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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° Cion doc.:	ST 8255/25 + ADD 1 ST 8259/25 + ADD 1 - 4
Subject:	Proposal for a Directive of the European Parliament and of the Council amending Directive 2014/45/EU on periodic roadworthiness tests for motor vehicles and their trailers and Directive 2014/47/EU on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union Proposal for a Directive of the European Parliament and of the Council on the registration documents for vehicles and vehicle registration data recorded in national vehicle registers and repealing Council Directive 1999/37/EC - Comments from France

Delegations will find, attached, comments from **France** , followed by a courtesy translation in English.

RÉPUBLIQUE FRANÇAISE
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Réf. : SGAE/MMT/2025/0406

Paris, le 6 août 2025

NOTE DES AUTORITÉS FRANÇAISES

Objet : Commentaires des autorités françaises sur la révision du paquet relatif au contrôle technique des véhicules – Directive modifiant les directives 2014/45/CE relative au contrôle technique périodique et 2024/47/CE relative au contrôle technique sur route

Réf. : Documents ST 8255/25 et ADD 1

Ann. : (A) Tableau rassemblant les commentaires écrits des Etats membres, dont les ajouts français

(B) Ajouts des commentaires français sur les annexes à la proposition de directive de la Commission

Concernant la proposition de directive modifiant les directives 2014/45/CE relative au contrôle technique périodique des véhicules à moteur et de leurs remorques et 2024/47/CE relative au contrôle technique sur route des véhicules utilitaires circulant dans l'Union, les autorités françaises soutiennent à la fois (i) l'adaptation des règles en matière de contrôle technique périodique aux différentes évolutions technologiques des véhicules, (ii) le renforcement de la lutte contre la fraude au compteur kilométrique et (iii) la limitation des émissions polluantes.

Les autorités françaises souhaitent toutefois une meilleure prise en compte de l'analyse coûts-bénéfices et de la faisabilité de certaines dispositions, notamment au regard des moyens humains et techniques à mobiliser et des délais de mise en œuvre. Elles souhaitent notamment attirer l'attention de la Présidence sur plusieurs éléments précisés ci-dessous, sans préjudice de nouvelles observations ultérieures.

1. S'agissant des modifications apportées à la directive 2014/45/UE

La Présidence trouvera dans le tableau en annexe (A) les commentaires détaillés des autorités françaises, dont voici une synthèse des principaux éléments :

- ***Concernant la notion de « contenu minimum » du contrôle technique (considérant 2)***

Les autorités françaises souhaitent maintenir cette notion. Les Etats membres doivent avoir le choix de définir des points de contrôles supplémentaires dans leur propre législation.

- ***Concernant le contrôle des émissions polluantes (considérant 6)***

Les autorités françaises souhaitent qu'il soit spécifié que la définition d'une méthodologie appropriée est nécessaire afin de s'assurer de la simplicité, la rapidité et l'absence de coûts disproportionnés du contrôle technique.

- ***Concernant la mise à disposition et l'harmonisation des données des constructeurs (considérant 14, article 4.6)***

Les autorités françaises estiment que le contrôle des systèmes d'aide à la conduite implique la mise à disposition, par les constructeurs, de données harmonisées/standardisées pour tester les systèmes de sécurité électroniques. **Une proposition d'amendement est faite en ce sens à l'article 4.6 modifié.**

- ***Concernant la facilitation des campagnes de rappel des véhicules défectueux (proposition d'ajout à l'art. 4)***

Les autorités françaises souhaitent que le contrôle technique périodique puisse constituer un moyen d'accroitre l'efficacité des campagnes de rappel de véhicules dont les dysfonctionnements ont des conséquences graves sur la sécurité routière ou l'environnement.

A titre d'illustration, en France, se déroulent actuellement des campagnes de rappel visant les véhicules équipés d'airbags de la marque « Takata », qui ont déjà causé en France le décès de 16 personnes et 21 blessés graves. Une note des autorités française spécifique a déjà été transmise le 12 juin 2025 à ce sujet. Les propositions formulées sont reprises dans le tableau en annexe (A).

- ***Concernant les cas de manipulation des systèmes de sécurité et environnementaux (considérant 18, art. 5.3)***

Les autorités françaises estiment que de telles modifications du véhicule sont prises en compte par l'homologation et ne relèvent pas du contrôle technique. En effet, ce type de manipulation/fraude ne peut être facilement décelable lors du contrôle technique dans la mesure où le démontage des véhicules n'est pas autorisé. Par ailleurs, la responsabilité du centre de contrôle technique pourrait être engagée sans que le contrôleur ne soit en mesure de détecter ce type de manipulation/fraude. Il est donc proposé de ne pas prévoir un contrôle technique dans ce type de cas, qui relève de la responsabilité des Etats membres.

- ***Concernant le contrôle technique des tracteurs (art. 2.1 et 5.1.c)***

Aux art. 2.1 et 5.1.c modifiés, les autorités françaises soutiennent la rédaction proposée par la Commission et souhaitent maintenir le mot « *mainly* » (principalement) dans la mesure où il ne semble pas nécessaire de contrôler les véhicules qui sont principalement utilisés hors route.

Les autorités françaises proposent d'harmoniser la rédaction de l'art. 2.1 avec celle de la directive 2014/47 en ajoutant **la notion d'usage commercial**. Une proposition d'amendement est ainsi formulée dans le tableau en annexe A.

- ***Concernant l'enregistrement des compteurs kilométrique (art. 4a.1)***

Les autorités françaises appellent à la vigilance sur le coût du système, notamment celui de l'analyse de la cohérence des données issues de sources diverses par les autorités nationales. Elles souhaitent que la Commission précise à qui le constructeur doit transmettre les relevés d'odomètres.

- ***Concernant la fréquence du contrôle technique (considérant 17, art. 5.1)***

Les autorités françaises s'interrogent sur la valeur ajoutée d'un contrôle des véhicules utilitaires légers un an après leur immatriculation, dans la mesure où les véhicules âgés d'un ou deux ans sont peu susceptibles de présenter des défaillances liées à la pollution.

Elles s'opposent à un contrôle technique annuel des véhicules de plus de dix ans dans la mesure où cela représente un coût excessif pour les citoyens et risque de conduire à un évitement du contrôle technique, remettant en cause l'utilité de la mesure. La France a par ailleurs déjà mis en place un contrôle de pollution annuel pour les véhicules de catégorie N1 âgés de plus de 4 ans.

- ***Concernant le contrôle technique obligatoire au changement de propriétaire (art. 5.4)***

Les autorités françaises souhaitent sa réintégration car cela représente un élément important de sécurité routière et permet à l'acquéreur de connaitre l'état du véhicule.

- ***Concernant le contrôle des véhicules ayant déjà fait l'objet d'un contrôle d'émissions sonores ou polluantes (art. 6.4)***

Les autorités françaises s'interrogent sur la valeur ajoutée de cette disposition, par ailleurs très complexe à mettre en place.

- ***Concernant les certificats de contrôle technique (art. 8)***

Les autorités françaises souhaiteraient que les deux versions (papier et électronique) du rapport de contrôle technique coexistent dans un premier temps pendant une période transitoire. Les exigences minimales de sécurité concernant le rapport électronique de contrôle technique devraient également être précisées. Enfin, les informations incluses dans le précédent rapport de contrôle technique ne devraient pas l'être dans le nouveau rapport. Le résultat d'un contrôle technique dépend de l'état du véhicule, non de son historique.

- ***Concernant le suivi des défaillances (art. 9)***

Les autorités françaises s'inquiètent de l'application de ces dispositions au cas de manipulation d'un odomètre. En effet, il n'existe pas de moyen de « réparer » cette manipulation.

- ***Concernant l'échange de données entre Etats membres (considérant 25, art. 16)***

Les autorités françaises sont attentives à l'analyse coûts-bénéfices de la plateforme MOVE-HUB et considèrent que le délai de mise en œuvre d'un an est trop court.

- ***Concernant les actes délégués (art. 17)***

Les autorités françaises s'opposent au renvoi à des actes délégués portant sur des éléments aussi importants que la mise à jour de l'annexe I, point 3 et la définition des méthodes de mesure des particules et des No_x.

- ***Concernant l'Annexe I***

Les autorités françaises saluent globalement le travail d'adaptation de cette annexe à l'évolution technologique des véhicules et, en particulier, elles soutiennent les dispositions concernant les véhicules électriques, même si plusieurs points restent à préciser.

Elles émettent néanmoins des réserves sur les points suivants :

- Elles estiment que plusieurs dispositions nécessitent que **l'accès aux données des véhicules et leur standardisation soient garantis**. Elles souhaitent donc que la Commission expose ses pistes en ce sens. C'est notamment le cas de l'utilisation de l'interface électronique du véhicule pendant une inspection ou un contrôle, ainsi que de la vérification de la version du logiciel des systèmes et des composants. Cela concerne notamment le contrôle des batteries prévu au sein de la fonction 4 (feux, dispositifs réfléchissants et équipement électrique) et la nouvelle fonction 10 (systèmes de sécurité électronique) ;
- Elles souhaitent également que **le point 4.14.5** « **équipements électroniques haute tension » soit obligatoirement testé**, à l'inverse **du test d'amortissement (point 5.3.2.1) qui doit rester optionnel** ;
- Elles s'interrogent quant à la **qualification de défaillance « *majeure* » du point 7.11 « Odomètre manifestement manipulé », de la fonction 7** (autres équipements) : comment les centres de contrôle pourront-ils lever cette défaillance ? Quelle procédure permet d'établir le véritable kilométrage du véhicule ? Dans ce contexte, les autorités françaises recommandent que cette défaillance demeure qualifiée de **mineure** afin que l'usager ne se voit pas immobiliser son véhicule sans possibilité d'obtenir la levée de cette défaillance ;
- Elles considèrent que la **nouvelle fonction 10, portant sur l'utilisation de systèmes de sécurité électroniques et notamment les aides automatisées à la conduite (*advanced driver-assistance***

***systems* – ADAS), comporte un nombre trop élevé de points de contrôle et de défaillances**. Il pourrait en effet s'avérer difficile pour le contrôleur de choisir la défaillance adéquate parmi celles figurant sur cette liste. Le temps de contrôle pourrait également s'en trouver substantiellement allongé. De plus, un tel niveau de détail dans les défaillances ne peut être atteint en inspection visuelle. Seule une interface électronique permet d'atteindre un niveau de détail si élevé, impossible à obtenir sans données standardisées/harmonisées. **Le contrôle technique des systèmes de sécurité électroniques devrait donc se limiter à ceux qui sont obligatoires**. Il apparait plus pertinent de tester les différents systèmes dans la fonction qui les concerne. **Par exemple, le système d'antiblocage des freins (*anti-lock braking system* – ABS) devrait être contrôlé en fonction 1 (équipements de freinage) et non en fonction 10 (systèmes de sécurité électroniques) et son contrôle devrait être combiné avec celui du système de stabilité du véhicule** ;

- Enfin, concernant **la mesure des émissions polluantes**, les autorités françaises soulignent le manque de retour d'expérience relatif au contrôle des particules des véhicules à essence, ainsi que **l'enjeu de faisabilité de la mesure** en raison de la contamination des sondes par l'eau que génère ce type de moteur. Pour les NO_x (point 8.2.2.3), la méthode de contrôle proposée n'est pas adaptée au contrôle technique en France, dans la mesure où il est impossible de garantir qu'un véhicule pourra être inspecté dès son arrivée dans le centre. **La mesure des NO_x ne doit pas être introduite tant qu'il n'existe pas de méthodologie adaptée.**

Outre ces éléments transmis et ceux renseignés dans le tableau en ann. A, les autorités françaises ont commenté directement la proposition d'annexe 1 (cf. ann. B de la présente note).

- ***Concernant l'Annexe III***

Concernant **le besoin d'un équipement pour lever les véhicules sur un essieu**, les autorités françaises estiment que cela ne devrait pas être obligatoire pour les véhicules lourds car (i) la manipulation par un opérateur seul est dangereuse, (ii) le test est non représentatif d'un véhicule en conditions réelles d'utilisation et (iii) les plaques à jeux permettent de détecter de nombreuses défaillances.

2. <u>S'agissant des modifications apportées à la directive 2014/47/UE</u>

La Présidence trouvera dans le tableau en ann. (A) les commentaires détaillés des autorités françaises, dont voici, ci-dessous, les principaux éléments.

Elles estiment que **l'élargissement du champ du contrôle technique sur route aux véhicules utilitaires légers est disproportionné** et devrait être mis en cohérence avec les textes de l'UE qui régulent l'activité professionnelle de transport routier[1]. **En effet, à titre d'exemple, le parc français de véhicules utilitaires légers est composé d'environ 6 millions de véhicules, ce qui imposerait de réaliser 120 000 nouveaux contrôles techniques sur routes par an**. Cet objectif conduirait à une augmentation très importante des effectifs à mobiliser sur cette mission, option peu envisageable dans le contexte budgétaire actuel.

Dans un premier temps, les autorités françaises proposent donc de **limiter l'extension du champ aux véhicules utilitaires légers compris entre 2,5 et 3,5 tonnes utilisés pour le transport de marchandises à titre commercial**. Elles estiment que les enjeux en termes de sécurité et de protection de l'environnement des véhicules utilitaires les plus légers (2,5 t et moins), ainsi que de ceux qui ne sont pas utilisés pour des activités commerciales de transport routier, peuvent être traités par le système de contrôle technique périodique auquel ils sont déjà soumis.

S'agissant de **la télédétection**, les autorités françaises expriment leur **forte préoccupation par rapport à l'ensemble du dispositif proposé**, qui apparaît complexe et ferait donc peser une charge administrative et

[1] Il s'agit du règlement 1071/2009 établissant des règles communes sur les conditions à respecter pour exercer la profession de transporteur par route, du règlement 1072/2009 établissant des règles communes pour l'accès au marché du transport international de marchandises par route et de règlement 561/2006 relatif à l'harmonisation de certaines dispositions de la législation sociale dans le domaine des transports par route.

financière considérable sur les autorités de contrôle des Etats membres. Cela pourrait également poser des difficultés d'acceptabilité sociale.

S'agissant des **obligations de formation et des objectifs du contrôle de l'arrimage**, les propositions nécessitent d'être revues dans leur contenu et posent de sérieuses questions en termes de **responsabilité des agents de contrôle**. Les autorités françaises s'opposent à toute disposition qui serait susceptible de **reporter tout ou partie de la responsabilité des utilisateurs de véhicules vers les autorités de contrôle**.

Enfin, le délai de transposition envisagé apparaît insuffisant au regard de l'ampleur des modifications proposées.

Des propositions alternatives et commentaires détaillés sont insérés dans l'annexe A de la présente note afin d'illustrer ces observations. **Ces éléments ne soldent pas pour autant les observations ou propositions complémentaires ou modificatives qui pourraient s'avérer opportunes à l'aune de l'examen détaillé des textes et des débats à venir.**

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Les autorités françaises se tiennent à la disposition de la Présidence pour toute information complémentaire.

PUBLIC

Courtesy translation

This is a courtesy translation. In the event there are any differences with the French version, the latter shall prevail.

PUBLIC

Subject: Comments from the French authorities on the revision of the roadworthiness package - Proposal to add a provision making it possible to increase the effectiveness of vehicle recall campaigns for serious safety issues via periodic roadworthiness tests

Ref.: Documents ST 8255/25 and ADD 1

Appendices:

(A) Table summarising written comments of Member States, including the French ones

(B) Addition of French comments to the Annexes of the proposal for a Directive of the Commission

Concerning the proposed directive amending Directives 2014/45/EU on periodic roadworthiness tests for motor vehicles and their trailers and 2024/47/EU on the technical roadside inspection of commercial vehicles circulating in the Union, the French authorities support: (i) the adaptation of periodic roadworthiness testing rules to various technological developments, (ii) the strengthening of the struggle against odometer fraud, and (iii) the limitation of pollutant emissions.

However, the French authorities would like greater consideration given to cost-benefit analysis, feasibility for certain provisions, particularly with regard to the human and technical resources required and implementation timelines. In particular, they wish to draw the Presidency's attention to the following elements, which are set out without prejudice to any further comments that may be made at a later date.

1. **With regard to the amendments made to Directive 2014/45/EU**

The Presidency will find in the table in appendice (A) the detailed comments of the French authorities, the main points of which are as follows:

- ***Regarding the notion of "minimum content" of the roadworthiness test (Recital 2)***

The French authorities wish to maintain this notion. Member States must be allowed to add additional inspection items in their national legislation.

- ***Regarding the inspection of pollutant emissions (Recital 6)***

The French authorities wish it to be specified that defining an appropriate methodology is necessary to ensure the simplicity, speed, and absence of disproportionate costs in the technical inspection.

- ***Regarding the provision and harmonisation of manufacturer data (Recital 14, Article 4.6)***

The French authorities believe that the inspection of driver assistance systems requires manufacturers to provide harmonised/standardised data to test electronic safety systems.

A draft amendment is proposed in this regard for the amended Article 4.6.

- ***Regarding the facilitation of recall campaigns for defective vehicles (proposed addition to Article 4)***

The French authorities wish that periodic roadworthiness tests could be used as a mean of increasing the effectiveness of recall campaigns for vehicles whose malfunctions have serious consequences for road safety or the environment.

By way of illustration, ongoing recall campaigns in France target vehicles equipped with "Takata" airbags, which have already caused the deaths of 16 people and 21 serious injuries in France.

A specific note from the French authorities was already transmitted on 12 June 2025. The French proposals are included in the table in appendice (A).

- ***Regarding cases of tempering with safety and environmental systems (Recital 18, Article 5.3)***

The French authorities consider that such vehicle modifications fall under homologation/reception process and do not concern roadworthiness tests. Indeed, this type of tampering/fraud cannot easily be detected during a technical inspection since dismounting of the vehicles is not allowed. Furthermore, the responsibility of PTI centres could be engaged even though the inspector is not able to detect such tampering/fraud. Therefore, it is proposed not to provide for roadworthiness testing in such cases, which are the responsibility of Member States.

- ***Regarding the technical inspection of wheeled tractors (Articles 2.1 and 5.1.c)***

For the amended Articles 2.1 and 5.1.c, the French authorities support the wording proposed by the Commission and wish to maintain the word "*mainly*" as it does not seem necessary to inspect vehicles mainly used off-road.

For Article 2.1, the French authorities propose to harmonise the wording with that of Directive 2014/47 by adding the notion of commercial purpose. A draft amendment is thus included in the table.

- ***Regarding the recording of odometer readings (Article 4a.1)***

The French authorities call for vigilance regarding the cost of the system, in particular concerning the analysis by national authorities of consistency among data from various sources. They would like the Commission to specify to whom the manufacturer must transmit odometer readings.

- ***Regarding the frequency of periodic technical inspection (Recital 17, Article 5.1)***

The French authorities question the added value of an inspection for light commercial vehicles one year after registration, given that vehicles aged one or two years are not expected to have significant pollution related issues.

They oppose the introduction of annual inspections for vehicles over ten years old, as this would represent an excessive cost for citizens and could lead to avoidance of roadworthiness testing, putting in question the usefulness of the measure. France has also already put in place an annual pollution inspection for N1 vehicles over 4 years old.

- ***Regarding the mandatory technical inspection test upon change of ownership (Article 5.4)***

The French authorities wish to reinstate this requirement, as it constitutes an important road safety measure and allows the purchaser to be informed of the vehicle's condition.

- ***Regarding the inspection of vehicles that have already successfully passed an emissions noise or pollution test (Article 6.4)***

The French authorities question the added value of this disposition that is very complex to put in place.

- ***Regarding roadworthiness certificate (Article 8)***

The French authorities would like that both versions (paper and electronic) of the roadworthiness certificates coexist at first during a temporary period. Minimum safety requirements regarding the electronic roadworthiness inspection report should also be specified. Moreover, information included in the previous certificate should not be included in the new one. The result of a roadworthiness test depends on the condition of the vehicle, not on its history.

- ***Regarding the follow-up of deficiencies (Article 9)***

The French authorities are concerned about applying these provisions to the case of odometer tampering. Indeed, there is no way to "*repair*" this tampering.

- ***Regarding the exchange of data between Member States (Recital 25, Article 16)***

The French authorities pay attention to the cost/benefit ratio of the MOVE-HUB platform and consider that the one-year implementation period is too short.

- ***Regarding delegated acts (Article 17)***

The French authorities oppose the reference to delegated acts for elements as important as updating Annex I, point 3, and defining methods for measuring particles and NO_x.

- ***Regarding Annex I***

The French authorities welcome the work on updating Annex I defining the content of technical inspections, in view of technological developments in vehicles and, in particular, they support the dispositions concerning electric vehicles, even though several points remain to be clarified.

However, they express reservations about the following points:

- They consider that several provisions require **guaranteed access to vehicle data and standardisation of such data**. They would like the Commission to indicate its proposals for ensuring it. This is particularly the case for the use of the vehicle's electronic interface during inspections or tests, as well as verification of the software version of systems and components. This mainly concerns battery inspection under function 4 (lights, reflectors and electrical equipment) and new function 10 (Electronic safety systems);

- They also wish that **item 4.14.5 "high-voltage electronic equipment" be made mandatory for testing**, as opposed to **the efficiency testing of damping (item 5.3.2.1)**, which should remain optional;

- They question **the classification as a "*major*" defect for item 7.11 "Odometer obviously manipulated" in function 7** (other equipment): How will centres be able to clear this defect? What procedure would establish the vehicle's true mileage? They therefore recommend that this defect remains ***minor***, so users do not lose the use of their vehicle without the possibility of lifting this deficiency;

- They consider that **new function 10, covering the use of electronic safety systems including advanced driver-assistance systems (ADAS), contains too many inspection points and deficiencies**. It could be indeed difficult for the inspector to select the correct defect from those listed. The inspection time could be then significantly increased. Moreover, such a level of detail cannot be achieved by visual inspection. Only an electronic interface would allow such detail, which is impossible without harmonised/standardised data. **Inspection of electronic safety systems should thus be limited to those that are mandatory**. It appears more appropriate to test the various systems under their related function. **For example, the anti-lock braking system (ABS) should be inspected under function 1 (braking equipment) and not function 10 (electronic safety systems), and this control should be combined with the one of the vehicle stability system**;

- Finally, regarding **exhaust emission measurement**, the French authorities note the lack of feedback regarding particle inspection for petrol vehicles and a feasibility issue with the measurement due to probe contamination by water produced by this engine type. For NO_x (point 8.2.2.3), the proposed inspection method is not suited to France as it is impossible to guarantee that a vehicle will be inspected as soon as it arrives at the centre. **NO_x measurement should not be implemented until an appropriate methodology is available.**

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In addition to these transmitted elements and those included in the table in appendice (A), the French authorities have commented directly on the draft Annex 1 (appendice (B)).

- ***Regarding Annex III***

Regarding **the need of a device to lift vehicles on one of the axes**, the French authorities consider this should not be mandatory for heavy vehicles because:

- The operation is dangerous if conducted by a single operator;
- The test is unrepresentative of real-life use of vehicle;
- Play detectors allow the detection of many deficiencies.

PUBLIC

2. <u>With regard to the amendments made to Directive 2014/47/EU</u>

The Presidency will find in the table in appendice (A) the detailed comments of the French authorities, the main points of which are as follows.

They consider that **extending the scope of roadworthiness testing to light commercial vehicles is disproportionate** and should be brought into line with EU legislation regulating professional road transport activities[1]. **For example, the French fleet of light commercial vehicles comprises around 6 million vehicles, which would require 120,000 new roadworthiness tests to be carried out each year**. This target would lead to a very significant increase in the number of staff required for this task, which is not feasible in the current budgetary context.

As an initial consideration, the French authorities are therefore proposing to **limit the extension of the scope to light commercial vehicles between 2.5 tonnes and 3.5 tonnes used for commercial goods transport**. They believe that safety and environmental protection issues relating to the lightest commercial vehicles (2.5 tonnes and under), and those not used for commercial road transport activities, can be addressed by the periodic technical inspection system to which they are already subject.

With regard to **remote sensing**, the French authorities express their **strong concern about the proposed system as a whole**, which appears to be extremely complex, and so would place a considerable administrative and financial burden on the control authorities of the Member States. It also could pose difficulties in terms of social acceptability.

With regard to **training requirements and the objectives of cargo securing checks**, the proposals need to be reviewed in terms of their content and raise serious questions in terms of the responsibility of inspectors. The French authorities will reject any provision that would **shift all or part of the responsibility from vehicle users to the inspection authorities.**

Finally, the proposed transposition period appears to be very insufficient given the scale of the proposed changes.

Alternative proposals or comments are included in the table in appendice (A) to illustrate these observations. **These elements do not exhaust the additional or amending observations or proposals that may be appropriate in the light of a detailed examination of the texts and future debates.**

* * * * *

The French authorities remain at the disposal of the Presidency for any further information.

[1] Regulation 1071/2009 establishing common rules concerning the conditions to be complied with to pursue the occupation of road transport operator; regulation 1072/2009 on common rules for access to the international road haulage market and regulation 561/2006 on the harmonisation of certain social legislation relating to road transport.

Proposal on Periodic roadworthiness tests and technical roadside inspection Deadline: ***14 May 2025***

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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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 and Comments/ Questions
General comments	SK (Comments/ Questions): SK would like to place a general scrutiny reservation. Generally, we thank the Commission for the proposal, we want to be constructive and looking forward to the discussion. DE (Comments/ Questions): Germany must maintain its general reservation regarding the entire proposal. General remark: Changes amending directive 2014/47/EU are under futher examination. This particularly concerns the proposed provisions on remote recognition (Article 4a). We will issue a separate statement on this.

Commission proposal	Drafting suggestions and Comments/ Questions
	Further regulatory proposals: 1. Technical roadside inspections often involve the use of vehicle data that is read by the inspectors via the OBD interface. The problem of encrypting the OBD vehicle data stream in newly type-approved vehicles is becoming increasingly apparent. In our view, the problem of the encryption of the OBD vehicle data stream by vehicle manufacturers could be solved by including a requirement in the amended Directive 2014/47/EU that competent authorities be granted unrestricted, standardized, and non-discriminatory access to the direct vehicle data stream of vehicle OBD information in accordance with Article 61, as well as free access to repair and maintenance information in accordance with Article 63 of Regulation (EU) 2018/858, for the purpose of verifying technical roadside inspections (see Article 4 of the draft Directive 2014/45/EU). This also applies to other promising technologies such as OTA (Over the Air) and OBM (On-Board Monitoring System). 2. A legal basis for removal and confiscation of defective and tampered vehicle parts, analogous to the provisions of Article 38(3) of Regulation (EU) No. 165/2014 should be incorporated in the legal framework of Directive 2014/47/EU. During RSI, it is often necessary to retain damaged and tampered vehicle parts (control units, AdBlue emulators, brake parts, etc.) as evidence for the penalty proceedings, similar to tampered tachographs. AT (Comments/ Questions): AT reserves general scrutiny reservation IE (Comments/ Questions):

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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Commission proposal	Drafting suggestions and Comments/ Questions
	IE retains its general scrutiny position – initial comments and expected challenges are outlined below.
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	DE (Comments/ Questions): With regard to "digitalization," Germany asks that consideration be given to the fact that an exception to the obligation to provide electronic vehicle registration and inspection certificates and to exchange data on these for law enforcement authorities (armed forces, police, border control) is necessary.
(Text with EEA relevance)	

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Commission proposal	Drafting suggestions and Comments/ Questions
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,	

[1] OJ C , , p. .
[2] OJ C , , p. .

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Commission proposal	Drafting suggestions and Comments/ Questions
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 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.	DE (Drafting suggestions): • Regarding recital 2: On the one hand, Directive 2014/45/EU specifies the minimum content of the tests, and on the other hand, follow-up checks should also be possible outside the member state of registration (see Article 9, paragraph 2). Therefore, in the view of Germany, "minimum content" should be replaced by "content." LU (Comments/ Questions):

[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).

Commission proposal	Drafting suggestions and Comments/ Questions
	The proposal suggests that only the minimum requirements for PTI should be defined. However, this approach may lead to inconsistencies in how inspections are conducted across different Member States. To ensure uniformity and reliability, detailed requirements should be established. LU (Comments/ Questions): The proposal suggests that only the minimum requirements for PTI should be defined. However, this approach may lead to inconsistencies in how inspections are conducted across different Member States. To ensure uniformity and reliability, detailed requirements should be established. FR (Comments / Questions): FR wishes to keep the notion of "minimum content" as it is. Member states should have the choice to add more control points in their own legislation
(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	PL (Comments/ Questions): How to interpret the provision concerning e*nforcement of the repair of the vehicle that has been suspended from traffic* after a roadside inspection in a Member State other than the country of registration: how the MS of registration is to enforce the repair of a vehicle suspended from traffic in a MS of inspection?

Commission proposal	Drafting suggestions and Comments/ Questions
to notify the Member State of registration in order to enforce the repair of the vehicle that has been suspended from traffic.	It is proposed to notify the country of registration of the dangerous defect after the inspection, in order to avoid, for example, the issuing of another operating permit. Detection of a serious defect in a number that does not prohibit further use of the vehicle (number of defects resulting in a change of category to dangerous) - notification justified in order to enforce repair of a vehicle that has been temporarily put into service (access to service, exit to garage and repairs).
(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.	PT (Comments/ Questions): In line with one of the stated objectives of this revision, that of including electric vehicles in its scope, a clearer reference to electric and hybrid powered vehicles (not just "**newerer** technologies and **vehicles**") should be made in this recital. LU (Comments/ Questions): The term "technology" in the text refers to various advancements in vehicle systems, including ADAS, emission control systems, digital interfaces, and connectivity features. However, the proposal does not provide practical solutions for implementing these goals in real-world testing scenarios. Ensuring that testing methods are effective, not time consuming and reliable in various conditions is crucial for achieving the desired outcomes. LU

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): The term "technology" in the text refers to various advancements in vehicle systems, including ADAS, emission control systems, digital interfaces, and connectivity features. However, the proposal does not provide practical solutions for implementing these goals in real-world testing scenarios. Ensuring that testing methods are effective, not time consuming and reliable in various conditions is crucial for achieving the desired outcomes.
	NL (Drafting suggestions): 5a) Testing during the life cycle of a vehicle should be relatively simple, quick and inexpensive, while at the same time effective in achieving the objectives of the Directives. NL (Drafting suggestions): 5a) Testing during the life cycle of a vehicle should be relatively simple, quick and inexpensive, while at the same time effective in achieving the objectives of the Directives.
(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.	DE (Drafting suggestions): • Regarding recital 5: The administrative procedures are not being fully harmonized, and this is not a regulation. Therefore, in the view of the German delegation, the word "harmonize" in the second sentence should be replaced by "largely harmonize." PL (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	What happens when a roadworthiness test is conducted in a country where more restrictive technical conditions apply than the ones set in the directive? Example: Vehicle registered in a country that requires uniform tread pattern on one axle (e.g. Poland) to be tested in a country where this obligation does not apply (e.g. Germany).
(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).	NL (Drafting suggestions): (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, proportionate and suitable 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[5], especially for fine particulate matter and nitrogen oxides (NO_X). EE (Comments/ Questions): Question towards Cion: What is the expected cost of the technical devices to measure NOx and PM? NL (Drafting suggestions):

[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).

[5] 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).

Commission proposal	Drafting suggestions and Comments/ Questions
	(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, proportionate and suitable 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[6], especially for fine particulate matter and nitrogen oxides (NO_X). LU (Comments/ Questions): The proposal advocates for applying the best available test methods to help Member States reach stricter air quality standards. However, it does not provide practical solutions for implementing these methods in real-world scenarios. Ensuring that testing methods are effective, cost effective and reliable in various conditions is crucial for achieving the desired outcomes. Moreover, it does not address the challenge of ensuring consistency and reliability in these tests across different Member States. IE (Comments/ Questions): NOx testing requires the vehicle to be under load, this would add extra time to the test and would not be feasible for vehicles over 3.5 tonnes. Further details would need to be provided. Consideration for OBM or OBD. Please see extract from 8.2.2.3. NOx Measurement of Annex I:

[6] 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).

Commission proposal	Drafting suggestions and Comments/ Questions
	"Vehicle preparation: [to be specified in accordance with the delegated acts referred to in Article 17]; - […] Measuring instrument preparation: — [to be specified in accordance with the delegated acts referred to in Article 17 or combined with PN testing above];" LU (Comments/ Questions): The proposal advocates for applying the best available test methods to help Member States reach stricter air quality standards. However, it does not provide practical solutions for implementing these methods in real-world scenarios. Ensuring that testing methods are effective, cost effective and reliable in various conditions is crucial for achieving the desired outcomes. Moreover, it does not address the challenge of ensuring consistency and reliability in these tests across different Member States. FR (Drafting suggestion): To add: **However, the definition of an appropriate methodology is necessary to ensure that the PTI remain simple, rapid and do not incur disproportionate costs.**
(7) The number of fatalities and serious injuries on Union roads remains at an unacceptably high level, with 20 400 deaths in 2023.	

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Commission proposal	Drafting suggestions and Comments/ Questions
Therefore, further action is required in order to reach the targets for road safety set out in EU road safety policy framework 2021-2030[7].	
(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.	PT (Comments/ Questions): Portugal acknowledges the safety benefits associated with roadworthiness testing for motorcycles. However, we consider that the current framework, which allows Member States to apply an opt-out for motorcycles over 125 cm^3, continues to provide the necessary flexibility to accommodate national specificities. Portugal supports maintaining this possibility, as it allows for an evidence-based approach tailored to each Member State's road safety context and administrative capacity. FI (Drafting suggestions): (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 cm3 is no longer appropriate, and periodic testing should be mandatory for such vehicles without exception.~~ FI (Comments/ Questions): **Justification:** See comments in Article 2.

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

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Commission proposal	Drafting suggestions and Comments/ Questions
(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 that the testing centres authorised by them also have the required access.	IE (Comments/ Questions): We expect that full potential will not be realised until this is mandated at type-approval.
(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.	NL (Drafting suggestions): (10) For M1 vehicles, 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. DE (Drafting suggestions): • Regarding recital 10: A real simplification would be mutual recognition for at least 12 months, also taking into account the cost/benefit aspects for citizens. The DEU therefore proposes amending this to 12 months. NL (Drafting suggestions): (10) For M1 vehicles, the Member State of registration should recognise a temporary roadworthiness certificate issued by another

Commission proposal	Drafting suggestions and Comments/ Questions
	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. LU (Comments/ Questions): The proposal limits the recognition of temporary roadworthiness certificates to six months but does not explain why this period was chosen. Extending the duration beyond six months could further facilitate the free movement of people and reduce administrative burdens. However, it is crucial to ensure that extended periods do not compromise vehicle safety. Detailed requirements and frequent checks may be necessary to maintain high safety standards over longer periods. LU (Comments/ Questions): The proposal limits the recognition of temporary roadworthiness certificates to six months but does not explain why this period was chosen. Extending the duration beyond six months could further facilitate the free movement of people and reduce administrative burdens. However, it is crucial to ensure that extended periods do not compromise vehicle safety. Detailed requirements and frequent checks may be necessary to maintain high safety standards over longer periods.
(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	LU (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
considered by all Member States as equivalent to certificates issued by the Member State of registration.	The proposal advocates for mutual recognition of roadworthiness certificates, but it does not provide practical solutions for implementing this. At the very least, guidelines or better-defined procedures should be established to ensure that conditions are met for mutual recognition of roadworthiness certificates. This would help standardize the process and ensure that concerned Member States adhere to the same standards LU (Comments/ Questions): The proposal advocates for mutual recognition of roadworthiness certificates, but it does not provide practical solutions for implementing this. At the very least, guidelines or better-defined procedures should be established to ensure that conditions are met for mutual recognition of roadworthiness certificates. This would help standardize the process and ensure that concerned Member States adhere to the same standards
(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 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,	PT (Comments/ Questions): PT considers that information about odometer history should be made available in the EU database (in association with the VIN). However, we feel that this proposal should be better clarified in terms of how it will be implemented. NL (Drafting suggestions): (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

Commission proposal	Drafting suggestions and Comments/ Questions
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).	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 odometer fraud, Member States should ensure that odometer readings are taken whenever an accredited service provider carries out maintenance or repair work on a vehicle and that the readings are recorded in a ~~national database or register~~ their national vehicle 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). NL (Comments/ Questions): To combat fraude related to the mileage of vehicles, we very much encourage the registration of odometer readings. In the proposal it is stated that the readings must be available to several parties such as the inspectors, the holder of registration certificate, the competent authorities and Eurostat. Just for clarification and point of discussion with MS: legal basis for this preferred in 2014/45 or 2014/46? ES

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Spain already has in place a system to register and collect odometer readings by PTI services during testing since 2014. Therefore, Spain considers quite relevant for road safety and consumers rights to include this obligation within the content of the directive, along with other readings coming from maintenance services and manufacturers. EE (Comments/ Questions): Question towards Cion: What is the expected cost of this on dealerships/repairshops? Preliminarily questioning the value of this. DE (Comments/ Questions): • Regarding recital 12: The specifications for checking the odometer still need to be reviewed by experts. In this respect, Germany has a study reservation on the proposed text. NL (Drafting suggestions): (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 odometer fraud, Member States should ensure that odometer readings are taken whenever an accredited service provider carries out maintenance or repair work on a vehicle and that the readings

Commission proposal	Drafting suggestions and Comments/ Questions
	are recorded in a ~~national database or register~~ their national vehicle 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). NL (Comments/ Questions): To combat fraude related to the mileage of vehicles, we very much encourage the registration of odometer readings. In the proposal it is stated that the readings must be available to several parties such as the inspectors, the holder of registration certificate, the competent authorities and Eurostat. Just for clarification and point of discussion with MS: legal basis for this preferred in 2014/45 or 2014/46? LU (Comments/ Questions): For us, the implementation is likely to be very difficult. We are located at a crossroads between three countries, and European citizens move freely, including for services performed on vehicles.

