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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
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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 Austria

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

AT remarks on PTI and RSI following WP on 12 September 2025

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PTI

Art. 4a (1)

We welcome the new wording stating that agencies other than PTI testing centres are no longer obliged to enter the mileage into a database, but that only the Member States are responsible for ensuring that these other agencies can enter the mileage into a database.

The data from OBM (from the Euro 7 regulation) or OBFCM (collection of fuel consumption data in real driving conditions, already in place) could be used, as this data is collected anyway. However, the relevant regulations would have to be amended to allow the data to be collected and processed in relation to a VIN and for these purposes.

Article 5 (1) last sentence or 8 (1a) on the validity of EU temporary roadworthiness tests for 6 months:

we appreciate the efforts of the Presidency to find a solution for MS with a system of fixed deadlines for the validity of tests.

Art. 8, 9

General remark: It should not be prescribed mandatory to store data relating to PTI and RSI in specific databases (e.g., in the vehicle register/registration database). Only the data to be stored and the access rights to this data should be regulated. Member States must be able to decide where this data is stored and how it is made accessible. (e.g. Art. 8 (1a), 9 (2))

Art. 9(3)

It would be useful if tests after rectifying 'dangerous deficiencies' were possible in the Member State of registration also, not only in the Member State that requested the suspension of registration on the basis of a negative roadworthiness test. "The new certificate shall be issued by the competent authority that requested the suspension **or of the Member State of registration**".

Art. 10

In the context of the temporary roadworthiness certificate issued in another MS this MS issues also the 'proof of test'. The problem arises that in the course of roadside checks, the control authorities must be familiar with all 27 proofs of test, which is difficult in practice. In the case of electronic proof of test, it must be ensured that registration holders from other Member States also have access to the electronic system (e.g., wallet system); this should not be restricted by systems to which citizens from other Member States do not have access.

Art. 16 (1a)

The term ‘any technical roadside inspection report’ should be further restricted either by "of the last [3] years" or, for example, by "available in the national database." The three years would be in line with the data retention period in Article 8(5).

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Article 17 (c)

The EC's authorization should be defined more precisely in terms of purposes and cases for adjustments.

Article 20a:

It would be appreciated to learn more about ‘the purpose of data collection’.

Annex 8.2.2, 8.2.2.3, 8.2.3.3

We oppose mandatory NOx measurements for PTI in general.

For gasoline engines, since NOx is implicitly measured via CO and HC emission tests. If CO and HC emissions measured during PTI already are within the limits, it can be assumed that the three-way catalytic converter is functioning and the NOx emissions are also below the limit.

For diesel engines, the measurement method is not yet fully developed. There is a risk of incorrect results. The method must be further developed on a scientific basis before this measurement can be made mandatory. (We would suggest a clause stating that this could be prescribed at a later stage).

Annex 10

Electronic safety systems – should be precribed only for those systems necessary in the context of the type approval and only when using the standard diagnostic device without the need for expensive additional equipment.

Annex 8.3.2.3

The option of omitting opacity measurement should be retained, essentially for Euro 5 and 6 diesel vehicles (for which opacity measurement would apply and PN measurement would not be possible). The technology is outdated, cannot detect defective particulate filters in EURO 5 and 6 vehicles and, moreover, often leads to engine damage during measurement.

General remark:

Regulations must ensure that the data and information required for PTI and RSI at the testing centers are made available centrally in a simple manner: ideally through a central office for all MS (e.g., trust center or FSD from Germany), or through extensive standardization so that MS no longer have to

expend effort on data preparation, which small MS would not be able to afford (however, the latter option seems rather unrealistic).

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RSI

General remark:

With regard to some provisions of the RSI, the problem of inadequate network coverage must be taken into account (e.g., in the case of the obligation to carry and issue digital inspection reports).

Article 4a (1) – remote sensing – we appreciate the plan for a dedicated expert meeting. Our position so far concerning this topic:

Remote sensing of noise is rejected as it is not currently technically feasible.

Remote sensing of NOx works on a technical level. However, the cost of mandatory implementation is too high, especially the 30% threshold. Remote measurement of NOx can be mentioned in the directive, but only as an option. In that case, however, the setting of limit values should not be left to the Member States, but should be harmonized.

Article 5 (2)

We are against mandatory inspection quotas for N1. N1 are inspected anyway in our country, but recording the data would involve a huge amount of work for the authorities. Reducing the quota from 2% to 1% is a step in the right direction, but there should be no mandatory quota at all.

Article 10(c) in conjunction with Article 13

For the control of securing of the cargo, "may" should be retained instead of "shall" (para. 1 lit. c). However, the deletion of "in accordance with Article 13" in conjunction with the addition in paragraph 2 could be acceptable. However we would support a facultative wording in Art 13 as well.

Article 18a

The following should be added here: "any EU temporary roadworthiness certificate issued during the last [3] years." This would also be in line with the retention period in Article 16(3). In any case it must be clear that only data that still exists can be made available (this also applies to Article 16 of Directive 2014/45/EU).