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WORKING DOCUMENT

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

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

- Germany expressly thanks the Presidency for addressing the key proposed amendments from Germany, particularly with regard to NOx measurement for diesel-engined vehicles. However, Germany would welcome it if the following comments were also taken into account.

- Re Article **6(2) PTI (NOx measurement for diesel engines) -** The proposed period of three years is unlikely to be sufficient for the introduction of a new measurement procedure. It should be increased to four years, in line with the planned introduction period for PN measurement. This also applies to the period of 18 months, which is also too short for the preparation of an implementing act in view of the planned verification.

  The aim should be to ensure that the measurement method for vehicles of emission category Euro 7 can be applied when the first emissions test is due.

- Regarding Article **6(2) PTI (NOx measurement for petrol engines) –** Germany welcomes the fact that the drafting of an implementing act is now only optional. Germany had always emphasized that a separate NOx measurement for petrol engines is not necessary. However, the wording in Article 6(2) is not consistent with EEC 15b and the overview table on page 2. Therefore, “shall” in Article 6(2) must be replaced with “may”.

- If Germany’s comments are included in the compromise text, we see a viable basis for targeted and mature further development of exhaust emissions testing.

- **Re Annex 8.2.2.1 (PN measurement for petrol engines)**

The following subparagraph under point 8.2.2.1 “Particle number measurement” should be deleted, as it already stipulates specifications for the measurement method to be specified in the implementing act.

“— After the probe has been inserted into the tailpipe, the following steps shall be followed:

1. A stabilization period of at least 15 seconds with the engine running at idle speed.

2. After the stabilisation period, the PN concentration emissions are measured during a sufficient period of time [to be specified in accordance with implementing acts].”

8.2.2.1 Particle number measurement	Vehicle preparation: — [to be specified in accordance with implementing acts] Measuring instrument preparation: — The device to measure PN is powered on for at least the warm-up time indicated by the manufacturer; — Self-checks of the instrument [to be specified in accordance with implementing acts], to monitor the proper operation of the instrument during operation and trigger a warning or message in case of malfunction; Before each test, the good condition of the sampling system shall be verified, including checking the sampling hose and probe for damage. Test procedure: — The software of the particle counter automatically guides the instrument operator through the test procedure; — The probe is inserted at least 0,20 m into the outlet of the exhaust system. In justified exemptions where sampling at this depth is not possible, the probe is inserted at least 0,05 m. The sampling probe shall not touch the walls of the tailpipe; — If the exhaust system has more than one outlet, the test shall be done to all of them. In this case, the highest measured PN concentration measured at different exhaust system outlets shall be considered as the vehicle's PN concentration; — The vehicle operates [as specified in accordance	Measurement result exceeds the limit values to be specified in accordance with implementing acts		X

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	with implementing acts]. In case the engine of a vehicle is not switched on at static conditions then the start/stop system shall be deactivated by the test operator. For hybrid and plug-in hybrid vehicles, the thermal engine shall be switched on; ~~— After the probe has been inserted into the tailpipe, the following steps shall be followed:~~ ~~1. A stabilization period of at least 15 seconds with the engine running at idle speed.~~ ~~2. After the stabilisation period, the PN concentration emissions are measured during a sufficient period of time [to be specified in accordance with implementing acts].~~ After the completion of the test procedure, the instrument reports (and stores) the PN concentration of the vehicle and a “PASS” or “FAIL” message: — If the test result is less than or equal to the limit, the instrument reports a “PASS” message. — If the test result is greater than the limit, the nstrument reports a “FAIL” message.			

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