Commission proposal	Drafting suggestions and Comments/ Questions
	To address the issue of tracking odometer readings when a vehicle goes abroad for maintenance, it would be more appropriate to refer to existing services such as EUCARIS, which already provides a mileage service and facilitates the secure cross-border exchange of vehicle data.This database would be accessible to all approved stakeholders across Member States, ensuring that odometer readings are consistently recorded and tracked, regardless of where the maintenance occurs. This would require cooperation and approval from each Member State to ensure comprehensive and accurate data collection. While this measure aims to enhance the tracking of odometer readings, it inadvertently places non-connected cars at an advantage. Since the odometer readings of non-connected cars are not automatically communicated to the Member States, there is a potential gap in the data collection process. This could lead to inconsistencies in tracking mileage, especially if these vehicles undergo maintenance or repair abroad, where odometer readings might not be recorded in the national database. Odometer blockers are devices that can prevent the recording of mileage, leading to potential fraud. The current proposal does not specify how the EU Commission plans to detect or prevent the installation of such devices. It is crucial for the effectiveness of this initiative that measures are put in place to identify and address the use of odometer blockers. IE (Comments/ Questions): We would welcome additional information and other MS experience on this point. This is a significant requirement on mechanics and vehicle repairers, many of of whom are small independent operators. The range and practicality of this measure needs further consideration. For instance

Commission proposal	Drafting suggestions and Comments/ Questions
	would garages be required to manually enter a reading for every vehicle and how would errors be addressed? How would enforcement work? Most if not all member states do not have this function at present and it would require significant software development, verification processes where there is no national register of people authorised to repair or modify vehicles. Significant communication campaigns would be required nationally in each Member State. This requirement to take odometer readings at each repair far exceeds the scope of roadworthiness and is in the realm of consumer protection. The Commission has access to odometer readings directly from manufacturers and Member States for vehicles fitted with OBFCM devices since 2021. Could this data be made available for the purposes outlined? LU (Comments/ Questions): For us, the implementation is likely to be very difficult. We are located at a crossroads between three countries, and European citizens move freely, including for services performed on vehicles. To address the issue of tracking odometer readings when a vehicle goes abroad for maintenance, it would be more appropriate to refer to existing services such as EUCARIS, which already provides a mileage service and facilitates the secure cross-border exchange of vehicle data.This database would be accessible to all approved stakeholders across Member States, ensuring that odometer readings are consistently recorded and tracked, regardless of where the maintenance occurs. This would require

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	cooperation and approval from each Member State to ensure comprehensive and accurate data collection. While this measure aims to enhance the tracking of odometer readings, it inadvertently places non-connected cars at an advantage. Since the odometer readings of non-connected cars are not automatically communicated to the Member States, there is a potential gap in the data collection process. This could lead to inconsistencies in tracking mileage, especially if these vehicles undergo maintenance or repair abroad, where odometer readings might not be recorded in the national database. Odometer blockers are devices that can prevent the recording of mileage, leading to potential fraud. The current proposal does not specify how the EU Commission plans to detect or prevent the installation of such devices. It is crucial for the effectiveness of this initiative that measures are put in place to identify and address the use of odometer blockers.
(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 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.	LU (Comments/ Questions): Requirements specifically for electric vehicles in inspector training are missing (e.g., high voltage training). LU (Comments/ Questions): Requirements specifically for electric vehicles in inspector training are missing (e.g., high voltage training). PL (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Minimum qualification requirements for the personnel performing the tests should also be included.
(14) Regulation (EU) 2019/2144 of the European Parliament and of the Council[8] 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.	NL (Drafting suggestions): Regulation (EU) 2019/2144 of the European Parliament and of the Council[9] 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, that cannot be disabled by the driver of the vehicle, 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

[8] 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).

[9] 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).

Commission proposal	Drafting suggestions and Comments/ Questions
	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. EE (Comments/ Questions): Questions toward Cion: How should they be tested? Through OBD or some standardised physical test/calibration (i.e as currently the systems are calibrated for an example after windshield change)? What would be the extra cost for the consumer if testing facilities need additional equipment or the time concluding PTI will become longer? NL (Drafting suggestions): Regulation (EU) 2019/2144 of the European Parliament and of the Council[10] 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, that cannot be disabled by the driver of the vehicle, 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

[10] 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).

Commission proposal	Drafting suggestions and Comments/ Questions
	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. LU (Comments/ Questions): If this is verified through a practical test (e.g., driving the vehicle on a test course), the time required to perform a PTI risks becoming too long. The proposal suggests that reading out the OBD data is enough to confirm the functionality of ADAS. However, this overlooks the complexity of real-world conditions. Therefore, relying solely on OBD data is inadequate for ensuring the proper functioning of ADAS. It does not specify how these inspections should be conducted or what standards should be applied. Clear guidelines and standardized testing methods are essential to ensure these systems continue to deliver their expected safety benefits. The text refers to Regulation (EU) 2019/2144 and Directives 2014/45/EU and 2014/47/EU but does not provide details on the minimum requirements for testing. To ensure harmonised compliance and safety, it is crucial to outline specific testing criteria and methods that should be used. IE (Comments/ Questions): This is a needed addition to testing, however it is noted that the new item 10 in Annex I outlines 61 separate tests. This may prove burdensome and costly for national PTI schemes to implement. LU (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	If this is verified through a practical test (e.g., driving the vehicle on a test course), the time required to perform a PTI risks becoming too long. The proposal suggests that reading out the OBD data is enough to confirm the functionality of ADAS. However, this overlooks the complexity of real-world conditions. Therefore, relying solely on OBD data is inadequate for ensuring the proper functioning of ADAS. It does not specify how these inspections should be conducted or what standards should be applied. Clear guidelines and standardized testing methods are essential to ensure these systems continue to deliver their expected safety benefits. The text refers to Regulation (EU) 2019/2144 and Directives 2014/45/EU and 2014/47/EU but does not provide details on the minimum requirements for testing. To ensure harmonised compliance and safety, it is crucial to outline specific testing criteria and methods that should be used. PL (Comments/ Questions): Introducing mandatory control of electronic security systems into the scope of the PTI is complicated and costly. There are no standardised interfaces and protocols. The question is about the cost-benefit analysis. The scope already includes control of the e-call system. Is it known what the rejection rate is for this system? How many breaches related to the e-call system have occurred? A better solution is to keep mandatory control only when data is available. FR (Comments / Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Inspection of driver assistance systems requires manufactures to provide harmonized/standardized data in order to test electronic safety systems.
(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[11] 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.	NL (Drafting suggestions): (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[12] 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~~. For NOx, these measures should be further examined. NL (Comments/ Questions): In the Road Worthiness Package it is proposed that a measurement to check NOx emissions must be carried out for the PTI of diesel vehicles. Prior to testing, the vehicle's exhaust aftertreatment system shall be warmed up to the conditions that allow effective abatement of NOx emissions by the selective catalytic reduction (SCR) unit of the vehicle by at least a 5-minute drive or an equivalent method. Once the condition is

[11] 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).

[12] 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).

Commission proposal	Drafting suggestions and Comments/ Questions
	reached, the vehicle shall not be turned off and the measurement shall be performed within 3 minutes for M1 and N1 vehicles and within 3.5 minutes for M2, M3, N2 and N3 vehicles. A 5-minute warm-up drive does not fit within the way in which the PTI is carried out in many Member States. Such a NOx emission test (hot idle NOx test) can only be carried out as part of a Road Side Inspection. This should than be done as follows. Vehicles selected as high emitters by remote remote sensing should be stopped and then a check of the NOx emissions should be performed immediately. Such a check should consist of a hot idle NOx emission test on the exhaust and then a visual inspection of the emission control systems ans reading the OBD. By performing the remote sensing tests, the obligation of 5% RSI testing of heavy commercial vehicles and 2% RSI testing of light commercial vehicles can be fulfilled. NL (Drafting suggestions): (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[13] 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

[13] 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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	number measurement. ~~and the measurement of NOx~~. For NOx, these measures should be further examined. NL (Comments/ Questions): In the Road Worthiness Package it is proposed that a measurement to check NOx emissions must be carried out for the PTI of diesel vehicles. Prior to testing, the vehicle's exhaust aftertreatment system shall be warmed up to the conditions that allow effective abatement of NOx emissions by the selective catalytic reduction (SCR) unit of the vehicle by at least a 5-minute drive or an equivalent method. Once the condition is reached, the vehicle shall not be turned off and the measurement shall be performed within 3 minutes for M1 and N1 vehicles and within 3.5 minutes for M2, M3, N2 and N3 vehicles. A 5-minute warm-up drive does not fit within the way in which the PTI is carried out in many Member States. Such a NOx emission test (hot idle NOx test) can only be carried out as part of a Road Side Inspection. This should than be done as follows. Vehicles selected as high emitters by remote remote sensing should be stopped and then a check of the NOx emissions should be performed immediately. Such a check should consist of a hot idle NOx emission test on the exhaust and then a visual inspection of the emission control systems ans reading the OBD. By performing the remote sensing tests, the obligation of 5% RSI testing of heavy commercial vehicles and 2% RSI testing of light commercial vehicles can be fulfilled. LU (Comments/ Questions): The proposal does not provide practical solutions for managing the extended duration of these tests. Ensuring that testing methods are both

Commission proposal	Drafting suggestions and Comments/ Questions
	thorough and efficient is crucial to avoid excessive delays and inconvenience for vehicle owners. Perhaps the measurement of NOx should be reconsidered. IE (Comments/ Questions): See comment above on NOx. LU (Comments/ Questions): The proposal does not provide practical solutions for managing the extended duration of these tests. Ensuring that testing methods are both thorough and efficient is crucial to avoid excessive delays and inconvenience for vehicle owners. Perhaps the measurement of NOx should be reconsidered. PL (Comments/ Questions): The amendments concerning emissions, including the specification of methods for measuring the particle number (PN) of spark-ignition engines and for measuring the oxides of nitrogen (NOX) of diesel and spark-ignition engines, are reasonable. However, it will be necessary to ensure a sufficiently long transposition period taking into account lengthy legislative procedures in the Member States and the need to raise sufficient funds to purchase relevant equipment (particle counter). It should be noted that there will be high costs for operators of vehicle testing stations associated with the new NOx measurement methods.

Commission proposal	Drafting suggestions and Comments/ Questions
(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.	PT (Comments/ Questions): In Portugal, M1 vehicles are inspected every year, after 8 years from the date of first registration; N1 vehicles are inspected after two years from the date of first registration and then every year. NL (Drafting suggestions): (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.~~ ES (Comments/ Questions): The proposed new frequency is in place in Spain fro M1 and N1 vehicles since 2010. DE (Comments/ Questions): Regarding recital 16 and the annual inspection of vehicles over 10 years old: - Germany notes that very few accidents are caused by significant technical defects and therefore opposes the annual inspection of vehicles over 10 years old for road safety reasons. - The annual vehicle emissions and environmental performance tests are to be considered separately from this appraisal. In this regard, Germany

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	enters a scrutiny reservation, and will comment on this aspect as soon as the Federal Government has reached a final opinion. NL (Drafting suggestions): (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.~~ IE (Comments/ Questions): Annual testing already incorporated in Ireland for passenger cars (M1) over 10 years from first registration PL (Comments/ Questions): Light commercial vehicles are used more intensively and should therefore be checked annually.
(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.	NL (Comments/ Questions): This has an impact on the registration and amount of vehicles to be tested. One and two year old vans are not to be expected that systems for controlling emissions are already defective. A more realistic approach is

Commission proposal	Drafting suggestions and Comments/ Questions
	to start testing this from the third year after admission. In the Netherlands, diesel cars must go for the PTI from the third year after admission. NL (Comments/ Questions): This has an impact on the registration and amount of vehicles to be tested. One and two year old vans are not to be expected that systems for controlling emissions are already defective. A more realistic approach is to start testing this from the third year after admission. In the Netherlands, diesel cars must go for the PTI from the third year after admission. LU (Comments/ Questions): Since the odometer should be tracked in all Member States, why not introduce a PTI based on the mileage covered for N1 vehicles? LU (Comments/ Questions): Since the odometer should be tracked in all Member States, why not introduce a PTI based on the mileage covered for N1 vehicles? FR (Comments / Questions): FR questions the added value of such an inspection, as 1-2 years old vehicles are not expected to have significant pollution related issues

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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Commission proposal	Drafting suggestions and Comments/ Questions
(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.	NL (Drafting suggestions): (18) In addition to scheduled periodic technical inspections, vehicles ~~should~~ may 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. NL (Comments/ Questions): It is important that major changes are monitored. However, this should not be part of the PTI. The design for this should be determined by the Member States This is not feasible. Cars must be sent to the PTI by the competent authorities of a country. How should the competent authorities of a Member State find out that a vehicle has been significantly altered or modified? Companies that modify emission and safety systems are, for example, chip tuning companies. Chip tuning companies often do not perform PTI inspections themselves. It cannot be expected that such companies will report changes to emission and safety systems to the competent authorities of a Member State. Furthermore, it is questionable whether a car will fail to pass the PTI emission inspection if for example a chip tuning modification has been carried out. It could well be that it simply passes the PTI emission test.

Commission proposal	Drafting suggestions and Comments/ Questions
	The emission test in the PTI is often not effective enough to actually detect this type of manipulation. Requiring that vehicles with significantly altered or modified safety and environmental systems and components be submitted to the PTI, would reverse the current state of affairs. The PTI is precisely intended to detect these kinds of alterations or modifications. For illus .;/p[tration, the following example: Since 2017, there has been a ban on the removal of particulate filters in the Netherlands. However, this ban was difficult to enforce at the time because there were numerous companies and also private individuals who removed diesel particulate filters. However, it was only from 2023 with the introduction of the particle test in the PTI that the ban on removing diesel particutale filters could be properly enforced. With the particle test, a diesel car with a removed particulate filter will not pass the PTI. DE (Drafting suggestions): • Regarding recital 18: Germany supports the testing of vehicles "if the safety and environmental systems and components of the vehicle have been significantly altered or modified." However, Germany believes that it must be determined whether the vehicle still complies with the (type) approval requirements after the modification. Germany does not consider a roadwortiness test alone to be sufficient in this case. To date, the assessment of modifications to vehicles has been part of the national regulations of the Member States. Germany has implemented extensively detailed regulations in this area. Germany therefore proposes that the assessment of modifications and conversions to vehicles remain within the competence of the Member States and that the recital should be deleted.

Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Drafting suggestions): (18) In addition to scheduled periodic technical inspections, vehicles ~~should~~ may 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. NL (Comments/ Questions): It is important that major changes are monitored. However, this should not be part of the PTI. The design for this should be determined by the Member States This is not feasible. Cars must be sent to the PTI by the competent authorities of a country. How should the competent authorities of a Member State find out that a vehicle has been significantly altered or modified? Companies that modify emission and safety systems are, for example, chip tuning companies. Chip tuning companies often do not perform PTI inspections themselves. It cannot be expected that such companies will report changes to emission and safety systems to the competent authorities of a Member State. Furthermore, it is questionable whether a car will fail to pass the PTI emission inspection if for example a chip tuning modification has been carried out. It could well be that it simply passes the PTI emission test.

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	The emission test in the PTI is often not effective enough to actually detect this type of manipulation. Requiring that vehicles with significantly altered or modified safety and environmental systems and components be submitted to the PTI, would reverse the current state of affairs. The PTI is precisely intended to detect these kinds of alterations or modifications. For illus .;/p[tration, the following example: Since 2017, there has been a ban on the removal of particulate filters in the Netherlands. However, this ban was difficult to enforce at the time because there were numerous companies and also private individuals who removed diesel particulate filters. However, it was only from 2023 with the introduction of the particle test in the PTI that the ban on removing diesel particutale filters could be properly enforced. With the particle test, a diesel car with a removed particulate filter will not pass the PTI. IE (Comments/ Questions): Clarification request - could the additional PTI include vehicles that have an incident/accident whereby structural elements of the vehicle are affected? FR (Comments / Questions): Such modifications to the vehicle are taken into account by the homologation/reception process and do not fall under PTI. This type of issue is, today, the responsibility of the member states and should remain

Commission proposal	Drafting suggestions and Comments/ Questions
	so. It is therefore proposed that no roadworthiness test be required in such cases. Indeed, this kind of manipulation/tampering cannot easily be detected since no dismounting of the vehicles is allowed. Moreover, PTI centres' responsibility could be involved even though the inspector is not able to detect this type of manipulation/tampering.
(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.	PT (Comments/ Questions): PT welcomes the adoption of harmonised periodic technical inspection and roadworthiness certificates. DE (Drafting suggestions): (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, **preferably**. DE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Even if the results of technical roadside checks have to be recorded in electronic registers, the basic possibility of issuing the driver with a paperbased report should be retained due to accessibility for the driver, LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years)
(20) It should be ensured that personal data processing for the implementation of this Directive complies with the data protection framework of the Union, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council[14]. 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	LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years)

[14] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (OJ L 119, 4.5.2016, p. 1, ELI: http://data.europa.eu/eli/reg/2016/679/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
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 deficiencies are rectified. The suspension should be recorded in the vehicle register of the Member State of registration.	LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) PL (Comments/ Questions): The two-month period of is too long. Additional restrictions should be included, e.g. banning the carriage of cargo or passengers depending on the defects found and their impact on the continued use of the vehicle.
(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.	PT (Comments/ Questions): PT suggests as a possible measure the inibition of registering a vehicle with previous records in other Member State of major deficiencies or manipulation warnings NL (Drafting suggestions): Tampering or manipulating any component and/or system 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. NL (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	For effective follow-up of remote sensing and in the PTI it is important to have sufficient possibilities to signal such manipulation on components and software. PTI stations in the Netherlands are not authorized to impose fines. This can only be done by official enforcement authorities such as the police. If the manipulation or tampering with a part of a vehicle is discovered by a PTI station, then a PTI station cannot impose a fine for this. If the police discover the manipulation or tampering during a Road Side Inspection, a fine can be imposed. DE (Comments/ Questions): The wording of this recital differs from that of Article 1(8) (concerning Article 9(4) of Directive 2014/45/EU) and Article 2(12) (concerning Article 14(4) of Directive 2014/47/EU). The provisions should be worded identically. Whether each type of conduct covered by the provisions is punishable remains to be examined. NL (Drafting suggestions): Tampering or manipulating any component and/or system 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. NL (Comments/ Questions): For effective follow-up of remote sensing and in the PTI it is important to have sufficient possibilities to signal such manipulation on components and software.

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	PTI stations in the Netherlands are not authorized to impose fines. This can only be done by official enforcement authorities such as the police. If the manipulation or tampering with a part of a vehicle is discovered by a PTI station, then a PTI station cannot impose a fine for this. If the police discover the manipulation or tampering during a Road Side Inspection, a fine can be imposed. IE (Comments/ Questions): We believe that the proposed text should be more specific. Tampering with a windscreen washer or number plate light shouldn't be considered to be a dangerous deficiency.
(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.	LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years)
(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 Member States' national electronic	NL (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
registers[15]. 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)[16].	(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~~ Member States~~' national electronic registers shall be connected via~~ shall use the highly secured European Vehicle and Driving License Information System (EUCARIS) through which they are already connected. ~~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)[17].~~ ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC.

15 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).

16 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).

17 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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[18] 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).

Commission proposal	Drafting suggestions and Comments/ Questions
	have been taken to ensure the integration of these systems, and what challenges or milestones have been identified in this process? We would like to highlight that most of the information and data needed by the Commission are already available within the EUCARIS network. We would therefore welcome the use of EUCARIS instead of MOVE-HUB or in parallel. PL (Comments/ Questions): 1. Implementation of MOVE-HUB (exchange of information and data) may require longer transposition period than one year following the adoption of implementing acts, due to necessary legal and operational adaptations. It is proposed to extend the proposed period. 2. Would it be possible to connect to the RAPEX system?
(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.	PT (Comments/ Questions): One year to operationalize the MOVE-HUB system is insufficient, at least two. NL (Drafting suggestions): ~~(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~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~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.~~ ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. NL (Drafting suggestions): ~~(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~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~implementing acts pursuant to Article 16 of Directive 2014/45/EU and Article 18a of Directive 2014/47/EU.~~ LU (Comments/ Questions): We would like to highlight that EUCARIS already enables the secure exchange of vehicle and roadworthiness data between Member States. Given its existing functionalities and infrastructure, we would welcome the use of EUCARIS either alongside or instead of MOVE-HUB. Leveraging the EUCARIS network would help avoid duplication, reduce implementation delays, and ensure continuity in cross-border data exchang LU (Comments/ Questions): We would like to highlight that EUCARIS already enables the secure exchange of vehicle and roadworthiness data between Member States. Given its existing functionalities and infrastructure, we would welcome the use of EUCARIS either alongside or instead of MOVE-HUB. Leveraging the EUCARIS network would help avoid duplication, reduce implementation delays, and ensure continuity in cross-border data exchang FR (Comments / Questions): FR pays attention to the cost/benefit ratio and considers that a one-year deadline is too short.

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(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, 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.	ES (Comments/ Questions): Spain supports the extension of the scope to N1 category vehicles, given their road risk exposure ratio (crashes & victims per number of vehicles) which, in the case of Spain, is much higher than for N2-N3 vehicles.
(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 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	NL (Comments/ Questions): It is true that compared to the mandatory test methods of the PTI, remote sensing significantly increases the detection percentages of cars with increased emissions. As part of the Road Worthiness Package, it is proposed to send a vehicle that is identified as a high emitter by remote sensing for a subsequent PTI emission control. There, a car is then checked again with the standard emission control methods of the PTI. There is a good chance that a vehicle that is identified as a high emitter will then simply pass thi subsequent PTI emission control. After all, the

Commission proposal	Drafting suggestions and Comments/ Questions
generate excessive emissions that pose risks to human health and the environment, they should be repaired, and any tampering should be sanctioned.	detection rate of remote sensing is higher than that of the standard PTI test methods for emissions. This will then be experienced by the owner of the vehicle as if he was not sent to the PTI for nothing. Nothing is achieved for the environment either because the car classified as a high emitter can simply continue driving. Sending cars for a subsequent emission control after remote sensing can therefore only be done if much better control methods become available for the subsequent emission control. This applies in particular to petrol cars. The current four-gas emission test for petrol cars is only very limitedly capable of detecting cars with increased emissions. This is certainly the case if petrol cars with twice as high emissions are classified as high emitters. ES (Drafting suggestions): ~~(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 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.~~

Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Comments/ Questions): Neither the existing technology nor the environmental and traffic conditions allow for a solid measurement of emissions coming from one specific vehicle. Therefore, authorities will not have the legal certainty to impose any mandatory action or sanction on a specific vehicle. Therefore, if the proposed obligation is set out, there will be a clear breach of the legal system and the conditions related to any administrative measure, even questioning the jurisdiction of the authority. In this regard, any mandatory action or penalty on a citizen should be solid and proof-based/certificate-based, proportionate and non-discriminatory so as to comply with the requisites of legal guarantee´s principle of any administrative decision imposing a restriction, burden or sanction. Given the uncertainty and the lack of reliability of the system and equipment, remote sensing related controls shall be deleted from the text. EE (Comments/ Questions): Questions to Cion: How would road conditions, weather etc affect the readings (i.e dust in the air, heavy winds, rain)? In case of attaching a trailer to a vehicle, the fuel consumption and emissions will go up drastically. How to ensure that the reading is correct or adequate? Preliminarily questioning the value of this. NL (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	It is true that compared to the mandatory test methods of the PTI, remote sensing significantly increases the detection percentages of cars with increased emissions. As part of the Road Worthiness Package, it is proposed to send a vehicle that is identified as a high emitter by remote sensing for a subsequent PTI emission control. There, a car is then checked again with the standard emission control methods of the PTI. There is a good chance that a vehicle that is identified as a high emitter will then simply pass thi subsequent PTI emission control. After all, the detection rate of remote sensing is higher than that of the standard PTI test methods for emissions. This will then be experienced by the owner of the vehicle as if he was not sent to the PTI for nothing. Nothing is achieved for the environment either because the car classified as a high emitter can simply continue driving. Sending cars for a subsequent emission control after remote sensing can therefore only be done if much better control methods become available for the subsequent emission control. This applies in particular to petrol cars. The current four-gas emission test for petrol cars is only very limitedly capable of detecting cars with increased emissions. This is certainly the case if petrol cars with twice as high emissions are classified as high emitters. LU (Comments/ Questions): Is the effectiveness of remote sensing proven? LU (Comments/ Questions): Is the effectiveness of remote sensing proven? PL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): 1) What about systems directly responsible for safety - e.g. braking system? Remote control of brake systems - temperature test? 2) Infrastructural constraints on remote sensing of emissions - e.g. measurements on single carriageway roads without opposite direction or outside built-up areas, windy weather conditions. How many remote measurements would warrant the necessary confirmation of remote sensing results by stationary measurement? Solution - Optionally, set the level of all stationary emissions inspections analogous to the technical roadside inspections each year at a minimum of ...% of the total number of heavy commercial vehicles inspected on the road on its territory.
(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 the competent authority of Member State of registration.	PT (Comments/ Questions): What supports the 30% figure? NL (Comments/ Questions): Remote sensing ensures that cars are subjected to an interim emission check earlier than the regular PTI emission checks. If a member state already performs the regular PTI emission check annually, the added value of remote sensing is limited. FI (Comments/ Questions): **Comment:** Before requiring massive amount of remote sensing in members states, the Commision should further study the feasibility of this technology in wider climatic conditions.

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Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Drafting suggestions): ~~(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 the competent authority of Member State of registration.~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. NL (Comments/ Questions): Remote sensing ensures that cars are subjected to an interim emission check earlier than the regular PTI emission checks. If a member state already performs the regular PTI emission check annually, the added value of remote sensing is limited.

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Commission proposal	Drafting suggestions and Comments/ Questions
(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.	PT (Comments/ Questions): It seems difficult to operationalize the 5% of the total number of vehicles, considering the resources available at national level.
(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.	PL (Comments/ Questions): Uniform rules for the inspection and enforcement of cargo securing procedures should be implemented in all Member States.
(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.	ES (Comments/ Questions): Spain supports the inclusion of cargo securing checks within the revision of the directive. However, given the complexity and varietry of cargo types, some flexibility should be given to MS to start controlling this element, and even assess the possibility of developing this provision via an implementing act. DE (Drafting suggestions): (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 performed in each Member State. On the decision**

Commission proposal	Drafting suggestions and Comments/ Questions
	of Member States, these checks can be made a mandatory part of roadside inspections ~~**in all Member States**~~**.** DE (Comments/ Questions): Load securing checks are an important component of maintaining road safety. Numerous Member States have established requirements in their inspection policies that provide for load securing checks. From our perspective, Member States should be allowed to continue applying these inspection policies. The integration of load securing checks into technical roadside inspections should therefore remain optional.
(33) To ensure uniform conditions for the implementation of this Directive, implementing 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[19].	
(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	NL (Comments/ Questions):

[19] 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).

Commission proposal	Drafting suggestions and Comments/ Questions
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 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[20]. 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.	The NOx test for positive ignition engines is to be developed for vehicles as of emission classes Euro VI, 6d-TEMP and newer. For these vehicles, the new NOx test and the four gas emissiontest in accordance with 8.2.2.2 should be performed. It is preferable that there will be one new test for these vehicles, in which the functioning of the three-way catalytic converter is checked on the basis of all gaseous components (CO, HC, NOx, CO_2 and O_2). So not that the old four-gas test should be performed supplemented with a separate new NOx test. Please see the amendments in the table in the Annex for the precise wording of this amendment regarding one test for checking three-way catalytic converters on petrol cars from Euro-6d onwards, measuring CO, HC, NOx and Lambda ES (Drafting suggestions): **To be reviewed and aligned to art. 291 TFEU** ES (Comments/ Questions): As these aspects are quite technical and sensitive, the definition of requirements, methods, values, etc. would require the intensive and active participation of MS experts, such as empowerment to the EC should be provided for in the form of implementing acts and not delegated acts as proposed. NL (Comments/ Questions): The NOx test for positive ignition engines is to be developed for vehicles as of emission classes Euro VI, 6d-TEMP and newer. For these vehicles,

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

Commission proposal	Drafting suggestions and Comments/ Questions
	the new NOx test and the four gas emissiontest in accordance with 8.2.2.2 should be performed. It is preferable that there will be one new test for these vehicles, in which the functioning of the three-way catalytic converter is checked on the basis of all gaseous components (CO, HC, NOx, CO_2 and O_2). So not that the old four-gas test should be performed supplemented with a separate new NOx test. Please see the amendments in the table in the Annex for the precise wording of this amendment regarding one test for checking three-way catalytic converters on petrol cars from Euro-6d onwards, measuring CO, HC, NOx and Lambda IE (Comments/ Questions): See comment above on NOx.
(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 principle of proportionality as set out in that Article, this Directive does not go beyond what is necessary in order to achieve those objectives.	

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Commission proposal	Drafting suggestions and Comments/ Questions
(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.	LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes. The proposed 2 year timeframe for compliance would be of concern. LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years)
(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' 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	ES (Drafting suggestions): (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' authorities, the Commission should report to the European Parliament and Council on the

Commission proposal	Drafting suggestions and Comments/ Questions
roadworthiness certificates, and Directive 2014/47/EU, including that on remote sensing.	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.~~ ES (Comments/ Questions): See comments to recitals (28) and (29)
(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[21], 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,	

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

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Commission proposal	Drafting suggestions and Comments/ Questions
HAVE ADOPTED THIS DIRECTIVE:	
	BE (Comments/ Questions): BE comments to the Annex I: **In Annex I, (1) (b) :** In point 2, the following point is added: *'(10) Electronic safety systems.';* This addition comprises 62 new items that are to be covered during testing. Currently, we have no harmonized system in place capable of extracting this information. We would be grateful if the European Commission could clarify how this requirement is intended to be implemented in practice and how it is expected to be operationally feasible. In the table, item 1.6 ('anti-lock braking system') has been removed from the 'braking equipment' category and relocated to 'electronic safety systems'. Similarly, item 2.6 ('Electronic Power Steering)' has been removed from the 'steering' category and has also been placed under 'electronic safety systems'. We would like to ask the Commission to provide the rationale for this reclassification. The exclusion of ABS from the 'braking equipment' category and of EPS from the 'steering' category appears inconsistent and could possibly cause confusion. BE comments to Annex III Point 3: How can a visual inspection be carried out on systems that are integrated into other parts and are invisible? In some parts of BE, it is

Commission proposal	Drafting suggestions and Comments/ Questions
	forbidden to dismantle a part (cover, protection, wheels, etc.) to carry out inspections. If you consider what the Commission proposal in Chapter 10, most checks cannot be carried out. It concerns electronic systems that could be interconnected in the same control box (ABS, EBS, etc.). For certain types of vehicles it will be possible. Another important point is how much time these checks will take, and how to manage the flow of cars should the additional checks slow down the flow. If more checks have to be carried out this will also increase the cost of the controls. Point (xiv) in the table, items 4.1.1: There seems to be a X missing in point (a) With regards to the checks on software and hardware versions, how do you intend to gather information from all the manufacturers and how will they then be shared with the roadworthiness testing centres themselves? If the software/hardware version is not known, should penalties be imposed and how? Item 8.2.2: does it concern gasoline engines exclusively? Chapter 10: How is the Commission going to provide all roadworthiness test centres with all the data on software/hardware versions for all vehicles for every model and type and every brand, including non-EU vehicles? How will the Commission ensure the information is up-to-date? What is the purpose of this check? What risks to road safety do they pertain to? What should roadworthiness testing centres do if the information is unavailable or incorrect? How will the inspectors be able to know all the options on all types of vehicles? In our opinion, it is

Commission proposal	Drafting suggestions and Comments/ Questions
	impossible for someone to know all the options on all the different models, so how would they be able to carry out an effective inspection? The commission wants all defects to be checked in all control boxes for all on-board systems. Is there a device capable of doing this for all types and manufacturers makes, including non-EU ones? The commission should put in place an identical protocol for all vehicles that will allow access to the defects in each system provided on all vehicles in a similar way. Does this protocol exist? Following a thorough review of Chapter 10, it currently appears that the implementation of the proposed controls is not feasible. In most instances, the components in question consist of enclosures, wiring, and sensors/actuators, which may potentially be integrated into other systems. The systems are highly interconnected, with a single sensor potentially serving multiple functions across different systems. Furthermore, the sensors and actuators are not necessarily visible when embedded within mechanical parts. For example, this may include a steering actuator, an angular position sensor for the steering wheel, or actuators integrated within the ABS control unit. Some inspectors in BE do not work in operations equipped with the full range of manufacturer-specific tools required to inspect vehicles of a particular brand. Technical inspection services in Brussels, for example, are responsible for assessing vehicles of all makes and models. Consequently, it is essential to establish harmonised protocols applicable across all vehicles, in order to collect data on malfunctions affecting the various systems present in the vehicle. Lastly, it should be noted that technical inspection inspectors are not mechanics, and their role is not to perform diagnostics, but rather to verify the proper functioning of the different systems.

Proposal on Periodic roadworthiness tests and technical roadside inspection Deadline: ***14 May 2025***

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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Commission proposal	Drafting suggestions and Comments/ Questions
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:	
	RO (Drafting suggestions): — trailers designed and constructed for the carriage of goods or persons, as well as for the accommodation of persons, having a maximum mass exceeding **750 kg** ~~3,5 tonnes~~ – vehicle categories **O_2,** O 3 and O 4 ; RO (Comments/ Questions): Having in view that O_2 trailers are fitted with a braking system, would be recommended that these trailers be periodically checked
'– 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;	SK (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	We would like to ask the Commission, why the new criterion of net power above 11 kW was included. Wouldn't it be more appropriate to list exactly which subcategories are subject to PTI and which are not? Our understanding is that the intention is to exclude the L3e-A1 category. For more clarity, we think, it would be better to list the subcategories instead of adding the criterion of engine capacity. PL (Comments/ Questions): It is required to clarify which of the listed conditions for L3e, L4e, L5e and L7e vehicles applies to electric vehicles.
– 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.';	SK (Drafting suggestions): – wheeled tractors of category~~ies~~ T~~1~~b~~, 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.~~'; SK (Comments/ Questions): The new indent lists the tractor categories T1b, T2b, T3b, T4.1b, T4.2b and T4.3b. The letter b means that these are tractors over 40 km/h, so the addition "with a maximum design speed exceeding 40km/h" is redundant. Why not to state directly that these are categories Tb which includes all categories from T1b to T4.3b? The word *mainly* is problematic: „…the use of which **mainly** takes place on public roads…".

Commission proposal	Drafting suggestions and Comments/ Questions
	We believe that all the tractors used on public roads should be included (subject to PTI). Current formulation could be understood that if these tractors are used mainly off public roads (e.g. in fields, forests) and on public roads only sporadically, then the PTI obligation would not apply to these tractors. We would like to ask the Commission to clarify why there is such formulation and why not to include all tractors that are used on public roads? PT (Comments/ Questions):) NL (Drafting suggestions): – 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.'; NL (Comments/ Questions): Tractors: Very difficult to determine whether they are mainly used on the terrain where activity takes place. NL (Comments/ Questions): Tractors: Very difficult to determine whether they are mainly used on the terrain where activity takes place.

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Commission proposal	Drafting suggestions and Comments/ Questions
	RO (Drafting suggestions): - wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b**,** ~~and~~ T4.3b **and T5** the use of which mainly takes place on public roads ~~with a maximum design speed exceeding 40km/h.~~ RO (Comments/ Questions): There are T5 tractors in use, so they should be included. All the mentioned tractors have a maximum speed exceeding 40 km/h by definition.
	RO (Drafting suggestions): **- trailers and interchangeable towed equipments for tractors of categories Rb and Sb the use of which mainly takes place on public roads;** RO (Comments/ Questions): The agricultural trailers with a maximum design speed exceeding 40km/h should also be subject of the PTI FR (Drafting suggestion):

Commission proposal	Drafting suggestions and Comments/ Questions
	FR agrees with the Commission's text and wishes to maintain the word "mainly" as there is no point to inspect vehicles that are mainly used off-road. FR suggests to harmonize with the provision set out in directive 2014/47 by adding the notion of commercial purposes : "« 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,** with a maximum design speed exceeding 40km/h. »"
(b) in paragraph 2, the seventh indent is deleted;	PT (Comments/ Questions): Portugal acknowledges the safety benefits associated with roadworthiness testing for motorcycles. However, we consider that the current framework, which allows Member States to apply an opt-out for motorcycles over 125 cm³, continues to provide the necessary flexibility to accommodate national specificities. Portugal supports maintaining this possibility, as it allows for an evidence-based approach tailored to each Member State's road safety context and administrative capacity. [as indicated in recital 8] NL (Drafting suggestions): ~~(b) in paragraph 2, the seventh indent is deleted;~~ FI (Drafting suggestions): ~~(b) in paragraph 2, the seventh indent is deleted~~; FI (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Justification: i.e. Keep text from current directive. Currently according to IA 7 of 27 MSs have used this exemption. The effect on road safety and environment at European level from these 7 MS's are minimal but cost and administrative burden are high. Road safety statistics do not show significant differences between Finland and countries with similar conditions even if they have introduced PTI for motorcycles. Specially from a Finnish point of view it is important to note that a road side inspection and a enforcemet inspection are already in force and also all serious accident are studied by an accident investigation boby. Due to Finland's northern wheather conditions motorcycling is a hobby and concertrated in the three summer months. The current opt-out is well balanced as it enables better road safety measures for MS that all have their own conditions. We see that a union wide rule would not increase road safety in this case but would make us focus our scarce resources on actions that do not have any meaningfull effectiveness in Finland. The Commission has itself made this conclusion in the IA, and therefore the proposal seems unproportionate. BE (Comments/ Questions): BE: Point b is very important for BE NL (Drafting suggestions): ~~(b) in paragraph 2, the seventh indent is deleted;~~ IE (Comments/ Questions): This will have significant implications for member states that do not current require motorcycles to undergo PTI due to alternative measures.

