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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	11343/26 + ADD1 + ADD2
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 - Four-column document = Comments from the Netherlands

Delegations will find attached comments from **the Netherlands** on the above-mentioned document.

PTI/RSI DIRECTIVE – INPUT NL WP 7 & 14 July 2026

We would (once again) like to thank the Irish Presidency for its ambition regarding the Roadworthiness Package. We have high hopes regarding the PTI and RSI directives considering the trilogue negotiations. The Netherlands remains very much supportive of the general approach, however, based on the Commission's proposal and the European Parliament's mandate, we have a few points we would like to highlight.

- **Recital 8 (PTI for motorcycles)**
  The Netherlands wants to repeat its support for the general approach in allowing member states to exclude motorcycles as long as they have put effective alternative roadside safety measures.

- **Recital 12 – (Recording of odometer readings)**
  The Netherlands already extensively records odometer readings and sees it as an effective measure for combatting fraud and improving road safety. We are therefore in favor of maintaining ambition in recording and sharing odometer readings by member states. We think the minimum one hour repair condition that the EP proposes is impractical and we cannot support that amendment.

- **Recital 15 – (Emission testing methods including NOx)**
  We could support the EP position on making NOx optional in PTI, because of the obligatory warm-up drive of the vehicle which is not feasible for our garages. We would however like to see a mandatory PN-test, particularly for diesels, in PTI.

- **Recital 15d – (Mandatory recall check)**
  The Netherlands does not support making it mandatory as the registration and information processes of recalls are not properly organized yet.

- **Recital 28 – (Remote sensing)**
  The Netherlands supports the use and further development of technologies such as remote sensing. However, due to the burden increase for implementing organizations, The Netherlands is in favor of keeping remote sensing optional for roadside inspections.

Annex PTI

- 4.14.4.6. Charging cable: NL can support the EP-position to make the control of the charging cable optional
- 5.3.2.1. Efficiency damping: We want to keep this optional (EP & General Approach both want this optional)

- 7.9. Tachograph (point c) *software version* and f) *system indicates failure via vehicle interface*): We do not think this can be checked within the PTI because the tachograph is not integrated into the vehicle.
- 10.19a Seatbelt reminder (proposal EP): we have doubts about the practical feasibility because it might require a drive to check if it works. This would require an extra person as a passenger.
- 10.56 Intelligent Speed Assistance ((ca) *map version outdated or incorrect, where applicable)* (proposal EP): Map data updates 7 years at the OEM's expense, after that at the owner's expense. NL would not support the EP-proposal. To check in PTI whether this is functioning would require the owner/holder to update this and to buy from the OEM.

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