of these vehicles, primarily impacting those with lower income and considerably increases the administrative duties and obligations of the relevant authorities. Road safety and the protection of the environment would only improve to a relatively small extent in return. We note that according to vehicle fleet statistics in Hungary, nearly 80% of M1 vehicles are older than 10 years, which corresponds to approximately 3.3 million vehicles in Hungary, for which the number of periodic inspections would double. Implementing this in practice would require enormous development efforts. The Commission justifies the introduction of the annual inspection with improvements in accident data; however, it does not provide data specifically for vehicles older than 10 years, only accident statistics for the entire fleet. Thus, this justification can only be considered an assumption, not a well-founded argument. According to Hungarian accident statistics, the number of accidents caused by technical defects

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		is not significant, and the data does not show a marked increase in accidents caused by technical failures in vehicles older than ten years.
(b) vehicles of category M_1 used as taxis or ambulances, vehicles of categories M_2, M_3, N_2, N_3, O_3 and O_4: one year after the date on which the vehicle was first registered, and thereafter annually;		
(c) wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b and T4.3b the use of which mainly takes place on public roads for commercial road haulage purposes: four years after the date on which the vehicle was first registered, and thereafter every two years.		
For the purposes of point (a) of the first subparagraph, in the case of the roadworthiness tests referred to in Article 4(3), the expiry date of the subsequent roadworthiness certificate shall be counted as from the expiry date of the temporary roadworthiness certificate issued as a result of that test.		
2. Member States shall establish appropriate intervals within which vehicles of categories L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm3 or with a maximum continuous rated or net power above		

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11 kW, are to be subject to a roadworthiness test.		
3. Notwithstanding the date of a vehicle's last roadworthiness test, vehicles shall undergo a roadworthiness test when the safety and environmental systems and components of the vehicle have been significantly altered or modified.	**HU:** We support the proposals that also serve coherence. In addition, we suggest clarifying Article 5(3) as follows: "(3) Notwithstanding the date of a vehicle's last roadworthiness test, vehicles shall undergo a roadworthiness test when the safety and environmental systems and components significantly altered or changed." Justification: The alteration or modification may not only be intentional but could also result from an accident, which may justify an additionnal roadworthiness test.	
4. Member States or competent authorities may establish a reasonable period during which the roadworthiness test is to be carried out, not exceeding the intervals laid down in paragraph 1.';		
(6) Article 6 is amended as follows:		
(a) paragraph 1 is replaced by the following:		
'1. For vehicle categories falling within the scope of this Directive, with the exception of categories L3e, L4e, L5e and L7e, Member		

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States shall ensure that roadworthiness tests cover at least the areas referred to in point 2 of Annex I.’;		
(b) paragraph 3 is replaced by the following:		
‘3. For vehicle categories L3e, L4e, L5e and L7e, with an engine capacity of more than 125 cm^3 or with a maximum continuous rated or net power above 11 kW, Member States shall determine the areas, items and appropriate methods of testing.’;		
(c) the following paragraph 4 is added:		
‘4. The Member State of registration may decide not to require the testing of items 8.1 or 8.2 of point 3 of Annex I to this Directive during the roadworthiness test of a vehicle where that vehicle successfully passed a corresponding exhaust test or noise test, or both, involving the checking of item 8.1 or 8.2 or both of point 3 of Annex to Directive 2014/47/EU during the six months preceding the due date of the roadworthiness test.’;		**HU:** We disagree with the proposal allowing Member States to exempt vehicles from exhaust test or noise testing if they have successfully passed the corresponding test within six months prior to the periodic roadworthiness inspection. Justification: A roadworthiness test does not guarantee the vehicle’s compliance with exhaust test or noise limits for a six-month period. Moreover, this exemption would impose a disproportionate administrative burden on the testing authorities in comparison to its benefits.
(7) Article 8 is replaced by the following:		

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'Article 8		**HU:** We agree with the proposal for the fundamental, EU-wide uniform use and acceptance of electronically issued roadworthiness certificates, which is user-friendly and also supports mobility and digitalization objectives. However, we note the absence of a harmonized document for periodic and temporary roadworthiness certificates. We suggest prescribing the data content of these documents, similar to registration certificates, and—if a physical document is issued—also specifying their appearance. It is essential to clarify the terminology and align it with the VRD proposal to ensure clear Member State obligations. The terms used in the proposals are inconsistent, imprecise, and contradictory. For example, the VRD proposal requires recording the result of the "mandatory" periodic roadworthiness test as mandatory vehicle registration data, while the details of the data to be recorded suggest that these do not correspond to the "information included in the roadworthiness certificate" to be transmitted under the PTI proposal, which encompasses a significantly broader data set. In our view, resolving these contradictions and harmonizing the data content of the documents to a greater extent—especially for the electronic

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		transfer of temporary or periodic roadworthiness certificates issued by another Member State—is indispensable.
Roadworthiness certificate		
1. Member States shall ensure that testing centres or, where relevant, the competent authorities, which have carried out a roadworthiness test on a vehicle issue a roadworthiness certificate for that vehicle indicating at least the standardised elements of the corresponding harmonised Union codes as laid down in Annex II. Member States shall ensure roadworthiness certificates are issued as electronic attestations of attributes to European Digital Identity Wallets in accordance with Regulation (EU) No 910/2014 of the European Parliament and of the Council**.		
Member States shall ensure that roadworthiness certificates contain the information necessary for authentication and validation of those certificates.		
Member States shall inform the Commission of trusted issuers of roadworthiness certificates which they shall keep up to date. The Commission shall make a list of those issuers publicly available through a secure channel and in an electronically signed or sealed form suitable for automated processing.		