Commission proposal	Drafting suggestions and Comments/ Questions
	The 2 year timeframe for implementation is a concern, notably where commercial contracts are in place for extended periods to provide other forms of PTI and where significant infrastructure change may be required to accommodate motorcycles at existing or new test centres.
	SK (Comments/ Questions): We would **propose to add a new indent**, to **allow for MS to exclude trolleybuses** from the scope of the directive 2014/45/EU. In 2014 – DG GROW provided an interpretation of the Directive 2007/46/EC, currently Regulation (EU) 2018/858, where trolleybuses are included within M3 category and they fall under the type approval regulations. Since trolleybus is a vehicle of M3 category, according to the Directive 2014/45(EU), they should be subject to PTI. This is not feasible in praxis, as trolleybus overhead line does not lead to the testing centre. We are not aware that trolleybuses are subject to PTI in any MS. That is why we would like to ask the Commission to comment on this issue. We would propose to take the trolleybuses out of the scope of the Directive 2014/45(EU) and leave this to the MS
(2) Article 3 is amended as follows:	
(a) the following point (6a) is inserted:	

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Commission proposal	Drafting suggestions and Comments/ Questions
'(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;';	NL (Comments/ Questions): We know that a vehicle is often equipped with such a device but just as often is not connected. There are all sorts of reasons for this. Perhaps this definition needs some finetuning. NL (Comments/ Questions): We know that a vehicle is often equipped with such a device but just as often is not connected. There are all sorts of reasons for this. Perhaps this definition needs some finetuning. IE (Drafting suggestions): '(6a) 'connected vehicle' means any vehicle with a device installed which is designed to allow a wireless connection or communication with external devices, vehicles, infrastructure, networks or services;'; IE (Comments/ Questions): Should this also include a reference to infrastructure?
(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	IE

Commission proposal	Drafting suggestions and Comments/ Questions
requirements referred to in Regulations (EU) No 167/2013, (EU) No 168/2013 and (EU) 2018/858;’;	(Drafting suggestions): ‘(10) ‘approval’ means a procedure whereby a Member State’s approval authority 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;’; IE (Comments/ Questions): Should it be specified that the approval authority carries out this requirement?
(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;’;	FI (Comments/ Questions): **Question:** Should the definition of a ‘roadworthiness certificate’ mention also that it means a digital and a physical certificate? DE (Drafting suggestions): • Regarding the amendment to Article 3, point 12: Germany prefers the original definition of the term “roadworthiness certificate” in Directive 2014/45/EU, which includes the addition: “containing the result of the roadworthiness test;” and cannot see the need to delete this addition in the proposed amendment.

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Commission proposal	Drafting suggestions and Comments/ Questions
(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 Member State of registration of the vehicle in accordance with Article 4(3);';	NL (Drafting suggestions): (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 Member State of registration of the vehicle in accordance with Article 4(3) and which has a validity of 6 months;'; FI (Comments/ Questions): **Question:** Can the Commission confirm, that also this temporary PTI-certificate sholud also be given as a digital certificate? This means that the European digital identity wallet should support this use case in the future. What plans exists to develop the European digital identity wallet? We are supportive of this development, but would like to have more information. DE (Drafting suggestions): • With regard to the new introduced definition of "temporary roadworthiness certificate" (point 12a in Article 3), Germany (also) sees the need for clarity to add or insert the following: "containing the result of the roadworthiness test;" NL (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	(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 Member State of registration of the vehicle in accordance with Article 4(3) and which has a validity of 6 months;';
(3) Article 4 is replaced by the following:	BE (Comments/ Questions): BE: How can mutual recognition by other Member States be ensured? Is it necessary to issue a specific certificate, either in paper or digital format?
'Article 4	
Responsibilities	
1. Each Member State shall ensure that vehicles registered in its territory are periodically tested in accordance with this Directive.	

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Commission proposal	Drafting suggestions and Comments/ Questions
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 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.	SK (Comments/ Questions): Regarding **paragraphs 3 and 4**, we understand that the temporary PTI should help for example the citizens working abroad. However, this is not specified, the provision is general and we still think that there is a risk of seeking PTI in neighbouring MS due to possibly less strict conditions. This we see as very problematic. If there can be only one PTI in a different MS as is the MS of registration of the vehicle, the following sentence is unclear: "*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.*". According to this sentence, a subsequent PTI will only be carried out in the State of registration of the vehicle if the Member State of registration has not recognised this inspection. If Member States have to take the initiative and not recognise PTI abroad, we consider this to be an increase in bureaucracy and we will not be able to support such provisions. We would like to ask the Commission to clarify the exact steps on how this PTI in another Member State is to work and what the Member State of registration of the vehicle must do in order for the PTI to be carried out again in the State of registration of the vehicle. PT

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): PT welcomes this measure but considers it should be extended to all M and N vehicles. NL (Drafting suggestions): 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 tests carried out and 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. NL (Comments/ Questions): Has impact on data sharing and how we currently register PTI Possible danger of 'PTI tourism' or race to the bottom. How do you check the requirement 'once in another country, then again mandatory in country of registration'? For a foreign vehicle, can you check on the spot in the register of the MS of registration whether the vehicle was inspected there last time? If the member states recognise the roadworthiness certificate, is this on the basis of mutual recognition?

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Commission proposal	Drafting suggestions and Comments/ Questions
	"However, unless the Member State of registration recognises roadworthiness certificates issues by the Member State concerned in accordance with paragraph 4[...]": Current Directive already holds the obligation to mutually recognise roadworthiness certificates (Article 8(3)). Isn't this new Article meant to recognise the actual PTI carried out in another MS (and hence the subsequent certificate)? Leads to confusion as it is currently formulated. DE (Drafting suggestions): Mutual recognition for only six months does not appear to be effective. For citizens abroad, the examination carried out there should be useful and not lead to an additional burden. Against this background, the proposed time limits appear too short. Taking into account the different time limits in the Member States, Germany considers that this period should be 12 months. DE (Comments/ Questions): Furthermore, the persons responsible for and addressees of the action described in the sentence "The competent authority shall notify the result of the examination to the Member State of registration, which shall enter it in the national vehicle register" are not clearly enough defined at this point. Who is the competent authority? BE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	BE: Is this temporary certificate based on the period consistent with the dates and frequencies of the inspections? Does it not have an impact on the reference date (immatriculation)? AT (Drafting suggestions): The competent authority shall communicate the result of the test to the Member State of registration, which shall record it in the **appropriate** national ~~vehicle~~ register. AT (Comments/ Questions): It should be regulated that certain data has to be recorded and provided for certain administrative procedures but the technical detail should be at the discretion of the Member State. NL (Drafting suggestions): 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 tests carried out and 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.

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Comments/ Questions): Has impact on data sharing and how we currently register PTI Possible danger of 'PTI tourism' or race to the bottom. How do you check the requirement 'once in another country, then again mandatory in country of registration'? For a foreign vehicle, can you check on the spot in the register of the MS of registration whether the vehicle was inspected there last time? If the member states recognise the roadworthiness certificate, is this on the basis of mutual recognition? *"However, unless the Member State of registration recognises roadworthiness certificates issues by the Member State concerned in accordance with paragraph 4[…]":* Current Directive already holds the obligation to mutually recognise roadworthiness certificates (Article 8(3)). Isn't this new Article meant to recognise the actual PTI carried out in another MS (and hence the subsequent certificate)? Leads to confusion as it is currently formulated. LU (Comments/ Questions): Why are only M1 vehicles allowed to have roadworthiness tests carried out in a Member State other than the Member State of registration, and not L category vehicles, which are also subject to PTI? LU

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Why are only M1 vehicles allowed to have roadworthiness tests carried out in a Member State other than the Member State of registration, and not L category vehicles, which are also subject to PTI? PL (Comments/ Questions): Remarks: 1) Member State of registration of the vehicle may refuse to recognise the provisional certificate of conformity, if the vehicle is found to be in non-compliance with the technical conditions; 2) Member State may set a shorter period of validity than 6 months for the provisional certificate of conformity; 3) Consideration should be given to extending this regulation to N1 vehicles with a reference mass not exceeding 2610 kg (see REGULATION (EC) No 715/2007 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 June 2007 on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information); (4) the designation of the M1 vehicle category should apply only to vehicles used for private purposes. RO (Comments/ Questions): This kind of PTI should be available for all vehicle categories subject of the PTI

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Commission proposal	Drafting suggestions and Comments/ Questions
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.	SK (Comments/ Questions): On sharing the information on roadworthiness tests between MSs. In SK the information system monitors each vehicle to see whether the test has been carried out. If not, the owner is automatically fined. Could the Commission explain, how the exchange of information (between MS) will take place, and how the refusal to recognise certificate by the state should be handled? How will the vehicle owner find out that such a roadworthiness certificate has been refused and that he needs to undergo a roadworthiness test in the state of registration? This can be problematic, since the vehicle owner has a roadworthiness certificate. PT (Comments/ Questions): PT considers that further information on purposes and conditions should be established/provided in this provision. NL (Drafting suggestions): 4. Member States may recognise a roadworthiness test and certificate, other than the temporary roadworthiness certificate referred to in paragraph 3, carried out and 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 test carried out and a certificate issued by another Member State shall inform the Commission and the other Member States accordingly. NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Current Directive already holds the obligation to mutually recognise roadworthiness certificates (Article 8(3)). Isn't this new Article meant to recognise the actual PTI carried out in another MS (and hence the subsequent certificate)? Leads to confusion as it is currently formulated. FI (Comments/ Questions): **Question:** Is a temporary roadworthiness certificate valid in light of the Wienna Convention on road traffic, if the PTI is done in another country than the country of registration? CZ (Comments/ Questions): On this point, it is not clear what other proof of roadworthiness might be involved, since under paragraph 3, Member States may carry out periodic roadworthiness tests on vehicles not registered in a Member State only for category M1. Or does this provision also allow periodic roadworthiness tests to be carried out on categories of vehicles not registered in a Member State other than those referred to in paragraph 3, on the basis of a communication from the Member State to the Commission on the recognition of such tests? NL (Drafting suggestions): 4. Member States may recognise a roadworthiness test and certificate, other than the temporary roadworthiness certificate referred to in paragraph 3, carried out and issued by a Member State other than the Member State of registration of the vehicle. In such cases, that

Commission proposal	Drafting suggestions and Comments/ Questions
	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 test carried out and a certificate issued by another Member State shall inform the Commission and the other Member States accordingly. NL (Comments/ Questions): Current Directive already holds the obligation to mutually recognise roadworthiness certificates (Article 8(3)). Isn't this new Article meant to recognise the actual PTI carried out in another MS (and hence the subsequent certificate)? Leads to confusion as it is currently formulated.
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 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.	SK (Comments/ Questions): **Para 5 and 6:** We believe that the order of paragraphs 5 a 6 should be changed – first, the obligation for manufacturer to make the information available, then the authorisation for the Commission to adopt an implementing act which sets out the specifications of the technical information required for PTI (maybe also the Council legal service could comment on this). Currently, there is the Implementing regulation 2019/621 in forece. Does the Commission plan issue a new implementing regulation and repeal this one? What is the Commission's intention? FI (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Question: We support the goal of enhancing access to vehicle data in PTI. However, we are concerned that regulations on vehicle data are becoming fragmented. Could the Commission utilize its existing powers under EU Regulation 2018/858 to establish detailed rules on the data format and procedures for accessing relevant technical information? DE (Comments/ Questions): • Amendment to Article 4 (paragraph 5): The need for european requirements is supported. However, as these requirements may involve considerable implementation costs and the power delegated on the Commission is very general, Germany considers that the implementing acts in paragraph 5 need to be clarified and limited. IE (Comments/ Questions): The rationale is supported, but we note its full potential will not be realised until diagnostic trouble codes and software versions are standardised and are mandated at type-approval. PL (Comments/ Questions): Representatives of Member States must be involved in drawing up these implementing acts.
Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).	

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Commission proposal	Drafting suggestions and Comments/ Questions
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.	SK (Comments/ Questions): We like the obligation for the manufacturers to make the information available free of charge. Currently, this is not the case. As a whole, we see very problematic the practical functioning of this system for PTIs as currently proposed in paragraphs 5 and 6. There are many manufacturers. They have different ways of making information available, there are different search systems. This is not practical for PTI. It would be complicated for the PTI inspector to look up the information, study them and then carry out PTI when a vehicle comes for PTI. We think, it might be better, if the manufacturers make the information available to a single Commission repository, where the information would be saved and available. When a vehicle arrives for a PTI, the information could be provided online, via MOVE-HUB based on the VIN number. In one place, the Commission would collect information from manufacturers and through MOVE-HUB it would be provided to the Member States, who in turn would provide it to the testing centers. In para 6, there is a reference to the Regulation (EU) 2018/858. This regulation is to apply for some vehicles of category L and Tb for which the Regulation (EU) 2018/858 does not apply. Could the Commission clarify how these principles should apply to L and Tb category vehicles, since Regulation (EU) 2018/858 does not apply to these categories? FI (Comments/ Questions): **Question:** Can the Commission give a more detailed descripition on, how the "competent authority" would make data available to the test centers? Couldn't the test centers have direct access to this vehicle data and instruction from teh manufacturers in similar fashion as repair and

Commission proposal	Drafting suggestions and Comments/ Questions
	maintnance operators? Have you considered making use of the SERMI-scheme? We fear, that in countries where PTI-centers are privately owned this kind of "two-step-access" might create issues later on. ES (Comments/ Questions): Support, the format of this technical information should be harmonized and structured DE (Drafting suggestions): Germany supports the provision of the relevant data by manufacturers. In the case of imports of individual new vehicles into the EU, e.g. via small import companies specialized in this area, the provision of the relevant data is not clearly regulated. This also remains open in Regulation (EU) 2018/858. In DEU's view, importers should also be designated as responsible for these individual new vehicles, as it is not easy to address a manufacturer outside the EU in this case. DE (Comments/ Questions): In addition, Germany considers the national implementation of this obligation in the respective regulations of the member states to be difficult to enforce against manufacturers and importers. This could be an obstacle to the effective implementation of the amendment to the directive. Should this not be addressed by a regulation at EU level? BE (Comments/ Questions): BE: The major difficulty is also the harmonization of data, especially given the multitude of vehicle manufacturers and vehicle models.

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Commission proposal	Drafting suggestions and Comments/ Questions
	What would be the cost for the competent authority, to the organization responsible for the digital development ? And what are the deadlines? AT (Comments/ Questions): Making available the technical information is only possible for the authorities, if the implementing acts referred to in paragraph 5 include sufficient provisions regarding standardisation and format of this information. IE (Drafting suggestions): 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 or authorised testing centres, 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. IE (Comments/ Questions): The proposed text introduces an additional layer of bureaucracy. The information should be made available directly from the manufacturers to the authorised testing centres. RO (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	6. ~~In accordance with the principles laid down in Regulation (EU) 2018/858, vehicle~~ **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. RO (Comments/ Questions): R (EU) 2018/858 is applicable only for M, N, O categories. FR (Drafting suggestions): "[…] and in a machine-readable **and standardized** format" And add : "**Where vehicles seriously compromise road safety or seriously harm the environment or public health and are recalled by their manufacturer or the manufacturer's authorised representative, Member States may introduce measures concerning these vehicles when they are presented for roadworthiness testing. These provisions, based on the identification of vehicles from data supplied by their manufacturer or their authorised representative to the inspection centres, may go as far as considering that the roadworthiness test has failed**." FR wishes to see periodic roadworthiness tests used as a means of increasing the effectiveness of recall campaigns for vehicles whose

Commission proposal	Drafting suggestions and Comments/ Questions
	malfunctions have serious consequences for road safety or the environment. In France, for example, recall campaigns are currently underway for vehicles fitted with Takata brand airbags, which have already caused the deaths of 16 people and seriously injured 21 others. These airbags are fitted to vehicles throughout the European Union, representing several million vehicles. These airbag malfunctions are therefore likely to affect all Member States, especially territories with hot climate. Further malfunctions of other vehicle components or systems could occur in the future, with serious consequences for the physical integrity of users or the state of the environment. FR therefore suggests that the directive allow Member States wishing to do so to lay down provisions in their national law enabling roadworthiness tests to be used to facilitate vehicle recall operations for serious safety issues or environmental nuisance. The aim is for Member States to be able to put in place measures to ensure that owners are informed and encouraged to take their vehicles to the garage as part of the recall campaign. If the vehicle is not taken to the garage as part of the recall campaign, this could result in an item of information being added to the roadworthiness certificate as a result of the periodic roadworthiness test, or even, in certain critical cases, as far as an unfavourable roadworthiness test result. However, this would not be a conformity check, as the inspector would not check the condition of the defective component or system. Instead, vehicles concerned by a serious safety recall would only be identified, on the basis of information transmitted by the manufacturers or their representatives to the technical inspection centres *via* the vehicle identification number (VIN) of the vehicles concerned by the recalls

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Commission proposal	Drafting suggestions and Comments/ Questions
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:	
‘*Article 4a*	SK (Comments/ Questions): We welcome the introduction of Art. 4a. We think it is necessary to have national registers and record odometer readings in different situations. We also don’t think that this is burdensome for the repair and maintenance services (In SK, we have such a national register and we also enter data from Roadside inspection into it, since there, too, odometer data is recorded according to Directive 2014/47/EU. Insurance companies record odometer data when they have carried out vehicle inspections. Professional car dealers record odometer data, also rental companies, court experts etc. The commission has proposed to record the odometer readings only by testing centres and in connection with repair and maintenance works. Why other situations were not included? **We believe that other actors should be added, which deal with the vehicle during its life cycle.** We do not believe that such an adjustment will bring increased costs to service facilities and repair shops (in SK suppliers of information systems for

Commission proposal	Drafting suggestions and Comments/ Questions
	services have adjusted the systems in a way that the system itself sends this data to the service station after accepting the order, without any burden for the service station.) BE (Comments/ Questions): BE: **Very good idea and good news for the fight against fraud**
Recording of odometer readings	FI (Comments/ Questions): **Question:** Has the Commission considered, that this reguirement has something in common with reguirements regarding information on software (SW) updates and how information on SW-versions should/might be updated into a national registeries? At the moment such information is missing from national vehicle registries, but this question has been on the MVWG agenda. DE (Comments/ Questions): Regarding the newly inserted Article 4a: DEU supports the fundamental approach against the manipulation of odometers. The measures contained in the proposed amendment require intensive examination in Germany. Germany therefore reserves the right to review the obligations for the administration, trade, and service providers set out in this article Art. 4a para. 2 lit. b: Wherever the obligations of the holder of the registration document are regulated, the owner should also be listed as an

Commission proposal	Drafting suggestions and Comments/ Questions
	alternative legal entity. This is already fulfilled in Art. 22 para. 1 lit. a and must also be added here in Art. 4a.
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.	SK (Comments/ Questions): We would like to ask the Commission to explain the last sentence: "*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.*" How should this work, which data should the manufacturer send every 3 months, and to whom? If this is the data that the manufacturer has from authorized service centers, then based on the previous sentence, the service center will provide this data directly so this would create a duplicity. NL (Drafting suggestions): 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 accredited 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. NL (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	'records the odometer reading in that database or national vehicle register ' Will this also work for repairs carried out in a country other than country of registration? *"require vehicle manufacturers to transmit the odometer readings of connected vehicles"* In favour but how will OEMs know which vehicles drive around in which Member State in order to be able to transmit odometer readings there? GR (Comments/ Questions): This specific provision should be given an additional implementation period (2 years) in relation to the rest provisions, due to the need for workshops to adapt. FI (Drafting suggestions): 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.~~

Commission proposal	Drafting suggestions and Comments/ Questions
	FI (Comments/ Questions): **Comment**: text 'any repair or maintenance work carried out on a vehicle' might need a clear definition also in this directive. Is i.e. car wash or buying spare parts considered mantenance work? **Question:** Could the Commision produce a reference architecture description ect. that would help MSs in their analysis? This proposal needs more analysis due to its effects to businesses and costs it will create to different counterparts also to public authorities. **Comment:** Requiring manufacturers to transmit odometer readings should be done by the commision and redings should be delivered to Member State of registration via MOVE-HUB. There cannot be 27 different ways/interfaces for manufacturers to deliver the odometer reading. In Eucaris there is a batch functionality that might be able to handle such a use case. EE (Comments/ Questions): Question towards Cion: What is the expected cost for consumers if manufacturers have to reprogram their systems so that connected vehicles would automatically (in accordance with GDPR) send odometer data to MS? AT (Drafting suggestions): Member States shall also require vehicle manufacturers **or their representatives** to transmit the odometer readings of connected vehicles…

Commission proposal	Drafting suggestions and Comments/ Questions
	AT (Comments/ Questions): It is defficult for Member States to impose obligations on manufacturers and enforce them which are not seated within the territory of this Member State. At least this provision should refer to the manufacturer's representatives, too. NL (Drafting suggestions): 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 accredited 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. NL (Comments/ Questions): '*records the odometer reading in that database or national vehicle register* ' Will this also work for repairs carried out in a country other than country of registration? *"require vehicle manufacturers to transmit the odometer readings of connected vehicles"*

Commission proposal	Drafting suggestions and Comments/ Questions
	In favour but how will OEMs know which vehicles drive around in which Member State in order to be able to transmit odometer readings there? LU (Comments/ Questions): For us, the implementation is likely to be very difficult. Very complexe to manage the database (e.g. in case false odometer data is put in the data base by mistake) IE (Comments/ Questions): As this proposal is entering into the realm of consumer protection, there is a question on if this is perhaps beyond the scope of this directive. While understanding the rationale and commendable intent, it will be onerous to implement, identify and register all vehicle mechanics and repairers and to require them to enter the data at every repair. This approach will require significant changes to IT systems and current data managamemnt processes. The proposed 2 year timeframe for compliance would be of concern. LU (Comments/ Questions): For us, the implementation is likely to be very difficult. Very complexe to manage the database (e.g. in case false odometer data is put in the data base by mistake) PL (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Required clarification that: a Member State defines a list of entities obliged to provide information on the status of the meter. In order to ensure quality and reduce the number of actors, the subject should not be identified directly. RO (Drafting suggestions): 1. Each Member State shall take the measures necessary to enable the recording of odometer readings **from the testing centers** 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.~~ RO (Comments/ Questions): Excessive administrative and financial burden for authorities and economic operators; may be considered at a later stage FR (Comments / Questions): FR calls for vigilance regarding the cost of the system, particularly the cost of analysing the consistency of data by national authorities from various sources.

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Commission proposal	Drafting suggestions and Comments/ Questions
	Could the Commission specify to whom the manufacturer has to transmit the odometers readings?
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.	SK (Comments/ Questions): This paragraph states to whom the data is made available. The meaning of this provision is unclear. Why is the data made available to the competent authorities responsible for vehicle registration or vehicle approval? Why does the registration authority or approval authority need the data on the odometer history? The data is important for the vehicle owner or buyer. (In SK, if a car dealer wants to know the history of odometer data for a specific vehicle, he must enter the current odometer value and after that, the entire history is made available to him). A mention that data from this register is also provided to other Member States when the vehicle is re-registered is missing. We believe that this should be explicitly stated here. NL (Drafting suggestions): 2. Member States shall make the odometer history of vehicles registered by them available ~~to inspectors,~~ to the holder of the registration certificate and competent authorities upon re-registration. Member States shall provide the results of the assessment of the odometer history to inspectors and to competent authorities in the Member States responsible for roadworthiness testing, ~~vehicle registration,~~ and vehicle approval.

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Drafting suggestions): 2. Member States shall make the odometer history of vehicles registered by them available ~~to inspectors,~~ to the holder of the registration certificate and competent authorities upon re-registration. Member States shall provide the results of the assessment of the odometer history to inspectors and to competent authorities in the Member States responsible for roadworthiness testing, ~~vehicle registration,~~ and vehicle approval. IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. RO (Drafting suggestions): 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~~,~~ **and** vehicle registration~~, and vehicle approval~~. RO (Comments/ Questions): The odometer history should not be available to the inspectors – protection of personal data. See 2.1
	RO

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): **2.1. Member States shall ensure that, for the purposes of checking the odometer, where an odometer is normally fitted, the information included in the previous roadworthiness test is made available to the inspectors as soon as it is available electronically.** RO (Comments/ Questions): Existing Article 8 (6) For PTI is not relevant to make available all the odometer readings. In RO opinion, the odometer reading from the last PTI is sufficient.
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.	FI (Comments/ Questions): **Question**: Can the Commission please explain, what this means? 'Buyers' are not in scope of paragraph 2. To give the odometer data to a 'buyer' means, that the data should be publicly available to all in paragraph 2. IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern.
4. Member States shall also make available the odometer data stored in the national databases and national vehicle registers referred to in	SK

Commission proposal	Drafting suggestions and Comments/ Questions
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*.	(Comments/ Questions): The meaning of this paragraph on making the data available for statistics offices and Eurostat is unclear. Could the Commission provide clarification? In which way should the data be made available? (In SK there are approximately 2.7 million passenger vehicles registered, but more than 10 million odometer records are added to the national registry annually.) NL (Comments/ Questions): With what purpose? FI (Comments/ Questions): **Question:** If the first 10 characters of the VIN are kept as a reference, is the data anonymised? NL (Comments/ Questions): With what purpose? IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. RO (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	4. Member States shall also make available the odometer data stored in the national databases ~~and~~ **or in the** 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*. RO (Comments/ Questions): Correlation with paragraph 1
* 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).';	IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern.
(5) Article 5 is replaced by the following:	

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Commission proposal	Drafting suggestions and Comments/ Questions
'Article 5	
Date and frequency of testing	SK (Comments/ Questions): We would like to flag that this article is **very sensitive**, especially regarding the date and frequency for M1 and N1 categories. The position will be subject to decision on higher level.
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;	SK (Comments/ Questions): Why 10 years - how was this number picked and why doesn't it reflect average age of vehicles in EU? PT (Comments/ Questions): For vehicles registered in other Member States, the reference is the date of first registration. But this provision does not mention vehicles registered outside EU: is the date of first registration also the reference date for vehicles previously registered in third countries?

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Drafting suggestions): 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, three~~one~~ year after the date on which the vehicle was first registered, and thereafter annually; NL (Comments/ Questions): the article indicates that older vehicles show more defects as they get older, what is the expectation and reason that vehicles must be checked for emissions after only 1 year? One and two year old vans are not to be expected that systems for controlling emissions are already defective. A more realistic approach is to start testing this from the third year after admission. In the Netherlands, diesel cars must go for the PTI from the third year after admission. FI (Comments/ Questions): **Question:** We would appreciate more detail cost and benefit calculation on annual emmision tests for N1-vehicles that are under four years old? ES (Comments/ Questions): We have some concerns (potential cost benefit ratio) on the annual emission testing for N1 from the registration date. DE (Comments/ Questions): Re the amendment to point (a) of Article 5(1): In the past, the Federal Government had always emphasised to the European Commission that

Commission proposal	Drafting suggestions and Comments/ Questions
	while it supports the evolution of Directive 2014/45/EU, new testing and measurement procedures must be suitable for the performance of exhaust emission tests, feasible at all testing centres, as well as effective and efficient to avoid disproportionately high additional costs for vehicle keepers. Regarding the inspection requirements for vehicles 10 years or older: In general, Germany notes with regard to safety requirements that only very few accidents are caused by significant technical defects. The Commission itself acknowledges this in the middle of page 1 (explanatory memorandum) of this proposal: "Due to EU type-approval rules and a well-developed system of technical inspections during a vehicle's lifetime, vehicle defects are the cause of only a small percentage of road crashes in the EU." Self-diagnosis includes brake wear indicators, battery monitoring in electric cars and problems with sensors. Manufacturers are also increasingly using more robust technologies for components that have previously been subject to faults, such as LED lighting and electric parking brakes. In this respect, Germany rejects the mandatory reduction of the inspection interval for vehicles older than 10 years on the basis of road safety considerations. The review of the environmentally relevant aspects of point (a) of Article 5(1) has not yet been completed. Germany will comment on the proposed annual tests as soon as the Federal Government has formed a final opinion on the annual monitoring of exhaust and noise emissions. NL (Drafting suggestions): 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, three~~one~~ year after the date on which the vehicle was first registered, and thereafter annually; NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): the article indicates that older vehicles show more defects as they get older, what is the expectation and reason that vehicles must be checked for emissions after only 1 year? One and two year old vans are not to be expected that systems for controlling emissions are already defective. A more realistic approach is to start testing this from the third year after admission. In the Netherlands, diesel cars must go for the PTI from the third year after admission. PL (Comments/ Questions): PL does not agree with carrying out an emissions test every year for N1 category vehicles. The extension of this obligation to N1 category vehicles simultaneously covers all vehicles with a maximum permissible weight of up to 3.5 t, including those with passenger car characteristics (M1 category). 1) The provision should not apply to vehicles used as commercial vehicles. 2) Comment on the second part of the sentence: - Consideration should be given to specifying that the test of section 8.2 of Annex 1 (Exhaust emissions) applies to N1 vehicles with a reference mass exceeding 2610 kg (see REGULATION (EC) No 715/2007 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 June 2007 on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information).
	RO

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): **vehicles of category O_2, Rb and Sb: four years after the date on which the vehicle was first registered, and thereafter every two years;** RO (Comments/ Questions): Correlation with the new proposals at Article 2 FR (Comments / Questions): FR opposes this measure because it represents an excessive economic cost for citizens and is likely to increase the number of people avoiding to bring their vehicles to PTI test, putting into question the usefulness of the measure. FR has already put in place an annual pollution inspection for N1 vehicles after 4 years. FR wants to warn that inspectors cannot mention safety related defects during this kind of inspection. FR questions the added value of this inspection before 4 years, as recent vehicles are not expected to have significant pollution related issues.
(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;	PL (Comments/ Questions): 1) Why is category N1 not indicated in the first part of point b? In PL, ambulances can be category N1. 2) It is proposed that M3 category vehicles should be subject to roadworthiness tests one year from the date of the vehicle's first registration and every six months thereafter.

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Commission proposal	Drafting suggestions and Comments/ Questions
(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.	SK (Comments/ Questions): Could the Commission explain the part "*the use of which mainly takes place on public roads for commercial road haulage purposes*"? Tractors are mostly used for agricultural or forestry work and not for commercial road haulage, as category N3 trucks or category O4 semi-trailers. We also have concers regarding the word "*mainly*": "….***mainly*** *takes place on public roads…*". If these vehicles are used mainly in the field or in the forest and only sporadically on public roads, then this does not apply to them? We would welcome clarification. We would prefer to **delete** this **and simply name the category Tb** (without specifying T1b-T4.3.b). NL (Drafting suggestions): (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. RO (Drafting suggestions): (c) wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b**,** ~~and~~ T4.3b **and T5** 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. RO

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): See comments on Article 2 (1) The type of use can not be verified at the PTI
	RO (Drafting suggestions): **(d) L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm3 or with a maximum continuous rated or net power above 11 kW: four years after the date on which the vehicle was first registered, and thereafter every two years.** RO (Comments/ Questions): The minimum frequency should be harmonized at the EU level FR (Comments / Questions): FR agrees with the Commission's text and wishes to maintain the word "mainly" as there is no point to inspect vehicles that are mainly used off-road.
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.	SK (Comments/ Questions): On how how the period should be calculated if a previous PTI was carried out in another Member State - given our general reservations and concerns we cannot support this paragraph.

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Commission proposal	Drafting suggestions and Comments/ Questions
	AT (Comments/ Questions): The frequency of testing is defined as multiples of full years. If the expiry date of the subsequent roadworthiness certificate shall be counted as from the expiry date of the temporary roadworthiness certificate, this would deviate from the original frequency. In AT, the date of the periodic technical inspection is on the anniversary of the first registration. This date can only be rescheduled with the permission of the registration authority. PL (Comments/ Questions): Member State of registration of the vehicle should "have a say" in recognising the expiry date of the temporary certificate of fitness.
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 11 kW, are to be subject to a roadworthiness test.	NL (Drafting suggestions): ~~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 11 kW, are to be subject to a roadworthiness test.~~ NL (Comments/ Questions): If the interval of category L is left to the Member States, there may be a proliferation of intervals and with that also the possibility of future mutual recognition. BE

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): BE: Article 5(2) seems to have been numbered wrong + very important for BE NL (Drafting suggestions): 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 11 kW, are to be subject to a roadworthiness test.~~ NL (Comments/ Questions): If the interval of category L is left to the Member States, there may be a proliferation of intervals and with that also the possibility of future mutual recognition. RO (Drafting suggestions): ~~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 11 kW, are to be subject to a roadworthiness test.~~ RO (Comments/ Questions): See paragraph 1 (d) FR

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments / Questions): FR agrees with the Commission's text as Member states should be able to specify category L vehicles' periodicity.
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.	SK (Comments/ Questions): In the current Directive, there is an option for a **MS to determine that vehicles are subject to PTI if the vehicle has been involved in a road accident that has affected the main safety components of the vehicle**. In SK, this criterion applies, and it is important to us, we think, it should remain in art. 5. Could the Commission explain why this was deleted? NL (Drafting suggestions): 3. NL (Comments/ Questions): This is not feasible. Cars must be sent to the PTI by the competent authorities of a country. How should the competent authorities of a Member State find out that a vehicle has been significantly altered or modified? Companies that modify emission and safety systems are, for example, chip tuning companies. Chip tuning companies often do not perform PTI inspections themselves. It cannot be expected that such companies will report changes to emission and safety systems to the competent authorities of a Member State.

Commission proposal	Drafting suggestions and Comments/ Questions
	Furthermore, it is questionable whether a car will fail to pass the PTI emission inspection if for example a chip tuning modification has been carried out. It could well be that it simply passes the PTI emission test. The emission test in the PTI is often not effective enough to actually detect this type of manipulation. Requiring that vehicles with significantly altered or modified safety and environmental systems and components be submitted to the PTI would reverse the current state of affairs. The PTI is precisely intended to detect these kinds of alterations or modifications. For illustration, the following example: Since 2017, there has been a ban on the removal of particulate filters in the Netherlands. However, this ban was difficult to enforce at the time because there were numerous companies and also private individuals who removed particulate filters. However, it was only from 2023 with the introduction of the particle test in the PTI that the ban on removing diesel particutale filters could be properly enforced. With the particle test, a diesel car with a removed particulate filter will not pass the PTI. DE (Drafting suggestions): Germany supports the testing of vehicles "if the safety and environmental systems and components of the vehicle have been significantly altered or modified." However, from the German point of view, it must then be determined whether this vehicle still complies with the (type) approval requirements after the modification. A pure roadworthiness test is not considered sufficient by Germany in this case. If so, this paragraph could be deleted and regulated by national provisions.

Commission proposal	Drafting suggestions and Comments/ Questions
	CZ (Comments/ Questions): Are these cases where the vehicle has been rebuilt and additional approval is sought or other cases? BE (Comments/ Questions): BE: Very good but how will it be known whether the vehicle has been altered or modified? NL (Drafting suggestions): 3. NL (Comments/ Questions): This is not feasible. Cars must be sent to the PTI by the competent authorities of a country. How should the competent authorities of a Member State find out that a vehicle has been significantly altered or modified? Companies that modify emission and safety systems are, for example, chip tuning companies. Chip tuning companies often do not perform PTI inspections themselves. It cannot be expected that such companies will report changes to emission and safety systems to the competent authorities of a Member State.

Commission proposal	Drafting suggestions and Comments/ Questions
	Furthermore, it is questionable whether a car will fail to pass the PTI emission inspection if for example a chip tuning modification has been carried out. It could well be that it simply passes the PTI emission test. The emission test in the PTI is often not effective enough to actually detect this type of manipulation. Requiring that vehicles with significantly altered or modified safety and environmental systems and components be submitted to the PTI would reverse the current state of affairs. The PTI is precisely intended to detect these kinds of alterations or modifications. For illustration, the following example: Since 2017, there has been a ban on the removal of particulate filters in the Netherlands. However, this ban was difficult to enforce at the time because there were numerous companies and also private individuals who removed particulate filters. However, it was only from 2023 with the introduction of the particle test in the PTI that the ban on removing diesel particutale filters could be properly enforced. With the particle test, a diesel car with a removed particulate filter will not pass the PTI. IE (Comments/ Questions): The previous text was 'may'. Now it has moved to 'shall'. This is a considerable change. It is not always possible to determine when the safety and environmental systems and components of the vehicle have been significantly altered or modified. Until there's a system in place to capture these changes, this will be difficult to enforce.

