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PUBLIC

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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 Ireland

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

IE Comments - st12271-re03.en25

Additional Comments

Amendments to Directive 2014/45/EU

Annex 1

- **0.3 Vehicle under ongoing recall campaign (X)**

Ireland would be in favour of including recall notifications on PTI reports if this was introduced at a European level. The onus, however, should always remain with the manufacturer and should not be taken away from the OEM to notify the owner.

There are some challenges around this, including:

- Most recalls happen within the first few years of a vehicle's lifecycle, but first PTI does not happen until the car reaches 4 years old.
- Can a recall notification that does not impact the current operation of a vehicle (including the current airbag issue) and does not cause a vehicle to fail a PTI inspection, be a cause of a major/minor fail item on a PTI result?
- How long should a recall notification be displayed on a PTI record?
- How can a manufacturer notify a central database that the recall has been rectified?

Ireland suggests that recall information should be displayed wherever possible to citizens, notably at national taxation points/reminders, change of vehicle ownership processes, vehicle history checks/information and on PTI appointments reminders and records/certificates. However, Ireland accepts that there would be significant work to implement this on all screens being displayed to customers at taxation stage or change of ownership.

However, we would consider it not to be appropriate to fail a vehicle at a PTI inspection due to a current recall notification or without being able to officially confirm that it has been rectified.

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