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2. Member States shall require that testing centres or, where relevant, the competent authorities, provide, on request, a certified printout of the roadworthiness certificate to the person presenting the vehicle for testing. Those printouts shall be user-friendly and shall contain an interoperable [barcode][QR code], which allows the verification of its authenticity, validity and integrity. By six months after the adoption of the implementing acts referred to in paragraph 9, the [barcode][QR code] shall comply with the technical specifications set out in those implementing acts. The information contained in the certificate shall also be displayed in human-readable form and shall be provided in at least the official language or languages of the issuing Member State.		
3. Notwithstanding Article 5, in the case of re-registration of a vehicle already registered in another Member State, each Member State shall recognise the roadworthiness certificate issued by that other Member State, whether in electronic or paper format, as if it had itself issued that certificate, provided that the roadworthiness certificate is still valid in terms of the frequency intervals established for periodic roadworthiness tests by the re-registering Member State. Member States shall communicate any new specimen of the roadworthiness certificate, and the description		

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of the set of data issued to roadworthiness certificates as electronic attestations of attributes to the Commission and to the other Member States without undue delay. The Commission shall publish those specimens and descriptions of the sets of data.		
4. In addition to the provisions of paragraph 3, Member States shall recognise the validity of a roadworthiness certificate, whether in electronic or paper format, where there is a change in ownership of a vehicle having a valid proof of periodic roadworthiness test.		
5. The Member State of registration shall recognise the validity of a temporary roadworthiness certificate issued in another Member State.		
6. Testing centres shall communicate electronically to the competent authority of the Member State concerned, the information included in the roadworthiness certificates which they issue. Such communication shall take place within a reasonable time after each roadworthiness certificate is issued. Member States shall determine the period during which the competent authority is to retain that information. The duration of that period shall not be less than 36 months, without prejudice to the national tax systems of the Member States.		

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7. Member States shall ensure that the information included in the previous roadworthiness certificate is made available to the inspectors.		
8. Member States shall ensure that the results of the roadworthiness test are notified, or made available electronically, as soon as possible to the authority responsible for registration of the vehicle. That notification shall contain the information included in the roadworthiness certificate.		
9. By [date of entry into force + 2 years], the Commission shall adopt implementing acts to lay down the technical specifications and rules regarding the following:		
(a) securely issuing and verifying the certificates referred to paragraphs 1 and 2;		
(b) ensuring the protection and security of personal data;		
(c) laying down the common data structure of roadworthiness certificates;		
(d) issuing and verifying a valid, secure and interoperable [barcode][QR code];		
(e) notifying trusted issuers of roadworthiness certificates.		

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Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).		
_____		
** Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (OJ L 257, 28.8.2014, p. 73, ELI: http://data.europa.eu/eli/reg/2014/910/oj)';		
(8) Article 9 is replaced by the following:		
'*Article 9*		
Follow-up of deficiencies		
1. In the case of minor deficiencies only, the test shall be deemed to have been passed, the deficiencies shall be rectified, and the vehicle shall not be re-tested.		
2. In the case of major deficiencies, the test shall be deemed to have been failed. The Member State or the competent authority shall decide on the period during which the vehicle in question may be used before it is required to		

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undergo another roadworthiness test, which shall take place not later than two months after the initial test. The result of the test and the time limit until the subsequent test shall be notified to the Member State of registration and recorded in the vehicle register in accordance with Article 3a(1) of Council Directive 1999/37/EC***. That subsequent test may take place in the Member State where the vehicle failed the initial test, or in the Member State of registration.		
3. In the case of dangerous deficiencies, the test shall be deemed to have been failed. The Member State or the competent authority may decide that the vehicle in question is not to be used on public roads and that the authorisation for its use in road traffic is to be suspended for a limited period of time, without requiring a new process of registration. Such request for suspension shall be notified to the Member State of registration and the suspension shall be recorded in the vehicle register in accordance with Article 3a(1) of Directive 1999/37/EC. When the deficiencies are rectified, a new roadworthiness certificate shall be issued without delay testifying that the vehicle is in a roadworthy condition. The new certificate shall be issued by the competent authority that requested the suspension.		
4. In the case of obvious tampering or manipulation of any component of the vehicle,		