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Commission proposal	Drafting suggestions and Comments/ Questions
	PL (Comments/ Questions): It is proposed to clarify what kind of 'systems' are referred to. FR (Comments / Questions): Such modifications to the vehicle are taken into account by the homologation/reception process and do not fall under PTI. This type of issue is, today, the responsibility of the member states and FR wishes that to remain so. FR therefore proposed that no roadworthiness test be required in such cases. Indeed, this kind of manipulation/tampering cannot easily be detected since no dismounting of the vehicles is allowed. Moreover, PTI centres' responsibility could be involved even though the inspector is not able to detect this type of manipulation/tampering.
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.';	PL (Comments/ Questions): It is proposed to clarify the term 'reasonable period'. FR (Comments / Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	FR regrets that the mandatory technical inspection was abolished upon a change of ownership. FR hopes to see this provision reinstated because it represents an important element of road safety, as it allows the buyer to know the condition of the vehicle.
(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 States shall ensure that roadworthiness tests cover at least the areas referred to in point 2 of Annex I.';	RO (Drafting suggestions): '1. For vehicle categories falling within the scope of this Directive~~,~~ ~~with the exception of categories L3e, L4e, L5e and L7e,~~ Member States shall ensure that roadworthiness tests cover at least the areas referred to in point 2 of Annex I.'; RO (Comments/ Questions): The areaes of the test should be harmonized also for L vehicles, with the necessary amendments in Annex I.

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Commission proposal	Drafting suggestions and Comments/ Questions
(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.';	IE (Drafting suggestions): 3. For vehicles in categories L3e, L4e, L5e and L7e that either: – have an engine capacity greater than 125 cm^3, or – have a maximum continuous rated power or net power output exceeding 11 kW, Member States shall define the specific areas, items, and appropriate methods of testing. IE (Comments/ Questions): It's unclear whether: • The 11 kW power threshold applies to all L3e–L7e vehicles, or • It's only an alternative to the 125 cm^3 condition — i.e. does the test apply if *either* threshold is met, regardless of category type? Also, "maximum continuous rated or net power" combines two different concepts (continuous power vs. net power), which could be better defined or separated. RO (Drafting suggestions): ~~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.~~

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Commission proposal	Drafting suggestions and Comments/ Questions
	RO (Comments/ Questions): See comments on paragraph 1 FR (Comments / Questions): FR welcomes this text. Inspection items for L category vehicles should remain the responsibility of member states.
(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.';	NL (Comments/ Questions): Does this mean that N1 would in that case not need a yearly emission test? ES (Drafting suggestions): 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, **during a more detailed technical roadside inspection** involving the checking of item

Commission proposal	Drafting suggestions and Comments/ Questions
	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.'; ES (Comments/ Questions): Added just to make clear that this exemption will only be applicable if a more detailed technical roadside inspection is carried out. NL (Comments/ Questions): Does this mean that N1 would in that case not need a yearly emission test? IE (Comments/ Questions): It is not clear if the 3rd party service needs to meet the standard as the PTI centre and who polices these? RO (Drafting suggestions): ~~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.'~~ FR

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments / Questions): FR questions the added value as this disposition is very complex to put in place.
(7) Article 8 is replaced by the following:	
'Article 8	
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**.	SK (Comments/ Questions): According to this paragraph, the roadworthiness certificates indicate "*at least the standardised elements of the corresponding harmonised Union codes as laid down in Annex II*.". There are no harmonised codes in Annex II, only the order of points from 1 to 10 – what in our opinion are not harmonised codes. **The harmonised codes are given in the Registration Documents Directive in the current Directive 1999/37/EC** and also in the new proposal submitted by the Commission. We believe that the same

Commission proposal	Drafting suggestions and Comments/ Questions
	harmonised codes should be used and Annex II to Directive 2014/45/EU should be amended accordingly. Could the commission clarify this? (the Working Party dealing with the End-of-Life Vehicles proposal has similary added harmonised codes based on the Registration Documents Directive to the template certificate of destruction). NL (Comments/ Questions): NL would be interested to hear other MS' points of view on added value EiD wallets when expiry date PTI is also an item on the (digital) registration certificate. FI (Comments/ Questions): **Question:** Will it be possible to receive an electronic roadworthiness certificate from the testing centre that is different from the country that issued the digital identity wallet? **Question:** We see that the "use case" where the driver is not a owner or holder of a vehicle is "not supported" in the European Digital Identity Wallets scheme at the moment. Could the commission clarify this, do you share this concern and do you see a need to expand the consept somehow? This will have implications on our final position on application timelines. DE (Comments/ Questions): Regarding the amendment to Article 8: Germany welcomes digitalization. The detailed provisions of Article 8 require intensive review in Germany. Due to the mandatory ISO 17020 accreditation for inspection bodys in Germany, the provisions on digitization and data protection should be in

Commission proposal	Drafting suggestions and Comments/ Questions
	line with the accreditation rules. This can only be assessed after a technical review by the relevant authorities (including the Federal Motor Transport Authority*). * Kraftfahrt-Bundesamt NL (Comments/ Questions): NL would be interested to hear other MS' points of view on added value EiD wallets when expiry date PTI is also an item on the (digital) registration certificate. LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) RO (Drafting suggestions): 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**.~~

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	RO (Comments/ Questions): RO does not support the mandatory introduction of the electronic certificate; the standard certificate should be the paper certificate. FR (Comments / Questions): FR would like that both versions of the roadworthiness certificates (paper one and electronic one) coexist during a temporary phase. The minimum safety requirements regarding the electronic roadworthiness inspection report should be specified.
Member States shall ensure that roadworthiness certificates contain the information necessary for authentication and validation of those certificates.	RO (Comments/ Questions): See comments on paragraph 1
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.	NL (Comments/ Questions): Member States should be able to decide who they consider trusted issuers (always authorities) NL (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Member States should be able to decide who they consider trusted issuers (always authorities) RO (Comments/ Questions): See comments on paragraph 1
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.	FI (Comments/ Questions): **Comment:** We see that we should not develop physical certificates as they will become marginalized after the digitalisation of the certificate. RO (Comments/ Questions): See comments on paragraph 1
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 of the set of data issued to roadworthiness certificates as electronic attestations of attributes to the Commission and to the other	SK (Comments/ Questions): This paragraph deals with **re-registration** of vehicles and recognition of the roadworthiness certificate. We think this provision is missing a text, that the roadworthiness certificate does not always have to be recognised, if the competent authority considers that the vehicle has defects. We would like to refer to Point 3 of the judgment of the Court of Justice of 24 January 2019 in **case C-326/17**, where recognition of roadworthiness certificates from abroad may be refused if there is a suspected risk to road

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Commission proposal	Drafting suggestions and Comments/ Questions
Member States without undue delay. The Commission shall publish those specimens and descriptions of the sets of data.	safety. We would like to ask why this has not been reflected in the provision? The last two sentences on the specimen of certificates should, in our opinion, be in a separate paragraph (as this does not follow the introductory part of paragraph 3.) RO (Drafting suggestions): 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 **corresponds to Annex II and** 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 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. RO (Comments/ Questions): Not all existing PTI certificates correspond to the EU format
4. In addition to the provisions of paragraph 3, Member States shall recognise the validity of a roadworthiness certificate, whether in	BE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
electronic or paper format, where there is a change in ownership of a vehicle having a valid proof of periodic roadworthiness test.	BE: Does this mean that it will be possible to register a vehicle with the roadworthiness certificate of the previous owner and hence without en new roadworthiness tests until the end of the validity of said certificate, or will it require a new validity date?
5. The Member State of registration shall recognise the validity of a temporary roadworthiness certificate issued in another Member State.	PL (Comments/ Questions): It seems that it is the Member State of registration of the vehicle that should have a say in recognising the expiry date of the temporary certificate of roadworthiness.
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.	NL (Comments/ Questions): What is the authority concerned? After all, there are two involved: the one in the country of inspection and the one in the country of registration. Do you perhaps get that a foreign PTI has to be reported to the authority in the country of origin? FI (Comments/ Questions): **Comment:** Text "a reasonable time after each roadworthiness certificate is issued" is vague. At least the information should be communicated in same time to the national authority or the authority in another EU country.

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	NL (Comments/ Questions): What is the authority concerned? After all, there are two involved: the one in the country of inspection and the one in the country of registration. Do you perhaps get that a foreign PTI has to be reported to the authority in the country of origin?
7. Member States shall ensure that the information included in the previous roadworthiness certificate is made available to the inspectors.	AT (Drafting suggestions): Member States ~~shall ensure~~ **may decide** that the information included in the previous roadworthiness certificate is made available to the inspectors. AT (Comments/ Questions): In AT, it was decided not to provide the results of previous roadworthiness tests to the inspectors in order to avoid any influence on the inspector's unbiasedness and to guarantee that every vehicle is inspected in the same way. FR (Comments / Questions): This should remain optional Transmission of the information included on the previous certificate shall not be mandatory as the result of an inspection shall only depend on the current state of the vehicle, not on its history.

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Commission proposal	Drafting suggestions and Comments/ Questions
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:	SK (Comments/ Questions): There is a **deadline 2 years** for the Commission to issue and implementing act. That is the same deadline as for the transposition. There is no transitional period for Member States to apply this implementing act. Could the Commission explain to us what the timetable is and how it should be applied? ES (Comments/ Questions): Not clear when it becomes mandatory to MS
(a) securely issuing and verifying the certificates referred to paragraphs 1 and 2;	
(b) ensuring the protection and security of personal data;	

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(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.	
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:	

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'*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 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.	NL (Comments/ Questions): Hence in the case of PTI abroad: the MS of inspection determines the period within which a retest must take place, the MS of registration must receive the inspection results and expiry date, the second inspection may still take place in that same foreign MS. In terms of implementation, this becomes quite complicated DE (Comments/ Questions): n the view of Germany, the "possibility of re-inspections in the Member State where the vehicle failed the initial test or in the Member State of registration" requires a uniform European "list of deficiencies." However, Member States have so far been free to add additional "deficiencies" at national level. Germany has numerous national "deficiencies" that should not simply be removed. This requires extensive additions to the

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	harmonized "deficiencies" in the annex to the Directive or a clear provision within the proposed amendment on how to deal with national deficiencies of other Member States in the event of a re-inspection. Appropriate deadlines for implementation should be set for this. BE (Comments/ Questions): BE: We would be grateful if the European Commission could provide some clarification on the following point: *"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***".* AT (Drafting suggestions): 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~~ **appropriate national database** AT (Comments/ Questions): See above NL (Comments/ Questions): Hence in the case of PTI abroad: the MS of inspection determines the period within which a retest must take place, the MS of registration must receive the inspection results and expiry date, the second inspection may

Commission proposal	Drafting suggestions and Comments/ Questions
	still take place in that same foreign MS. In terms of implementation, this becomes quite complicated
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.	SK (Drafting suggestions): 3. In the case of dangerous deficiencies, the test shall be deemed to have been failed. The Member State or the competent authority ~~may~~ shall 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. SK (Comments/ Questions): According to paragraph 3 if a vehicle has **dangerous deficiencies**, *"...Member State or the competent authority authority **may** decide that the vehicle in question is not to be used on public roads*,". In our opinion, the word "may" should be changed to "shall" to be in line with Directive 2014/47/EU, as it also states that if a vehicle has a dangerous deficiency, it cannot be used in road traffic.

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	Could the Commission clarify the meaning of the last sentence: "*The new certificate shall be issued by the competent authority that requested the suspension.*"? If a vehicle was assessed with a dangerous deficiency during the PTI, a new PTI can also be carried out by another testing centre. We do not understand why it should be the same authority that issued the suspension. NL (Comments/ Questions): Is the Member State or the competent authority also authorized in case of dangerous deficiencies to suspend the authorisation for its use in road traffic if it concerns a vehicle from another Member State? AT (Drafting suggestions): The new certificate shall be issued by the competent authority that requested the suspension **or by the Member State of registration**. AT (Comments/ Questions): In cases where the vehicle is brought to the Member State of registration to rectify the deficiencies, it would be an unnecessary burden for the vehicle owner to bring back the vehicle to the Member State requested the suspension. NL (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	Is the Member State or the competent authority also authorized in case of dangerous deficiencies to suspend the authorisation for its use in road traffic if it concerns a vehicle from another Member State? PL (Comments/ Questions): In PL's view, the second part of paragraph 3 is not clear. It needs clarification as to why the competent authority has to notify the Member State of registration of the fact that a vehicle cannot be used on public roads. Furthermore, it is questionable that the issue of a new roadworthiness certificate is restricted only to the competent authority that requested the stoppage. It seems reasonable to allow the issuing of a new roadworthiness certificate also by the Member State of registration.
4. In the case of obvious tampering or manipulation of any component of the vehicle, 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.	SK (Comments/ Questions): We see as problematic manipulation with odometers – we do not know how to remove such manipulation. If the kilometers have been tampered, it cannot be restored to its original state, since the actual mileage is not known. If the odometer has been tampered with, it is important for the buyer to know this. However, this cannot be restored to its original state. Some vehicle owners may purchase a vehicle with a tampered odometer (unknowingly) and they will not be able to ensure the removal of this

Commission proposal	Drafting suggestions and Comments/ Questions
	manipulation. Could the Commission clarify this odometer manipulation? What to do next with such a vehicle? NL (Drafting suggestions): and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties NL (Comments/ Questions): PTI stations in the Netherlands are not authorized to impose fines. This can only be done by official enforcement authorities such as the police. If the manipulation or tampering with a part of a vehicle is discovered by a PTI station, then a PTI station cannot impose a fine for this. If the police discover the manipulation or tampering during a Road Side Inspection, a fine can be imposed. FI (Comments/ Questions): **Comment**: If tampering of odometer is found and PTI is failed, how can the vehicle ever pass a PTI? How should odometer reading be corrected or reported as tampered? What, if the odometer has broke down and repaired? CZ (Comments/ Questions): The provision is too general and does not define what is meant by tampering and manipulation. This could lead to different application of this provision across Member States. So what cases does this provision cover? NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties NL (Comments/ Questions): PTI stations in the Netherlands are not authorized to impose fines. This can only be done by official enforcement authorities such as the police. If the manipulation or tampering with a part of a vehicle is discovered by a PTI station, then a PTI station cannot impose a fine for this. If the police discover the manipulation or tampering during a Road Side Inspection, a fine can be imposed. IE (Drafting suggestions): In the case of obvious tampering or manipulation of any component of the vehicle, including its emission control system, silencer, safety-related systems, batteries, battery management 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. IE (Comments/ Questions): Batteries and battery management systems should be included in the definition of tampering or manipulation PL (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	The provision is vague because for penalties to be effective, proportionate, dissuasive and non-discriminatory across the EU this will be difficult to enforce. FR (Comments / Questions): FR is concerned about the major deficiency regarding odometer tampering since there is no way to fix it. Indeed, it is not guaranteed that mechanics accept to modify the value of the odometer (it is strictly forbidden in French law). Moreover, once the mileage of the vehicle has been manipulated, it is very difficult or impossible to know the real mileage to do the correction.
*** 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)’;	
	AT (Comments/ Questions): Article 10: As Article 10 was not modified, the Commission is asked to reflect on wether a digitalisation of the proof of test is not intended or if a pure digital proof of test is already admissible under the current provisions.

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Commission proposal	Drafting suggestions and Comments/ Questions
(9) Article 16 is replaced by the following:	
'*Article 16*	
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.	DE (Comments/ Questions): • Regarding the amendment to Article 16: DEU welcomes the "exchange of data between the authorities of the Member States." However, the provisions contained in Article 16 require detailed review. Germany has therefore a study reservation on the proposed text. •Art. 16 introduces the obligation for MS to connect their vehicle registers to the MOVE-HUB platform for data exchange. However, the vehicle registers of the Member States are already interconnected via EUCARIS, see, for example, Article 5g of Directive (EU) 2015/413. EUCARIS has proven to be a reliable system for the secure, EU-wide exchange of vehicle and personal data in various areas of application. It is cost-effective and expandable. Did the Commission examine the use of EUCARIS for the purposes of Directive 2015/45/EU in its impact assessment? Why should this system not also be sufficient for the

Commission proposal	Drafting suggestions and Comments/ Questions
	exchange of PTI data? The use and adaptation of an already established system is likely to be more cost-effective and sustainable than setting up a new system. Member States must continue to be able to use EUCARIS. BE (Comments/ Questions): BE: MOVE-HUB? We don't know about MOVE-HUB. Does this system already exist? On the other hand, we know EUCARIS. Its purpose is the exchange of vehicle data between Members States. Could the European Commission clarify the existence of this system?
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.	CZ (Comments/ Questions): Through which platform this data will be provided? The MOVE-HUB electronic system, according to the wording of the following paragraph, does not take into account the transmission of most of this data. AT (Drafting suggestions): 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 **of the last [3] years**, and the odometer history of the vehicle stored in national databases, to the competent authorities of and testing centres authorised by other Member States. AT

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): The Certificate of Conformity will be publicly available acc. to the framework Regulation (EU) 2018/858, so there is no need to exchange this data. The exchange of RSI reports should be limited to a reasonable period of time and should also be only obligatory for reports generated after entry into force of this Directive. RO (Drafting suggestions): 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. **The competent authorities make available the necessary information to their authorised testing centers.** RO (Comments/ Questions): For administrative and security reasons, the direct access should be available only to the competent authorities. Even the title refers to the exchange of data between MS authorities. The exchange of the CoC data are subject of other EU provisions
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.	NL (Drafting suggestions): Member States shall use a specifically designed and highly secured software application of the European Vehicle and Driving Licence Information System (EUCARIS) in its up-to-date version to exchange

Commission proposal	Drafting suggestions and Comments/ Questions
	information on roadworthiness certificates and on odometer history, 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.~~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.~~ ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. BE (Comments/ Questions): BE: Will it be possible to allow access to other interested authorities such as the police and others that should have access to the data?

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Commission proposal	Drafting suggestions and Comments/ Questions
	How will MOVE-HUB function and when will it be ready for use? AT (Comments/ Questions): The Commission is asked to consider that data exchange is already mandatory via different platforms (EUCARIS for eCOC). AT does not favour any specific platform but urges to find a solution which imposes as little burden on Member States as possible and avoids duplications of IT solutions. NL (Drafting suggestions): Member States shall use a specifically designed and highly secured software application of the European Vehicle and Driving Licence Information System (EUCARIS) in its up-to-date version to exchange information on roadworthiness certificates and on odometer history, 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.~~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.~~ IE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. RO (Drafting suggestions): 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. **The competent authorities make available the necessary information to their authorised testing centers.** RO (Comments/ Questions): For administrative and security reasons, the direct access should be available only to the competent authorities. Even the title refers to the exchange of data between MS authorities.
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	SK (Comments/ Questions): The Commission has 2 years to issue an implementing act - same period as for transposition by the Member States. Paragraph 3 states that Member States have one year to apply this, however we believe that this implementing act should already be applicable at the time of the

Commission proposal	Drafting suggestions and Comments/ Questions
protection of personal data and shall be adopted in accordance with the examination procedure referred to in Article 19(2).	transposition. Could the Commission clarify the timetable? It is not clear, what will happen in the period between mandatory transposition and the start of application of the implementing act? If the Member States will be able to use existing systems such as EUCARIS (which will be able to connect to MOVE-HUB), we would like to include this clarification at least in the Recitals. (This has been similarly amended in the End-of-Life Vehicles Regulation). NL (Drafting suggestions): 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). ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): See previous comment. NL (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	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). IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. FR (Comments / Questions): FR underlines that putting in place such data exchanges is a complex task and that the timeline will have to deal with this complexity.
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.’;	ES (Drafting suggestions): The electronic systems interconnections provided for in paragraph 1 shall be operational within ~~one year~~ **two years** after the adoption of the implementing acts referred to in paragraph 2.’; To be reviewed

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Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Comments/ Questions): See previous comment. More time to make this functional by MS is clearly needed, if eventually decided to mandate MOVE-HUB interconnection. CZ (Comments/ Questions): Does the whole of paragraph 1 apply or just the part that governs the transmission of information via the MOVE-HUB? The time limit of 1 year to become operational seems insufficient. IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. PL (Comments/ Questions): The indicated period may not be sufficient to prepare the full functionality of the electronic system.

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Commission proposal	Drafting suggestions and 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;';	FR (Comments / Questions): FR believes that Member States should be included in such important discussions. FR wishes not to refer the update of Annex I, point 3, to a delegated act.
(c) the following fourth indent is added:	

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Commission proposal	Drafting suggestions and Comments/ Questions
'– specify the methods for the particle number (PN) measurement of positive ignition engines and for the nitrogen oxides (NOx) measurement of compression and positive ignition engines provided for in Section 8.2 of point 3 of Annex I.';	NL (Drafting suggestions): specify the methods for the particle number (PN) measurement of positive ignition engines, ~~and~~ for the nitrogen oxides (NOx) measurement of compression ignition engines and the nitrogen oxides (NO_x) and other gaseous components of positive ignition engines provided for in Section 8.2 of point 3 of Annex I.'; NL (Comments/ Questions): The NOx test for positive ignition engines is to be developed for vehicles as of emission classes Euro VI, 6d-TEMP and newer. For these vehicles, the new NOx test and the four gas emissiontest in accordance with 8.2.2.2. should be performed. It is preferable that there will be one new test for these vehicles, in which the functioning of the three-way catalytic converter is checked on the basis of all gaseous components (CO, HC, NOx, CO_2 and O_2). So not that the old four-gas test should be performed supplemented with a separate new NOx test. GR (Comments/ Questions): Particle number (PN) measurement should also apply to compression engines. FI (Drafting suggestions): '– specify the methods for the particle number (PN) measurement of positive ignition engines ~~and for the nitrogen oxides (NOx) measurement~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~of compression and positive ignition engines~~ provided for in Section 8.2 of point 3 of Annex I.'; FI (Comments/ Questions): **Justification:** Powers to adapt NOx measurement by delegated acts should not be given to the Commission as proposed. The temperatures outside of Type Approval tests should be properly verified before NOx measurement can be introduced in this directive. Ambient temperatures during PTI is a unsolved problem at the moment. DE (Comments/ Questions): Re the new fourth indent in Article 17: An in-depth expert review is required of the Commission's powers to adopt delegated acts specifying the "methods for the particle number (PN) measurement of positive ignition engines and for the nitrogen oxides (NOX) measurement of compression and positive ignition engines provided for in Section 8.2 of point 3 of Annex I". As this could entail high adaptation costs, Germany believes that separate deliberation on the authorization to introduce new measurement and testing procedures is required. Germany will comment on this at a later date. AT (Comments/ Questions): Contrary to PN measurements, at the time being, there is no suitable procedure available for measuring NOx at PTI. Therefore, a review clause considering the possibility of introducing NOx measurements and limits at PTI should be introduced to avoid an obligation that cannot be fulfilled by Member States/authorities/testing centres. NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): specify the methods for the particle number (PN) measurement of positive ignition engines, ~~and~~ for the nitrogen oxides (NO_X) measurement of compression ignition engines and the nitrogen oxides (NO_x) and other gaseous components of positive ignition engines provided for in Section 8.2 of point 3 of Annex I.'; NL (Comments/ Questions): The NOx test for positive ignition engines is to be developed for vehicles as of emission classes Euro VI, 6d-TEMP and newer. For these vehicles, the new NOx test and the four gas emissiontest in accordance with 8.2.2.2. should be performed. It is preferable that there will be one new test for these vehicles, in which the functioning of the three-way catalytic converter is checked on the basis of all gaseous components (CO, HC, NOx, CO_2 and O_2). So not that the old four-gas test should be performed supplemented with a separate new NOx test. IE (Comments/ Questions): NOx testing requires the vehicle to be under load, this would add extra time to the test and would not be feasible for vehicles over 3.5 tonnes. Further details would need to be provided. Consideration for OBM or OBD. Please see extract from 8.2.2.3. NOx Measurement of Annex I: "Vehicle preparation: [to be specified in accordance with the delegated acts referred to in Article 17]; - […]

Commission proposal	Drafting suggestions and Comments/ Questions
	Measuring instrument preparation: — [to be specified in accordance with the delegated acts referred to in Article 17 or combined with PN testing above];" PL (Comments/ Questions): 1) It is necessary to indicate the assumptions for NOx measurement 2) It is required that experts from the Member States participate in the development of the implementing regulations. FR (Comments / Questions): FR is not in favour of the definition of the method for measuring particles and NO_x by delegated acts because it is not possible to lay down rules without knowing whether they will be applicable. Member States must therefore be involved in their definition.
(11) Article 20 is replaced by the following:	
'*Article 20*	

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Commission proposal	Drafting suggestions and Comments/ Questions
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*	
Communication of information to the Commission	

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Commission proposal	Drafting suggestions and Comments/ Questions
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):	DE (Comments/ Questions): • Regarding the new Article 20a: From Germany's point of view, there is no fundamental objection to the transfer of information to the Commission. The procedure laid down for the online reporting platform needs to be examined by the competent authorities in Germany, which means that no assessment can be made at this stage. AT (Comments/ Questions): Commission is kindly asked to explain the purpose of this data collection: which kind of analysis should be done with the collected data, which consequences may arise. IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern.
(a) the number of testing centres per Member State;	
(b) the total number of vehicles inspected;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(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;	RO (Drafting suggestions): (d) the **failure rate** **per category** ~~areas checked, and the items failed, in accordance with point 3 of Annex I to this Directive;~~ RO (Comments/ Questions): Administrative burden
(e) the number, category and [failure rate][test result] of vehicles tested registered in another Member State.	RO (Drafting suggestions): (e) the number, category and [failure rate **per category**]~~[test result]~~ of vehicles tested registered in another Member State.
The first report shall cover the years 2027, 2028 and 2029, separately.	ES (Comments/ Questions): Given that the format will be defined in implementing acts, more time is needed, first year to be included in the reporting should be postponed PL (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	The dates indicated for the adoption of the first report are unrealistic and need to be postponed. It should be borne in mind that each Member State will implement the Directive on a different date.
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 and Comments/ Questions
(13) Article 22 is replaced by the following:	
'*Article 22*	
Extension of validity of roadworthiness certificates in case of crisis	DE (Comments/ Questions): On the new Article 22: Germany welcomes the new options available to Member States and the Commission in the event of a crisis. A detailed examination of this has not yet been possible. RO (Drafting suggestions): **Extension of validity of roadworthiness certificates <u>and inspectors certificates</u> in case of crisis** RO (Comments/ Questions): That extension should be applied also for the inspectors certificates
1. For the purposes of this Article, the following definitions shall apply:	

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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Commission proposal	Drafting suggestions and Comments/ Questions
(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 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.	SK (Comments/ Questions): It is not clear who issues the decision, is it the Commission or the Member State? The provision says that Member State may refer the matter to the Commission. However, it does not state what the Commission will do and by when. According to paragraph 6, the measures are adopted by Member States and it is the Commission who publishes them. Additional clarifications are needed.
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.	

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Commission proposal	Drafting suggestions and Comments/ Questions
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 months, as long as the crisis persists and the Commission authorises it.	RO (Drafting suggestions): Notwithstanding Article 5(1), Article 10(1)**, Article 13(1), point 2 b) of Annex IV** and point 8 of Annex II, the competent authorities of the Members States may extend the period of validity **of inspectors certificates and** 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 months, as long as the crisis persists and the Commission authorises it. RO (Comments/ Questions): That extension should be applied also for the inspectors certificates
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.’;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(14) Annex I, Annex III and Annex IV are amended in accordance with Annex I to this Directive.	SK (Comments/ Questions): We would like to ask, whether expert meeting is planned to analyse the whole Annex I to analyse whether other changes are necessary. We would see added value in such a meeting. NL (Comments/ Questions): ANNEX 10. ELECTRONIC SAFETY SYSTEMS – What is the role of the manufacturer in these safety systems in checking the software and self-diagnostics, especially with connected vehicles? Many of these systems can be switched off and do not have to be used by the driver, so it is proportional to make only those systems mandatory during the technical inspection that cannot be switched off. Where is it ensured that the data from the vehicle is available and can be read-out in a simple way with an interface? And where can the controller see if the software integrity and version are correct? Regarding testing the charging cable for EV's, NL is not in favore of testing this item because the charging cable isn't an mandatory item in

Commission proposal	Drafting suggestions and Comments/ Questions
	type-approval and therefore the charging cable isn't always in the vehicle at the PTI. Question about the suspension/shockabsorbertest. It was optional in the 2014/45. In the proposal, the test is mandatory again. In the table of equipment, the shock absorber test equipment is missing. Is it a typo or is the test indeed mandatory in the proposal? DE (Comments/ Questions): Re the amendments to Annex I, Annex III and Annex IV: Germany welcomes the adaptations to technological progress in the safety-relevant requirements. However, this also requires a detailed review and, in principle, the introduction of new environmentally relevant measurement and testing procedures. CZ (Comments/ Questions): In Annex I, some inspection tasks require the use of special equipment, but the Directive does not specify these as equipment for technical inspection stations (see 4.14.4.3 and 5.3.2.1). If the inspection stations do not have to be equipped with such equipment, will they not have to carry out such checks? In relation to the requirements for the inspector to check the high voltage systems of the vehicle, is the assumption that all such checks will be either visual or via OBD? AT

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Electronic safety systems should be limited to the systems required by type-approval regulations and being type approved. For systems like adaptive cruise control or automatic light, there are no harmonised requirements, inspection of these items is disproportionate. It is of utmost importance that the use and characteristic of the electronic interface is sufficiently definied and standardised by this Directive. Testing centres will only be able to use the electronic interface if it is possible to prescribe the use of a diagnostic interface according to standard [XYZ] via national provisions. If national authorities have to gather relevant information from every single manufacturer, transform this information into specifications for manufacturers of diagnostic interfaces and make the testing centres use a diagnostic interface developed according to national specifications, smaller Member States like AT will not be able to handle these obligations. NL (Comments/ Questions): ANNEX 10. ELECTRONIC SAFETY SYSTEMS – What is the role of the manufacturer in these safety systems in checking the software and self-diagnostics, especially with connected vehicles? Many of these systems can be switched off and do not have to be used by the driver, so it is proportional to make only those systems mandatory during the technical inspection that cannot be switched off.

Commission proposal	Drafting suggestions and Comments/ Questions
	Where is it ensured that the data from the vehicle is available and can be read-out in a simple way with an interface? And where can the controller see if the software integrity and version are correct? Regarding testing the charging cable for EV's, NL is not in favore of testing this item because the charging cable isn't an mandatory item in type-approval and therefore the charging cable isn't always in the vehicle at the PTI. Question about the suspension/shockabsorbertest. It was optional in the 2014/45. In the proposal, the test is mandatory again. In the table of equipment, the shock absorber test equipment is missing. Is it a typo or is the test indeed mandatory in the proposal? FR (Comments / Questions): An expert meeting should be set in order to analyse the whole annex I. Furthermore, more detailed comments are provided directly in the comments section of the appendices. The elements below highlight these comments. **Annex I:** - ABS (§10.10 Anti-lock braking system) should remain in item 1 "Braking equipment", and should be combined with ESP (§10.16 Electronic Stability program)

Commission proposal	Drafting suggestions and Comments/ Questions
	- Electro-mechanic power steering (§10.12) should remain in item 2 "Steering" - FR welcomes the proposal regarding EV (§4.14). However more detailed analysis has to be done. - FR wonders why the point 4.14.5 "High voltage electrical and electronical equipment" is not mandatory (X) - Regarding item 4 "Lamps, reflectors and electrical equipment", FR questions the feasibility regarding software versions and integrity checks (how to read them, necessity to have a data base to compare with). - Regarding testing of damping (§5.3.2.1) what are the "given minimum values"? FR believes it should remain optional. - Regarding the major defect on odometer obviously manipulated (§7.11), how can the default be remedied? - Regarding NO_x measurement (§8.2.2.3), the proposed method is not suitable for PTI in France as it is impossible to guarantee that a vehicle can be inspected immediately after it has arrived in a PTI station. NOx measurement should not be implemented until there is a suitable method. **Regarding item 10 "Electronic safety systems":** - There are too many points and deficiencies. It will be very difficult for inspector to choose among all these deficiencies.

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Commission proposal	Drafting suggestions and Comments/ Questions
	- Systems should be inspected in the idem they deal with. For example, ABS deals with braking and has to be tested in item 1, AVAS deals with EV and has to be tested in item 4, etc. - Such a detailed level cannot be reached with visual inspection. For example, when the camera is deteriorated, inspector cannot determine which functions are affected. - Only electronic interface allows to reach such a detailed level. However, it will be possible only with harmonized/standardized data. - Inspection should be limited to mandatory safety systems. - Item 10 should only be related to e-PTI. Another item could be added for ADAS if they are too numerous to be included in item 7 "Other equipment". **Annex III:** Regarding the need of a device to lift a vehicle on one of the axes, FR thinks that it should be not mandatory (X) for heavy vehicles, since: - the operation is dangerous if conducted by a single operator; - the test is not representative of real life use of vehicles; - play detectors allow the detection of many deficiencies.

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Commission proposal	Drafting suggestions and Comments/ Questions
Article 2	
Amendments to Directive 2014/47/EU	DE (Comments/ Questions): • Regarding the amendments to Directive 2014/47/EU (part of the article): It has not been possible to carry out a review at short notice, which is why Germany must reserve the right to review this provision as a whole.
Directive 2014/47/EU is amended as follows:	
(1) Article 1 is replaced by the following:	
'Article 1	
Subject matter	

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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Commission proposal	Drafting suggestions and 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.’;	ES (Drafting suggestions): 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.’; ES (Comments/ Questions): As pointed out in the comments to recitals (28) and (29), given the lack of legal certainty and the impossibility of determining the specific responsible subject using measures and values obtained by remote sensing systems so as to adopt mandatory measures on citizens by public authorities, remote sensing controls shall be deleted from the text and its scope. Technology is not mature and reliable.
(2) Article 2 is amended as follows:	
(a) paragraph 1 is amended as follows:	
(i) the following point (aa) is inserted:	

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Commission proposal	Drafting suggestions and Comments/ Questions
'(aa) motor vehicles designed and constructed primarily for the carriage of goods, having a maximum mass not exceeding 3.5 tonnes – vehicle category N1;';	FR (Drafting suggestion): motor vehicles designed ~~and~~, constructed primarily **and used** for the **commercial** carriage of goods, having a maximum mass **exceeding 2.5 tonnes and** 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 Parliament and of the Council***** – vehicle category L.	SK (Comments/ Questions): This new subparagraph stipulates that Article 4a shall apply to vehicles of category M1 and L. We would like to ask why such construction of Article was chosen. Why hasn't the scope of the entire directive changed for category M1 and category L vehicles? Article 4a, paragraph 2 allows for roadside inspection and Article 10 applies – then Annex II automatically applies as well and also the vehicle assessment in Article 12. *De facto* the other articles apply for category M1 and category L too. ES (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	~~'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 Parliament and of the Council***** – vehicle category L.~~ ES (Comments/ Questions): See comment to article 1. IE (Comments/ Questions): Scrutiny regarding the extension of scope. While it might provide road safety benefit, it will have significant implications nationally in terms of the costs required to amend IT systems, train and equip inspectors to carry out these inspections, and for national police services to enforce.
***** 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	

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Commission proposal	Drafting suggestions and Comments/ Questions
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:	
(a) point (11) is replaced by the following:	IE (Comments/ Questions): Correction - should this not be point (13) and not point (11) that is referenced?
‘(11) ‘roadworthiness certificate’ means a roadworthiness test report as defined in Article 3, point (12), of Directive 2014/45/EU;’;	SK (Drafting suggestions): ‘(~~11~~13) ‘roadworthiness certificate’ means a roadworthiness test report as defined in Article 3, point (12), of Directive 2014/45/EU;’; SK (Comments/ Questions): Current definition is in point 13. IE (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	As above.
(b) point 18 is deleted;	SK (Comments/ Questions): Could the Commission explain why was this definition 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;	ES (Drafting suggestions): ~~'(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;~~ ES (Comments/ Questions): See comment to article 1. AT (Drafting suggestions): '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~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~roadside equipment,~~ or by plume chasing in the case of screening vehicles for air pollutant emissions; AT (Comments/ Questions): Noise measurements are highly complex. The surrounding and surrounding noises are of highest importance and cannot be controlled during noise measurements on public roads. No measurement method is known suitable for this purpose. Noise measurements on public roads can identify the noise exposure of the public and the environment but they are not suitable for assessing individual vehicles or the fleet of specific vehicle types.
(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 and 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).'	ES (Drafting suggestions): ~~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).'~~ ES (Comments/ Questions): See comment to article 1. DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. IE (Comments/ Questions): Not insurmoutable but expect to have challenges in implementing this. Implementation will depend on equipment used to enforce and may require extensive changes to police powers for national road authorities. Plume chasing vehicles or WIM sites with ANPR recognition. We would have to use technology to decrease the enforcement burden. There is a significant road infrastructure implication here and the 2 year time frame for implementation will be a serious issue.

