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WORKING DOCUMENT

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

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

Point	Commission proposal	Comments & Questions
1.2.2 Effiency	(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.	We have concerns about the proposed new method for testing braking efficiency for LDV, in case the minimum figure of braking ratio is not achieved (lock of wheels), as in our opinion, it could reduce the braking testing requirements. Currently, as LD vehicles usually undergo the inspection unloaded, this means that if we reference the forces to MAM, we are considering a much higher mass than the vehicle's mass during the test, while the recorded braking forces are lower. This leads to rejecting cars that comply with braking requirements. We suggest an alternative method to be considered to test LDV when the vehicle is not loaded in order to calculate the braking ratio in a more accurate way.
1.4.2 Efficiency	Test with a brake tester. If not possible, then by a road test using either an indicating or deceleration recording instrument or with the vehicle on a slope of known gradient.	For electronic park braking systems there is a high risk of damage while testing in brake tester. No possibility of road or slope test. We suggest to include an alternative testing method, such as using the wheel play detector
1.2.1 Performance	(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.	Tha phrase "Or, in the case of testing on the road, the vehicle deviates excessively from a straight line." is repeated, also included in the part b)

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4.14.7 Anti-Staring 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	In ECE R100, there is no requirement for the driver to be seated or not. Therefore, for the functional check, we would eliminate the phrase 'and the driver's weight lifted out of the seat.' The verification that the vehicle cannot move by itself with the charging cable plugged in must be independent of whether a driver is present or not. This is particularly relevant for scenarios like autonomous parking vehicles or those controllable via remote control from an application or the key itself R100 rev3 - 5.3.3: *If the REESS can be externally charged, vehicle movement by its own propulsion system shall be impossible as long as the vehicle connector is physically connected to the vehicle inlet.* *This requirement shall be demonstrated by using the vehicle connector specified by the vehicle manufacturer.* On the other hand, at his respect, R100rev3 - 5.3.2 specifies: *When leaving the vehicle, the driver shall be informed by a signal (e.g. optical or audible signal) if the vehicle is still in the active driving possible mode. Moreover, in case of vehicles of category M2 and M3 with a capacity of more than 22 passengers in addition to the driver, this signal shall already be given when the drivers leave their seat .*
5.2.3 Tyres		What is meant to be tested to measure the environmental performance. What information to ensure envirnomental performance of the tyres. Should we assume that a ECE R117 approval ensures environmental performance?
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	It should remain optional. There are no reference values to be considered for this test

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France comments about recall	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	We support this proposal and suggest to include that the introduced measures will be proportionate to the level of risk due to the failure of the vehicle to meet requirements relating to the health or safety of persons or to the protection of the environment. For the last paragraph we also suggest: These provisions, based on the identification of vehicles from data supplied by their manufacturer or their authorised representative ~~to the inspection centres~~ **and available to the inspection centres**, may go as far as considering that the roadworthiness test has failed
8.2.3.3 NOX measurement	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.	In practice, it is difficult to guarantee that the test is performed within 3 minutes after the 5 minutes drive.
4.14.1 Electrical safety	a) Indicator or vehicle interface shows system malfunction	R100 rev 3 defines 3 relevante warnings in the event of failure in REES: 6.13. "Warning in the event of operational failure of vehicle controls that manage the REESS safe operation" 6.14. "Warning in the case of a Thermal Event within the REESS" 6.15. "Thermal propagation"
7.11 Odometer	Visual inspection, and/or using electronic interface (OBD or OBM)	What is the consecuence if the vehicles's distance record by visual inspection is different from the distance record via OBD?
4.1.5 Manual levelling devices	Visual inspection and by operation, if possible, or using the electronic vehicle interface.	Given that the reason for failure "c) System indicates failure via the electronic vehicle interface" has been deleted, we suggest: Visual inspection and by operation, if possible, ~~or using the electronic vehicle interface.~~

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