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including its emission control system, silencer, safety-related systems, or odometers, with the aim of reducing or misrepresenting the distance record of a vehicle, such tampering or manipulation shall be considered as a major or dangerous deficiency and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties.		
*** Council Directive 1999/37/EC of 29 April 1999 on the registration documents for vehicles, (OJ L 138, 1.6.1999, p. 57, ELI: http://data.europa.eu/eli/dir/1999/37/oj)';		
(9) Article 16 is replaced by the following:		
'*Article 16*		**HU:** We support the objective of the proposal, which entails the EU-level interconnection of national vehicle registries and technical inspection databases regarding vehicle registration data, conformity declarations, the latest roadworthiness certificates, and road vehicle technical inspection reports. This proposal primarily provides support for authorities responsible for vehicle technical compliance checks within the European Union, thereby promoting EU-wide digitalization goals. However, the implementation of the proposal in our country is expected to require significant IT

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		development, which may involve substantial costs; the expected extent of these costs is currently under assessment in Hungary. The interconnection of national vehicle registries and electronic systems for technical inspection certificates between Member States will be a long-overdue and critically important step in terms of repeated vehicle registration procedures and the conduct of technical inspections. Hungary fully supports efforts aiming this goal. During this process, it is essential to consider that some Member States already operate functional data exchange via the EUCARIS platform. To respect the time, effort, and expenses already invested by Member States in establishing these data exchanges, we propose a hybrid solution that, alongside the MOVE-HUB, also allows the use of other existing data exchanges, under the obligation to ensure interoperability between systems. This would ensure the Commission's necessary oversight and supervision of the legislative implementation and provide technological flexibility for those Member States where periodic technical inspections and vehicle registration fall under different authorities (such as Hungary), which therefore cannot or do not wish to use EUCARIS services for all data exchanges.

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		Based on the above, we do not support the Commission's proposal to grant Member States only one year to connect to the system following the technical specifications developed within two years. In Hungary's case, the estimated development time exceeds two years; therefore, we propose a three-year connection period after the implementing regulation enters into force.
Exchange of data between Member States' authorities		
1. Member States shall assist one another in the implementation of this Directive. They shall exchange information and data in particular with the aim of checking, at the time of roadworthiness testing, the vehicle's legal and technical status, where necessary in the Member State in which it is registered.		
Member States shall provide access to vehicle registration data, data regarding the content of the certificates of conformity, the last roadworthiness certificate, any technical roadside inspection report, and the odometer history of the vehicle stored in national databases, to the competent authorities of and testing centres authorised by other Member States.		

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Commission proposal	Drafting suggestions	Comments/ Questions
Member States shall interconnect their electronic systems on roadworthiness certificates and on odometer history through the MOVE-HUB electronic system developed by the Commission in such a way that the competent authorities and authorised testing centres of any Member State are able to consult the relevant database or the national vehicle register of any other Member State in real time.		
2. By [PLEASE INSERT DATE: 2 years after the entry into force of this directive], the Commission shall adopt implementing acts laying down the necessary arrangements for the implementation of the functionalities of the MOVE-HUB electronic system and specifying the minimum requirements for the format and content of the information and data to be exchanged by Member States regarding vehicles subject to roadworthiness testing. Those implementing acts shall ensure the protection of personal data and shall be adopted in accordance with the examination procedure referred to in Article 19(2).		
3. The electronic systems interconnections provided for in paragraph 1 shall be operational within one year after the adoption of the implementing acts referred to in paragraph 2.’;		

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Commission proposal	Drafting suggestions	Comments/ Questions
(10) Article 17 is amended as follows:		
(a) the first indent is replaced by the following:		
'– update only the vehicle category designations referred to in Article 2(1), Article 5(1) and (2), and Article 6(1) and (2) as appropriate in the event of changes to the vehicle categories resulting from amendments to the type-approval legislation referred to in Article 2(1), without affecting the scope and frequency of testing;';		
(b) the third indent is replaced by the following:		
'– adapt point 3 of Annex I, following a positive assessment of the costs and benefits involved, in respect of the list of test items, methods, reasons for failure and assessment of deficiencies;';		
(c) the following fourth indent is added:		
'– specify the methods for the particle number (PN) measurement of positive ignition engines and for the nitrogen oxides (NO_X) measurement of compression and positive ignition engines provided for in Section 8.2 of point 3 of Annex I.';		

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Commission proposal	Drafting suggestions	Comments/ Questions
(11) Article 20 is replaced by the following:		
'*Article 20*		
Reporting		
By [two years from the date referred to in Article 20a(1)], the Commission shall submit a report to the European Parliament and the Council on the implementation and effects of this Directive, in particular as regards the effectiveness of the provisions on its scope, notably in relation to L-category vehicles, the frequency of testing, the mutual recognition of roadworthiness certificates in cases of re-registration of vehicles originating from another Member State, and the recognition of temporary roadworthiness certificates. The report shall also analyse whether it is necessary to update the Annexes, particularly in the light of technical progress and practices.';		
(12) the following Article 20a is inserted:		
'*Article 20a*		

