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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 Poland

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

Poland's opinion on the issue of in intoducing NOx measurement into PTI

It should be noted that the methodology for measuring NOx during technical inspections of vehicles was developed by the JRC (Joint Research Centre) and is designed to detect malfunctions/failures in the SCR (Selective Catalytic Reduction System). In order to carry out the NOx test properly, it is necessary to prepare the vehicle appropriately – warm up the engine/SCR system to its activation temperature.

During the Council WP Land meetings a number of Member States raised objections to the proposed method of conducting the test in question. Poland as well raised doubts about the mandatory implementation of NOx measurement in the periodic technical inspection of vehicles, and in particular about performing the measurement in the climatic conditions of Poland (in the autumn and winter).

The basic assumption of the measurement methodology is that the engine and SCR system are warmed up and active during the measurement. However, there will be cases where the system, although operational during the test at the vehicle inspection station, will not work or will not work fully effectively. Thus it may be problematic to warm up the SCR system properly in order to carry out the test in question.

Therefore, there is doubt as to whether the proposed measurement methodology ensures reliable and credible measurement results for all vehicles presented for technical inspection.
It should be noted that, in accordance with Directive 2014/45/EU of the European Parliament and of the Council of 3 April 2014 on periodic roadworthiness tests for motor vehicles and their trailers and repealing Directive 2009/40/EC, (OJ EU L 127 of 29.04.2014, p. 51, as amended), technical inspections throughout the life cycle of a vehicle should be relatively simple, quick and inexpensive, while at the same time effective in achieving the objectives of this Directive.

In view of the above, and given the doubts regarding the proposed methodology and technology for measuring NOx, it would be reasonable to introduce an optional approach to the use of this test method at vehicle inspection stations and to continue work on improving it, i.e. making it more unambiguous.

The issue of implementing NOx measurement into PTI was consulted with the Polish Motor Transport Institute and the Transport Technical Supervision Authority.

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