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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 the Netherlands

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

PTI/RSI DIRECTIVE - INPUT NL FOLLOWING WP 9 OCTOBER 2025

The Netherlands is happy with many of the changes proposed by the Presidency and believe the proposal is going in the right direction. We support in particular: the changes in Article 2(b) regarding the opt-out for motorcycles, Article 4a(1) on the recording of odometer, the deletion of the yearly N1 emission test, the deletion in Article 6(c), and the insertion of a concrete timeframe in Article 8(1)(a).

We still have a few remaining points that have not yet been incorporated in the compromise text:

- We think MS should not be obliged to provide odometer history to other parties than the holder of the registration certificate. Instead, an assessment can be provided;
- The NL does not consider it feasible in practice to have a mandatory roadworthiness test when the safety and environmental components have been significantly altered or modified;
- NL would like to include the vehicle diagnostic link connector (OBD port) as a test item in Annex I;
- Because of the necessary conditioning of the vehicle we do not think a NOx test for diesel should be mandatory in PTI. We propose that Member Staes can alternatively choose for NOx testing of diesel in RSI, using remote sensing for vehicle selection, plume chasing as an initial technical inspection and performing a hot idle NOx test as a more detailed technical inspection.
- With vehicles becoming increasingly complex the NL believes that PTI inspectors should be allowed to specialize and they should consequently not be obliged to possess all necessary competences (Annex IV).

➢ Article 4a (recording of odometer readings)

- Article 4a(3) and recital 12
  "odometer history should be made available to inspectors".
  We have already made this comment before, but we are of the opinion that there should be no obligation for MS to provide the history to inspectors, but instead provide an assessment. This because of the sensitive nature of the readings. Also in recital 12 we would propose to change this to "and should provide those readings and/or an assessment [of those readings] to inspectors"

➢ Article 5 (Date and frequency of testing)

- **Article5(3)**
  Significantly altered or modified
  NL believes that it is not feasible that vehicles shall undergo a roadworthiness test when the safety and environmental systems and components of the vehicle have been significantly altered or modified. The authorities in NL have no insight

into when such systems in a vehicle significantly altered or modified. Companies that make these kinds of modifications, such as tuning companies, cannot be expected to report them to the authorities. The PTI is intended to identify such modifications, but in practice, it's often difficult to do so. We would like to make this an optional clause again and leave the national application up to the MS.

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➢ Annex I (PTI)

- **New inspection point: Working condition OBD**

  NL would like to add a new point.

  All safety-relevant systems must be testable not only through visual inspection but also via the electronic vehicle interface. If vehicle characteristics support tests according to '10 Electronic safety systems' with the use of electronic interface, this electronic interface should be required to be in working condition during PTI, where it is part of the electronic safety systems.

  Therefore, it is necessary to include the vehicle diagnostic link connector (OBD port) as a test item in Annex I. We will provide a drafting suggestion in writing.

  Addition to Annex I:
  7. OTHER EQUIPMENT
  Main item: Vehicle diagnostic link connector (OBD Port)
  Methode: Visual inspection, and/or by electronic
  Failure: (all Major)
  * interface not accessible
  * Obviously inoperative
  * Wirings damaged
  * System or component missing
  * System or component damaged

- **NOx in RSI rather than PTI**

  As the new PTI NOx test for diesel requires a hot catalyst, the test needs to be done immediately after arrival at the PTI station. If the SCR catalyst has already cooled down when starting the PTI, a warm-up ride outside the PTI station must be performed. These conditions reconcile very poorly with the way the PTI is done in many Member States. In addition, the test cannot be performed if the outside temperature is too high or too low or if the PTI station is located at too high an altitude above sea level. Given these circumstances, NL would like to see that Member State NOx can alternatively choose for checking the NOx emissions from diesel within the framework of RSI, instead of PTI. This is, because the new hot idle NOx test for diesel aligns well to be performed within the framework of RSI. This alternative approach should then consist of selecting vehicles by means of remote sensing, performing an initial technical inspection

by carrying out a plume chase measurement and, if this measurement is positive, stopping the vehicle for a more detailed technical inspection by performing the hot idle NOx test and reading the OBD.

- **Annex IV**

  The Netherlands proposes to include an additional paragraph in point 1 of Annex IV to allow PTI inspectors to specialise. Technology is becoming increasingly complex. The Netherlands believes that, when a PTI-centre inspects only EVs, the inspector should only be assessed regarding his knowledge on EVs. Naturally, MS must oversee this process. This guarantee is only partly made possible by the proposed amendment to Annex IV, Article 3, "Certificate of Competence," "...and where relevant, areas of specialized competence of the inspector."

Drafting suggestion NL:

Annex IV

1. Competence

Before authorising an applicant for a position as inspector to carry out periodic roadworthiness tests, Member States or competent authorities shall verify that that person:

(a) has a certified knowledge and understanding relevant for road vehicles in the following areas:

— mechanics;
— dynamics;
— vehicle dynamics;
— combustion engines;
— material and material processing;
— electronics;
— electrics;
— electronic vehicle components;
— IT applications;

(b) has at least three years of documented experience or equivalent, such as documented mentorship or studies, and appropriate training in the road vehicle field set out above.

Member States may grant inspectors specific authorisation to inspect only certain vehicle categories and/or perform specific types of tests. The inspector shall then only be required to have certified knowledge of those competences under 1a which correspond to his specific authorization. The Member State shall ensure the implementation of appropriate (automated) monitoring mechanisms to ensure that inspectors only perform inspections on vehicles for which they are authorised.

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