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Commission proposal	Drafting suggestions and Comments/ Questions
	FR (Comments / Questions): reconsider this proposal
(5) the following Article 4a is inserted:	ES (Drafting suggestions): ~~(5) the following Article 4a is inserted:~~ ES (Comments/ Questions): The whole article is to be deleted. See comment to art. 1
'*Article 4a*	ES (Drafting suggestions): ~~'*Article 4a*~~
Remote sensing	SK (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	This article proposes Remote sensing. We do not have experience with this technology in SK. We would like to kindly ask the Commission if it could make a separate presentation on how such devices work, how much they cost and how the whole system should work? ES (Drafting suggestions): ~~**Remote sensing**~~ BE (Comments/ Questions): BE: To date, we are not aware of any system approved by the metrology of a Member State for the remote sensing. The control and the sanction are not done in relation to the vehicle's specifications but in relation to the limits set in a legal framework relating to the environment. Could the European Commission inform us about the availability of technology approved by the metrology?
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.	SK (Comments/ Questions): At least 30 % of the vehicles from the entire vehicle fleet should be checked using Remote Sensing. Could the Commission explain why 30 %? We think that this is a high number, if we count the entire vehicle fleet

Commission proposal	Drafting suggestions and Comments/ Questions
	registered in SK (motorcycles, passenger cars, buses, trucks, trailers, tractors and non-road mobile machinery). NL (Drafting suggestions): 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. The 30% remote sensing obligation does not apply to Member States in which for light vehicles with positive ignition the PTI is carried out annually from the fourth year after first registration, for light vehicles with compression ignition the PTI is carried out annually from the third year after first registration and for heavy vehicles the PTI is carried out annually from the first year of registration NL (Comments/ Questions): The purpose of inspections using remote sensing is that for vehicles that are classified as high emitters, an early measurement can be performed to verify the emissions. However, if vehicles in a Member State already undergo the PTI annually, the added value of remote sensing inspections are limited. This is because in that case, for a vehicle that is classified as a high emitter, the regular PTI emission check must be performed after an average of six months. Member States that already perform PTI checks annually should therefore be exempted from the obligation for 30% remote sensing inspections of the vehicle fleet. For Member States that perform PTI annually, it is useful though to carry out remote sensing measurements in the form of plume chasing in order to fulfil the obligatio for 5% RSI control of heavy commercial vehicles and 2% RSI control of light commercial vehicles. Remote sensing in de form of plume chasing provides better accuracy than remote sensing than

Commission proposal	Drafting suggestions and Comments/ Questions
	remote sensing with fixed portal setups because a vehicle's emissions can be measured for a longer period of time. If plume chase measurements are to be performed to meet the 5% and 2% RSI obligation for heavy and light duty commercial vehicles, respectively, these tests should be aimed at screening the NOx emissions of diesel vehicles In this case if a vehicle is identified as a high emitter by remote sensing, the test to verify NOx emissions must be performed immediately after the remote sensing measurement. The subsequent Road Side inspection to verify the NOx-emssions should be done by means of a so-called 'hot idle NOx test' directly after the vehicle has been stopped. Furthermore, also the OBD should be read and a visual inspection of the vehicle must be carried out to detect manipulation devices or other indications of manipulation. In the Road Worthiness Package this test is now proposed for the PTI of vehicles as of emission classes Euro 6d-TEMP and Euro VI and newer. (NOx measurement in accordance with 8.2.3.3). However, for execution within the PTI 'the hot idle NOx test' is not suitable, as it can only be done after a warm-up drive of at least 5 minutes outside the PTI station. The hot idle NOx test is however very suitable for Road Side Inspections FI (Comments/ Questions): **Comment:** We are looking into this remote sensing as we have no experience on it. Generally speaking we have our concern on the readiness and availabilty of this technology and also the cost for our authorities. Preliminary we see the targets in RSI difficult. ES (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	~~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.~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. AT (Drafting suggestions): Each year, each Member State shall take the measures necessary to screen the equivalent of at least ~~30~~ **3** % of the fleet of motor vehicles registered in its territory using that technology AT (Comments/ Questions): AT has experience with remote sensing measurements. During a measurement campaign, 3,800 motor vehicles have been measured per day on average. 30 % of the fleet would mean 2,000,000 measurements leading to 528 days of measurement per year which is an unrealistic high number. NL (Drafting suggestions): 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. The 30% remote sensing obligation does not apply to Member States in which for light vehicles with positive ignition the PTI is carried out annually from the fourth year after first

Commission proposal	Drafting suggestions and Comments/ Questions
	registration, for light vehicles with compression ignition the PTI is carried out annually from the third year after first registration and for heavy vehicles the PTI is carried out annually from the first year of registration NL (Comments/ Questions): The purpose of inspections using remote sensing is that for vehicles that are classified as high emitters, an early measurement can be performed to verify the emissions. However, if vehicles in a Member State already undergo the PTI annually, the added value of remote sensing inspections are limited. This is because in that case, for a vehicle that is classified as a high emitter, the regular PTI emission check must be performed after an average of six months. Member States that already perform PTI checks annually should therefore be exempted from the obligation for 30% remote sensing inspections of the vehicle fleet. For Member States that perform PTI annually, it is useful though to carry out remote sensing measurements in the form of plume chasing in order to fulfil the obligatio for 5% RSI control of heavy commercial vehicles and 2% RSI control of light commercial vehicles. Remote sensing in de form of plume chasing provides better accuracy than remote sensing than remote sensing with fixed portal setups because a vehicle's emissions can be measured for a longer period of time. If plume chase measurements are to be performed to meet the 5% and 2% RSI obligation for heavy and light duty commercial vehicles, respectively, these tests should be aimed at screening the NOx emissions of diesel vehicles In this case if a vehicle is identified as a high emitter by remote sensing, the test to verify NOx emissions must be performed immediately after the remote sensing measurement. The subsequent Road Side inspection to verify the NOx-emssions should be done by means of a so-called 'hot idle

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	NOx test' directly after the vehicle has been stopped. Furthermore, also the OBD should be read and a visual inspection of the vehicle must be carried out to detect manipulation devices or other indications of manipulation. In the Road Worthiness Package this test is now proposed for the PTI of vehicles as of emission classes Euro 6d-TEMP and Euro VI and newer. (NOx measurement in accordance with 8.2.3.3). However, for execution within the PTI 'the hot idle NOx test' is not suitable, as it can only be done after a warm-up drive of at least 5 minutes outside the PTI station. The hot idle NOx test is however very suitable for Road Side Inspections LU (Comments/ Questions): 30% is a lot. Will have a great impact on RSI operations as the volume of vehicles to be checked will rise significantly IE (Comments/ Questions): The proposal here will require technology to be added to the existing/new WIM/enforcement sites on the motorway network. There is a significant road infrastructure implication here and the 2 year time frame for implementation will be a serious issue. LU (Comments/ Questions): 30% is a lot. Will have a great impact on RSI operations as the volume of vehicles to be checked will rise significantly FR

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Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments / Questions): reconsider this proposal
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.	ES (Drafting suggestions): ~~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.~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. AT (Drafting suggestions): However, a vehicle shall not be considered to have failed or passed a roadside inspection on the basis of **exceeding below limits during** a single remote sensing measurement. AT (Comments/ Questions): This sentence should be limited to the “screening limits”. Other methods of remote measurements are possible where limits can be defined describing the technical condition of a vehicle. Scientific studies are ongoing.

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	For the identification of high-emitting vehicles, it is necessary to read, record, store and process the license plate (or other attributes) of individual vehicles. This data is personal data and therefore protected by the GDPR. Provisions on how to rate such data processing in accordance with GDPR should be included in this Directive, otherwise it will be exteremely difficult for the Member States to enforce these provisions. FR (Comments / Questions): reconsider this proposal
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 positive or compression ignition. For noise, the level shall be 3 dB above the average level for vehicles belonging to the same vehicle category.	FI (Comments/ Questions): **Comment:** Identifing vehicles to exhaust emission or noise level may prove to be difficult and legally unstable. Measures to verify emission may be difficult to execute in the proposed way. ES (Drafting suggestions): ~~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 positive or compression ignition. For noise, the level shall be 3 dB above the average level for vehicles belonging to the same vehicle category.~~

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	DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording CZ (Comments/ Questions): Is there any real data from operation that can be used to determine the reliability of such a system that would justify requiring an emergency inspection of a vehicle that is detected as non-compliant? What is meant by average values of vehicles belonging to the same category, and have these values already been established? AT (Drafting suggestions): 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 positive or compression ignition. ~~For noise, the level shall be 3 dB above the average level for vehicles belonging to the same vehicle category.~~ AT (Comments/ Questions): See above IE (Comments/ Questions):

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	We foresee significant issues arising in practically implementing this. For example large amounts of data will need to be captured and stored, vehicles tracked using a network of ANPR cameras, and then if current WIM sites were to be equipped with exhaust emissions and noise equipment, how would the target vehicle be identified it two vehicle were to pass the sensing similtaneoulsy. Then there would be the issue of having to notify operators to take vehicles to a PTI centre to have the verification measurements taken. Many won't show up and then what do we do, waste time chasing them around the road network. Also how would we know what levels to apply to a particular make and model of vehicles before taking enforcement action which unless something changes would involve proceedings in court system. There is a very significant burden on member states associated with this amendment. FR (Comments / Questions): reconsider this proposal
Such verification by Member States may take place as follows:	ES (Drafting suggestions): ~~Such verification by Member States may take place as follows:~~ DE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. IE (Comments/ Questions): It will be important to maintain some flexibility, i.e. word 'may' is key here.
(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;	ES (Drafting suggestions): ~~(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;~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. AT (Drafting suggestions): including a**n** ~~noise or~~ exhaust emission test IE (Comments/ Questions): Significant enforcement and motorway operator resources would be required here. Traffic Mgmt plans for these operations typically cost in the region of €10K to implement.

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	There will be very significant implications for member states in respect of this amendment. The 2 year time frame for compliance is a major issue.
(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.	NL (Comments/ Questions): In the Netherlands there is doubt whether it is effective to call up cars to be tested within 15 days after the last remote sensing measurement. If a vehicle is identified as a high emitter by remote sensing, the test to verify emissions should be performed immediately after the remote sensing measurement. The 15-day period offers the opportunity for manipulated vehicles to be restored. For vehicles that have been chip-tuned, the original setting can be restored. Vehicles with AdBlue manipulation can be returned to their original state. For vehicles that make a lot of noise, the original muffler can be refitted. The measurement to verify the emissions should therefore be performed by means of an Roas Side Inspection immediately after the remote sensing measurement. ES (Drafting suggestions): ~~(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.~~ NL (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	In the Netherlands there is doubt whether it is effective to call up cars to be tested within 15 days after the last remote sensing measurement. If a vehicle is identified as a high emitter by remote sensing, the test to verify emissions should be performed immediately after the remote sensing measurement. The 15-day period offers the opportunity for manipulated vehicles to be restored. For vehicles that have been chip-tuned, the original setting can be restored. Vehicles with AdBlue manipulation can be returned to their original state. For vehicles that make a lot of noise, the original muffler can be refitted. The measurement to verify the emissions should therefore be performed by means of an Roas Side Inspection immediately after the remote sensing measurement. IE (Comments/ Questions): We foresee significant practical difficulties implementing this.
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 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.	SK (Comments/ Questions): If a vehicle has been registered via Remote Sensing as not complying, a PTI should be carried out. We can agree that this should be the procedure. Could the Commission explain how was the deadline – 45 days – set? If a Member State receives a notification that a vehicle has been recorded in another Member State as making excessive noise, the obligation to subject the vehicle to a PTI must be notified to the vehicle owner in some way. An official letter must be delivered. If delivery is not made, how does the

Commission proposal	Drafting suggestions and Comments/ Questions
	vehicle owner learn that he/she must go for a PTI? Could the Commission explain to us how this notification is envisaged? NL (Comments/ Questions): How long does the competent authority have to notify the competent authority of the Member State of registration? The obligation to have the emissions verified in the country of registration within 45 days can become a problem for vehicles that are driven abroad for a long time. A vehicle that is classified as a high emitter vehicle abroad, must be returned to the country of registration. Back home a PTI emissins check has to be done. There is then also a great chance that the vehicle will simply be approved during the emissions test in the country of registration, especially if it is a petrol vehicle. The journey back home will then have been made 'for nothing'. For vehicles classified as high emitter abroad, the verification check must therefore be carried out immediately after the remote sensing measurement in the country where the remote sensing measurement was carried out. ES (Drafting suggestions): ~~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 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~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~latest 45 days after the notification received from the Member State where the remote sensing measurements took place.~~ NL (Comments/ Questions): How long does the competent authority have to notify the competent authority of the Member State of registration? The obligation to have the emissions verified in the country of registration within 45 days can become a problem for vehicles that are driven abroad for a long time. A vehicle that is classified as a high emitter vehicle abroad, must be returned to the country of registration. Back home a PTI emissins check has to be done. There is then also a great chance that the vehicle will simply be approved during the emissions test in the country of registration, especially if it is a petrol vehicle. The journey back home will then have been made 'for nothing'. For vehicles classified as high emitter abroad, the verification check must therefore be carried out immediately after the remote sensing measurement in the country where the remote sensing measurement was carried out. IE (Comments/ Questions): Clarification required - how will these notifications be done, i.e. what IT system, and then if an owner is written to and decides to ignore the notification how will it be enforced.
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	ES (Drafting suggestions): ~~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,~~

Commission proposal	Drafting suggestions and Comments/ Questions
based on only one or two remote sensing measurements. Such verification shall take in accordance with paragraph 3.’;	~~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.’;~~ AT (Drafting suggestions): 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 IE (Comments/ Questions): In order to underatke an accurate noise measurement on a vehicle, a large open space with a hard surface is required to minimise background noise. Hence PTI centres may not be suitable. A noise expert may need to be consulted in due course.
(6) in Article 5, paragraphs 1 and 2 are replaced by the following:	BE (Comments/ Questions): BE: N1 vehicles are 10 times more numerous than N2+N3 vehicles. Even with a target of 2% of checks for N1s, the number of road checks will be multiplied by 4 or 5. This represents a challenge both for the police and the financial costs of these road controls. Could the European Commission inform us about the costs of these road controls?

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'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.	DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording.
2. For vehicles referred to in of Article 2(1), point (aa), Member States shall carry out a 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.';	SK (Comments/ Questions): Article 5 paragraph 2 sets the number of roadside inspections for category N1 vehicles. This should be 2% of vehicles registered in a given state. Could the Commission explain how this number (2%) was set? The number of category N1 vehicles is much higher than that of other categories where the limit was 5%. For SK, the proposal of 2% for category N1 is very high. With our current capacities, we will not be able to ensure this, unless the number of inspectors is increased, which will mean a higher administrative burden for the state. We would prefer not to set the limit of 2%. The Member State should ensure an appropriate number of checks. FI (Comments/ Questions): **Comment:** For category N1 the target of 2% in practise means doubling the amount of initial checks. Authorities perfoming the checks do not

Commission proposal	Drafting suggestions and Comments/ Questions
	currently have the resources required for this massive increase in RSI activity. ES (Comments/ Questions): Spain supports the extension of the scope of the directive to N1 category vehicles, although a detailed justification on the specific target value is needed. DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. AT (Drafting suggestions): corresponding to at least ~~2~~**1** % of the total number AT (Comments/ Questions): 2 % would mean an increase of the minimum required number of inspections of 56 % in AT which seems disproportionate. IE (Comments/ Questions): Meeting this target will not be achievable without major resourcing and co-operation with other bodies, and even still, raise significant concerns re. achievability. In Ireland, 2% of the current LCV polualtion based on 2024 CVRT states would be circa 9,000 to 10,000 LCVs. Currently we carry out circa 2,000

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	LCV inspections per year with our current staffing complement having regard to the min HGV volumes required. FR (Drafdting suggestion): For vehicles referred to in of Article 2(1), point (aa), Member States shall carry out a total number of initial technical roadside inspections, per calendar year, corresponding to at least ~~2~~ **1** % of the total number of those vehicles that are registered in their territory.’;
(7) in Article 6, paragraph 1 is replaced by the following:	SK (Comments/ Questions): The current Article 6 has no paragraph numbering. There are only four subparagraphs. Can the Commission clarify which subparagraphs are to be replaced and which remain?
‘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.	

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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Commission proposal	Drafting suggestions and Comments/ Questions
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 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.’;	FI (Comments/ Questions): **Comment:** The driver of these vehicles rarely is the holder or owner of the vehicle. How can the digital documents be issued to a fleet of drivers? ES (Drafting suggestions): ‘1. Member States ~~shall~~ may 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.’;

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Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Comments/ Questions): This provision introduces a useless administrative burden to citizens. If inspectors and police officers have digital access to registration database, what is the reason to impose such an obligation to citizens? AT (Comments/ Questions): The provisions for having a roadworthiness certificate at the driver's proposal and the obligation for the authorities to accept electronic certificates should consider cases where there is no network connection at the location of the inspection: who is responsible in this case?
(9) Article 9 is replaced by the following:	
'Article 9	
Selection of vehicles for initial technical roadside inspection	

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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 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.’;	ES (Drafting suggestions): 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 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~~.’; ES (Comments/ Questions): See comment to art. 1
(10) in Article 10, paragraph 1, the second subparagraph is amended as follows:	NL (Drafting suggestions): An initial technical roadside inspection of a vehicle may consist of a remote sensing measurement bij plume casing. NL (Comments/ Questions): It should be determined here that the 5% RSI requirement for heavy commercial vehicles and 2% RSI requirement for light commercial vehicles can be fulfilled by plume chase measurements in which the NOx emissions of diesel vehicles are measured. In case of detecting n high

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	emitter, a more detailed technical roadside inspection can be done by stopping the vehicle and then immediately doing a hot idle NOx test, followed by reading the OBD and a visual inspection. NL (Drafting suggestions): An initial technical roadside inspection of a vehicle may consist of a remote sensing measurement bij plume casing. NL (Comments/ Questions): It should be determined here that the 5% RSI requirement for heavy commercial vehicles and 2% RSI requirement for light commercial vehicles can be fulfilled by plume chase measurements in which the NOx emissions of diesel vehicles are measured. In case of detecting n high emitter, a more detailed technical roadside inspection can be done by stopping the vehicle and then immediately doing a hot idle NOx test, followed by reading the OBD and a visual inspection.
(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:	

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'(c) shall carry out a visual assessment of the securing of the vehicle's cargo in accordance with Article 13;';	SK (Comments/ Questions): The Commission proposes that a visual assessment of the securing of the vehicle's cargo must be carried out on each vehicle during the initial technical roadside inspection. This would mean that every single lorry or semi-trailer, whether it is a roller unit vehicle or box truck, must be opened and the cargo carried must be checked. We cannot imagine that every single vehicle will be checked for securing the cargo. Could the Commission explain to us why this change is proposed? If a cargo check were to be carried out on every single vehicle, the number of checks carried out for the same capacities would be lower. DE (Drafting suggestions): '(c) **may** carry out a visual assessment of the securing of the vehicle's cargo in accordance with Article 13;'; DE (Comments/ Questions): The mandatory introduction of load securing inspections in this specific form is viewed critically. Already today, the traffic control service checks the load securing regulations in accordance with Section 22 of the German Road Traffic Act (StVO) and the specifications of VDI 2700, as well as the relevant DIN EN standards, during every complete inspection.

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	Since the follow-up measures in the event of a complaint regarding load securing would significantly bind technical experts, efforts must be made to ensure that the inspection of load securing during technical roadside inspections remains a "optional provision" (see Article 13, old version), provided that a member state already incorporates extensive and therefore sufficient load securing inspections into its inspection plan. German inspection services has always taken this into account. IE (Comments/ Questions): Appropriate authority in Ireland is already considering this, but it will require additional inspection resources for which funding will be needed.
(11) Article 13 is replaced by the following:	
'Article 13	
Inspection of cargo securing	
1. During roadside inspections, vehicles shall be subject to an inspection of their cargo securing in accordance with Annex III, in order	ES

Commission proposal	Drafting suggestions and Comments/ Questions
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:	(Drafting suggestions): 1. **Not later than [36 months after the entry into force of this directive],** 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: DE (Drafting suggestions): 1. During roadside inspections, vehicles **may** 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 DE (Comments/ Questions): See above FR (Comments / Questions): This writing is not acceptable because it charges the liability on the inpectors in case of cargo securing defects. Inspectors shall not be responsible to ensure the cargo securing instead of the vehicle's user.

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(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.	
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.	DE (Drafting suggestions): 3. The follow-up procedures referred to in Article 14 **may** also apply in the case of major or dangerous deficiencies related to cargo securing. DE (Comments/ Questions): See above
4. Member States shall ensure that personnel involved in cargo securing checks are appropriately trained for that purpose.	FR

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments / Questions): Such a general writing is excessive because it can lead to a training obligation of all the inspectors covering the whole scope of cargo securing standards and inspection tools. It shall remain possible to provide a first level inspection on obvious items of cargo securing, without the necessity that each and every inspector is an expert on every items.
****** 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.’;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(13) in Article 16, paragraph 2 is replaced by the following:	
'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.';	FI (Comments/ Questions): **Comment:** How will this digital report be provided to the vehicle owner/holder? DE (Drafting suggestions): 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**, preferably in electronic format.**'; DE (Comments/ Questions): Even if the results of technical roadside checks have to be recorded in electronic registers, the basic possibility of issuing the driver with a paperbased report should be retained due to accessibility for the driver, AT (Comments/ Questions): When there is no network connection at the location of the inspection, it could be impossible to provide an electronic copy of the inspection report.

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Commission proposal	Drafting suggestions and Comments/ Questions
	IE (Comments/ Questions): Appropriate authority in Ireland has already commenced a project to implement this change
(14) in Article 18, paragraph 1 is replaced by the following:	
'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*******.	PT (Comments/ Questions): All Member States should have access to those results, as vehicles can cross multiple countries. NL (Drafting suggestions): 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~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~Article 3 of Commission Implementing Regulation (EU) 2017/2205~~*******~~]~~ NL (Drafting suggestions): 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~~*******~~]~~
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 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).';	NL (Drafting suggestions): ~~******* 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~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~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).';~~ NL (Drafting suggestions): ~~******* 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 defieieneies 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:	
'*Article 18a*	DE (Comments/ Questions): Article 18a introduces an obligation for Member States to connect their vehicle registers to the MOVE-HUB platform for data exchange. However, the vehicle registers of the Member States are already connected via EUCARIS, cf. for example Article 5g of Directive (EU) 2015/413. EUCARIS has proven to be a reliable system for the secure, EU-wide exchange of vehicle and owner data in various areas of application. It is cost-effective and expandable. Questions: 1. Did the Commission examine the use of EUCARIS for the purposes of Directive 2015/47/EU in its impact assessment?

Commission proposal	Drafting suggestions and Comments/ Questions
	2. Why should this system not be sufficient for the exchange of RSI report data? Using and adapting an already established system is likely to be more cost-effective and sustainable than setting up a new system. Member States must continue to be able to use EUCARIS. IE (Comments/ Questions): Proposed changes make sense but will require an impact assessment from the relevant PTI Authorities. Significant costs will be incurred and significant development/testing resources will be needed to implement it. The 2 year timeframe for compliance would be of concern.
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 technical status, where necessary, in the Member State in which it is registered.	

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Commission proposal	Drafting suggestions and Comments/ Questions
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.	AT (Drafting suggestions): Member States shall provide access ~~to data regarding the content of the certificates of conformity.~~ the last roadworthiness certificate, any technical roadside inspection report **of the last [3] years**, and the odometer history of the vehicle stored in national databases, to the competent authorities of other Member States. AT (Comments/ Questions): The Certificate of Conformity will be publicly available acc. to the framework Regulation (EU) 2018/858, so there is no need to exchange this data. The exchange of RSI reports should be limited to a reasonable period of time and should also be only obligatory for reports generated after entry into force of this Directive.
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.	SK (Comments/ Questions): Can the Commission clarify why the odometer history is necessary for the purpose of roadside inspections? PT (Comments/ Questions): PT points out the importance of having harmonised certificates - information. NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): Member States shall use a specifically designed and highly secured software application of the European Vehicle and Driving Licence Information System (EUCARIS) in its up-to-date version to exchange information] ~~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.~~ ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. AT (Comments/ Questions): The Commission is asked to consider that data exchange is already mandatory via different platforms (EUCARIS for eCOC). AT does not

Commission proposal	Drafting suggestions and Comments/ Questions
	favour any specific platform but urges to find a solution which imposes as little burden on Member States as possible and avoids duplications of IT solutions. NL (Drafting suggestions): Member States shall use a specifically designed and highly secured software application of the European Vehicle and Driving Licence Information System (EUCARIS) in its up-to-date version to exchange information] ~~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 personal data and shall be adopted in accordance with the examination procedure referred to in Article 23(2).	NL (Drafting suggestions): 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 personal data and shall be adopted in accordance with the examination procedure referred to in Article 23(2). ES

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. NL (Drafting suggestions): 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 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.’;	ES (Drafting suggestions): To be reviewed

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Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. IE (Comments/ Questions): Implementation timeline appears to be overly ambitious. Suggest 24 momths should be the minimum.
(16) Article 20 is replaced by the following:	
'*Article 20*	
Communication of information to the Commission	

PUBLIC

Commission proposal	Drafting suggestions and Comments/ Questions
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:	FI (Comments/ Questions): **Question:** Will there be a interface available and when?
(a) the total number of vehicles inspected;	
(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.	ES (Drafting suggestions): ~~(e) the results of the remote sensing measurements carried out in accordance with Article 4a of this Directive.~~

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Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Comments/ Questions): See comments to art. 1
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.	
******** 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	

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Commission proposal	Drafting suggestions and Comments/ Questions
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: 	
(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 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: 	ES (Drafting suggestions): (b) the following fourth ~~and fifth~~ indent~~s~~ is ~~are~~ added:

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Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Comments/ Questions): See comments to art. 1
'– 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;	ES (Drafting suggestions): ~~'– 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;~~ ES (Comments/ Questions): See comments to art. 1bremote sensing CZ (Comments/ Questions): Have exhaust and noise emission limits already been set? If so, what are they? Have the methods for measuring particulate matter and NOx been established? If so, can supporting documents be provided? IE (Comments/ Questions): These limits will need to be set in advance of any enforcement activity taking place.

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Commission proposal	Drafting suggestions and Comments/ Questions
– specify the methods for the particle number (PN) measurement of positive ignition engines and for the nitrogen oxides (NOx) measurement of compression and positive ignition engines required pursuant to Section 8.2 of point 3 of Annex II.’;	AT (Comments/ Questions): Contrary to PN measurements, at the time being, there is no suitable procedure available for measuring NOx at PTI. Therefore, a review clause considering the possibility of introducing NOx measurements and limits at PTI should be introduced to avoid an obligation that cannot be fulfilled by Member States/authorities/testing centres. IE (Comments/ Questions): These limits will need to be set in advance of any enforcement activity taking place.
(18) Article 24 is replaced by the following:	
‘*Article 24*	
Reporting	

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Commission proposal	Drafting suggestions and Comments/ Questions
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.	SK (Comments/ Questions): Annexes require more detailed examination. We would like to ask, whether expert meeting is planned on annex I to analyse whether other changes are necessary.
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.	SK (Drafting suggestions): 1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [PLEASE INSERT DATE: **the first day of the month following** 2 years

Commission proposal	Drafting suggestions and Comments/ Questions
	after the date of~~following the~~ entry into force of this Directive]. They shall immediately communicate the text of those measures to the Commission. SK (Comments/ Questions): If Member States are to connect to MOVE-HUB, while the details will depend on implementing acts issued by the Commission, the transposition period of two years is short and a longer period of at least three years will be needed. We propose to set the transposition deadline to first day of the month following 2 years (or 3 years should the transposition period be prolonged) after the date of entry into force. Similar text was used also for *End of Life Vehicle Regulation*. DE (Comments/ Questions): Given the new exhaust and noise emission measurements mentioned in the proposal, the suggested transition period appears too short. An appropriate transition period should be defined. IE (Drafting suggestions): 1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [PLEASE INSERT DATE: **3 years** following the entry into force of this Directive]. They shall immediately communicate the text of those measures to the Commission. IE

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): The 2 year timeframe for compliance is a concern given the extent of data reporting, required system integration and infrastructure required. FR (Comments / Questions): 2 years is a too short transposition period taking into acount the significant changes in the proposal and the preparation needed for the member States
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 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*.	

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Commission proposal	Drafting suggestions and Comments/ Questions
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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EUROPEAN
COMMISSION

Brussels, 24.4.2025
COM(2025) 180 final

ANNEXES 1 to 2

Roadworthiness package

ANNEXES

to the 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

{SEC(2025) 119 final} - {SWD(2025) 96 final} - {SWD(2025) 97 final} -
{SWD(2025) 98 final} - {SWD(2025) 99 final}

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ANNEX I

Annexes I, III and IV to Directive 2014/45/EU are amended as follows:

(1) Annex I is amended as follows:

(a) in point 1, the second paragraph is replaced by the following:

'The test must cover at least the items listed in point 3 provided that the systems and components are fitted to the vehicle. The test may also include a verification as to whether the relevant parts and components of that vehicle correspond to the required safety and environmental characteristics that were in force at the time of approval or, where applicable, at the time of retrofitting.';

(b) in point 2, the following point is added:

'(10) Electronic safety systems.';

(c) point 3 is amended as follows:

(i) the heading and the introduction are replaced by the following:

'3. CONTENTS AND METHODS OF TESTING, REASONS FOR FAILURE, AND ASSESSMENT OF DEFICIENCIES OF VEHICLES

The test shall cover at least the items, and use the minimum standards and the recommended methods, listed in the table set out in this point.

The components and systems of the vehicle shall be inspected visually or by means of the electronic interface, or both, where applicable, using the following inspection criteria:

(a) the inspection of the fitment includes the evaluation of any relevant diagnostic trouble codes and an examination of whether the fitted systems and components comply for example, with the following:

- the given design, specified attachment/number, specified circuit, required marking;
- the valid software version including the integrity feature;

(b) the inspection of the condition includes an examination of whether the fitted systems and components are for example:

- damaged, corroded, or aged;
- properly fastened, secured, assembled, and routed;
- operating freely and easily;
- indicating failure via the malfunction indicator lamp (MIL) or, where applicable, via the on-board monitoring (OBM) system;
- ready to be inspected (readiness);

(c) the inspection of the functioning includes an examination of the actuation and/or activation including that of the pedals, levers, switches, or operating devices, which initiate an action and of the electronically controlled systems and components, for example, actuators, to ensure that they are operating correctly in terms of timing and function;

Commented [redacted] FR : this can only be considered if the data is available.

Commented [redacted] FR : This can be considered only in case of relevant diagnostic trouble codes made available.

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(d) the inspection of the performance and efficiency is a metrological inspection of a component or system for compliance with, or achievement of, specified limit values, which may also include calculation, such as the following:

– testing the brakes on a brake tester and calculating the efficiency (where applicable by means of reference values);

– activation of a safety system and evaluating sensor values and/or measuring the performance with external test equipment.

As regards electronic periodic technical inspection (ePTI) using the electronic vehicle interface, an ePTI system list is defined in EN ISO 20730-3:2021. Those electronic safety systems are referred to in item 10 of the table set out in this point.

For each vehicle system and component subject to testing, the assessment of deficiencies is to be carried out, on a case-by-case basis in accordance with the criteria laid down in the table set out in this point.

Deficiencies not listed in this Annex shall be assessed in terms of the risks that they pose to road safety.';

(ii) in the table, items 1.1.3 to 1.1.6 are replaced by the following:

'

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1.1.3. Vacuum pump or compressor and reservoirs	Visual inspection of the components at normal working pressure. Check time required for vacuum or air pressure to reach safe working value and function of warning device, multi-circuit protection valve and pressure relief valve. Brake application means depression of the brake pedal/lever which allows the full flow of air/fluid application pressure to the brake assemblies.	(a) Insufficient pressure/vacuum to give assistance for at least four brake applications after the warning device has operated (or gauge shows an unsafe reading); at least two brake applications after the warning device has operated (or gauge shows an unsafe reading).		X X
		(b) Time taken to build up air pressure/vacuum to safe working value is too long according to the require-ments[1]		X	
		(c) Multi-circuit protection valve or pressure relief valve not working.		X	
		(d) Air leak causing a noticeable drop in pressure or audible air leaks. Air leak causing a critical drop in pressure.		X	 X
		(e) External damage likely to affect the function of the braking system. Secondary braking performance not met.		X	 X
1.1.4. Low pressure warning device	Functional check	Malfunctioning or defective warning device. Low pressure not identifiable.	X	 X	
1.1.5. Hand-operated brake control valve	Visual inspection of the components while the braking system is operated.	(a) Control cracked, damaged or excessively worn.		X	
		(b) Control insecure on valve or valve insecure.		X	
		(c) Loose connections, defective fixing, or leaks in system.		X	
		(d) Unsatisfactory operation.		X	

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1.1.6. Parking brake (activator, lever control, parking brake ratchet)	Visual inspection of the components while the braking system is operated.	(a) Ratchet not holding correctly.		X	
		(b) Wear at lever pivot or in ratchet mechanism. Excessive wear.	X	 X	
		(c) Excessive movement of lever indicating incorrect adjustment.		X	
		(d) Activator missing, damaged or inoperative.		X	
		(e) Incorrect functioning, warning indicator shows malfunction		X	

’;

(iii) in the table, item 1.1.13 is replaced by the following:

‘

1.1.13. Brake linings and pads	Visual inspection.	(a) Lining or pad excessively worn (minimum mark reached). Lining or pad excessively worn (minimum mark not visible).		X	 X

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		(b) Lining or pad contaminated (oil, grease etc.). Braking performance affected.		X	X
		(c) Lining or pad missing or wrongly mounted, or of obviously incorrect type.			X
		(d) Wear indicator electrical harness disconnected or damaged	X		

';

(iv) in the table, item 1.1.18 is replaced by the following:

'

1.1.18. Slack adjusters and indicators	Visual inspection of the components while the braking system is operated, if possible.	(a) Adjuster damaged, seized or having abnormal movement, excessive wear, or incorrect adjustment.		X	
		(b) Adjuster defective.		X	
		(c) Incorrectly installed or replaced.		X	

';

(v) in the table, item 1.1.19 is deleted;

Commented [redacted] FR wishes to maintain item 1.1.19 "Endurance braking system" within item 1 "Braking equipment"

(vi) in the table, item 1.1.23 is replaced by the following:

'

1.1.23. Overrun brake	Visual inspection and by operation	(a) Not working properly, for example, stroke of the drawbar exceeds 2/3 of the total overrun travel		X	
		(b) Breakaway cable defect or missing		X	

';

(vii) in the table, items 1.2.1 and 1.2.2 are replaced by the following:

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‘

1.2.1. Performance	During a test on a brake tester or, if impossible, during a road test, apply the brakes progressively up to maximum effort. It must be ensured, where possible, that the mechanical service brakes are inspected without interference/blending of regenerative braking or other continuous braking.	(a) Inadequate braking effort on one or more wheels. Or, in the case of testing on the road, the vehicle deviates excessively from a straight line and/or excessive vibration is produced at the service brake pedal/lever. No braking effort on one or more wheels.		X X	 X
		(b) Braking effort from any wheel is less than 70 % of the maximum effort recorded from the other wheel on the same axle. Or, in the case of testing on the road, the vehicle deviates excessively from a straight line. Braking effort from any wheel is less than 50 % of the maximum effort recorded from the other wheel on the same axle in the case of steered axles.		X	 X
		(c) No gradual variation in brake effort (grabbing).		X	
		(d) Abnormal lag in brake operation of any wheel.		X	
		(e) Excessive fluctuation of brake force during each complete wheel revolution.		X	

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1.2.2. Efficiency	Test with a brake tester or, if one cannot be used for technical reasons, by a road test using a deceleration recording instrument to establish the braking ratio which relates (a) to the maximum authorised mass or, (b) in the case of semi-trailers, to the sum of the authorised axle loads, or (c) to reference values. Vehicles or a trailer with a maximum permissible mass exceeding 3,5 tonnes must be inspected following the standards given by ISO 21069 or equivalent methods. For vehicles not inspected following the standards given by ISO 21069 or equivalent methods, if the minimum figure of braking ratio is not achieved, at least meaningful brake testing must be performed. Meaningful brake testing is performed if brake efficiency is below the service, secondary or parking values prescribed in 1.2.2 or 1.3.2 or 1.4.2 but all the following conditions are met: — the braking system is in good condition with no obvious defects, — wheels of all axles lock because adhesion between the tyre and brake tester surface was exhausted during the brake test; if wheels on some axles do not lock, it must be safely concluded that the braking efficiency values prescribed in 1.2.2 or 1.3.2 or 1.4.2 would be achieved when the vehicle is loaded, — brake actuation level by the inspector must always be proportional to the current load of the axle. Information on system values may be retrieved using electronic vehicle interface.	Does not give at least the minimum figure as follows ([1]): 1. Vehicles registered for the first time after 1/1/2012: — Category M_1: 58 % — Categories M_2 and M_3: 50 % — Category N_1: 50 % — Categories N_2 and N_3: 50 % — Categories O_2, O_3 and O_4: — for semi-trailers: 45 % ([2]) — for draw-bar trailers: 50 %		X	
		2. Vehicles registered for the first time before 1/1/2012: — Categories M_1, M_2 and M_3: 50 % ([3]) — Category N_1: 45 % — Categories N_2 and N_3: 43 % ([4]) — Categories O_2, O_3 and O_4: 40 % ([5])		X	
		3. Other categories Categories L (both brakes together): — Category L1e: 42 % — Categories L2e, L6e: 40 % — Category L3e: 50 % — Category L4e: 46 % — Categories L5e, L7e: 44 % Category L (rear wheel brake): all categories: 25 % of the total vehicle mass Category T: 40% Less than 50 % of the above values reached.		X	X

Commented [redacted] FR wishes that M1/N1 vehicles to be exempt from this control point

Commented [redacted] FR would like some clarifications and point out the need for standardized/homologated data.