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Commission proposal	Drafting suggestions	Comments/ Questions
Communication of information to the Commission		
1. By 31 March 2030, and by 31 March every three years thereafter, Member States shall communicate to the Commission through the online reporting platform referred to in Article 28 of Regulation (EU) 2018/1999 of the European Parliament and of the Council**** ('e-platform'), the data collected relating to each of the previous three calendar years and concerning the vehicles inspected in their territory. Those data shall include the following (per calendar year):		
(a) the number of testing centres per Member State;		
(b) the total number of vehicles inspected;		
(c) the number of vehicles inspected per category;		
(d) the areas checked, and the items failed, in accordance with point 3 of Annex I to this Directive;		
(e) the number, category and [failure rate][test result] of vehicles tested registered in another Member State.		

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Commission proposal	Drafting suggestions	Comments/ Questions
The first report shall cover the years 2027, 2028 and 2029, separately.		
2. The Commission shall adopt implementing acts laying down the format to be used by Member States for communication of the data referred to in paragraph 1 through the e-platform. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).		
The Commission shall report to the European Parliament and to the Council regarding the data collected pursuant to paragraph 1.		
**** Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI : http://data.europa.eu/eli/reg/2018/1999/oj).';		

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Commission proposal	Drafting suggestions	Comments/ Questions
(13) Article 22 is replaced by the following:		
'*Article 22*		
Extension of validity of roadworthiness certificates in case of crisis		
1. For the purposes of this Article, the following definitions shall apply:		
(a) 'crisis situation' means an exceptional, unexpected and sudden, natural or human -made event of extraordinary nature and scale that takes place inside or outside of the Union, with significant direct or indirect impacts on the area of road transport and that also prevents or significantly impairs the possibility for the owners or holders of vehicles registered in the Member States or relevant national authorities from carrying out roadworthiness tests;		
(b) 'crisis period' means the period during which a Member State is authorised by the Commission, in accordance with the procedure referred to in paragraph 2, to adopt the measures referred to in this Article.		
2. In the event of a crisis situation covering all or part of the territory of a Member State, that Member State may refer the matter to the Commission, by means of a duly motivated		

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request, with a view to the adoption of a decision authorising that Member State to adopt the measures referred to in this Article for all or part of its territory. Such measures may be applied for a maximum period of six months. The Commission may authorise the measures to be extended, at the request of the Member State, for additional periods of six months, as long as the crisis situation persists.		
3. The Commission may decide that the crisis period started before the matter was referred by the Member State in question pursuant to paragraph 2.		
4. If the Commission receives duly motivated requests by two or more Member States relating to a single crisis situation covering all or part of their territories, it may adopt a single decision applying to all of those Member States.		
5. Notwithstanding Article 5(1), Article 10(1) and point 8 of Annex II, the competent authorities of the Members States may extend the period of validity of roadworthiness certificates of all or certain categories of vehicles that have expired or would otherwise expire during the crisis period, for a maximum period of six months. That period may be renewed for successive additional periods of six		

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Commission proposal	Drafting suggestions	Comments/ Questions
months, as long as the crisis persists and the Commission authorises it.		
6. The measures adopted by the Member States on the basis of this Article shall be immediately notified to the Commission, which shall inform the other Member States and publish a notice in the Official Journal of the European Union.’;		
(14) Annex I, Annex III and Annex IV are amended in accordance with Annex I to this Directive.		
Article 2		
Amendments to Directive 2014/47/EU		
Directive 2014/47/EU is amended as follows:		
(1) Article 1 is replaced by the following:		
‘Article 1		
Subject matter		

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Commission proposal	Drafting suggestions	Comments/ Questions
This Directive lays down minimum requirements for a regime of technical roadside inspections of the roadworthiness of commercial vehicles, and for remote sensing of vehicles, circulating within the territory of the Member States.’;		**HU:** We consider these instruments to be effective tools exclusively for preliminary screening tests related to the roadside technical inspection of vehicles.
(2) Article 2 is amended as follows:		
(a) paragraph 1 is amended as follows:		
(i) the following point (aa) is inserted:		
‘(aa) motor vehicles designed and constructed primarily for the carriage of goods, having a maximum mass not exceeding 3.5 tonnes – vehicle category N1;’;		
(ii) the following second subparagraph is added:		
‘Article 4a shall also apply to motor vehicles designed and constructed primarily for the carriage of persons and their luggage comprising not more than eight seating positions in addition to the driver’s seating position – vehicle category M1, and to two-, three- or four-wheel motor vehicles referred to in Article 4 of Regulation (EU) No 168/2013 of the European		

