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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 Spain

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

Point	Proposal	Comments & Questions
Article 4.5	[Those competent authorities may decide to task centralised data centres to organise the dataflow from manufacturers and manage access to the technical information.] The competent authorities [or centralised data centres] shall make that technical information available to the testing centres.	We support the idea of centralised data centres tasked for managing access to the technical information, and that could simplify the procedures to competent authorities, we would suggest a more detailed development of this concept.
Article 4a		We support the new drafting wich sets clear rules applying the recording of odometerer readings
article 8.1a	An EU temporary roadworthiness certificate shall be valid for six months. The competent authority shall communicate without undue delay, and at the latest within 10 calendar days, the result of the test to the Member State of registration	clarification would be welcome about how this will be implemented
Annex 1 point 3 contents and methods of testing	the inspection of the fitment includes the evaluation of any relevant diagnostic trouble codes and an examination of whether the fitted systems and components comply for example, with the following: – the given design, specified attachment/number, specified circuit, required marking; – ~~the valid software version including the integrity feature;~~	What is the reason for the deletion of the software version including the integrity feature? We propose to keep it.
0.3. Vehicle under ongoing recall campaign (X)2		we support the introduction of this new optional inspection item that stablishes a link between recall campaings and roadworthiness tests. We propose to evaluate if a major deficiency could also be included, for intermediate cases.
1.1.3 Vacuum pump or compressor and reservoirs	Secondary braking performance not met	Secondary breaking performance is item 1.3.1
1.2.2 Effiency	(a) to the maximum authorised mass or, (b) in the case of semi-trailers, to the sum of the authorised axle loads, or (c) to reference values.	We have concerns about the proposed new method for testing braking efficiency for LDV, in case the minimum figure of braking ratio is not achieved (lock of wheels), as in our opinion, it could reduce the braking testing requirements. We would appreciate that the technical background that supports this method is provided
5.3.2.1. efficiency testing of damping	b) Given minimum values not reached.	It should be deleted as there are no reference values

8.2.3 Exhaust emission measurement - Compression ignition engines	Test procedures: For vehicles as of emission classes Euro 5b and Euro VI and newer or for M1 and N1 registered for the first time after 31 august 2019 and M2, M3, N2 and N3 registered for the first time after 1 January 2014:,	Regarding the inluded date 31 august 2019 for light duty vehicles, we are not sure it is correct in the paragraph related to particle number measurement (8.2.3), as that date corresponds to Euro 6d TEMP vehicles registration date and therefor it is related to the NOx measurement procedure .
8.2.3.3. NOX measurement	For vehicles as of emission classes Euro 6d-TEMP the outside temperature should be between 0◦C and 30◦C and altitude lower or equal to 700 meters above sea level and engine temperature above 70◦C. For vehicles as of emission classes Euro VI the outside temperature should be between -7◦C and 35◦C, altitude lower or equal to 1600 meters above sea level and engine temperature above 70◦C. For conditions that are not covered by the above mentioned conditions, either use OBD or a visual inspection.	There are some concerns about the practical implementation, given that conditioning is crucial for the measurement procedure. In practice, it is difficult to guarantee that the test is performed within 3 minutes after the 5 minutes drive. On the other hand, average height in Spain es 660 meters and temperatures over 30ºC and under 0ºC are largely surpassed over the year in many parts of the territory. Very difficult to implement under these conditions.
Area 10 ADAS and other safetty relatd systems		We support this approach to relocate certain elements into existing areas