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WK 14724/2025 ADD 10

**LIMITE**

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#### **WORKING DOCUMENT**

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From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12271/6/25 REV 6
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

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

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WK 14724/2025 ADD 10

**LIMITE**

**EN**

## Amendments to Directive 2014/45/EU

### 1. Recital 15a and Annex I 8.2.3.3 NOx measurement

Regarding the two steps approach for NOx testing in diesel vehicles, we would like to understand the reasons or justification for proposing to begin the first step with NOx testing for heavy-duty vehicles.

*15a) The implementation of NOx measurements for compression engine vehicles will be done in two steps. In a first step the verification of NOx emissions applies to category M2, with a maximum authorised mass exceeding 3 500 kg, M3, N2 and N3 and having emission class Euro VI and newer. Two years after the latest transposition date the verification of Euro 6d-TEMP and newer vehicles of category M1, M2, with a mass not exceeding 3 500 kg, and N1 will also be included in the scope.*

We would like to know the reason why the 3-minute timeframe for NOx measurement in the case of light-duty vehicles has been removed, while the 3.5 minutes timeframe has been retained for heavy-duty vehicles:

(8.2.3.3)

*Once the condition is reached, the vehicle shall not be turned off and the measurement shall be performed within ~~3 minutes for M1 and N1 vehicles and within~~ 3.5 minutes for M2, M3, N2 and N3 vehicles. Where possible, the vehicle's readiness to be tested shall be ascertained by checking the indicator lamp on the dashboard or via the vehicle interface (OBD or OBM read-out).*

On the other hand, we are proposing a correction on 8.2.3, as according to COMMISSION RECOMMENDATION (EU) 2023/688 of 20 March 2023 on particle number measurement for the periodic technical inspection of vehicles equipped with compression ignition engines, Euro VI date for new registrations is 31 December 2013:

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 December 2012 and M2, M3, N2 and N3 registered for the first time after 31 December ~~2012~~ **2013**

### 2. Annex 1 item 1.2.2 Efficiency

*For vehicles not inspected following the standards given by ISO 21069 or equivalent methods, if the minimum figure of braking ratio is not achieved,, at least meaningful brake testing must be performed.*

*Meaningful brake testing is performed if brake efficiency is below the service, secondary or parking values prescribed in 1.2.2 or 1.3.2 or 1.4.2 but all the following conditions are met:*

- the braking system is in good condition with no obvious defects,*
- wheels of all axles lock because adhesion between the tyre and brake tester surface was exhausted during the brake test; if wheels on some axles do not lock, it must be safely concluded that the braking efficiency values prescribed in 1.2.2 or 1.3.2 or 1.4.2 would be achieved when the vehicle is loaded,*
- brake actuation level by the inspector must always be proportional to the current load of the axle.*

The current text states that in cases where the minimum required braking efficiency is not achieved, the test can be considered valid if it can be verified that all wheels lock on the brake tester. We must consider that there are factors that influence the adhesion between the tyre and the roller, and therefore the wheel lock-up, such as the condition of the rollers, the condition of the tyres, whether the tyre is wet, or the design coefficient of friction between the tyre and the roller. Under the most unfavorable conditions, adhesion is exhausted “sooner” during the braking test, meaning with a lower braking force.

The braking efficiency results obtained from the brake tester are based on a technical, scientific and verifiable method. The braking efficiency value obtained can be compared with the results obtained using a decelerometer during road test. Consequently, this is a valid method for evaluating and verifying the vehicle braking performance.

However, inspection criteria which is only based on whether or not the wheels lock up raises a fundamental question: What technical basis or calculation supports this criterion?

As far as we know or can understand, it is not based on a technical-scientific method, but rather, perhaps, a statistical approach.

The answer to this question is key, as it determines the technical validity and traceability of the inspection process.

In conclusion, we see no technical justification for considering simple wheel lock-up as a meaningful braking test. In fact, this method does not guarantee repeatability of results, as a vehicle may obtain different results when the test is performed at different inspection centers or under different conditions.

Finally, the sentence: "if wheels on some axles do not lock, it must be safely concluded that the braking efficiency values prescribed in 1.2.2 or 1.3.2 or 1.4.2 would be achieved when the vehicle is loaded"—does this mean that the test must be repeated with the vehicle loaded? We believe the wording is unclear and could lead to wrong conclusions.