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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
N° Cion doc.:	ST 8255/25 + ADD 1
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 Poland

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

Proposal for a Directive of the European and Parliament and of the Council amending Directive 2014/45 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

- Examination of a revised Presidency compromise

= ST 12271/3/25 REV3

PUBLIC

Comments/questions from Poland:

1. Article 1(7) in relation to **Article 8(1a)** of the Directive concerning clarification of the deadline for Member States other than the Member State of registration of the vehicle to transmit data on the temporary roadworthiness test carried out within a period not exceeding 10 days.

Question: Since the data is to be transmitted via MOVE-HUB, why is this long deadline of 10 days set?

This provision removes the obligation to record data of the temporary roadworthiness testing in the register of the Member State where the vehicle is registered.

Questions: Since the obligation to register the temporary test in the Member State of registration of the vehicle has been removed, who is to confirm that the temporary test has been carried out?

Will the Member State/vehicle testing station carrying out the test obtain information/confirmation of the temporary test from the Member State that carried out the test?

2. **Annex I** to the Directive, **item 0.3** of the table concerning the possibility of verifying during a technical inspection whether a vehicle is covered by an ongoing recall campaign.

Question: Does the manufacturer decide/determine the nature of the defect for which the vehicle has been recalled?

Who bears the costs of adapting Member States' systems and vehicle inspection station registers?

3. **Annex I** to the Directive, in the scope of **points 8.2.2.** and **8.2.3.** of the table concerning the measurement of exhaust emissions from compression-ignition engines. The "Method" column clarifies the method of measuring the particle number, depending on the vehicle's registration date.

Question: What about vehicles without type approval (type approval category) and exhaust aftertreatment systems (DPF), imported third countries?

4. **Annex III** to the Directive, **item 15**, specifies a device for detecting LPG/CNG/LNG leaks if such vehicles are tested.

When testing hydrogen systems, the method does not specify a device. Therefore, since vehicles with hydrogen systems will be tested at a vehicle inspection station, we suggest the use of a hydrogen leak detection device