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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12271/3/25 REV 3
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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 - Further revised presidency compromise = Comments from Germany

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

German comments

- The Federal Government thanks the Danish Presidency for the comprehensive compromise proposal. Germany believes that it represents a good interim result.
- From the point of view of the Federal Government, it has to be noted that at least special vehicles of the armed forces need to be exempt from the obligation to provide electronic vehicle registration and roadworthiness certificates as well as from exchanging that data.

On PTI

- The Federal Government can support most parts.
- The Federal Government believes that information about the delivered technical specifications provided in **Article 4(6)** needs to be more specific.
- Germany rejects the **amendments to Article 4a**. The proposed additional data system for workshops, which would cost billions of euros, would be inefficient and susceptible to manipulation. The 2018 Impact Assessment does not yet take into account the revised UNECE R-39, which already includes a technical solution to avoid tachograph manipulation.
- The Federal Government **can support the amendment to Annex I item 10 in principle and proposes to limit this to systems that are part of the vehicle type approval.**

Re Annex I of 2014/45/EU

- The Federal Government welcomes most amendments to the Annex, too.
- The Federal Government **proposes to change the name of item 4.14.3** (Traction battery) into **"Rechargeable Energy Storage System, traction battery and battery management system"**, to include missing components defined in UN-R 100.
- The Federal Government is currently examining the addition of **the first registration data in item 8.2.**
- **Regarding item 8.2, the Federal Government in principle refers to the position paper of 2 September 2025**, of which essential points have still not been taken into account.

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- Irrespective of the position taken on individual measuring methods, the Federal Government **welcomes the change from delegated acts to implementing acts in items 8.2.2.1, 8.2.2.3 and 8.2.3.3.**
- Re number **8.2.3.3. "No_x measurement":** The Federal Government **considers the addition** appropriate; however, the concerns expressed regarding the **conditioning of the vehicles** have not been considered sufficiently.
- Re number **8.2.3.3: The Federal Government emphasises once again that the conditioning of the vehicle is considered to be decisive for valid NO_x measurements**. With reference to the position paper of 2 September 2025, the Federal Government again proposes that the Commission be tasked with developing a complete and suitable procedure for the measurement of the real NO_x emissions at the tailpipe and – with the aim of making testing possible in time for the deadline for the first regular exhaust emission test of these vehicles – presenting it by a certain date.
- Re number **8.2.3.3:** The Federal Government again underlines that the **scope of application** should be limited to **Euro 7**, as only in this way is it possible to reliably verify the operational readiness of the exhaust aftertreatment system, which indicates successful conditioning and is a prerequisite for starting the measurement. The reason for this is that the obligation to make available the necessary OBD signals is applicable only as of Euro 7.
- Reaktiv: [To combat bus fires, the Federal Government requests that the German **proposal for an additional item 9.13** to check alarm and fire suppression systems installed in M2/M3 vehicles **be taken into account**.]
- The Federal Government **can support the deletion of item 10.3**. As a consequence, reason (h) for failure in the table should also be deleted.
- The Federal Government **does not consider the content of item 2.6** (electronic power steering) **and item 10.4 (airbag) to be related** and therefore **would not support the deletion of item 10.4**.
- The Federal Government **does not consider the content of item 6** (chassis and chassis attachments) **and item 10.5 to be related** and therefore **would not support the deletion**.
- The Federal Government **rejects the deletion of item 10.7.**
- The Federal Government **questions the deletion of the description in item 10.13.**
- The Federal Government **rejects the deletion of item 10.43.**

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- The Federal Government **rejects moving item 10.44 because the system functionality is probably not covered by items 4.1.1 or 4.1.2**.
- The Federal Government **questions the isolated deletion of reason (c) for failure in item 10.49.** This reason was not deleted in other items.
- The Federal Government **welcomes the deletion in item 10.48** with regard to the verification of the minimum set of data. It would be helpful to add the following sentence in item 10.48: “A switched-off mobile network should not lead to any defect mentioned in the roadworthiness certificate.”

Re Annex III of 2014/45/EU

- The Federal Government **welcomes that “delegated acts” was changed to “implementing acts” under number (17)**.

<u>On RSI</u>

- **Germany currently retains its scrutiny reservation.**

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