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	Road tests should be carried out under dry conditions on a flat, straight road. In cases where vehicles of R or T category are tested on the road, meaningful brake testing is performed if all the above conditions are met. In case of doubt, the braking efficiency shall be demonstrated in loaded or partially loaded condition.				

’;

(viii) in the table, item 1.3.1 is replaced by the following:

‘

1.3.1. Performance	If the secondary braking system is separate from the service braking system, use the method specified in 1.2.1. It must be ensured that, where possible, the mechanical brakes are inspected without interference/blending of regenerative braking or other continuous braking.	(a) Inadequate braking effort on one or more wheels.		X	
		No braking effort on one or more wheels.			X
		(b) Braking effort from any wheel is less than 70 % of the maximum effort recorded from another wheel on the same axle specified. Or, in the case of testing on the road, the vehicle deviates excessively from a straight line.		X	
		Braking effort from any wheel is less than 50 % of the maximum effort recorded from the other wheel on the same axle in the case of steered axles.			X
		(c) No gradual variation in brake effort (grabbing).		X	

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';

(ix) in the table, item 1.4.1 is replaced by the following:

'

1.4.1. Performance	Apply the brake during a test on a brake tester or by road test.	Brake inoperative on one side or, in the case of testing on the road, the vehicle deviates excessively from a straight line. Less than 50 % of the braking effort values as referred to in point 1.4.2 reached in relation to the vehicle mass during testing.		X	X

';

(x) in the table, item 1.5 is replaced by the following:

'

1.5. Endurance braking system performance	Visual inspection and, where possible, test whether the system functions, i.e. by road test.	(a) Malfunction indicator indicates a fault.		X	
		(b) System not functioning.		X	

';

(xi) in the table, item 1.6 is deleted;

(xii) in the table, item 1.7 is replaced by the following:

'

1.7. Electric regenerative braking	Visual inspection of the indicator of electric regenerative braking, and, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, by using the electronic vehicle interface, or by road test.	(a) Warning device indicates malfunctioning.		X	
		(b) The system does not noticeably decelerate the vehicle, or the charge indicator (if fitted) does not display "on charge" when regeneration is activated.		X	
		(c) Vehicle interface indicates system malfunction.		X	

Commented [redacted] FR wishes for ABS (§10.10 Anti-lock braking system) to remain in item 1 "Braking equipment", and to be combined with ESP (§10.16 Electronic Stability program)

Commented [redacted] FR : EBS shall remain in function 1

Commented [redacted] FR : Shall be very complicated to detect in PTI as hybrid vehicles (for example) have very light regenerative braking at low speed

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';

(xiii) in the table, item 2.6 is deleted;

(xiv) in the table, items 4.1.1, 4.1.2 and 4.1.3 are replaced by the following:

'

4.1.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source. Multiple light sources (in the case of LED, up to 1/3 not functioning).	X		
		Seriously affected visibility.		X	
		(b) Slightly defective projection system (reflector and lens).	X		
		Heavily defective or missing projection system (reflector and lens).		X	
		(c) Lamp not securely attached.		X	
		(d) System indicates failure for example via the electronic vehicle interface.		X	
4.1.2. Alignment	Determine the horizontal and vertical aim of each headlamp on dipped beam using a headlamp aiming device.	(a) Aim of a headlamp not within limits laid down in the requirements[1]. If there are no specific requirements, the following reference values shall be used, where h is the height of headlamp (lowest point of the light-emitting surface): (i) M,N,O categories (Regulation No 48 UN/ECE [2016/1723], point 6.2.6.1.2): — h ≤ 0,8m: upper limit -0.5%; lower limit -2.5% — 0.8 < h ≤ 1m: upper limit -0.5%; lower limit -3% — h > 1m: upper limit -1% e inferior -3% — h > 1.2m, category N3G (all-terrain): upper limit -1.5%; lower limit -3.5% (ii) L category (Commission Delegated Regulation (EU) No 3/2014 and Regulation No 53 UN/ECE): — upper limit -0.5% — h ≤ 0,8m: lower limit -2,5% — h > 0.8m: lower limit -3,0% (-2,5% on L3e category) (iii) T category (Regulation No 86 UN/ECE):		X	

Commented [redacted] FR : In 2.1.1, add «except for heavy vehicles» for the «wheels off the ground» controls

Commented [redacted] FR : Electric Power Steering shall remain in function 2 and shall be integrated in «Power Steering» §2.1.5

Commented [redacted] FR warmly welcomes the simplifications operated regarding lighting

		— upper limit -0.5% — h ≤ 1,2m: lower limit -4% h > 1,2m: lower limit -6%			

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4.1.3. Switching	Visual inspection and by operation	(a) Switch does not operate in accordance with the requirements[1] (Number of headlamps illuminated at the same time)	X		
		Maximum permitted light brightness to the front exceeded.		X	
		(b) Function of control device impaired.		X	

’;

(xv) in the table, item 4.1.5 is replaced by the following:

‘

4.1.5. Manual levelling devices (where mandatory)	Visual inspection and by operation, if possible, or using the electronic vehicle interface.	(a) Device not operating.		X	
		(b) device cannot be operated from driver's seat.		X	

’;

(xvi) in the table, item 4.2.1 is replaced by the following:

‘

4.2.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source			
		Multiple light sources (in the case of LED, up to 1/3 not functioning); one of several lateral light sources defective.	X		
		Seriously affected visibility (in the case of LED, less than 2/3 functioning).		X	
		(b) Defective lens.		X	
		(c) Lamp not securely attached.	X		
		Very serious risk of falling off.		X	

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’;

(xvii) in the table, items 4.3.1 and 4.3.2 are replaced by the following:

‘

4.3.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source. Multiple light sources; in the case of LED up to 1/3 not functioning. Single light sources; in the case of LED less than 2/3 functioning. No light source functioning.	 X 	 X	 X
		(b) Slightly defective lens (no influence on emitted light). Heavily defective lens (emitted light affected).	X 	 X	
		(c) Lamp not securely attached. Very serious risk of falling off.	X 	 X	
4.3.2. Switching	Visual inspection and by operation	(a) Switch does not operate in accordance with the requirements[1]. Delayed operation. No operation at all.	X 	 X	 X
		(b) Function of control device impaired.		X	

’;

(xviii) in the table, item 4.4.1 is replaced by the following:

‘

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4.4.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source Multiple light sources (in the case of LED up to 1/3 not functioning). Single light sources; in the case of LED less than 2/3 functioning. No light source functioning.	X	X	X
		(b) Slightly defective lens (no influence on emitted light). Heavily defective lens (emitted light affected).	X	X	
		(c) Lamp not securely attached. Very serious risk of falling off.	X	X	

Commented [redacted] FR : Needs clarification: does it refer to both indicators failure or all light sources in one indicator? Critical defect seems to be disproportionate

';

(xix) in the table, item 4.5.1 is replaced by the following:

4.5.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source. Multiple light sources (in the case of LED up to 1/3 not functioning). Single light sources; in the case of LED less than 2/3 functioning.	X	X	
		(b) Slightly defective lens (no influence on emitted light). Heavily defective lens (emitted light affected).	X	X	
		(c) Lamp not securely attached. Very serious risk of falling off or dazzling oncomingtraffic.	X	X	

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';

(xx) in the table, item 4.6.1 is replaced by the following:

'

4.6.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source Multiple light sources (in the case of LED up to 1/3 not functioning). Single light sources; in the case of LED less than 2/3 functioning.	X	 X	
		(b) Defective lens	X		
		(c) Lamp not securely attached. Very serious risk of falling off	X	 X	

';

(xxi) in the table, item 4.7.1 is replaced by the following:

'

4.7.1. Condition and operation	Visual inspection and by operation.	(a) Lamp throwing direct or white light to the rear.	X		
		(b) Defective or missing light source. (Multiple light source). Defective or missing light source. (Single light source).	X	 X	
		(c) Lamp not securely attached. Very serious risk of falling off.	X	 X	

';

(xxii) in the table, item 4.11, the title in the first column of the table is replaced by the following:

'Electrical wiring (except high-voltage wiring)';

Commented [redacted] FR : Shall add (d):
"Reversing lamp can be switched on with gear not in reverse position. (Major) "

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(xxiii) in the table, item 4.13, the title in the first column of the table is replaced by the following:

'Battery (or batteries, except high-voltage batteries)';

(xxiv) the following item 4.14 is inserted:

'

4.14 High-voltage systems					
4.14.1 Electrical safety	Visual inspection complemented by using the vehicle interface	(a) Indicator or vehicle interface shows system malfunction		X	
		(b) Software version or -integrity incorrect		X	
4.14.2 Traction battery cover	Visual inspection.	(a) Slightly deteriorated	X		
		Heavily deteriorated		X	
		(b) Defective attachment		X	
		Very serious risk of falling off			X
		(c) Obstructed ventilation port(s)	X		
4.14.3 Traction battery	Visual inspection, complemented by using the vehicle interface (where made possible by the technical characteristics of the vehicle, and where the necessary data is available).	(a) Marks of leakage		X	
		Leaking (presence of droplets)			X
		(b) Incorrect software or hardware, or readiness-code not active		X	
4.14.4 High voltage electrical wiring					
4.14.4.1 High voltage wiring harness and connector	Visual inspection and by operation with the vehicle over a pit or on a hoist, including inside the engine compartment and the boot (where applicable)	(a) Slightly deteriorated	X		
		Heavily deteriorated		X	
		Risk of short-circuit fault			X
		(b) Wiring insecure or not adequately secured	X		
		Fixings loose, touching sharp edges, connectors		X	

Commented [redacted] FR warmly welcomes the integration of EV inspection items

Commented [redacted] FR : A point regarding AVAS shall be added (here and not in function 10)

Commented [redacted] FR : How to check ? How to compare ?

Commented [redacted] FR : Idem

Commented [redacted] FR General Remark: addition of a «under-level». It may cause heavy modification of PTI result data base and PTI software

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		likely to be disconnected Wiring likely to touch hot parts, rotating parts or the ground, connectors disconnected			X
		(c) Imminent risk of fire, formation of sparks			X
4.14.4.2 Ground braid, including their attachment	Visual inspection and by operation.	Slightly deteriorated Heavily deteriorated	X	X	
4.14.4.3 Ground continuity (X)[2]	Measurement using an ohmmeter	Test not feasible Too high resistance (over 100 Ohms)	X	X	
4.14.4.4 Charging inlet cover	Visual inspection and by operation.	Deteriorated Missing	X	X	
4.14.4.5 Charging inlet	Visual inspection and by operation.	(a) Deteriorated Trace of beginning of melting or electric arcs (b) Foreign material or moisture	X	X X	
4.14.4.6 Charging cable	Visual inspection and by operation.	(a) Deteriorated	X		
		(b) Charging cable not provided	X		
4.14.5. High voltage electrical and electronical equipment (X)[2]					
4.14.5.1. High voltage electrical and electronical equipment	Visual inspection and by using the electronic vehicle interface.	(a) Slightly deteriorated Heavily deteriorated	X	X	
		(b) Attachment defective		X	
		(c) Leaking		X	
4.14.5.2. Traction motor	Visual inspection Check of operational readiness of the systems by an applicable interface (OBD or OBM) Measurement of equipotential bonding, where made possible by the technical characteristics of the vehicle	(a) Shield is deformed, not in-place or damaged, or corroded		X	
		(b) Warning marking missing or illegible		X	
		(c) Connection of wiring harness insecure or corroded		X	
		(d) Electrical insulation damaged or deteriorated likely to cause injury when contacted.		X	X
		(e) Fault readiness of the traction motor		X	

Commented [redacted] FR Proposes: Missing or not meeting its function

Commented [redacted] FR Proposes: add a (c): Modified (Major)

Commented [redacted] FR : The separation between 4.14.5.1, 4.14.5.2 and 4.14.5.3 does not appear to be clear as some equipments can be concerned by 2 or 3 of them.
FR propose:
4.14.5.1 : Traction motor
4.14.5.2 : Converter, charger, inverter
4.14.5.3 : Other High Voltage Equipments.
In each of these points, the defects of the 4.14.5.1 shall be implemented

Commented [redacted] FR : This point shall not be optionnal. It is crucial for safety and easily inspectable.

Commented [redacted] FR needs clarification

		(f) Wrong version of type-approved hardware and software not in accordance with the requirements as defined in the ECE R100		X	
4.14.5.3 Electronic converters, motor, and inverter	Visual inspection Check of operational readiness of the systems by an applicable interface (OBD or OBM) Measurement of equipotential bonding, where made possible by the technical characteristics of the vehicle	(a) Not in accordance with requirements[1]		X	
		(b) Inadequately secured		X	
		(c) Damaged or corroded components Likely to cause injuries or to fall off	X	 X	
		(d) Shields not in place or damaged		X	
		(e) Damaged or deteriorated electrical insulation		X	
		(f) Fault readiness of the converter and inverter systems		X	
		(g) Wrong version of type-approved hardware and software		X	
4.14.6. Insulation resistance (X)[2]					
4.14.6.1. Insulation resistance of the vehicle charging inlet and resistance of the protective earthing	Read insulation resistance by the electronic vehicle interface, where made possible by the technical characteristics of the vehicle and where the necessary data is made available	(a) Insulation resistance is not in accordance with requirements or predefined values from the vehicle manufacturer		X	
		(b) Resistance of the protective earthing is not in accordance with requirements		X	
4.14.6.2. Insulation resistance between the high-voltage system and chassis	Visual inspection Read insulation resistance by the electronic vehicle interface, where made possible by the technical characteristics of the vehicle and where the necessary data is made available	(a) Insulation monitoring system shows malfunction		X	
		(b) Insulation resistance value not in accordance with requirements		X	
4.14.7. Anti-starting system					
4.14.7.1. Anti-starting system	Visual inspection and by operation when possible. Functional check by verifying that the vehicle cannot move by itself with the charging cable plugged, and the driver's weight lifted out of the seat	(a) Indicator malfunction	X		
		(b) Inoperative, i.e., vehicle can move with connected charging cable or with no driver present		X	

Commented [redacted] FR : How to read it and how to compare it ?

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';

(xxv) in the table, item 5.1.3 is replaced by the following:

'

5.1.3. Wheel bearings	Visual inspection with the vehicle over a pit or on a hoist. Wheel play detectors may be used and are recommended for vehicles having a maximum mass exceeding 3,5 tonnes. Rock the wheel or apply a lateral force to each wheel and note the amount of upward movement of the wheel relative to the stub axle.	(a) Excessive play in a wheel bearing. Directional stability impaired; danger of demolishment.		X X
		(b) Wheel bearing too tight, jammed. Danger of overheating; danger of demolishment.		X X
		(c) Audible signs of bearing wear or damage.		X	

Commented [redacted] FR : Seems to be redundant with (a)

';

(xxvi) in the table, item 5.2.3 is replaced by the following:

'

5.2.3. Tyres	Visual inspection of the entire tyre by either rotating the road wheel with it off the ground and the vehicle over a pit or on a hoist, or by rolling the vehicle backwards and forwards over a pit.	(a) Tyre size, load capacity, approval mark or speed category not in accordance with the requirements[1] and affecting road safety or environmental performance. Insufficient load capacity or speed category for actual use, tyre touches other fixed vehicle parts impairing safe driving.		X X
		(b) Tyres on same axle or on twin wheels of different sizes.		X	

Commented [redacted] FR : Needs clarification. To which regulation does it refer?

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		(c) Tyres on same axle of different construction (radial/ cross-ply).		X	
		(d) Any serious damage or cut to tyre.		X	
		Cord visible or damaged.			X
		(e) Tyre tread wear indicator becomes exposed.		X	
		Tyre tread depth not in accordance with the require-ments[1].			X
		(f) Tyre rubbing against other components (flexible anti spray devices).	X		
		Tyre rubbing against other components (safe driving not impaired)		X	
		(g) Re-grooved tyres not in accordance with require-ments[1].		X	
		Cord protection layer affected.			X
		(h) Tyre obviously underinflated.	X		

';

(xxvii) in the table, item 5.3.2.1 is replaced by the following:

'

5.3.2.1. efficiency testing of damping	Using special equipment and comparing left/ right differences, or based on measurement of oscillation behaviour or damping of the vehicle	(a) Significant difference between left and right.		X	
		(b) Given minimum values not reached.		X	

';

(xxviii) in the table, items 7.1.3, 7.1.4, 7.1.5 and 7.1.6 are deleted;

(xxix) in the table, item 7.8 is replaced by the following:

'

Commented [redacted] FR : Keep TPMS in this defect

Commented [redacted] FR : Are there minimum values to be reached in regulation? Shall remain optionnal

Commented [redacted] FR : All these systems shall remain in function 7

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7.8. Speedometer	Visual inspection or by operation during road test or by using the electronic vehicle interface, or any combination of these.	(a) Not fitted in accordance with the requirements[1].	X		
		Missing (if required).		X	
		(b) Operation impaired.	X		
		Not operational at all.		X	
		(c) Not capable of being sufficiently illuminated.	X		
		Not capable of being illuminated at all.		X	

';

(xxx) in the table, items 7.9 and 7.10 are deleted;

(xxxi) in the table, item 7.11 is replaced by the following:

'

7.11. Odometer, if available	Visual inspection, and/or using electronic interface (OBD or OBM)	(a) Obviously manipulated (fraud) to reduce or misrepresent the vehicle's distance record.		X	
		(b) Obviously inoperative.		X	

';

(xxxii) in the table, items 7.12 and 7.13 are replaced by the following:~~deleted;~~

Commented [redacted] FR : Shall remain in function 7

Commented [redacted] FR : This defect shall be minor since it is impossible to fix it.

Commented [redacted] To determine wether the reduction of the odometer is consecutive to:
A fraud / A technical issue /An error in the records, is very difficult.

Commented [redacted] FR : Shall be combined with ABS in function 1

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7.14. Advanced Driver Assistance Systems (ADAS)	Visual inspection.	(a) System or any component missing	-	X	-
	Regards following equipments: - To be defined	(b) System or components : attachement defective	-	X	-
		(c) System or components damaged	-	X	-
		(d) Wiring slightly damaged Wiring damaged	X	 X	-
		(e) Warning device shows system malfunction System still operative Inoperative system	 X	 X	-
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle	X	 X	

Commented [redacted] French proposal for a specific point for ADAS in item 7.

(xxxiii) in the table, items 8.1 and 8.2 are replaced by the following:

'

8.1.	Noise					
8.1.1.	Noise suppression system	For L-category vehicles powered by internal combustion engines, visual inspection and measurement of noise emitted by stationary vehicle using a sound level meter. For other vehicles, subjective evaluation (unless the inspector considers that the noise level may be borderline, in which case a measurement of noise emitted by stationary vehicle using a sound level meter may be conducted)	(a) Noise levels in excess of those permitted in the requirements[1].		X	
8.2.	Exhaust emissions					
8.2.1.	Exhaust emissions control equipment	Visual inspection complemented, where made possible by the technical characteristics of the	(a) Emission control equipment fitted by the manufacturer absent, modified or obviously defective.		X	

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	vehicle and where the necessary data is made available, with the use of electronic interface (OBD or OBM read-out)	(b) Leaks which would affect emission measurements.		X	
		(c) Warning device malfunctioning, warning indicator / tell-tale inoperative.		X	
		(d) MIL activated, warning device shows system malfunction.		X	
		(e) System indicates failure via the electronic vehicle interface.		X	
		(f) Exhaust emission control unit modified affecting safety and/or the environment.		X	
		(g) Any other emission relevant control unit modified affecting safety and/or the environment.		X	
		(h) Presence of electronic devices not authorised by the vehicle manufacturer nor approved during homologation changing signals to or from the engine or pollution control unit(s).		X	
		(i) OBD or OBM read-out indicating significant malfunction.		X	

Commented [redacted] FR : e) and i) seem to be very similar. OBM read-out is not ready yet

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8.2.2 Exhaust emission measurement – positive ignition engines	Test procedures: For vehicles that had a particle number (PN) limit at type-approval; Euro VI, Euro 6c and newer: Particle number measurement in accordance with 8.2.2.1. For all vehicles: Gaseous emissions test in accordance with 8.2.2.2. For vehicles as of emission classes Euro VI, 6d-TEMP and newer: NO_X measurement in accordance with 8.2.2.3.				
8.2.2.1 Particle number measurement	Vehicle preparation: — [to be specified in accordance with the delegated acts referred to in Article 17] Measuring instrument preparation: — The device to measure PN is powered on for at least the warm-up time indicated by the manufacturer; — Self-checks of the instrument [to be specified in accordance with the delegated acts referred to in Article 17], to monitor the proper operation of the instrument during operation and trigger a warning or message in case of malfunction; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage. Test procedure: — The software of the particle counter automatically guides the instrument operator through the test procedure; — The probe is inserted at least 0,20 m into the outlet of the exhaust system. In justified	Measurement result exceeds [to be specified in accordance with the delegated acts referred to in Article 17] ($1/cm^3$)		X	

Commented [redacted] FR : Lack of experience of testing PN on gasoline engines. Compatibility of existing equipments? Gasoline engines emit water that contaminates probes

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exemptions where sampling at this depth is not possible, the probe is inserted at least 0,05 m. The sampling probe shall not touch the walls of the tailpipe; — If the exhaust system has more than one outlet, the test shall be done to all of them. In this case, the highest measured PN concentration measured at different exhaust system outlets shall be considered as the vehicle's PN concentration; — The vehicle operates [as specified in accordance with the delegated acts referred to in Article 17]. In case the engine of a vehicle is not switched on at static conditions then the start/stop system shall be deactivated by the test operator. For hybrid and plug-in hybrid vehicles, the thermal engine shall be switched on; — After the probe has been inserted into the tailpipe, the following steps shall be followed: 1. A stabilization period of at least 15 seconds with the engine running at idle speed. 2. After the stabilisation period, the PN concentration emissions are measured. The duration of the test shall be at least [XX] seconds (total measurement duration) [to be specified in accordance with the delegated acts referred to in Article 17]. After the completion of the test procedure, the instrument reports (and stores) the PN concentration of the vehicle and a "PASS" or "FAIL" message: — If the test result is less than or equal to the limit, the instrument reports a "PASS" message. — If the test result is greater than the limit, the instrument reports a "FAIL" message.				

Commented [redacted] FR : Time consuming. May be add a precision to perform multiple measurments only if the vehicle is fitted with several DPF.

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8.2.2.2. Gaseous emissions	Measurement using an exhaust gas analyser in accordance with the requirements[1]. Measurements not applicable for two-stroke engines.	(a) Either gaseous emissions exceed the specific levels given by the manufacturer;		X	
		(b) Or, if this information is not available, the CO emissions exceed, (i) for vehicles not controlled by an advanced emission control system, — 4,5 %, or — 3,5 % according to the date of first registration or use specified in requirements[1]. (ii) for vehicles controlled by an advanced emission control system, — at engine idle: 0,5 % — at high idle: 0,3 % or — at engine idle: 0,3 % (7) — at high idle: 0,2 % or — at engine idle: 0,2 % (8) — at high idle: 0,1 % according to the date of first registration or use specified in requirements[1].		X	
		(c) Lambda coefficient outside the range 1 ± 0,03 or not in accordance with the manufacturer's specification;		X	
8.2.2.3. NO_X measurement	Vehicle preparation: [to be specified in accordance with the delegated acts referred to in Article 17]; - […] Measuring instrument preparation: — [to be specified in accordance with the delegated acts referred to in Article 17 or combined with PN testing above];	Measurement result exceeds [NO_X limit to be specified in accordance with the delegated acts referred to in Article 17].		X	

Commented [redacted] FR : It comes from no type approval regulation

Commented [redacted] FR : Shall not be implemented until a suitable method has been set

	— Self-checks of the instrument [to be specified in accordance with the delegated acts referred to in Article 17]; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage. Test procedure: — [to be specified in accordance with the delegated acts referred to in Article 17 or combined with PN testing above].				

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8.2.3 Exhaust emission measurement – compression ignition engines	Test procedures: For vehicles as of emission classes Euro 5b and Euro VI and newer: Particle number (PN) measurement in accordance with 8.2.3.1 For vehicles up to emission classes Euro 5a and Euro V: Opacity measurement in accordance with 8.2.3.2. For vehicles equipped with particle filters, Member States may apply PN measurement in accordance with 8.2.3.1 instead of opacity measurement. For vehicles as of emission classes Euro 6d-TEMP and Euro VI and newer: NO_X measurement in accordance with 8.2.3.3.				
8.2.3.1 Particle number measurement	Vehicle preparation: At the beginning of the test the vehicle's engine should be: — Hot, i.e., engine coolant temperature above 60 °C but preferably above 70 °C — Conditioned, by operating for a period of time at low idling and/or performing stationary accelerations up to maximum 2 000 rpm engine speed or by driving. The recommended total conditioning time is at least 300 seconds. During the test, the vehicle shall not be performing an active particulate filter regeneration. A fast pass test is possible with engine coolant temperature below 60 °C. However, if the vehicle fails to pass the test, the test shall be repeated, and the vehicle should fulfil the requirements set for the engine coolant temperature and the conditioning. Measuring instrument (as specified in Sections 3, 4, and 5 of Commission Recommendation (EU) 2023/688, as adopted on 20 March 2023) preparation:	Measurement result exceeds 250 000 ($1/cm^3$) For vehicles up to emission class Euro 5a and Euro V, equipped with particle filters, Member States may apply a limit up to 1 000 000 ($1/cm^3$)		X	

Commented [redacted] FR would like to know how to know?

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	— The instrument is powered on for at least the warm-up time indicated by the manufacturer; — Self-checks of the instrument as defined in Section 5 of Commission Recommendation (EU) 2023/688, as adopted on 20 March 2023, to monitor the proper operation of the instrument during operation and trigger a warning or message in case of malfunction; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage. Test procedure: — The software of the particle counter automatically guides the instrument operator through the test procedure; — The probe is inserted at least 0,20 m into the outlet of the exhaust system. In justified exemptions where sampling at this depth is not possible, the probe is inserted at least 0,05 m. The sampling probe shall not touch the walls of the tailpipe; — If the exhaust system has more than one outlet, the test shall be done to all of them. In this case, the highest measured PN concentration measured at different exhaust system outlets shall be considered as the vehicle's PN concentration; — The vehicle operates at low idling. In case the engine of a vehicle is not switched on at static conditions then the start/stop system shall be deactivated by the test operator. For hybrid and plug-in hybrid vehicles, the thermal engine shall be switched on; — After the probe has been inserted into the tailpipe, the following steps shall be followed: 1. A stabilization period of at least 15 seconds with the engine running at idle speed. Optionally, before the stabilization period 2-3 accelerations up to maximum 2 000 rpm engine speed are performed, 2. After the stabilisation period, the PN concentration emissions are measured. The duration of the test shall be at least 15 seconds (total measurement duration). The test result shall be the average PN concentration of the measurement duration. If the measured PN concentration is more than two times the limit, the measurement may stop immediately before waiting for 15 seconds to elapse. The test result shall be reported.				

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	After the completion of the test procedure, the instrument reports (and stores) the average PN concentration of the vehicle and a “PASS” or “FAIL” message: — If the test result is less than or equal to the limit, the instrument reports a “PASS” message. — If the test result is greater than the limit, the instrument reports a “FAIL” message.				
8.2.3.2. Opacity Vehicles registered or put into service before 1 January 1980 are exempted from this requirement	Exhaust gas opacity to be measured during free acceleration (no load from idle up to cut-off speed) with gear lever in neutral and clutch engaged and, if specified in accordance with the type-approval regulations, reading of OBD in accordance with the manufacturer's recommendations and other requirements. Vehicle preconditioning: 1. Vehicles may be tested without preconditioning, although for safety reasons checks should be made that the engine is warm and in a satisfactory mechanical condition.	(a) For vehicles registered or put into service for the first time after the date specified in requirements[1]. opacity exceeds the level recorded on the manufacturer's plate on the vehicle;		X	

	2. Precondition requirements: (i) Engine shall be fully warm, for instance the engine oil temperature measured by a probe in the oil level dipstick tube to be at least 80 °C, or normal operating temperature if lower, or the engine block temperature measured by the level of infrared radiation to be at least an equivalent temperature. If, owing to the vehicle configuration, this measurement is impractical, the establishment of the engine's normal operating temperature may be made by other means, for example by the operation of the engine cooling fan. (ii) Exhaust system shall be purged by at least three free acceleration cycles or by an equivalent method. Test procedure: 1. Engine and any turbocharger fitted, to be at idle before the start of each free acceleration cycle. For heavy-duty diesels, this means waiting for at least 10 seconds after the release of the throttle. 2. To initiate each free acceleration cycle, the throttle pedal must be fully depressed quickly and continuously (in less than one second) but not violently, so as to obtain maximum delivery from the injection pump.	(b) Where this information is not available or requirements[1] do not allow the use of reference values, — for naturally aspirated engines: 2,5 m^{-1}, — for turbo-charged engines: 3,0 m^{-1}, or — for vehicles identified in requirements[1] or first registered or put into service for the first time after the date specified in requirements[1]: 1,5 m^{-1} ([9]) or 0,7 m^{-1} ([8])			

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	3. During each free acceleration cycle, the engine shall reach cut-off speed or, the speed specified by the manufacturer or, if this data is not available, then two thirds of the cut-off speed, before the throttle is released. This could be checked, for instance, by monitoring engine speed or by allowing a sufficient time to elapse between initial throttle depression and release, which in the case of vehicles of categories M_2, M_3, N_2 and N_3, should be at least two seconds. 4. Vehicles shall only be failed if the arithmetic means of at least the last three free acceleration cycles are in excess of the limit value. This may be calculated by ignoring any measurement that departs significantly from the measured mean, or the result of any other statistical calculation that takes account of the scattering of the measurements. Member States may limit the number of test cycles. 5. To avoid unnecessary testing, Member States may fail vehicles which have measured values significantly in excess of the limit values after fewer than three free acceleration cycles or after the purging cycles. Equally to avoid unnecessary testing, Member States may pass vehicles which have measured values significantly below the limits after fewer than three free acceleration cycles or after the purging cycles.				

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Item	Method	Reasons for failure	Assessment of deficiencies		
			Minor	Major	Dangerous
8.2.3.3. NO_X measurement	Vehicle preparation: Prior to testing, the vehicle's exhaust aftertreatment system shall be warmed up, to the conditions that allow effective abatement of NO_X emissions by the selective catalytic reduction (SCR) unit of the vehicle by at least a 5-minute drive or an equivalent method. Once the condition is reached, the vehicle shall not be turned off and the measurement shall be performed within 3 minutes for M_1 and N_1 vehicles and within 3.5 minutes for M_2, M_3, N_2 and N_3 vehicles. Where possible, the vehicle's readiness to be tested shall be ascertained by checking the indicator lamp on the dashboard or via the vehicle interface (OBD or OBM read-out). During the test, the vehicle shall not be performing an active particulate filter regeneration. Measuring instrument preparation: — The device to measure NO_X emissions is powered on for at least the warm-up time indicated by the manufacturer; — Self-checks of the instrument [to be specified in accordance with the delegated acts referred to in Article 17] to monitor the proper operation of the instrument during operation and trigger a warning or message in case of malfunction; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage. Test procedure: — The software of the NO_X analyser automatically guides the instrument operator through the test procedure; — The probe is inserted at least 0,20 m into the outlet of the exhaust system. In justified exemptions where sampling at this	Measurement result exceeds 40 ppm		X	

Commented [redacted] FR : The proposed method is not suitable for PTI in France as it is impossible to guarantee that a vehicle can be inspected immediately after it has arrived in PTI

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	depth is not possible, the probe is inserted at least 0,05 m. The sampling probe shall not touch the walls of the tailpipe; — If the exhaust system has more than one outlet, the test shall be done to all of them. In this case, the highest measured NO_X concentration measured at different exhaust system outlets shall be considered as the vehicle's NO_X concentration; — The vehicle operates at low idling; — After the probe has been inserted into the tailpipe, the following steps shall be followed: 1. A stabilization period of at least 15 seconds with the engine running at idle speed. 2. After the stabilisation period, the NO_X concentration emissions are measured. The duration of the test shall be at least 15 seconds (total measurement duration). The test result shall be the average NO_X concentration of the measurement duration. After the completion of the test procedure, the instrument reports (and stores) the average NO_X concentration of the vehicle and a "PASS" or "FAIL" message: — If the test result is less than or equal to the limit, the instrument reports a "PASS" message. — If the test result is greater than the limit, the instrument reports a "FAIL" message.				

';

(xxxiv) in the table, item 8.4.1, is replaced by the following:

'

8.4.1. Fluid leaks	Visual inspection	Any excessive fluid leak, other than water, likely to harm the environment or to pose a safety risk to other road users. Steady formation of drops that constitutes a very serious risk.		X	X

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’;

(xxxv) in the table, the following item 10 is added:

‘

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10. ELECTRONIC SAFETY SYSTEMS					
10.1. Cornering light Description: during cornering, an extra headlamp is activated. Operates up to 40 km/h, for example in accordance with UNECE-R 48 or UNECE-R 119.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.2 Adaptive cruise control Description: The system maintains the vehicle's speed, depending on the preferred speed and distance to the vehicle in front.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged, or sensors obviously misaligned		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

Commented [redacted] FR : - There are too many points and deficiencies. It will be very difficult for inspector to choose among all these deficiencies
- Systems shall be inspected in the function they deal with. For example, ABS deals with braking and has to be tested in Function 1, AVAS deals with EV and has to be tested in function 4, etc.
- Such a detailed level cannot be reached with visual inspection. For example, when the camera is deteriorated, inspector cannot determine which functions are affected.
- Only electronic interface allows to reach such a detailed level. However, it will be possible only with harmonized/standardized data.
- Inspection shall limit to mandatory safety systems.

Commented [redacted] FR proposes another redaction (in blue after this table, page 78)

Commented [redacted] FR : Following comments are applicable to all other points as defects are the same:

No standardized means to check and no standadized database

Commented [redacted] FR : Seems very difficult to distinguish to which device the wiring is relative.

Commented [redacted] FR : Seems difficult to distinguish which defect will be major and which defect will be dangerous

Regarding defects relative to ADAS, dangerous defect seems to be quite disproportionate

Commented [redacted] FR : Redundant with b) and already dealed with inspection points in functions 1, 2, etc.

Commented [redacted] FR : Which other failure can occur?

