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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 Poland

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

Detailed technical notes **PL** to Annex I (ST 8255/25 ADD 1) in the scope of Directive 2014/45/EU"

1) the table regarding the change in the wording of item 1.1.3. Vacuum pump or compressor and reservoirs in the column „Criteria for considering technical condition unsatisfactory" – in letter d, the recognition criterion Air leakage causing a critical pressure drop" requires clarification. How should the inspector determine a "critical drop"? How much pressure drop should be to be considered critical?;
2) the table regarding the change in the wording of item 4.1.1. Condition and operation in the column „Criteria for considering the technical condition as unsatisfactory" in letter a requires clarification of the "Severely impaired visibility" criterion. It seems that such clarification is included in the third criterion in 4.2.1. letter a. It should be clarified whether there should be three assessment criteria or two, given that only two defect assessments are marked, or whether the regulations require only editorial corrections (similarly, in items 4.2.1, 4.3.1., 4.4.1., 4.5.1., 4.6.1. the number of criteria for considering the technical condition as unsatisfactory does not match the number of defect assessments);
3) the table in relation to the change in the wording of item 4.1.2. Setting in the column „Criteria for recognizing the technical condition as unsatisfactory" in letter a in (i) the categories indicated in the provision require correction;
4) in the table, regarding the change to the wording of item 4.1.5. Manual headlamp leveling devices (where mandatory) should be removed from the method, „or using the electronic vehicle interface" because item c has been removed from the Criteria for considering the technical condition as unsatisfactory" column, and furthermore, it is a manual leveling device, so it does not require the use of the electronic vehicle interface;
5) in the table regarding the addition of item 4.14.1. Electrical Safety in the Method column, the period should be replaced with a comma and the phrase „if applicable" should be added. The inconsistently used terminology regarding the vehicle interface also requires clarification;
6) in the table, in relation to the addition of item 4.14.4.4. Charging socket cover, the incorrect translation of the column „Criterion for recognizing the technical condition as unsatisfactory" should be indicated;
7) in the table regarding the addition of item 4.14.5.1. High-voltage electrical and electronic equipment, it should be noted that the translation of the column „Criterion for considering the technical condition as unsatisfactory" is incorrect;
8) in the table regarding the addition of item 4.14.5.2. Traction motor - how would a diagnostician check the susceptibility of the traction motor to faults, as referred to in item e.?
9) in the table regarding item 8.2.3.1. Particle number measurement, the column „Criterion for considering the technical condition as unsatisfactory" indicates that the measurement result exceeds 250,000 1/cm3. Why can't the measurement result exceed 1,000,000 ($1/cm^3$) to exclude measurement errors?;
10) table 8.2.3.2. Exhaust opacity - Is mandatory exhaust opacity testing justified if a new particle number test procedure is introduced?;
11) table 8.2.3.3. NOx measurement - On what basis was it indicated in the „Criterion for considering technical condition unsatisfactory" column that the measurement result exceeds 40 ppm?;
12) table 10.30. Hydrogen system, added to Annex III, item 15, specifies a device for detecting LPG/CNG/LNG leaks, if such vehicles are tested. The method does not specify a device for testing hydrogen systems. Since vehicles with hydrogen systems will be tested at a vehicle inspection station, should a device for detecting hydrogen leaks also be specified?