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Commission proposal	Drafting suggestions	Comments/ Questions
Parliament and of the Council***** – vehicle category L.		
***** Regulation (EU) No 167/2013 of the European Parliament and of the Council of 5 February 2013 on the approval and market surveillance of agricultural and forestry vehicles (OJ L 60, 2.3.2013, p. 1, ELI: http://data.europa.eu/eli/reg/2013/167/oj).’;		
(b) paragraph 2 is replaced by the following:		
‘2. This Directive shall not affect the right of Member States to carry out technical roadside inspections on vehicles not referred to in paragraph 1, and to check other aspects of road transport and safety, or to carry out inspections in places other than public roads. Nothing in this Directive shall prevent a Member State from limiting the use of a particular type of vehicle to certain parts of its road network for reasons of road safety.’;		
(3) Article 3 is amended as follows:		**HU:** We do not support the mandatory introduction of the "remote sensing" and "plume chasing" testing methods, as it is not possible to accurately measure the pollutant emission and noise emission levels for the vehicle being tested.

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Commission proposal	Drafting suggestions	Comments/ Questions
(a) point (11) is replaced by the following:		
'(11) 'roadworthiness certificate' means a roadworthiness test report as defined in Article 3, point (12), of Directive 2014/45/EU;';		
(b) point 18 is deleted;		
(c) the following points (21) and (22) are added:		
'(21) 'remote sensing' means the screening of vehicles by measuring on-road exhaust emissions, including nitrogen oxides and particulate matter, or noise levels of vehicles passing in the proximity of fixed or mobile roadside equipment, or by plume chasing in the case of screening vehicles for air pollutant emissions;		
(22) 'plume chasing' means the measuring of on-road air pollutant emissions of vehicles followed by a chasing vehicle equipped with an appropriate sampling device and measuring instrument.';		
(4) Article 4 is replaced by the following:		
'Article 4		

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Commission proposal	Drafting suggestions	Comments/ Questions
Roadside inspection system		
The technical roadside inspection system shall include the use of remote sensing as referred to in Article 4a, initial technical roadside inspections as referred to in Article 10(1), and more detailed technical roadside inspections as referred to in Article 10(2).'		
(5) the following Article 4a is inserted:		**HU:** We do not support the mandatory introduction of the "remote sensing" testing method as prescribed in the proposal, although we consider the devices effective tools for pre-screening tests related to roadworthiness inspections. Justification: it is not possible to accurately measure the pollutant emission and noise emission levels for the vehicle being tested. Note: In Hungary, a device based on the principle of remote sensing, suitable for measuring pollutant emissions, is already in use as a pre-screening inspection tool; however, currently there is neither equipment nor testing technology available in Hungary for noise measurement. Therefore, Hungary already uses the remote sensing testing method for pollutant emission

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		measurement, but only for pre-screening purposes. Since the planned nitrogen oxide (NOx) emission limits exist only in vehicle type-approval procedures, there is no legal roadside measurement limit in place for inspections on public roads. Consequently, if exceeded, it cannot be assumed or proven that the vehicle's AdBlue system is malfunctioning or has been deactivated, and thus the vehicle holder cannot be obligated to a technical inspection or fined. In our opinion from an administrative point of view such measurements could not lead to the registration or only lead to the registration of a suspicion regarding the vehicles, which would require more accurate follow-up measurements for effective enforcement of official measures. We see less environmental benefit from this complex and uncertain measurement system-based regulation than the amount of invested effort (financial, human, material resources, and administrative burdens) it demands. For this reason, we consider these devices suitable only for pre-screening tests. We note that remote sensing measurements are quite uncertain and influenced by many factors. At best, they can be used for fleet-wide assessments, but the purpose of periodic roadworthiness tests or roadside inspections is

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		to verify the compliance of individual vehicles, not the fleet as a whole.
‘*Article 4a*		
Remote sensing		
1. Member States shall use remote sensing technology to screen motor vehicles for their air pollutant and noise emissions. Each year, each Member State shall take the measures necessary to screen the equivalent of at least 30 % of the fleet of motor vehicles registered in its territory using that technology.		
2. Member States shall use the results of such remote sensing to identify high-emitting vehicles. However, a vehicle shall not be considered to have failed or passed a roadside inspection on the basis of a single remote sensing measurement.		
Member States shall take the measures necessary to verify the exhaust emissions, the noise level or both of any vehicle that, based on remote sensing data of at least three measurements of that vehicle within a period of six months, is suspected to emit above a certain level. For exhaust emissions, that level shall be double the average level for vehicles belonging to the same vehicle category, emission class, and having the same type of ignition, namely		

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positive or compression ignition. For noise, the level shall be 3 dB above the average level for vehicles belonging to the same vehicle category.		
Such verification by Member States may take place as follows:		
(a) immediately after a remote sensing measurement, as part of a technical roadside inspection carried out in accordance with Article 10, including a noise or exhaust emission test or both in accordance with point 3, item 8 of Annex II;		
(b) within 15 days from the last remote sensing measurement in a testing centre referred to in Article 12 of Directive 2014/45/EU, for vehicles registered in the Member State where the remote sensing measurements took place, following notification of the owner by the competent authority within five days from the last remote sensing measurement.		
3. Regarding vehicles registered in another Member State, the competent authority shall notify the competent authority of the Member State of registration of the remote sensing measurements and of any subsequent technical roadside inspection, through the contact points referred to in Article 17 of this Directive. Where no subsequent roadside inspection took place, the Member States of registration shall request		