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.3 Adaptive deflectors Description: Depending on the vehicle's speed, the air deflectors are adjusted in order to improve driving stability.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.4 Airbag Description: In case of an accident, inflatable airbags reduce the risk of injury by their absorbing effect, for example in accordance with UNECE-R 12; UNECE-R 14; or UNECE-R 16.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or components (for example seat occupancy detection) obviously missing.		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
		(g) System or components obviously not operating (for example not suitable with the vehicle)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
10.5 Active Headrest Description: the system reduces the danger of a whiplash injury in the event of a rear end collision by	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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changing the position of the headrest towards the head.		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	 X	 X
		(g) System or components not operating, where applicable, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	 X	 X
10.6 Active hood Description: by automatically lifting the bonnet, the system ensures a larger collapsible zone in the event of an accident involving a pedestrian.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating (for example outdated), where applicable, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.7 Automatic hold function Description: the system independently holds the vehicle after stopping using the service brake and/or parking brake and automatically releases them when starting.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.8 Automatic headlamp levelling Description: depending on the load and (optional) pitch angle, the system regulates the headlamp's	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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vertical aim, for example in accordance with UNECE-R 121.		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.9 Automatic emergency braking system Description: the system independently starts braking in order to avoid a collision with an obstacle or another road user, or to reduce the consequences of an inevitable impact.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged, or sensors obviously misaligned		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X

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		(g) System or components not operating, or implausible operative (for example audio components)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.10 Anti-lock braking system Description: the system automatically prevents wheel-locking during braking by selective reduction of the wheel brake force, for example in accordance with UNECE-R 13 and Regulation (EU) 2019/2144.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components (for example wheel speed sensor) damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(a) System or any component missing		X	

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10.11 Automatic light Description: depending on the ambient brightness, the system automatically switches on and off the driving light.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.12 Electro-mechanic power steering Description: the supporting power for steering is generated by an electric motor.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating (for example Power assistance not working), or implausible operation (for example inconsistency between the angle of the steering wheel and the angle of the wheels.) Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.13 Electronic four-wheel steering Description: two axles are steered, with a steering angle greater than 3° on all steered wheels, for example in accordance with UNECE-R 79 and Regulation (EU) 2019/2144.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.14 Electronic damping Description: depending on the driving situation, the rebound and compression stage of the shock absorbers is adjusted by the system.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.15 Electronic brake system Description: a brake pedal sensor and/or pressure sensor records the braking request and calculates the optimal brake force for each wheel,	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface, or by road test.	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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so that there is optimal activation of all wheel brakes.		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.16 Electronic stability program Description: the system stabilizes the vehicle or the complete vehicle train in critical, dynamic driving situations, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 140.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component (for example wheel speed sensors) missing		X	
		(b) System or components (for example wheel speed sensors) damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X

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		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.17 High beam assist Description: the system automatically activates and deactivates the high beam according to the driving situation and lighting conditions.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.18 Speed limiter Description: While driving, the	Visual inspection complemented, where made possible by the technical	(a) System or any component missing (for example seals, plaques), or not fitted in accordance with the requirements.		X	

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system prevents exceeding a defined maximum speed. Relevant, if mandatory, for example in accordance with UNECE-R 89 and Regulation (EU) 2019/2144.	characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation (for example tampered or manipulated, or size of tyres not compatible with calibration parameters, or incorrect set speed, if checked).		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.19 Belt tensioner and belt force limiter Description: In the event of an accident, the seat belt is tensioned to place the passengers in a setpoint position and/or limits the belt force, electrically controlled and, thus, limits the forces acting on the persons for example in accordance with UNECE-R 16 or UNECE-R 94.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing, or not suitable with the vehicle		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
		(g) System or components not operating, where applicable, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
10.20 Taillight switching Description: Depending on operating status and/or failure of the illuminants, lighting functions are taken over by other luminaires.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.21 Bending light Description: during cornering and depending on the steering angle and speed, the light beam is swivelled and/or an additional headlight is activated, for example in accordance with UNECE-R 48; UNECE-R 98; UNECE-R 112; or UNECE-R 123.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.22 Steering assist Description: depending on the driving situation, the steering angle is automatically changed, without intervention by the driver. Relevant if the steering intervention occurs at	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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a speed of more than 15 km/h, for example in accordance with UNECE-R 79.		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operative (for example audio components)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.23 Height levelling Description: the system changes the clearance between vehicle chassis and the road.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.24 Emergency braking signal Description: during strong deceleration, hazard warning lights and/or additional luminous surfaces are activated and/or the following traffic is warned by flashing brake lights, for example in accordance with UNECE-R 48 or UNECE-R 13.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(f) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.25 Pre-crash system Description: in a critical driving situation, the vehicle is prepared for the crash so that the risk of injury to	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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the passengers and/or other road users is reduced.		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation (for example power windows)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.26 Tyre pressure warning Description: the system detects loss of tyre pressure through integrated sensors and/or by implausible values for wheel speed, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 141.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.27 Traction control Description: the system prevents the drive wheels spinning during acceleration by applying brake force.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.28 Superimposed steering Description: depending on the driving situation, the system varies the transmission ratio of the steering.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating (for example power assistance not working), or implausible operation (for example inconsistency between the angle of the steering wheel and the angle of the wheels.) Steering affected		X	 X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.29 Roll over protection (active) Description: in the event of an imminent rollover, support elements are extended to secure the survival space, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 21.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X

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		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.30 Hydrogen installation Description: the hydrogen is stored in the vehicle and is used to propel the vehicle, either by combustion in an internal combustion engine or by conversion in a fuel cell with an additional electric engine.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.31 Start-up aid Description: aiding start-up, for example by raising the lift axle or by	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the	(a) System or any component missing		X	
		(b) System or components damaged		X	

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momentarily applying brake pressure or by automatic release of the parking brake.	necessary data is made available, with the use of electronic interface	(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.32 Trailer stabilization Description: through selective braking of the trailer by the service brakes, the complete vehicle train is stabilised.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X

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		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.33 Endurance brake Description: an additional braking system that can maintain braking over a period of time without a significant reduction in performance, for example in accordance with UNECE-R 13 and Regulation (EU) 2019/2144.	Visual inspection (with command activated and not activated, if possible) complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing (for example Insecure connectors or mountings)		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(j) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(a) System or any component missing		X	

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10.34 Differential lock deactivation Description: when this system is activated, the differential locks are unlocked depending on parameters (for example wheel slip, steering angle, speed).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.35 Electronically controlled leading and trailing axle Description: the steered axles are additional axles with electronically controlled steering. The steering force is generated by a hydraulic pump or by the lateral force on the wheels.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.36 Electronic steering damper Description: Steering damping is controlled electronically.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X

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		(g) System or components not operating, or implausible operation Steering affected		X	 X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.37 Bus stop brake Description: the system ensures the application of brake pressure when stationary, independent of the brake pedal activation. Buses can only start moving when the doors are closed.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X

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10.38 Kneeling Description: the system allows a road vehicle to be lowered to make it easier for passengers to board and disembark.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.39 Steering brake Description: during cornering, dosed braking is applied to one or more wheels.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.40 Tyre pressure control Description: according to the requirement of the driver, the system regulates the tyre pressure.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.41 Sliding joint stabilisation Description: The articulated joint is stabilised by damping, depending on vehicle speed, cylinder pressure of the articulated dampers, steering and articulation-angle.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.42 Four-wheel parking brake Description: the system applies the maximum brake pressure in the wheel cylinders at all four wheels.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.43 Front-wheel locking device Description: front wheel suspension, which permits lateral inclination of the motorcycle, can be locked and unlocked by an electric actuator. Above a certain speed, it is automatically unlocked.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.44 Adaptive headlights Description: the illumination of the surrounding road area and/or the direct illumination of road users in the danger area in front of the vehicle is optimised by dynamic adaption of the light beams.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.45 Electrically actuated parking brake Description: the parking brake function is triggered or transmitted	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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electronically or electromechanically.		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.46 Lane change assistance Description: at a lane change, the system warns the driver about vehicles in the next lane and steers the vehicle back.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.47 Lane keeping assistance Description: the system warns the driver when the vehicle is unintentionally leaving its lane and steers the vehicle back, e.g. in accordance with Regulation (EU) 2019/2144 and Commission Implementing Regulation (EU) 2021/646*.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.48 Automatic eCall Description: the system is triggered automatically by in-vehicle sensors or manually, it transmits a minimum set of data (EN 15722) via mobile communication network and	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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establishes an audio connection based on the (emergency) number between the vehicle passengers and the public safety answering point, in accordance with Regulation (EU) 2015/758 of the European Parliament and of the Council**, and Commission Delegated Regulation (EU) 2017/79***.	The verification of the minimum set of data (MSD) includes checking whether: - the mandatory fields are filled with plausible information; - the deviation between in-vehicle system (IVS) location and true location is less than 150 meters. The calculation can be done according to point 2.5 of Annex I of Commission Delegated Regulation (EU) 2017/79; - the deviation between the MSD timestamp and the timestamp of the reading is less than 60s.	(d) Wiring damaged		X	
		(e) Warning device (eCall MIL) shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	 X	 X
		(g) System or components not operating, or implausible operation: - audio components (for example failing echo-test); - minimum set of data incorrect		X	
		(h) Other failure (for example mobile network communication device, electronic control unit, or GPS signal failure) Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	 X	 X
10.49 Active roll stabilisation Description: via appropriate actuators the system produces a roll movement which counters the vehicle's body roll movement depending on the current driving situation.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X

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		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.50 Camera monitor Description: the system which generates at least a part of the indirect field of vision by a camera monitor combination (for example in accordance with UNECE-R 46).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.51 Acoustic vehicle alerting Description: at low speed, the system generates an external,	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the	(a) System or any component missing		X	
		(b) System or components damaged		X	

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specific sound in order to warn, for example pedestrians.	necessary data is made available, with the use of electronic interface	(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operative, or not respecting type-approved noise levels		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.52 Basic exterior lights Description: the system switches on/switches off the basic lighting devices (for example indicators).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X

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		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.53 Automated lane keeping system (ALKS) Description: a system which is activated by the driver, and which keeps the vehicle within its lane by controlling the lateral and longitudinal movements of the vehicle for extended periods without the need for further driver input (for example in accordance with UNECE-R 157).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.54 Turning assistant Description: a system to inform the driver of a possible collision with a	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the	(a) System or any component missing		X	
		(b) System or components damaged		X	

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traffic participant (for example bicycle) near side (for example in accordance with UNECE-R 151).	necessary data is made available, with the use of electronic interface	(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.55 Tachograph Description: a system to record the driving time, breaks, rest periods as well as periods of other work undertaken by a driver, for example, in accordance with Regulation (EU) No 165/2014 of the European Parliament and of the Council****.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing (for example seals, plaques), or not fitted in accordance with the requirements (for example plaque out of date).		X	
		(b) System or components damaged (for example illegible plaque)		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation (for example tampered or manipulated, or size of tyres not compatible with calibration parameters, or incorrect set speed, if checked).		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.56 Intelligent speed assistance Description: system to aid the driver in maintaining the appropriate speed for the road environment by providing dedicated and appropriate feedback, for example in accordance with Regulation (EU) 2019/2144 and Commission Delegated Regulation (EU) 2021/1958*****.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(g) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.57 Reversing detection Description: system to make the driver aware of people and objects at the rear of the vehicle with the primary aim of avoiding collisions when reversing, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 158.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.58 Driver drowsiness and attention warning Description: system that assesses the driver's alertness through vehicle systems analysis and warns the driver if needed, for example in	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	

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accordance with Regulation (EU) 2019/2144 and Commission Delegated Regulation (EU) 2021/1341******.		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.59 Advanced driver distraction warning Description: system that helps the driver to continue to pay attention to the traffic situation and that warns the driver when he or she is distracted, for example in accordance with Regulation (EU) 2019/2144 and Commission Delegated Regulation (EU) 2023/2590*******.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.60 Event data recorder Description: system with the only purpose of recording and storing critical crash-related parameters and information shortly before, during and immediately after a collision, for example in accordance with Regulation (EU) 2019/2144, Commission Delegated Regulation (EU) 2022/545********, and UNECE-R 160.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation	X		
		(g) System or components not operating, or implausible operation (for example data not accessible)		X	
		(h) Other failure Not affecting the safe operation	X		
10.61 Automated driving system Description: systems that are capable of performing the entire dynamic driving task of the fully automated vehicle on a sustained basis, for example in accordance with Regulation (EU) 2019/2144 and Commission Implementing Regulation (EU) 2022/1426*********.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation (for example HMI)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.62 Driver availability monitoring systems (automated driving) Description: System that assesses whether the driver is capable of taking over the driving function of a self-driving vehicle, if necessary, in certain situations, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 157.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation (for example HMI)		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X

10. ELECTRONIC PTI (X) -					
11.1. Electronic PTI	Inspection with the use ot electronic interface, where made possible by the technical characteristics of the vehicle and where the necessary data is made available. Regards following equipments: - To be defined	(a) Software version or -integrity incorrect	-	X	-
		(b) System indicates failure via the electronic vehicle interface Not affecting the safe operation	X		
		Affecting safe operation of the vehicle		X	

Commented [redacted] FR : Alternative proposal for a new item 11 regarding e-PTI. Since there would only be 1 inspection point, it could be included in item 7 "Other equipment".

Commented [redacted] FR : Needs standardized means to check and standadized database

Commented [redacted]

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French Alternative proposal for Function 10 : Function 10 regards now e-PTI and ADAS are included in a specific point in Function 7

10. ELECTRONIC PTI (X)					
10.1. Electronic PTI	Inspection with the use of electronic interface, where made possible by the technical characteristics of the vehicle and where the necessary data is made available. Regards following equipments: - To be defined	(a) Software version or integrity incorrect	-	X	-
		(b) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle	X 	 X	

Commented [redacted] FR : Alternative proposal for a new item 11 regarding e-PTI. Since there would only be 1 inspection point, it could be included in item 7 "Other equipment".

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Commented [redacted] FR : Needs standardized means to check and standadized database

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7. OTHER EQUIPMENT -					
7.14. Advanced Driver Assistance Systems (ADAS)	Visual inspection. Regards following equipments: - To be defined	(a) System or any component missing	-	X	-
		(b) System or components : attachement defective	-	X	-
		(c) System or components damaged	-	X	-
		(d) Wiring slightly damaged Wiring damaged	X	 X	-
		(e) Warning device shows system malfunction System still operative Inoperative system	 X	 X	-
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle	X	 X	

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* Commission Implementing Regulation (EU) 2021/646 of 19 April 2021 laying down rules for the application of Regulation (EU) 2019/2144 of the European Parliament and of the Council as regards uniform procedures and technical specifications for the type-approval of motor vehicles with regard to their emergency lane-keeping systems (ELKS) (OJ L 133, 20.4.2021, p. 31, ELI: http://data.europa.eu/eli/reg_impl/2021/646/oj).

** Regulation (EU) 2015/758 of the European Parliament and of the Council of 29 April 2015 concerning type-approval requirements for the deployment of the eCall in-vehicle system based on the 112 service and amending Directive 2007/46/EC (OJ L 123, 19.5.2015, p. 77, ELI: http://data.europa.eu/eli/reg/2015/758/oj).

*** Commission Delegated Regulation (EU) 2017/79 of 12 September 2016 establishing detailed technical requirements and test procedures for the EC type-approval of motor vehicles with respect to their 112-based eCall in-vehicles systems, of 112-based eCall in-vehicle separate technical units and components and supplementing and amending Regulation (EU) 2015/758 of the European Parliament and of the Council with regard to the exemptions and applicable standards (OJ L 12, 17.1.2017, p. 44, ELI: http://data.europa.eu/eli/reg_del/2017/79/oj).

**** Regulation (EU) No 165/2014 of the European Parliament and of the Council of 4 February 2014 on tachographs in road transport, repealing Council Regulation (EEC) No 3821/85 on recording equipment in road transport and amending Regulation (EC) No 561/2006 of the European Parliament and of the Council on the harmonisation of certain social legislation relating to road transport (OJ L 60, 28.2.2014, p. 1, ELI: http://data.europa.eu/eli/reg/2014/165/oj).

***** Commission Delegated Regulation (EU) 2021/1958 of 23 June 2021 supplementing Regulation (EU) 2019/2144 of the European Parliament and of the Council by laying down detailed rules concerning the specific test procedures and technical requirements for the type-approval of motor vehicles with regard to their intelligent speed assistance systems and for the type-approval of those systems as separate technical units and amending Annex II to that Regulation (OJ L 409, 17.11.2021, p. 1, ELI: http://data.europa.eu/eli/reg_del/2021/1958/oj).

****** Commission Delegated Regulation (EU) 2021/1341 of 23 April 2021 supplementing Regulation (EU) 2019/2144 of the European Parliament and of the Council by laying down detailed rules concerning the specific test procedures and technical requirements for the type-approval of motor vehicles with regard to their driver drowsiness and attention warning systems and amending Annex II to that Regulation (OJ L 292, 16.8.2021, p. 4, ELI: http://data.europa.eu/eli/reg_del/2021/1341/oj).

******* Commission Delegated Regulation (EU) 2023/2590 of 13 July 2023 supplementing Regulation (EU) 2019/2144 of the European Parliament and of the Council by laying down detailed rules concerning the specific test procedures and technical

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requirements for the type-approval of certain motor vehicles with regard to their advanced driver distraction warning systems and amending that Regulation (OJ L, 2023/2590, 22.11.2023, ELI: http://data.europa.eu/eli/reg_del/2023/2590/oj).

******** Commission Delegated Regulation (EU) 2022/545 of 26 January 2022 supplementing Regulation (EU) 2019/2144 of the European Parliament and of the Council by laying down detailed rules concerning the specific test procedures and technical requirements for the type-approval of motor vehicles with regard to their event data recorder and for the type-approval of those systems as separate technical units and amending Annex II to that Regulation (OJ L 107, 6.4.2022, p. 18, ELI: http://data.europa.eu/eli/reg_del/2022/545/oj).

********* Commission Implementing Regulation (EU) 2022/1426 of 5 August 2022 laying down rules for the application of Regulation (EU) 2019/2144 of the European Parliament and of the Council as regards uniform procedures and technical specifications for the type-approval of the automated driving system (ADS) of fully automated vehicles (OJ L 221, 26.8.2022, p. 1, ELI: http://data.europa.eu/eli/reg_impl/2022/1426/oj).

';

(2) Annex III is amended as follows:

(a) in section I 'Facilities and equipment', the first paragraph is amended as follows:

(i) points (9) and (10) are replaced by the following:

'(9) A Class II sound level meter, if sound level is measured;

(10) A 4-gas analyser in accordance with Directive 2014/32/EU of the European Parliament and of the Council*;

* Directive 2014/32/EU of the European Parliament and of the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of measuring instruments (OJ L 96, 29.3.2014, p. 149, ELI: http://data.europa.eu/eli/dir/2014/32/oj).';

(ii) the following points (16) and (17) are added:

'(16) device to measure particle number emissions with sufficient accuracy;

(17) [From one year after the entry into force of the delegated act referred to in Article 17], a device to measure nitrogen oxide (NO_X) emissions.';

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(b) in section II, Table I is replaced by the following:

‘*Table 1* (*)

Minimum equipment required for the purpose of performing a roadworthiness test

Vehicles		Category		Equipment required for each item listed in section I																
	Maximum mass			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
1. Motorcycles			[1]																	
		L1e	P	x								x	x		x	x	x			
		L3e, L4e	P	x								x	x		x	x	x			
		L3e, L4e	D	x								x		x	x	x	x			
		L2e	P	x	x							x	x		x	x	x			
		L2e	D	x	x							x		x	x	x	x			
		L5e	P	x	x							x	x		x	x	x			
		L5e	D	x	x							x		x	x	x	x			
		L6e	P	x	x							x	x		x	x	x			
		L6e	D	x	x							x		x	x	x	x			
		L7e	P	x	x							x	x		x	x	x			
		L7e	D	x	x							x		x	x	x	x			

2. Vehicles for the carriage of persons																		

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Vehicles		Category		Equipment required for each item listed in section I																
	Maximum mass			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
	Up to 3 500 kg	M_1, M_2	P	x	x		x					x	x		x	x	x	x	x	x
	Up to 3 500 kg	M_1, M_2	D	x	x		x					x		x	x	x	x		x	x
	> 3 500 kg	M_2, M_3	P	x	x	x		x	x	x	x	x	x		x	x	x	x	x	x
	> 3 500 kg	M_2, M_3	D	x	x	x		x	x	x	x	x		x	x	x	x		x	x
3. Vehicles for the carriage of goods																				
	Up to 3 500 kg	N_1	P	x	x		x					x	x		x	x	x	x	x	x
	Up to 3 500 kg	N_1	D	x	x		x					x		x	x	x	x		x	x
	> 3 500 kg	N_2, N_3	P	x	x	x		x	x	x	x	x	x		x	x	x	x	x	x
	> 3 500 kg	N_2, N_3	D	x	x	x		x	x	x	x	x		x	x	x	x		x	x
4. ►**M1** Special vehicles derived from a category N vehicle, T1b, T2b, T3b, T4.1b, T4.2b and T4.3b ◄																				
	Up to 3 500 kg	N_1	P	x	x		x					x	x		x	x	x	x	x	x
	Up to 3 500 kg	N_1	D	x	x		x					x		x	x	x	x		x	x

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Vehicles		Category		Equipment required for each item listed in section 1															
	Maximum mass			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
	> 3 500 kg	N_2, N_3, ►**M1** T1b, T2b, T3b, T4.1b, T4.2b and T4.3b ◄	P	x	x	x		x	x	x	x	x	x		x	x	x	x	x	x
	> 3 500 kg	N_2, N_3, ►**M1** T1b, T2b, T3b, T4.1b, T4.2b and T4.3b ◄	D	x	x	x		x	x	x	x	x		x	x	x	x		x	x
5. Trailers	Up to 750 kg	O_1		x												x				
	> 750 to 3 500 kg	O_2		x	x		x									x				
	> 3 500 kg	O_3, O_4		x	x	x			x	x	x					x				

* The vehicle categories which are outside the scope of this Directive are included for guidance.

[1] P…petrol (positive ignition); D…diesel (compression ignition)

’;

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(3) In Annex IV, in point 2, point (a), points (i) and (ii) are replaced by the following:

‘(i) vehicle technology:

— braking systems;

— steering systems;

— fields of vision;

— light installation, lighting equipment and electronic components;

— axles, wheels and tyres;

— chassis and bodywork;

— nuisance and emissions;

— alternative drives (high-voltage, hybrid, hydrogen systems);

— additional requirements for special vehicles;

(ii) testing methods (including the necessary training for inspecting vehicles equipped with high-voltage systems);’.

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ANNEX [II]

Annexes II, III, IV and V to Directive 2014/47/EU are amended as follows:

(1) Annex II is amended as follows:

(a) in point 1, the following point (10) is added:

'(10) Electronic safety systems.';

(b) point 3 is amended as follows:

(i) the heading is replaced by the following:

'3. CONTENTS AND METHODS OF TESTING, REASONS FOR FAILURE, AND ASSESSMENT OF DEFICIENCIES OF VEHICLES';

(ii) in the table, items 1.1.3 to 1.1.6 are replaced by the following:

'

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1.1.3. Vacuum pump or compressor and reservoirs	Visual inspection of the components at normal working pressure. Check time required for vacuum or air pressure to reach safe working value and function of warning device, multi-circuit protection valve and pressure relief valve. Brake application means depression of the brake pedal/lever which allows the full flow of air/fluid application pressure to the brake assemblies.	(a) Insufficient pressure/vacuum to give assistance for at least four brake applications after the warning device has operated (or gauge shows an unsafe reading); at least two brake applications after the warning device has operated (or gauge shows an unsafe reading).		X	 X
		(b) Time taken to build up air pressure/vacuum to safe working value is too long according to the require-ments[1]		X	
		(c) Multi-circuit protection valve or pressure relief valve not working.		X	
		(d) Air leak causing a noticeable drop in pressure or audible air leaks. Air leak causing a critical drop in pressure.		X	 X
		(e) External damage likely to affect the function of the braking system.		X	
1.1.4. Low pressure warning device	Functional check	Malfunctioning or defective warning device. Low pressure not identifiable.	X	 X	
1.1.5. Hand-operated brake control valve	Visual inspection of the components while the braking system is operated.	(a) Control cracked, damaged or excessively worn.		X	
		(b) Control insecure on valve or valve insecure.		X	
		(c) Loose connections, defective fixing, or leaks in system.		X	
		(d) Unsatisfactory operation.		X	

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1.1.6. Parking brake (activator, lever control, parking brake ratchet)	Visual inspection of the components while the braking system is operated.	(a) Ratchet not holding correctly.		X	
		(b) Wear at lever pivot or in ratchet mechanism. Excessive wear.	X	 X	
		(c) Excessive movement of lever indicating incorrect adjustment.		X	
		(d) Activator missing, damaged or inoperative.		X	
		(e) Incorrect functioning, warning indicator shows malfunction		X	

’;

(iii) in the table, item 1.1.13 is replaced by the following:

‘

1.1.13. Brake linings and pads	Visual inspection.	(a) Lining or pad excessively worn (minimum mark reached). Lining or pad excessively worn (minimum mark not visible).		X	 X

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		(b) Lining or pad contaminated (oil, grease etc.). Braking performance affected.		X	X
		(c) Lining or pad missing or wrongly mounted, or of obviously incorrect type.			X
		(d) Wear indicator electrical harness disconnected or damaged	X		

’;

(iv) in the table, item 1.1.18 is replaced by the following:

‘

1.1.18. Slack adjusters and indicators	Visual inspection of the components while the braking system is operated, if possible.	(a) Adjuster damaged, seized or having abnormal movement, excessive wear, or incorrect adjustment.		X	
		(b) Adjuster defective.		X	
		(c) Incorrectly installed or replaced.		X	

;

(v) in the table, item 1.1.19 is deleted;

(vi) in the table, item 1.1.23 is replaced by the following:

‘

1.1.23. Overrun brake	Visual inspection and by operation	(a) Not working properly, for example, stroke of the drawbar exceeds 2/3 of the total overrun travel		X	
		(b) Breakaway cable defect or missing		X	

’;

(vii) in the table, items 1.2.1 and 1.2.2 are replaced by the following:

‘

1.2.1. Performance (E)	During a test on a brake tester or, if impossible, during a road test, apply the brakes progressively up to maximum effort. It must be ensured, where possible, that the mechanical service brakes are inspected without interference/blending of regenerative braking or other continuous braking.	(a) Inadequate braking effort on one or more wheels. Or, in the case of testing on the road, the vehicle deviates excessively from a straight line and/or excessive vibration is produced at the service brake pedal/lever. No braking effort on one or more wheels.		X X	X
		(b) Braking effort from any wheel is less than 70 % of the maximum effort recorded from the other wheel on the same axle. Or, in the case of testing on the road, the vehicle deviates excessively from a straight line. Braking effort from any wheel is less than 50 % of the maximum effort recorded from the other wheel on the same axle in the case of steered axles.		X	X
		(c) No gradual variation in brake effort (grabbing).		X	
		(d) Abnormal lag in brake operation of any wheel.		X	
		(e) Excessive fluctuation of brake force during each complete wheel revolution.		X	
1.2.2. Efficiency(E)	Test with a brake tester at the presented weight or, if one cannot be used for technical reasons, by a road test usinga deceleration recording instrument ([1]).	Does not give at least the minimum figure as follows ([2]): Categories M_1, M_2 and M_3: 50 % ([3]) Category N_1: 45 % Categories N_2 and N_3: 43 % ([4]) Categories O_3 and O_4: 40 % ([5]) Category T: 40% Less than 50 % of the above values reached		X	X

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’;

(viii) in the table, item 1.3.1 is replaced by the following:

‘

1.3.1. Performance (E)	If the secondary braking system is separate from the service braking system, use the method specified in 1.2.1. It must be ensured that, where possible, the mechanical brakes are inspected without interference/blending of regenerative braking or other continuous braking.	(a) Inadequate braking effort on one or more wheels.		X	
		No braking effort on one or more wheels.			X
		(b) Braking effort from any wheel is less than 70 % of the maximum effort recorded from another wheel on the same axle specified. Or, in the case of testing on the road, the vehicle deviates excessively from a straight line.		X	
		Braking effort from any wheel is less than 50 % of the maximum effort recorded from the other wheel on the same axle in the case of steered axles.			X
		(c) No gradual variation in brake effort (grabbing).		X	

’;

(ix) in the table, item 1.4.1 is replaced by the following:

‘

1.4.1. Performance (E)	Apply the brake during a test on a brake tester or by road test.	Brake inoperative on one side or, in the case of testing on the road, the vehicle deviates excessively from a straight line.		X	
		Less than 50 % of the braking effort values as referred to in point 1.4.2 reached in relation to the vehicle mass during testing.			X

’;

(x) in the table, item 1.5 is replaced by the following:

‘

1.5. Endurance braking system performance	Visual inspection and, where possible, test whether the system functions, i.e. by road test.	(a) Malfunction indicator indicates a fault.		X	
		(b) System not functioning.		X	

’;

(xi) in the table, item 1.6 is deleted;

(xii) in the table, item 2.6 is deleted;

(xiii) in the table, item 4.1.1 is replaced by the following:

‘

4.1.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source. Multiple light sources (in the case of LED, up to 1/3 not functioning). Seriously affected visibility.	X	X	
		(b) Slightly defective projection system (reflector and lens). Heavily defective or missing projection system (reflector and lens).	X	X	
		(c) Lamp not securely attached.		X	
		(d) System indicates failure for example via the electronic vehicle interface.		X	

’;

(xiv) in the table, item 4.1.5 is replaced by the following:

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‘

4.1.5. Manual levelling devices (where mandatory)	Visual inspection and by operation, if possible, or using the electronic vehicle interface.	(a) Device not operating.		X	
		(b) Device cannot be operated from driver's seat.		X	

’;

(xv) in the table, item 4.2.1 is replaced by the following:

‘

‘4.2.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source Multiple light sources (in the case of LED, up to 1/3 not functioning); one of several lateral light sources defective. Seriously affected visibility (in the case of LED, less than 2/3 functioning).	X	X	
		(b) Defective lens.		X	
		(c) Lamp not securely attached. Very serious risk of falling off.	X	X	

’;

(xvi) in the table, item 4.3.1 is replaced by the following:

‘

4.3.1. Condition and operation	Visual inspection and by operation	(a) Defective or missing light source. Multiple light sources; in the case of LED up to 1/3 not functioning). Single light sources; in the case of LED less than 2/3 functioning. All light sources not functioning.	X	X	X

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		(b) Slightly defective lens (no influence on emitted light). Heavily defective lens (emitted light affected).	X	X	
		(c) Lamp not securely attached. Very serious risk of falling off,	X	X	

’;

(xvii) in the table, item 4.4.1 is replaced by the following:

‘

Item	Method	Reasons for failure	Assessment of deficiencies		
			Minor	Major	Dangerous
4.4.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source Multiple light sources (in the case of LED up to 1/3 not functioning). Single light sources; in the case of LED less than 2/3 functioning. No light source functioning.	X	X	X
		(b) Slightly defective lens (no influence on emitted light). Heavily defective lens (emitted light affected).	X	X	
		(c) Lamp not securely attached. Very serious risk of falling off.	X	X	

’;

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(xviii) in the table, item 4.5.1 is replaced by the following:

‘

4.5.1. Condition and operation	Visual inspection and by operation	(a) Defective or missing light source Multiple light source; in thecase of LED up to 1/3 not functioning.	X		
		Single light sources; in the case of LED less than 2/3 functioning.		X	
		(b) Slightly defective lens (no influence on emitted light).	X		
		Heavily defective lens (emitted light affected).		X	
		(c) Lamp not securely attached.	X		
		Very serious risk of falling off or dazzling oncoming traffic.		X	

’;

(xix) in the table, item 4.6.1 is replaced by the following:

‘

4.6.1. Condition and operation	Visual inspection and by operation.	(a) Defective or missing light source Multiple light sources (in the case of LED up to 1/3 not functioning).	X		
		Single light sources; in the case of LED less than 2/3 functioning.		X	
		(b) Defective lens.	X		
		(c) Lamp not securely attached.	X		
		Very serious risk of falling off.		X	

’;

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(xx) in the table, item 4.7.1 is replaced by the following:

‘

4.7.1. Condition and operation	Visual inspection and by operation	(a) Lamp throwing direct or white light to the rear.	X		
		(b) Defective or missing light source (multiple light source). Defective or missing light source (single light source).	X	 X	
		(c) Lamp not securely attached. Very serious risk of falling off.	X	 X	

’;

(xxi) in the table, in item 4.11, the title in the first column is replaced by the following:

‘Electrical wiring (except high-voltage wiring)’;

(xxii) in the table, in item 4.13, the title in the first column is replaced by the following:

‘Battery (or batteries, except high-voltage batteries)’;

(xxiii) in the table, the following item 4.14 is inserted:

‘

4.14 High-voltage systems					
4.14.1 Electrical safety	Visual inspection complemented by using the vehicle interface	(a) Indicator or vehicle interface shows system malfunction		X	
		(b) Software version or -integrity incorrect		X	
4.14.2 Traction battery cover	Visual inspection.	(a) Slightly deteriorated Heavily deteriorated	X		

				X	
		(b) Defective attachment		X	
		Very serious risk of falling off			X
		(c) Obstructed ventilation port(s)	X		
4.14.3 Traction battery	Visual inspection, complemented by using the vehicle interface (where made possible by the technical characteristics of the vehicle, and where the necessary data are available).	(a) Marks of leakage		X	
		Leaking (presence of droplets)			X
		(b) Incorrect software or hardware, or readiness-code not active		X	
4.14.4 High voltage electrical wiring					
4.14.4.1 High voltage wiring harness and connector	Visual inspection and by operation with the vehicle over a pit or on a hoist, including inside the engine compartment and the boot (where applicable)	(a) Slightly deteriorated	X		
		Heavily deteriorated		X	
		Risk of short-circuit fault			X
		(b) Wiring insecure or not adequately secured	X		
		Fixings loose, touching sharp edges, connectors likely to be disconnected		X	
		Wiring likely to touch hot parts, rotating parts or the ground, connectors disconnected			X
		(c) Imminent risk of fire, formation of sparks			X
4.14.4.2 Ground braid, including their attachment	Visual inspection and by operation.	Slightly deteriorated	X		
		Heavily deteriorated		X	
4.14.4.3 Ground continuity (X)[2]	Measurement using an ohmmeter	Test not feasible	X		
		Too high resistance (over 100 Ohms)		X	
4.14.4.4 Charging inlet cover	Visual inspection and by operation.	Deteriorated	X		
		Missing		X	
4.14.4.5 Charging inlet	Visual inspection and by operation.	(a) Deteriorated	X		
		Trace of beginning of melting or electric arcs		X	
		(b) Foreign material or moisture		X	
4.14.4.6 Charging cable	Visual inspection and by operation.	(a) Deteriorated	X		

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		(b) Charging cable not provided	X		
4.14.5. High voltage electrical and electronical equipment (X)[2]					
4.14.5.1. High voltage electrical and electronical equipment	Visual inspection and by using the electronic vehicle interface.	(a) Slightly deteriorated Heavily deteriorated	X	 X	
		(b) Attachment defective		X	
		(c) Leaking		X	
4.14.5.2. Traction motor	Visual inspection Check of operational readiness of the systems by an applicable interface (OBD or OBM) Measurement of equipotential bonding, where made possible by the technical characteristics of the vehicle	(a) Shield is deformed, not in-place or damaged, or corroded		X	
		(b) Warning marking missing or illegible		X	
		(c) Connection of wiring harness insecure or corroded		X	
		(d) Electrical insulation damaged or deteriorated likely to cause injury when contacted.		X	 X
		(e) Fault readiness of the traction motor		X	
		(f) Wrong version of type-approved hardware and software not in accordance with the requirements as defined in the ECE R100		X	
4.14.5.3 Electronic converters, motor, and inverter	Visual inspection Check of operational readiness of the systems by an applicable interface (OBD or OBM) Measurement of equipotential bonding, where made possible by the technical characteristics of the vehicle	(a) Not in accordance with requirements[1]		X	
		(b) Inadequately secured		X	
		(c) Damaged or corroded components Likely to cause injuries or to fall off	X	 X	
		(d) Shields not in place or damaged		X	
		(e) Damaged or deteriorated electrical insulation		X	
		(f) Fault readiness of the converter and inverter systems		X	
		(g) Wrong version of type-approved hardware and software		X	

4.14.6. Insulation resistance (X)[2]						
4.14.6.1. Insulation resistance of the vehicle charging inlet and resistance of the protective earthing	Read insulation resistance by the electronic vehicle interface, where made possible by the technical characteristics of the vehicle and where the necessary data is made available	(c) Insulation resistance is not in accordance with requirements or predefined values from the vehicle manufacturer		X		
		(d) Resistance of the protective earthing is not in accordance with requirements		X		
4.14.6.2. Insulation resistance between the high-voltage system and chassis	Visual inspection Read insulation resistance by the electronic vehicle interface, where made possible by the technical characteristics of the vehicle and where the necessary data is made available	(c) Insulation monitoring system shows malfunction		X		
		(d) Insulation resistance value not in accordance with requirements		X		
4.14.7. Anti-starting system						
4.14.7.1. Anti-starting system	Visual inspection and by operation when possible. Functional check by verifying that the vehicle cannot move by itself with the charging cable plugged, and the driver's weight lifted out of the seat	(a) Indicator malfunction	X			
		(b) Inoperative, i.e., vehicle can move with connected charging cable or with no driver present		X		

';

(xxiv) in the table, item 5.1.3 is replaced by the following:

'

5.1.3. Wheel bearings (+ E)	Visual inspection using. wheel play detectors if available. Rock the wheelor apply a lateral force to each wheel and note the amount of upwardmovement of the wheel relative to the stub axle.	(a) Excessive play in a wheel bearing. Directional stability impaired; danger of demolishment.		X	X
		(b) Wheel bearing too tight, jammed. Danger of overheating; danger of demolishment.		X	X
		(a) Audible signs of bearing wear or damage.		X	

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(xxv) in the table, items 7.1.3, 7.1.4, 7.1.5, and 7.1.6 are deleted;

(xxvi) in the table, item 7.8 is replaced by the following:

‘

7.8. Speedometer	Visual inspection or by operation during road test or by using the electronic vehicle interface, or any combination of these.	(a) Not fitted in accordance with the requirements[1]. Missing (if required).	X	 X	
		(b) Operation impaired. Not operational at all.	X	 X	
		(c) Not capable of being sufficiently illuminated. Not capable of being illuminated at all.	X	 X	

’;

(xxvii) in the table, items 7.9 and 7.10 are deleted;

(xxviii) in the table, item 7.11 is replaced by the following:

‘

7.11. Odometer, if available	Visual inspection, and/or using electronic interface (OBD or OBM)	(a) Obviously manipulated (fraud) to reduce or misrepresent the vehicle's distance record.		X	
		(b) Obviously inoperative.		X	

’;

(xxix) in the table, items 7.12 and 7.13 are deleted;

(xxx) in the table, items 8.1 and 8.2 are replaced by the following:

8.1. Noise

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8.1.1. Noise suppression system (+E)	For L-category vehicles powered by internal combustion engines, visual inspection and measurement of noise emitted by stationary vehicle using a sound level meter. For other vehicles, subjective evaluation (unless the inspector considers that the noise level may be borderline, in which case a measurement of noise emitted by stationary vehicle using a sound level meter may be conducted).	(a) Noise levels in excess of those permitted in the requirements[1].		X	
		(b) Any part of the noise suppression system loose, damaged, incorrectly fitted, missing or obviously modified in a way that would adversely affect the noise levels. Very serious risk of falling off.		X	X
	Measurement using remote sensing equipment	(c) Remote sensing measurement showing significant non-compliance.		X	
8.2. Exhaust emissions					
8.2.1. Exhaust emissions control equipment	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface (OBD or OBM read-out)	(a) Emission control equipment fitted by the manufacturer absent, modified or obviously defective.		X	
		(b) Leaks which would affect emission measurements.		X	
		(c) Warning device malfunctioning, warning indicator / tell-tale inoperative.		X	
		(d) MIL activated, warning device shows system malfunction.		X	
		(e) System indicates failure via the electronic vehicle interface.		X	
		(f) Exhaust emission control unit modified affecting safety and/or the environment.		X	
		(g) Any other emission relevant control unit modified affecting safety and/or the environment.		X	
		(h) Presence of electronic devices not authorised by the vehicle manufacturer nor approved during homologation changing signals to or from the engine or pollution control unit(s).		X	

