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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12271/1/25 REV 1
N° Cion doc.:	ST 8255 2025
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 - Comments from Germany

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

16. September 2025

Revision of Directive 2014/45/EU and 2014/47/EU –
Comments by Germany following the Working Group meeting on the 12. September 2025

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German amendments to the Presidency compromise	Comments
(5) Article 5 is replaced by the following: *'Article 5* **Date and frequency of testing** 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~~;	Germany rejects the shortening of the intervals for vehicles that are older than 10 years and exhaust emission testing intervals for light commercial vehicles. Background: Germany has already decided to reject the proposed shortening of the main inspection intervals for older passenger cars (> 10 years) and light commercial vehicles for road safety reasons as being unjustified (position was communicated to the Presidency on 14 May 2025; see WK 6746/2025 INIT). Germany also rejects a shortening of the exhaust emission testing intervals – both for older vehicles and for vehicles of category N1 in general (see WK 11092/2025 ADD 1 , 08 September 2025; Comments provided by Germany), since there are no studies, neither at European nor at national level, that would justify a shortening of the intervals from 24 to 12 months.
ANNEX I Annexes I, III and IV to Directive 2014/45/EU are amended as follows: point 3 is amended as follows: (i) the heading and the introduction are replaced by the following: … 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. …	Due to the deletion of the text, the rest of the sentence is incomplete.

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 **or using the wheel play detector**.	The use of a wheel play detector has no connection in terms of content to the parking brake effectiveness. The new text should be removed. The addition of a test specification for a park-lock device is still missing (see DE_Comments_8255-ad1)
4.14 High-voltage systems 4.14.1 Electrical safety Visual inspection complemented by using the vehicle interface	Starting at this item the term "vehicle interface" is used in parallel. It should be consistent throughout the document: "electronic vehicle interface".
4.14.2 Traction battery cover	From Germany's point of view, "cover" does not include the battery enclosure. "Enclosure" should be added
4.14.4.6 Charging cable (b) Charging cable not provided	There are no obligations to carry a charging cable in the vehicle (until now). Therefore "not providing a charging cable" can't be a defect.
4.14.5.2. Traction motor	Measurement of equipotential bonding requires a special measurement equipment (four wire resistance meter). There's no addendum in Annex III for this device.
4.14.5.3 Electronic converters, motor, and inverter	Motor is already covered by 4.14.5.2 (can be deleted here) Suggestion: Rename text to "4.14.5.3 Power electronics" Justification: now every component is covered by this new general term (see definition of the IEC at https://electropedia.org/iev/iev.nsf/display?openform&ievref=151-11-15).
5.2.3. Tyres … (a) Tyre size, load capacity, approval mark or speed category not in accordance with the requirements1 and affecting road safety or environmental performance. …	What is the meaning of "affecting … environmental performance"?
New item 9.13 Alarm and fire suppression system	Germany proposes a new test item for passenger-carrying vehicles categories M2, M3 (see DE_Comments_8255-ad1)
10. Electronic Safety Systems	Germany proposes to add text in item 10: 10. Electronic Safety Systems **(if fitted, in accordance with EU type approval legislation)**

10.20 Taillight switching Description: Depending on operating status and/or failure of the illuminants, lighting functions are taken over by other luminaires.	This “fail safe issue” needs to be discussed. Germany proposes to delete this item, because it does not cover the normal use of the vehicle.
10.51 Acoustic vehicle alerting Description: at low speed, the system generates an external, specific sound in order to warn, for example pedestrians. …. (g) System or components not operating, or implausible operative, ~~or not respecting type-approved noise levels~~	The defect “not respecting type approval noise levels” needs a measuring method, which is not common for PTI. Therefore, Germany proposes to delete the text "or not respecting type-approved noise levels". Germany assumes that the formulation under (g) covers the requirement to comply with the provisions of Regulation (EU) 540/2014, Article 8, and UN Regulation 138.
(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*;	Point 9 has no replacement, the content is still the same compared to the current version of Annex III. Should it be deleted in this table?
Annex III	1. Missing equipment: • damping test equipment (item 5.3.2.1)? • Resistance Meter (item 4.14.4.3)? 2. Calibration of damping test equipment (item 5.3.2.1) and Resistance Meter (item 4.14.4.3) missing? if mandatory?