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the holder of the vehicle registration certificate to present the vehicle in any testing centre referred to in Article 12 of Directive 2014/45/EU at the latest 45 days after the notification received from the Member State where the remote sensing measurements took place.		
4. Member States may also verify the exhaust emissions, the noise level, or both, of any vehicle that is suspected to emit more than double, or more than 3 dB above, the average levels referred to in paragraph 2 based on only one or two remote sensing measurements. Such verification shall take in accordance with paragraph 3.’;		
(6) in Article 5, paragraphs 1 and 2 are replaced by the following:		
‘1. For vehicles referred to in Article 2(1), points (a), (b), (c) and (d), Member States shall carry out a total number of initial technical roadside inspections, per calendar year, corresponding to at least 5 % of the total number of those vehicles that are registered in their territory.		
2. For vehicles referred to in of Article 2(1), point (aa), Member States shall carry out a		**HU:** We support the proposal on the mandatory roadworthiness inspection of N1 category

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total number of initial technical roadside inspections, per calendar year, corresponding to at least 2 % of the total number of those vehicles that are registered in their territory.’;		vehicles; however, instead of the minimum 2% inspection requirement, we suggest introducing a 1% threshold, considering that the 2% would entail significantly higher financial costs and increased administrative burdens. We note that currently, nearly 533,000 N1 category vehicles are registered in our country, which would mean approximately 11,000 additional inspections annually for Hungary.
(7) in Article 6, paragraph 1 is replaced by the following:		
‘For the attribution of a risk profile to an undertaking, Member States may use the criteria set out in Annex I. That information shall be used to perform checks on undertakings with a high risk rating score more closely and more often. The risk rating system shall be operated by the competent authorities of the Member States.		
For vehicles referred to in Article 2(1), points (a) to (c), Member States shall ensure that the information concerning the number and severity of deficiencies set out in Annex II and, where applicable, Annex III to this Directive found on vehicles operated by individual undertakings is introduced into the risk rating system		

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established pursuant to Article 9 of Directive 2006/22/EC.’;		
(8) in Article 7, paragraph 1 is replaced by the following:		
‘1. Member States shall require drivers to have at their disposal the roadworthiness certificate corresponding to the most recent periodic roadworthiness test in electronic format, or a certified printout thereof, and the report of the most recent technical roadside inspection. Member States shall require their authorities to accept electronic evidence of such roadworthiness tests and inspections.’;		
(9) Article 9 is replaced by the following:		
‘Article 9		
Selection of vehicles for initial technical roadside inspection		
When identifying vehicles to be subject to an initial technical roadside inspection, inspectors may select, as a priority, vehicles operated by undertakings with a high-risk profile in accordance with the criteria set out in Annex I		

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to this Directive or as referred to in Directive 2006/22/EC. Vehicles may also be selected randomly for inspection, or where there is a reasonable suspicion that the vehicle presents a risk to road safety or to the environment, including on the basis of remote sensing.’;		
(10) in Article 10, paragraph 1, the second subparagraph is amended as follows:		
(a) point (a) is replaced by the following:		
‘(a) shall check the latest roadworthiness certificate and technical roadside inspection report, where available, in accordance with Article 7(1) and Article 18a(1);’;		
(b) point (c) is replaced by the following:		
‘(c) shall carry out a visual assessment of the securing of the vehicle’s cargo in accordance with Article 13;’;		
(11) Article 13 is replaced by the following:		
‘Article 13		
Inspection of cargo securing		

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1. During roadside inspections, vehicles shall be subject to an inspection of their cargo securing in accordance with Annex III, in order to ensure that the cargo is secured in such a way that it does not interfere with safe driving, or pose a threat to life, health, property or the environment. Checks shall be carried out to verify that during all kinds of operation of the vehicle, including emergency situations or uphill starting manoeuvres:		
(a) loads can only minimally change their position relative to each other, against walls or surfaces of the vehicle;		
(b) loads cannot leave the cargo space or move outside the loading surface.		
2. Without prejudice to the requirements applicable to the transport of certain categories of goods, such as goods covered by Directive 2008/68/EC of the European Parliament and of the Council******, cargo securing and inspection of the securing of cargo shall be carried out in accordance with the principles and, where appropriate, the standards laid down in Section I of Annex III to this Directive. The latest version of the standards laid down in point 5 of that Section may be used.		

