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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 Romania

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

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Annex I	
pt. 3 2nd para. (a)	
(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*;	
RO - It is necessary to clarify if the diagnostic trouble codes and the valid software version are provided by the manufacturers.	
pt. 3 2nd para. (b)	
(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)*;	
RO - What is meant by "ready to be inspected" ?	
pt. 3 2nd para. (d)	
(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.	(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.

pt. 3 3rd para.	
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.	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~~ **the** electronic safety systems are ~~referred to~~ mentioned in item 10 of the table set out in this point.
RO - The reference to ISO is not relevant.	
1.1.3 d)	
(d) Air leak causing a *noticeable drop* in pressure or audible air leaks. Air leak causing a *critical drop* in pressure.	
RO - What is the difference between noticeable drop and critical drop ?	
1.1.4	
Malfunctioning or defective warning device. *Low pressure not identifiable*.	
RO - The 2nd deficiency unclear (It is about the low pressure warning device that is not identifiable?)	
1.1.5	
Visual inspection of the components while the braking system is operated.	Visual **and audible** inspection of the components while the braking system is operated.
1.1.23 (a)	
Not working properly, for example, stroke of the drawbar exceeds 2/3 of the total overrun travel	
RO - Complicated to verify.	
1.2.1	
During a test on a brake tester or, if impossible, during a road test, apply the brakes progressively up to maximum effort	
RO - It is necessary to impose a minimum speed from which the vehicle is braked in the case of the road test.	
1.2.2 pt. 3	
Category T: 40%	Category T**, R, S**: 40%
4.1.2 (a)	
(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):	(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):

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(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): — upper limit -0.5% — h ≤ 1,2m: lower limit -4% h > 1,2m: lower limit -6%	(iv) 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% (v) 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) (vi) T category ~~(Regulation No 86 UN/ECE)~~: — upper limit -0.5% — h ≤ 1,2m: lower limit -4% h > 1,2m: lower limit -6%
4.1.3 (a)	
(a) Switch does not operate in accordance with the requirements[1] (Number of headlamps illuminated at the same time) *Maximum permitted light brightness to the front exceeded.*	
RO -Which is the ma ximum permitted light brightness ? How is it measured ? To be reformulated!	
4.1.5	
Visual inspection and by operation, if possible, or using the electronic vehicle interface.	Visual inspection and by operation, if possible~~, or using the electronic vehicle interface~~.
4.14.1	
Visual inspection complemented by using the vehicle interface	Visual inspection complemented by using the vehicle interface **(where the necessary data is available).**
4.14.2	
Visual inspection.	Visual inspection **(where is possible depending of the technical characteristics of the vehicle)**.
4.14.4.1	

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)	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)
4.14.4.3	
4.14.4.3 Ground continuity (X)[2]	
RO - To be deleted (Measurement not recommended and the ohmmeter is not included in Annex III)	
4.14.5.1	
Visual inspection and by using the electronic vehicle interface.	Visual inspection ~~and by using the electronic vehicle interface~~.
4.14.5.2 (e)	
(e) Fault readiness of the traction motor	
RO - Unclear	
4.14.5.2 (f)	
Wrong version of type-approved hardware and software not in accordance with the requirements as defined in the ECE R100	Wrong version of type-approved hardware and software ~~not in accordance with the requirements as defined in the ECE R100~~
5.1.3	
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.	Visual **and audible** 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.
5.3.2. (c) - new	
-	**(c) asymmetric position of the vehicle (left/right difference)**
5.3.2.1	
RO - The testing method (and values/evaluation) shall be established by a delegated act and requires a shock absorber tester; ~~the method~~ installing a shock absorber tester could affect the existing PTI centers (necessary additional space and reconstruction PTI centers for the new device, if would be the case); the device should be introduced in Annex III.	
7.11. (c) - new	
-	**(c) difference regarding the vehicle's distance record compared with the record from the previous inspection; (DMi)**
8.1.1	
RO - The testing method (and values/evaluation) shall be established by a delegated act.	
8.1.1	
RO - To restore deficiency (b) from the text in force or to accordingly modify pt. 6.1.2	
8.2.	

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RO - To be clarified the application for categories L and T, upon the case.	
8.2.2/8.2.3	
RO - Proposed order for the sub pts. 8.2.2.1/8.2.3.1 (all vehicles), 8.2.2.2/8.2.3.2 (PT), 8.2.2.3/8.2.3.3 (NOx)	
RO - The reference to sub stages as Euro 6c, 6d-TEMP etc. is not feasible for PTI (information is not always available). For hybrid and plug-in hybrid vehicles, the thermal engine shall be switched on – *it could not be possible for all vehicles.*	
8.2.3	
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.	Opacity measurement in accordance with 8.2.3.2. For vehicles equipped with particle filters, Member States may **complementary** apply PN measurement in accordance with 8.2.3.1 ~~instead of opacity measurement~~.
10.	
RO - General comments *- the diagnostic trouble codes provided by the device (electronic interface) should be correlated with the codes of the deficiency (preferably by providing or developing a specific PTI OBD scanning device for this purpose), otherwise it is not possible to clearly indicate the deficiency (in certain cases the MIL is used to indicate failures for more systems/components)* *- the description of the systems in a such table is not usual; from a legal point of view, if necessary, the definitions of the systems could be included in the main text (also not necessary the reference to the UN Regulations)* *- the list of the systems and the deficiencies is too exhaustive (a general approach for those systems could be better applicable)*	
Annex III	
Section I (9)	
RO - The existing text should be maintain (the sound level measurement is applicable only for category L)	
Section I (16)	
'(16) device to measure particle number emissions with sufficient accuracy;	(16) **[From three years after the entry into force of the delegated act referred to in Article 17], a** device to measure particle number emissions ~~with sufficient accuracy~~.';
Section I (17)	
(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.';	(17) [From ~~one year~~ **three years** after the entry into force of the delegated act referred to in Article 17], a device to measure nitrogen oxide (NO_X) emissions.';
Annex IV	
2 (b)	
(b) Refresher training or appropriate examination	(b) Refresher training or appropriate examination

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Member States shall ensure that inspectors regularly receive refresher training or undergo an appropriate examination provided or set by the Member State or by an authorized training center of the Member State. Member States shall ensure that the contents of the refresher training or appropriate examination enable inspectors to maintain and refresh the requisite knowledge and skills in relation to the topics referred to in point (a), (i) to (vii) above.	Member States shall ensure that inspectors ~~regularly~~ receive refresher training or undergo an appropriate examination provided or set by the Member State or by an authorized training center of the Member State**, at least every 2 years**. Member States shall ensure that the contents of the refresher training or appropriate examination enable inspectors to maintain and refresh the requisite knowledge and skills in relation to the topics referred to in point (a), (i) to (vii) above.