		(i) Insufficient reagent, if applicable.		X	
		(j) OBD or OBM read-out indicating significant malfunction.		X	

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Item	Method	Reasons for failure	Assessment of deficiencies		
			Minor	Major	Dangerous
8.2.2 Exhaust emission measurement – positive ignition engines	Test procedures: For vehicles that had a particle number (PN) limit at type-approval; Euro VI, Euro 6c and newer: Particle number (PN) measurement in accordance with 8.2.2.1. For all vehicles: Gaseous emissions test in accordance with 8.2.2.2. For vehicles as of emission classes Euro VI, Euro 6d-TEMP and newer: NO_X measurement in accordance with 8.2.2.3.				
8.2.2.1 Particle number measurement (E)	Vehicle preconditioning: — [to be specified in accordance with the delegated acts referred to in Article 21]. Measuring instrument preparation: — The device to measure PN is powered on for at least the warm-up time indicated by the manufacturer; — Self-checks of the instrument [to be specified in accordance with the delegated acts referred to in Article 21], to monitor the proper operation of the instrument during operation and trigger a warning or message in case of malfunction; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage. Test procedure:	Measurement result exceeds [to be specified in accordance with the delegated acts referred to in Article 21] ($1/cm^3$).		X	

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— The software of the particle counter automatically guides the instrument operator through the test procedure; — The probe is inserted at least 0,20 m into the outlet of the exhaust system. In justified exemptions where sampling at this depth is not possible, the probe is inserted at least 0,05 m. The sampling probe shall not touch the walls of the tailpipe; — If the exhaust system has more than one outlet, the test shall be done to all of them. In this case, the highest measured PN concentration measured at different exhaust system outlets shall be considered as the vehicle's PN concentration; — The vehicle operates [as specified in accordance with the delegated acts referred to in Article 21]. In case the engine of a vehicle is not switched on at static conditions then the start/stop system shall be deactivated by the test operator. For hybrid and plug-in hybrid vehicles, the thermal engine shall be switched on; — After the probe has been inserted into the tailpipe, the following steps shall be followed: 1. A stabilization period of at least 15 seconds with the engine running at idle speed. 2. After the stabilisation period, the PN concentration emissions are measured. The duration of the test shall be at least [XX] seconds (total measurement duration) [to be specified in accordance with the delegated acts referred to in Article 21]. After the completion of the test procedure, the instrument reports (and stores) the PN concentration of the vehicle and a "PASS" or "FAIL" message:				

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	— If the test result is less than or equal to the limit, the instrument reports a "PASS" message. — If the test result is greater than the limit, the instrument reports a "FAIL" message.				
8.2.2.2. Gaseous emissions (E)	Measurement using an exhaust gas analyser in accordance with the requirements[1]. Measurements not applicable for two-stroke engines. Alternatively, measurement using remote sensing equipment and confirmed by standard test methods.	(a) Either gaseous emissions exceed the specific levels given by the manufacturer;		X	
		(b) Or, if this information is not available, the CO emissions exceed, (i) for vehicles not controlled by an advanced emission control system, — 4,5 %, or — 3,5 % according to the date of first registration or use specified in requirements[1]. (ii) for vehicles controlled by an advanced emission control system, — at engine idle: 0,5 % — at high idle: 0,3 % or — at engine idle: 0,3 % ([7]) — at high idle: 0,2 % or — at engine idle: 0,2 % ([8]) — at high idle: 0,1 % according to the date of first registration or use specified in requirements[1].		X	
		(c) Lambda coefficient outside the range 1 ± 0,03 or not in accordance with the manufacturer's specification;		X	
8.2.2.3. NO_X measurement (E)	Vehicle preconditioning: [to be specified in accordance with the delegated acts referred to in Article 21]; - […] Measuring instrument preparation: — [to be specified in accordance with the delegated acts referred to in Article 21) or	(a) Measurement result exceeds [NO_X limit to be specified in accordance with the delegated acts referred to in Article 21].		X	

	combined with PN measurement in accordance with 8.2.2.1]; — Self-checks of the instrument [to be specified in accordance with the delegated acts referred to in Article 21]; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage. Test procedure: — [to be specified in accordance with the delegated acts referred to in Article 21 or combined with PN measurement in accordance with 8.2.2.1]; Alternatively, measurement using remote sensing equipment and confirmed by standard test methods in accordance with item 8.2.2. in this table or with item 8.2.2 in point 3 of Annex I to Directive 2014/45/EU.	(b) OBD or OBM read-out indicating significant malfunction.		X	

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Item	Method	Reasons for failure	Assessment of deficiencies		
			Minor	Major	Dangerous
8.2.3 Exhaust emission measurement – compression ignition engines	Test procedures: For vehicles as of emission classes Euro 5b and Euro VI and newer: PN measurement in accordance with 8.2.3.1 For vehicles up to emission classes Euro 5a and Euro V: Opacity measurement in accordance with 8.2.3.2. For vehicles equipped with particle filters, Member States may apply PN measurement in accordance with 8.2.3.1 instead of opacity measurement. For vehicles as of emission classes Euro 6d-TEMP and Euro VI and newer: NO_X measurement in accordance with 8.2.3.3.				
8.2.3.1 Particle number measurement (E)	Vehicle preconditioning: At the beginning of the test the vehicle's engine should be: — Hot, i.e., engine coolant temperature above 60 °C but preferably above 70 °C — Conditioned, by operating for a period of time at low idling and/or performing stationary accelerations up to maximum 2 000 rpm engine speed or by driving. The recommended total conditioning time is at least 300 seconds. During the test, the vehicle shall not be performing an active particulate filter regeneration. A fast pass test is possible with engine coolant temperature below 60 °C. However, if the vehicle fails to pass the test, the test shall be repeated, and the vehicle should fulfil the requirements set for the engine coolant temperature and the conditioning. Measuring instrument preparation: — The instrument is powered on for at least the warm-up time indicated by the manufacturer;	Measurement result exceeds 250 000 ($1/cm^3$) For vehicles up to emission class Euro 5a and Euro V, equipped with particle filters, Member States may apply a limit up to 1 000 000 ($1/cm^3$)		X	

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	— Self-checks of the instrument as defined in Section 5 of Commission Recommendation (EU) 2023/688, as adopted on 20 March 2023, to monitor the proper operation of the instrument during operation and trigger a warning or message in case of malfunction; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage. Test procedure: — The software of the particle counter automatically guides the instrument operator through the test procedure; — The probe is inserted at least 0,20 m into the outlet of the exhaust system. In justified exemptions where sampling at this depth is not possible, the probe is inserted at least 0,05 m. The sampling probe shall not touch the walls of the tailpipe; — If the exhaust system has more than one outlet, the test shall be done to all of them. In this case, the highest measured PN concentration measured at different exhaust system outlets shall be considered as the vehicle's PN concentration; — The vehicle operates at low idling. In case the engine of a vehicle is not switched on at static conditions then the start/stop system shall be deactivated by the test operator. For hybrid and plug-in hybrid vehicles, the thermal engine shall be switched on; — After the probe has been inserted into the tailpipe, the following steps shall be followed: 1. A stabilization period of at least 15 seconds with the engine running at idle speed. Optionally, before the stabilization period 2-3 accelerations up to maximum 2 000 rpm engine speed are performed, 2. After the stabilisation period, the PN concentration emissions are measured. The duration of the test shall be at least 15 seconds (total measurement duration). The test result shall be the average PN concentration of the measurement duration. If the measured PN concentration is more than two times the limit, the measurement may stop immediately before waiting for 15 seconds to elapse. The test result shall be reported.				

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	After the completion of the test procedure, the instrument reports (and stores) the average PN concentration of the vehicle and a “PASS” or “FAIL” message: — If the test result is less than or equal to the limit, the instrument reports a “PASS” message. — If the test result is greater than the limit, the instrument reports a “FAIL” message.				
8.2.3.2. Opacity Vehicles registered or put into service before 1 January 1980 are exempted from this requirement	Exhaust gas opacity to be measured during free acceleration (no load from idle up to cut-off speed) with gear lever in neutral and clutch engaged and, if specified in accordance with the type-approval regulations, reading of OBD in accordance with the manufacturer's recommendations and other requirements. Vehicle preconditioning: 1. Vehicles may be tested without preconditioning, although for safety reasons checks should be made that the engine is warm and in a satisfactory mechanical condition.	(a) For vehicles registered or put into service for the first time after the date specified in requirements[1]. opacity exceeds the level recorded on the manufacturer's plate on the vehicle;		X	

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Item	Method	Reasons for failure	Assessment of deficiencies		
			Minor	Major	Dangerous
	2. Preconditionrequirements: (i) Engine shall be fully warm, for instance the engine oil temperature measured by a probe in the oil level dipstick tube to be at least 80 °C, or normal operating temperature if lower, or the engine block temperature measured by the level of infrared radiation to be at least an equivalent temperature. If, owing to the vehicle configuration, this measurement is impractical, the establishment of the engine's normal operating temperature may be made by other means, for example by the operation of the engine cooling fan. (ii) Exhaust system shall be purged by at least three free acceleration cycles or by an equivalent method.	(b) Where this information is not available or requirements[1] do not allow the use of reference values, — for naturally aspirated engines: 2,5 m^{-1}, — for turbo-charged engines: 3,0 m^{-1}, or — for vehicles identified in requirements[1] or first registered or put into service for the first time after the date specified in requirements[1]: 1,5 m^{-1} ([9]) or 0,7 m^{-1} ([8])			
	Test procedure: 1. Engine and any turbocharger fitted, to be at idle before the start of each free acceleration cycle. For heavy-duty diesels, this means waiting for at least 10 seconds after the release of the throttle. 2. To initiate each free acceleration cycle, the throttle pedal must be fully depressed quickly and continuously (in less than one second) but not violently, so as to obtain maximum delivery from the injection pump.				

Item	Method	Reasons for failure	Assessment of deficiencies		
			Minor	Major	Dangerous
	3. During each free acceleration cycle, the engine shall reach cut-off speed or, the speed specified by the manufacturer or, if this data is not available, then two thirds of the cut-off speed, before the throttle is released. This could be checked, for instance, by monitoring engine speed or by allowing a sufficient time to elapse between initial throttle depression and release, which in the case of vehicles of categories M_2, M_3, N_2 and N_3, should be at least two seconds. 4. Vehicles shall only be failed if the arithmetic means of at least the last three free acceleration cycles are in excess of the limit value. This may be calculated by ignoring any measurement that departs significantly from the measured mean, or the result of any other statistical calculation that takes account of the scattering of the measurements. Member States may limit the number of test cycles. 5. To avoid unnecessary testing, Member States may fail vehicles which have measured values significantly in excess of the limit values after fewer than three free acceleration cycles or after the purging cycles. Equally to avoid unnecessary testing, Member States may pass vehicles which have measured values significantly below the limits after fewer than three free acceleration cycles or after the purging cycles. Alternatively, measurement usingremote sensing equipment and confirmed by standard test methods in accordance with item 8.2.3 of this table or with item 8.2.3 in point 3 of Annex I to Directive 2014/45/EU.				

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Item	Method	Reasons for failure	Assessment of deficiencies		
			Minor	Major	Dangerous
8.2.3.3. NO_X measurement (E)	Vehicle preconditioning: Prior to testing, the vehicle's exhaust aftertreatment system shall be warmed up, to the conditions that allow effective abatement of NO_X emissions by the selective catalytic reduction (SCR) unit of the vehicle by at least a 5-minute drive or an equivalent method. Once the condition is reached, the vehicle shall not be turned off and the measurement shall be performed within 3 minutes for M_1 and N_1 vehicles and within 3.5 minutes for M_2, M_3, N_2 and N_3 vehicles. Where possible, the vehicle's readiness to be tested shall be ascertained by checking the indicator lamp on the dashboard or via the vehicle interface (OBD or OBM read-out). During the test, the vehicle shall not be performing an active particulate filter regeneration. Measuring instrument preparation: — The device to measure NO_X emissions is powered on for at least the warm-up time indicated by the manufacturer; — Self-checks of the instrument [to be specified in accordance with the delegated acts referred to in Article 21] to monitor the proper operation of the instrument during operation and trigger a warning or message in case of malfunction; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage.	(a) Measurement result exceeds 40 ppm		X	

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	Test procedure: — The software of the NO_X analyser automatically guides the instrument operator through the test procedure; — The probe is inserted at least 0,20 m into the outlet of the exhaust system. In justified exemptions where sampling at this depth is not possible, the probe is inserted at least 0,05 m. The sampling probe shall not touch the walls of the tailpipe; — If the exhaust system has more than one outlet, the test shall be done to all of them. In this case, the highest measured NO_X concentration measured at different exhaust system outlets shall be considered as the vehicle's NO_X concentration; — The vehicle operates at low idling; — After the probe has been inserted into the tailpipe, the following steps shall be followed: 1. A stabilization period of at least 15 seconds with the engine running at idle speed. 2. After the stabilisation period, the NO_X concentration emissions are measured. The duration of the test shall be at least 15 seconds (total measurement duration). The test result shall be the average NO_X concentration of the measurement duration. After the completion of the test procedure, the instrument reports (and stores) the average NO_X concentration of the vehicle and a "PASS" or "FAIL" message: — If the test result is less than or equal to the limit, the instrument reports a "PASS" message. — If the test result is greater than the limit, the instrument reports a "FAIL" message. Alternatively, measurement usingremote sensing equipment and confirmed by standard test methods in accordance with item 8.2.3 in this table or item 8.2.3 in point 3 of Annex I to Directive 2014/45/EU.				

(xxxi) in the table, item 8.4.1, is replaced by the following:

8.4.1. Fluid leaks	Visual inspection	Any excessive fluid leak, other than water, likely to harm the environment or to pose a safety risk to other road users. Steady formation of drops that constitutes a very serious risk.		X	 X

(xxxii) in the table, the following item 10 is added:

‘

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10. ELECTRONIC SAFETY SYSTEMS					
10.1. Cornering light Description: during cornering, an extra headlamp is activated. Operates up to 40 km/h, for example in accordance with UNECE-R 48 or UNECE-R 119.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.2 Adaptive cruise control Description: The system maintains the vehicle's speed, depending on the preferred speed and distance to the vehicle in front.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged, or sensors obviously misaligned		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.3 Adaptive deflectors Description: Depending on the vehicle's speed, the air deflectors are adjusted in order to improve driving stability.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X

10.4 Airbag Description: In case of an accident, inflatable airbags reduce the risk of injury by their absorbing effect, for example in accordance with UNECE-R 12; UNECE-R 14; or UNECE-R 16.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or components (for example seat occupancy detection) obviously missing.		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
		(g) System or components obviously not operating (for example not suitable with the vehicle)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
10.5 Active Headrest Description: the system reduces the danger of a whiplash injury in the event of a rear end collision by changing the position of the headrest towards the head.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
		(g) System or components not operating, where applicable, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
10.6 Active hood Description: by automatically lifting the bonnet, the system ensures a larger collapsible zone in the event of an accident involving a pedestrian.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating (for example outdated), where applicable, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.7 Automatic hold function Description: the system independently holds the vehicle after stopping using the service brake and/or parking brake and automatically releases them when starting.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.8 Automatic headlamp levelling Description: depending on the load and (optional) pitch angle, the system regulates the headlamp's vertical aim, for example in accordance with UNECE-R 121.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.9 Automatic emergency braking system Description: the system independently starts braking in order to avoid a collision with an obstacle or another road user, or to reduce the consequences of an inevitable impact.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged, or sensors obviously misaligned		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operative (for example audio components)		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.10 Anti-lock braking system Description: the system automatically prevents wheel-locking during braking by selective reduction of the wheel brake force, for example in accordance with UNECE-R 13 and Regulation (EU) 2019/2144.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components (for example wheel speed sensor) damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.11 Automatic light Description: depending on the ambient brightness, the system automatically switches on and off the driving light.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.12 Electro-mechanic power steering Description: the supporting power for steering is generated by an electric motor.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating (for example Power assistance not working), or implausible operation (for example inconsistency between the angle of the steering wheel and the angle of the wheels.) Steering affected		X	X

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.13 Electronic four-wheel steering Description: two axles are steered, with a steering angle greater than 3° on all steered wheels, for example in accordance with UNECE-R 79 and Regulation (EU) 2019/2144.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.14 Electronic damping Description: depending on the driving situation, the rebound and compression stage of the shock absorbers is adjusted by the system.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.15 Electronic brake system Description: a brake pedal sensor and/or pressure sensor records the braking request and calculates the optimal brake force for each wheel, so that there is optimal activation of all wheel brakes.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface, or by road test.	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.16 Electronic stability program Description: the system stabilizes the vehicle or the complete vehicle train in critical, dynamic driving situations, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 140.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component (for example wheel speed sensors) missing		X	
		(b) System or components (for example wheel speed sensors) damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.17 High beam assist Description: the system automatically activates and deactivates the high beam according to the driving situation and lighting conditions.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.18 Speed limiter Description: While driving, the system prevents exceeding a defined maximum speed. Relevant, if mandatory, for example in accordance with UNECE-R 89 and Regulation (EU) 2019/2144.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing (for example seals, plaques), or not fitted in accordance with the requirements.		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation (for example tampered or manipulated, or size of tyres not compatible with calibration parameters, or incorrect set speed, if checked).		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.19 Belt tensioner and belt force limiter Description: In the event of an accident, the seat belt is tensioned to place the passengers in a setpoint position and/or limits the belt force, electrically controlled and, thus, limits the forces acting on the persons for example in accordance with UNECE-R 16 or UNECE-R 94.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing, or not suitable with the vehicle		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
		(g) System or components not operating, where applicable, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board	X	X	X
10.20 Taillight switching Description: Depending on operating status and/or failure of the illuminants, lighting functions are taken over by other luminaires.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.21 Bending light Description: during cornering and depending on the steering angle and speed, the light beam is swivelled and/or an additional headlight is activated, for example in accordance with UNECE-R 48; UNECE-R 98; UNECE-R 112; or UNECE-R 123.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.22 Steering assist Description: depending on the driving situation, the steering angle is automatically changed, without intervention by the driver. Relevant if the steering intervention occurs at a speed of more than 15 km/h, for example in accordance with UNECE-R 79.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operative (for example audio components)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.23 Height levelling Description: the system changes the clearance between vehicle chassis and the road.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

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		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.24 Emergency braking signal Description: during strong deceleration, hazard warning lights and/or additional luminous surfaces are activated and/or the following traffic is warned by flashing brake lights, for example in accordance with UNECE-R 48 or UNECE-R 13.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(f) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.25 Pre-crash system Description: in a critical driving situation, the vehicle is prepared for the crash so that the risk of injury to the passengers and/or other road users is reduced.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation (for example power windows)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.26 Tyre pressure warning Description: the system detects loss of tyre pressure through integrated sensors and/or by implausible values for wheel speed, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 141.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.27 Traction control Description: the system prevents the drive wheels spinning during acceleration by applying brake force.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.28 Superimposed steering Description: depending on the driving situation, the system varies the transmission ratio of the steering.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating (for example Power assistance not working), or implausible operation (for example inconsistency between the angle of the steering wheel and the angle of the wheels.) Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.29 Roll over protection (active) Description: in the event of an imminent rollover, support elements	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the	(a) System or any component missing		X	
		(b) System or components damaged		X	

are extended to secure the survival space, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 21.	necessary data is made available, with the use of electronic interface	(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.30 Hydrogen installation Description: the hydrogen is stored in the vehicle and is used to propel the vehicle, either by combustion in an internal combustion engine or by conversion in a fuel cell with an additional electric engine.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.31 Start-up aid Description: aiding start-up, for example by raising the lift axle or by momentarily applying brake pressure or by automatic release of the parking brake.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.32 Trailer stabilization Description: through selective braking of the trailer by the service brakes, the complete vehicle train is stabilised.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.33 Endurance brake Description: an additional braking system that can maintain braking over a period of time without a significant reduction in performance, for example in accordance with UNECE-R 13 and Regulation (EU) 2019/2144.	Visual inspection (with command activated and not activated, if possible) complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing (for example Insecure connectors or mountings)		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(j) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.34 Differential lock deactivation Description: when this system is activated, the differential locks are unlocked depending on parameters (for example wheel slip, steering angle, speed).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.35 Electronically controlled leading and trailing axle Description: the steered axles are	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the	(a) System or any component missing		X	
		(b) System or components damaged		X	

additional axles with electronically controlled steering. The steering force is generated by a hydraulic pump or by the lateral force on the wheels.	necessary data is made available, with the use of electronic interface	(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.36 Electronic steering damper Description: Steering damping is controlled electronically.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	

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		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.37 Bus stop brake Description: the system ensures the application of brake pressure when stationary, independent of the brake pedal activation. Buses can only start moving when the doors are closed.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.38 Kneeling Description: the system allows a road vehicle to be lowered to make it easier for passengers to board and disembark.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.39 Steering brake Description: during cornering, dosed braking is applied to one or more wheels.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation Steering affected		X	X
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.40 Tyre pressure control Description: according to the requirement of the driver, the system regulates the tyre pressure.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.41 Sliding joint stabilisation Description: The articulated joint is stabilised by damping, depending on vehicle speed, cylinder pressure of the articulated dampers, steering and articulation-angle.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.42 Four-wheel parking brake Description: the system applies the maximum brake pressure in the wheel cylinders at all four wheels.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.43 Front-wheel locking device Description: front wheel suspension, which permits lateral inclination of the motorcycle, can be locked and unlocked by an electric actuator. Above a certain speed, it is automatically unlocked.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.44 Adaptive headlights Description: the illumination of the surrounding road area and/or the direct illumination of road users in the danger area in front of the vehicle is optimised by dynamic adaption of the light beams.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.45 Electrically actuated parking brake Description: the parking brake function is triggered or transmitted electronically or electromechanically.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.46 Lane change assistance Description: at a lane change, the system warns the driver about vehicles in the next lane and steers the vehicle back.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.47 Lane keeping assistance Description: the system warns the driver when the vehicle is unintentionally leaving its lane and steers the vehicle back, e.g. in accordance with Regulation (EU) 2019/2144 and Commission Implementing Regulation (EU) 2021/646*.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.48 Automatic eCall Description: the system is triggered automatically by in-vehicle sensors or manually, it transmits a minimum set of data (EN 15722) via mobile communication network and establishes an audio connection based on the (emergency) number	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

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between the vehicle passengers and the public safety answering point, in accordance with Regulation (EU) 2015/758 of the European Parliament and of the Council**, and Commission Delegated Regulation (EU) 2017/79***.	The verification of the minimum set of data (MSD) includes checking whether: - the mandatory fields are filled with plausible information; - the deviation between in-vehicle system (IVS) location and true location is less than 150 meters. The calculation can be done according to point 2.5 of Annex I of Commission Delegated Regulation (EU) 2017/79; - the deviation between the MSD timestamp and the timestamp of the reading is less than 60s.	(e) Warning device (eCall MIL) shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation	X		
		Affecting safe operation of the vehicle		X	
		Danger to health of persons on board			X
		(g) System or components not operating, or implausible operation: - audio components (for example failing echo-test); - minimum set of data incorrect		X	
		(h) Other failure (for example mobile network communication device, electronic control unit, or GPS signal failure) Not affecting the safe operation	X		
		Affecting safe operation of the vehicle		X	
		Danger to health of persons on board			X
10.49 Active roll stabilisation Description: via appropriate actuators the system produces a roll movement which counters the vehicle's body roll movement depending on the current driving situation.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation	X		
		Affecting safe operation of the vehicle		X	
		Danger to health of persons on board or of other road users			X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.50 Camera monitor Description: the system which generates at least a part of the indirect field of vision by a camera monitor combination (for example in accordance with UNECE-R 46).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.51 Acoustic vehicle alerting Description: at low speed, the system generates an external, specific sound in order to warn, for example pedestrians.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operative, or not respecting type-approved noise levels		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.52 Basic exterior lights Description: the system switches on/switches off the basic lighting devices (for example indicators).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.53 Automated lane keeping system (ALKS) Description: a system which is activated by the driver, and which keeps the vehicle within its lane by controlling the lateral and longitudinal movements of the vehicle for extended periods without the need for further driver input (for example in accordance with UNECE-R 157).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.54 Turning assistant Description: a system to inform the driver of a possible collision with a traffic participant (for example bicycle) near side (for example in accordance with UNECE-R 151).	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.55 Tachograph Description: a system to record the driving time, breaks, rest periods as well as periods of other work undertaken by a driver, for example, in accordance with Regulation (EU) No 165/2014 of the European Parliament and of the Council****.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing (for example seals, plaques), or not fitted in accordance with the requirements (for example plaque out of date).		X	
		(b) System or components damaged (for example illegible plaque)		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation (for example tampered or manipulated, or size of tyres not compatible with calibration parameters, or incorrect set speed, if checked).		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.56 Intelligent speed assistance Description: system to aid the driver in maintaining the appropriate speed for the road environment by providing dedicated and appropriate feedback, for example in accordance with Regulation (EU) 2019/2144 and Commission Delegated Regulation (EU) 2021/1958*****.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(g) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.57 Reversing detection Description: system to make the driver aware of people and objects at the rear of the vehicle with the primary aim of avoiding collisions when reversing, for example in	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

accordance with Regulation (EU) 2019/2144 and UNECE-R 158.		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.58 Driver drowsiness and attention warning Description: system that assesses the driver's alertness through vehicle systems analysis and warns the driver if needed, for example in accordance with Regulation (EU) 2019/2144 and Commission Delegated Regulation (EU) 2021/1341******.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	

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		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.59 Advanced driver distraction warning Description: system that helps the driver to continue to pay attention to the traffic situation and that warns the driver when he or she is distracted, for example in accordance with Regulation (EU) 2019/2144 and Commission Delegated Regulation (EU) 2023/2590*******.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
10.60 Event data recorder Description: system with the only purpose of recording and storing critical crash-related parameters and information shortly before, during and immediately after a collision, for example in accordance with Regulation (EU) 2019/2144,	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	

Commission Delegated Regulation (EU) 2022/545********, and UNECE-R 160.		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation	X		
		(g) System or components not operating, or implausible operation (for example data not accessible)		X	
		(h) Other failure Not affecting the safe operation	X		
10.61 Automated driving system Description: systems that are capable of performing the entire dynamic driving task of the fully automated vehicle on a sustained basis, for example in accordance with Regulation (EU) 2019/2144 and Commission Implementing Regulation (EU) 2022/1426*********.	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the necessary data is made available, with the use of electronic interface	(a) System or any component missing		X	
		(b) System or components damaged		X	
		(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
		(g) System or components not operating, or implausible operation (for example HMI)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	 X	 X
10.62 Driver availability monitoring systems (automated driving) Description: System that assesses	Visual inspection complemented, where made possible by the technical characteristics of the vehicle and where the	(a) System or any component missing		X	
		(b) System or components damaged		X	

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whether the driver is capable of taking over the driving function of a self-driving vehicle, if necessary, in certain situations, for example in accordance with Regulation (EU) 2019/2144 and UNECE-R 157.	necessary data is made available, with the use of electronic interface	(c) Software version or -integrity incorrect		X	
		(d) Wiring damaged		X	
		(e) Warning device shows system malfunction.		X	
		(f) System indicates failure via the electronic vehicle interface Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X
		(g) System or components not operating, or implausible operation (for example HMI)		X	
		(h) Other failure Not affecting the safe operation Affecting safe operation of the vehicle Danger to health of persons on board or of other road users	X	X	X

* Commission Implementing Regulation (EU) 2021/646 of 19 April 2021 laying down rules for the application of Regulation (EU) 2019/2144 of the European Parliament and of the Council as regards uniform procedures and technical specifications for the type-approval of motor vehicles with regard to their emergency lane-keeping systems (ELKS) (OJ L 133, 20.4.2021, p. 31, ELI: http://data.europa.eu/eli/reg_impl/2021/646/oj).

** Regulation (EU) 2015/758 of the European Parliament and of the Council of 29 April 2015 concerning type-approval requirements for the deployment of the eCall in-vehicle system based on the 112 service and amending Directive 2007/46/EC (OJ L 123, 19.5.2015, p. 77, ELI: http://data.europa.eu/eli/reg/2015/758/oj).

*** Commission Delegated Regulation (EU) 2017/79 of 12 September 2016 establishing detailed technical requirements and test procedures for the EC type-approval of motor vehicles with respect to their 112-based eCall in-vehicles systems, of 112-based eCall in-vehicle separate technical units and components and supplementing and amending Regulation (EU) 2015/758 of the European Parliament and of the Council with regard to the exemptions and applicable standards (OJ L 12, 17.1.2017, p. 44, ELI: http://data.europa.eu/eli/reg_del/2017/79/oj).

**** Regulation (EU) No 165/2014 of the European Parliament and of the Council of 4 February 2014 on tachographs in road transport, repealing Council Regulation (EEC) No 3821/85 on recording equipment in road transport and amending Regulation (EC) No 561/2006 of the European Parliament and of the Council on the harmonisation of certain social legislation relating to road transport (OJ L 60, 28.2.2014, p. 1, ELI: http://data.europa.eu/eli/reg/2014/165/oj).

***** Commission Delegated Regulation (EU) 2021/1958 of 23 June 2021 supplementing Regulation (EU) 2019/2144 of the European Parliament and of the Council by laying down detailed rules concerning the specific test procedures and technical requirements for the type-approval of motor vehicles with regard to their intelligent speed assistance systems and for the type-approval of those systems as separate technical units and amending Annex II to that Regulation (OJ L 409, 17.11.2021, p. 1, ELI: http://data.europa.eu/eli/reg_del/2021/1958/oj).

****** Commission Delegated Regulation (EU) 2021/1341 of 23 April 2021 supplementing Regulation (EU) 2019/2144 of the European Parliament and of the Council by laying down detailed rules concerning the specific test procedures and technical requirements for the type-approval of motor vehicles with regard to their driver drowsiness and attention warning systems and amending Annex II to that Regulation (OJ L 292, 16.8.2021, p. 4, ELI: http://data.europa.eu/eli/reg_del/2021/1341/oj).

******* Commission Delegated Regulation (EU) 2023/2590 of 13 July 2023 supplementing Regulation (EU) 2019/2144 of the European Parliament and of the Council by laying down detailed rules concerning the specific test procedures and technical requirements for the type-approval of certain motor vehicles with regard to their advanced driver distraction warning systems and amending that Regulation (OJ L, 2023/2590, 22.11.2023, ELI: http://data.europa.eu/eli/reg_del/2023/2590/oj).

******** Commission Delegated Regulation (EU) 2022/545 of 26 January 2022 supplementing Regulation (EU) 2019/2144 of the European Parliament and of the Council by laying down detailed rules concerning the specific test procedures and technical requirements for the type-approval of motor vehicles with regard to their event data recorder and for the type-approval of those systems as separate technical units and amending Annex II to that Regulation (OJ L 107, 6.4.2022, p. 18, ELI: http://data.europa.eu/eli/reg_del/2022/545/oj).

********* Commission Implementing Regulation (EU) 2022/1426 of 5 August 2022 laying down rules for the application of Regulation (EU) 2019/2144 of the European Parliament and of the Council as regards uniform procedures and technical specifications for the type-approval of the automated driving system (ADS) of fully automated vehicles (OJ L 221, 26.8.2022, p. 1, ELI: http://data.europa.eu/eli/reg_impl/2022/1426/oj).

(2) Annex III is amended as follows:

The first sentence in Chapter II, Section 3, is replaced by the following:

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‘Table 1 sets out rules that shall be applied during a cargo securing inspection to determine whether the condition of the transport is acceptable.’;

(3) Annex IV is amended as follows:

(a) on the front side of the form, point 6 is replaced by the following:

‘6. Category of vehicle[(a)]

(a) N_1 (up to 3,5 t) □

(b) N_2 (3,5 to 12 t) □

(c) N_3 (more than 12 t) □

(d) O_3 (3,5 to 10 t) □

(e) O_4 (more than 10 t) □

(f) M_2 (more than 9 seats[(b)], up to 5 t) □

(g) M_3 (more than 9 seats[(b)], more than 5 t) □

(h) T1b □

(i) T2b □

(j) T3b □

(k) T4.1b □

(l) T4.2b □

(m) T4.3b □

(n) Other vehicle category:

(please specify).’;

(b) point 10 is amended as follows:

(i) point (10) is replaced by the following:

‘(10) Electronic safety systems[(f)]’;

(ii) the following point (11) is added:

(11) Cargo securing[(f)]’;

(c) the reverse side of the form is amended as follows:

(i) the following item 4.14 is inserted:

‘4.14 High-voltage systems

4.14.1 Electrical safety

4.14.2 Traction battery cover

4.14.3 Traction battery

4.14.4 High-voltage electrical wiring

4.14.5 High-voltage electrical and electronical equipment

4.14.6 Insulation resistance

4.14.7 Anti-starting system’;

(ii) items 8.2.1 to 8.2.2.2 are replaced by the following:

‘8.2.1 Exhaust emissions control equipment

8.2.2 Exhaust emission measurement – positive ignition engines

8.2.2.1 Particle number measurement

8.2.2.2 Gaseous emissions

8.2.2.3 NO_X measurement

8.2.3 Exhaust emission measurement – compression ignition engines

8.2.3.1 Particle number measurement

8.2.3.2 Opacity

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8.2.3.3 NO_X measurement';

(iii) the following item 10 is added:

'10. Electronic safety systems in accordance with Annex II to Directive 2014/47/EU'.

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(4) Annex V is replaced by the following:

'*ANNEX V*

STANDARD FORM FOR REPORTING TO THE COMMISSION

The standard form shall be drawn up in a computer-processable format and transmitted by electronic means using standard office software.

Each Member State shall produce both the following tables:

(a) one summary table per year;

(b) for each country of registration of vehicles checked in a more detailed inspection, a separate table containing information on checked and detected deficiencies for each vehicle category.

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Summary table

of all (initial and more detailed) inspections

Reporting Member State: Reporting period year [X]

Vehicle Category:	N_1		N_2		N_3		M_2		M_3		O_3		O_4		T1b, T2b, T3b, T4.1b, T4.2b, and T4.3b		Other categories (optional)		Total	
Country of registration	Number of vehicles checked [1]	Number of vehicles failed [2]	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed
Belgium																				
Bulgaria																				
Czech Republic																				
Denmark																				
Germany																				
Estonia																				
Ireland																				
Greece																				
Spain																				
France																				
Croatia																				
Italy																				
Cyprus																				
Latvia																				
Lithuania																				

Vehicle Category:	N_1		N_2		N_3		M_2		M_3		O_3		O_4		T1b, T2b, T3b, T4.1b, T4.2b, and T4.3b		Other categories (optional)		Total	
Country of registration	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed
Luxembourg																				
Hungary																				
Malta																				
Netherlands																				
Austria																				
Poland																				
Portugal																				
Romania																				
Slovenia																				
Slovakia																				
Finland																				
Sweden																				
Albania																				
Andorra																				
Armenia																				
Azerbaijan																				

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Vehicle Category:	N_1		N_2		N_3		M_2		M_3		O_3		O_4		T1b, T2b, T3b, T4.1b, T4.2b, and T4.3b		Other categories (optional)		Total	
Country of registration	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed
Belarus																				
Bosnia and Herzegovina																				
Georgia																				
Kazakhstan																				
Liechtenstein																				
Monaco																				
Montenegro																				
North Macedonia																				
Norway																				
Republic of Moldova																				
Russian Federation																				
San Marino																				
Serbia																				
Switzerland																				
Tajikistan																				
Türkiye																				
Turkmenistan																				

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Vehicle Category:	N_1		N_2		N_3		M_2		M_3		O_3		O_4		T1b, T2b, T3b, T4.1b, T4.2b, and T4.3b		Other categories (optional)		Total	
Country of registration	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed
Ukraine																				
United Kingdom																				
Uzbekistan																				
Other third countries (please specify)																				

([1]) Total number of vehicles checked (at initial and more detailed inspections), including those without deficiencies, as well as those with minor, major or dangerous deficiencies.

([2]) Failed vehicles with major or dangerous deficiencies as per Annex IV.

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Results of more detailed inspections

Reporting Member State:

Name of the reporting Member State

Country of Registration: PERIOD: year [x]

Name of the country of vehicle registration

Vehicle Category:	N_1		N_2		N_3		M_2		M_3		O_3		O_4		T1b, T2b, T3b, T4.1b, T4.2b, and T4.3b		Other categories (optional)		Total	
	Number of vehicles checked (1)	Number of vehicles failed (2)	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed

Defect detail

	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed
(0) Identification																				
(1) Braking equipment																				
(2) Steering																				
(3) Visibility																				
(4) Lighting equipment and electrical system																				
(5) Axles, wheels, tyres, suspension																				
(6) Chassis and chassis attachments																				

Vehicle Category:	N_1		N_2		N_3		M_2		M_3		O_3		O_4		T1b, T2b, T3b, T4.1b, T4.2b, and T4.3b		Other categories (optional)		Total	
	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed	Number of vehicles checked	Number of vehicles failed
	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed	Checked	Failed
(7) Other equipment including tachograph and speed limitation devices																				
(8) Nuisance including emissions and spillage of fuel and/or oil																				
(9) Supplementary tests for M_2/M_3																				
(10) Electronic safety systems																				
(11) Cargo securing																				
Total number of failures																				

([1]) Total number of vehicles checked (at initial and more detailed inspections), including those without deficiencies, as well as those with minor, major or dangerous deficiencies.

([2]) Failed vehicles with major or dangerous deficiencies as per Annex IV.

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