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3. The follow-up procedures referred to in Article 14 shall also apply in the case of major or dangerous deficiencies related to cargo securing.		
4. Member States shall ensure that personnel involved in cargo securing checks are appropriately trained for that purpose.		
****** Directive 2008/68/EC of the European Parliament and of the Council of 24 September 2008 on the inland transport of dangerous goods (OJ L 260, 30.9.2008, p. 13, ELI: http://data.europa.eu/eli/dir/2008/68/oj).';		
(12) in Article 14, the following paragraph 4 is added:		
'4. Obvious tampering or manipulation of any component of the vehicle, including its emission control system, silencer and safety-related systems, shall be considered as major or dangerous deficiencies and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties.';		
(13) in Article 16, paragraph 2 is replaced by the following:		

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'2. On completion of a more detailed inspection, the inspector shall draw up a report in accordance with Annex IV. Member States shall ensure that the driver of the vehicle is provided with an electronic copy of the inspection report.';		
(14) in Article 18, paragraph 1 is replaced by the following:		**HU:** The proposal updates the references concerning the reporting of serious and dangerous deficiencies identified during roadside inspections of vehicles registered in another Member State, taking into account the implementing rules already adopted by the Commission in the meantime. We agree with this proposal aimed at ensuring coherence. HU would like to highlight the absence of provisions regarding follow-up measures to be taken by Member States after the notification. The act of sending notifications, which is already a requirement under the current Directive, itself demands significant resources from both the sending and receiving parties. In this context, making electronic communication mandatory will entail additional costs and resource burdens. Without mandatory minimum follow-up procedures, the notifications risk becoming ineffective and may lack substantive consequences.

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‘1. In cases where major or dangerous deficiencies, or deficiencies resulting in a restriction or prohibition on the use the vehicle, are found in a vehicle not registered in the Member State of inspection, the contact point shall notify the results of the inspection to the contact point of the Member State of registration of the vehicle. That notification shall contain the elements of the roadside inspection report as set out in Annex IV and shall be communicated to the contact point of the Member State of registration through the messaging system (RSI system) referred to in Article 3 of Commission Implementing Regulation (EU) 2017/2205*******.		HU would urge COM to introduce the minimum mandatory follow-up steps to be taken by the MS of registration. This notification obligation has been in place for many years, using a lot of resources already for both the sender and the recipient. The introduction of the electronic notification procedure will require further resources and cost a significant amount of money for the MS's. Without any obligatory minimum follow-up procedures set out this notification be it on paper or electronic will be weightless and will have no consequences.
The Commission shall adopt implementing acts laying down detailed rules concerning the procedures for the notification of vehicles with major or dangerous deficiencies to the contact point of the Member State of registration pursuant to the first subparagraph of this Article. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 23(2).		
******* Commission Implementing Regulation (EU) 2017/2205 of 29 November 2017 on detailed rules concerning the procedures for the notification of commercial vehicles with major or dangerous		

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deficiencies identified during a technical roadside inspection, (OJ L 314, 30.11.2017, p. 3, ELI: http://data.europa.eu/eli/reg_impl/2017/2205/oj) .’;		
(15) the following Article 18a is inserted:		**HU:** The proposal obliges Member States to connect their national vehicle registers and roadworthiness databases to the MOVE-HUB platform developed by the Commission, to enable the exchange of relevant data during roadside technical inspections. The data exchange covers vehicle registration information, conformity declaration contents, the latest roadworthiness certificate, and any roadside inspection reports. We support the proposal due to its contribution to digitalization and the establishment of unified, fast, and direct data exchange within the European Union. However, implementing this will require significant and costly IT developments within domestic vehicle registration systems. Hungary is currently assessing the magnitude of these development costs. The interconnection of national vehicle registers and electronic systems for roadworthiness certificates among Member States represents a long-overdue and highly important step for the repeated registration procedures of vehicles and the conduct of technical inspections. However,

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		it is essential to consider that operational data exchange already exists between some Member States via the EUCARIS platform. In respect of the time, effort, and costs invested by Member States in establishing this existing data exchange, we propose the development of a hybrid solution that, alongside MOVE-HUB, also allows the use of other existing data exchange systems, under the obligation to ensure interoperability between systems. This would provide the Commission with the necessary oversight to monitor the implementation of legislation, while granting technological flexibility to Member States where periodic technical inspection and vehicle registration fall under different authorities (such as Hungary), and thus may be unable or unwilling to use the EUCARIS service for all data exchanges.
'*Article 18a*		
Exchange of data between Member States' authorities		
1. Member States shall assist one another in the implementation of this Directive. They shall exchange information and data in particular with the aim of checking, at the time of roadside inspection of a vehicle, its legal and		

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technical status, where necessary, in the Member State in which it is registered.		
Member States shall provide access to data regarding the content of the certificates of conformity, the last roadworthiness certificate, any technical roadside inspection report, and the odometer history of the vehicle, stored in national databases, to the competent authorities of other Member States.		
Member States shall interconnect their electronic systems on roadworthiness certificates and on odometer history through the MOVE-HUB electronic system developed by the Commission, in such a way that the competent authorities of any Member State are able to consult the relevant database or national vehicle register of any other Member State in real time.		
2. By [PLEASE INSERT DATE: 2 years after the entry into force of this directive], the Commission shall adopt implementing acts laying down the necessary arrangements for the implementation of the functionalities of the MOVE-HUB electronic system and specifying the minimum requirements for the format and content of the information and data to be exchanged by Member States regarding the vehicles subject to roadside inspections. Those implementing acts shall ensure the protection of		

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personal data and shall be adopted in accordance with the examination procedure referred to in Article 23(2).		
3. The electronic systems interconnections provided for in paragraph 1 shall be operational within one year after the adoption of the implementing acts referred to in paragraph 2.’;		**HU:** We do not accept the one-year deadline and request that the development period be extended to three years.
(16) Article 20 is replaced by the following:		
‘*Article 20*		
Communication of information to the Commission		
1. By 31 March 2030 and by 31 March every three years thereafter, Member States shall communicate to the Commission, through the online reporting platform referred to in Article 28 of Regulation (EU) 2018/1999 of the European Parliament and of the Council********, (‘e-platform’), the data collected relating to each of the previous three calendar years and concerning the vehicles inspected in their territory. Those data shall include the following information, per calendar year:		
(a) the total number of vehicles inspected;		

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(b) the number of vehicles inspected per category;		
(c) the country of registration of each vehicle inspected;		
(d) in the case of more detailed inspections, the areas checked and the items failed, in accordance with point 10 of Annex IV of this Directive;		
(e) the results of the remote sensing measurements carried out in accordance with Article 4a of this Directive.		
The first report shall cover the years 2027, 2028 and 2029, separately.		
2. The Commission shall adopt implementing acts laying down detailed rules concerning the format for communicating the data referred to in paragraph 1 through the e-platform. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 23(2). Until the entry into force of such rules, Member States shall use the standard reporting form set out in Annex V.		
The Commission shall report the data collected to the European Parliament and to the Council.		

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******** Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI : http://data.europa.eu/eli/reg/2018/1999/oj).’;		
(17) Article 21 is amended as follows:		**HU:** We do not support the addition of “remote sensing,” for the reasons previously stated.
(a) the second and third indents are replaced by the following:		
‘– update point 3 of Annex II in respect of methods in the event that more efficient and effective test methods become available, without extending the list of items to be tested;		
– adapt point 3 of Annex II, following a positive assessment of the costs and benefits		

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involved, in respect of the list of test items, methods, reasons for failure and assessment of deficiencies in the event of a modification of mandatory requirements relevant for type-approval in Union safety or environmental legislation;’;		
(b) the following fourth and fifth indents are added:		
‘– set common [remote sensing] limits for exhaust or noise emissions, or for both, to be used to identify high-emitting vehicles, based on the results communicated by the Member States to the Commission in accordance with Article 20(1), point (e); different limits may be set for identifying vehicles with defective emission control systems and vehicles with tampered emission control systems;		
– specify the methods for the particle number (PN) measurement of positive ignition engines and for the nitrogen oxides (NO_X) measurement of compression and positive ignition engines required pursuant to Section 8.2 of point 3 of Annex II.’;		
(18) Article 24 is replaced by the following:		
‘*Article 24*		

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Reporting		
By [two years from the date referred to in Article 20(1)], the Commission shall submit a report to the European Parliament and the Council on the implementation and effects of this Directive. The report shall analyse, in particular, its effect in terms of improvement of road safety and reduction in emissions.’;		
(19) Annexes II, III, IV, and V are amended in accordance with Annex II to this Directive.		**HU:** We support the proposals set out in the annexes, subject to a detailed examination of the anticipated costs at a later stage. However, regarding Annexes I and III, we note that access to on-board diagnostic (OBD) information of vehicles is subject to strict conditions and accreditation requirements. Service centers and testing stations require separate accreditation for this access, which the majority of currently operating testing stations in our country are unable to fully comply with. We consider it necessary to clearly clarify whether the testing station license issued by the national authority also authorizes the inspector to access OBD information, and if not, how and on what basis the inspector is granted such authorization. Furthermore, it is essential to

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		clarify what happens if a given testing station cannot access the OBD system data due to technical or authorization reasons. In this respect, we see the need to develop transitional or alternative solutions to ensure that technical inspections uniformly comply with the relevant EU and national legislation. Our country regards the resolution of these issues as important to guarantee uniform and lawful data access during technical inspections.
Article 3		
1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [PLEASE INSERT DATE: 2 years following the entry into force of this Directive]. They shall immediately communicate the text of those measures to the Commission.		**HU:** 3 years are necessary for the transposition.
When Member States adopt those measures, they shall contain a reference to this Directive or be accompanied by such a reference on the occasion of their official publication. Member States shall determine how such reference is to be made.		
2. Member States shall communicate to the Commission the text of the main measures of		

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national law which they adopt in the field covered by this Directive.		
Article 4		
This Directive shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.		
Article 5		
This Directive is addressed to the Member States.		
Done at Brussels,		
For the European Parliament For the Council		
The President The President		

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