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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12271/7/25 REV 7
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 Portugal

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

Proposal for a Directive amending Directive 2014/45/EU on periodic roadworthiness tests and Directive 2014/47/EU on the technical roadside inspection

Revised Presidency compromise proposal (ST12271/7/25 REV7)

Comments from PT

(New comments, compared to the previous comments on compromise proposal ST 12271/6/25 REV 6, are highlighted in yellow).

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RECITALS

ST 12271/7/25 (REV7)	Comments/ Questions
(15) While road transport contributes to significant shares of harmful air pollutant emissions in particular NOX and fine particles, the current testing methods for exhaust emissions are not adapted to more recent vehicles and technologies. Commission Recommendation (EU) 2023/688 was a first step in harmonising particle number measurement during roadworthiness testing. In the interests of public health, environmental protection and fair competition, the relevant items to be tested during periodic roadworthiness tests and roadside inspections set out in the annexes to Directives 2014/45/EU and 2014/47/EU should now include particle number measurement and the measurement of NOX. **(15a) For the measuring of NOx from compression ignition engine vehicles at periodic roadworthiness testing, the Commission should specify through implementing acts the requirements for the preconditioning of vehicles, verify appropriate limit values, and specify which EURO standards should be included in the scope, before these vehicles can be included in the scope of emission testing.** **(15b)** Regarding particle number (PN) measurement ~~and NOx measurement~~ for positive ignition engine vehicles, the Commission should specify the methods for measurements **and limit values** through implementing acts before they can be included in the scope of emission testing. **The Commission may specify the method, limit values, and which EURO**	PT considers that NOx emissions should be measured within the RSI rather than the PTI framework, as this approach ensures greater effectiveness and efficiency in testing. Moreover, this strategy would help avoid overburdening PTI centres and minimize inconvenience for the public

standards should be included for measuring NOx from positive ignition engines through implementing acts.	

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ST 12271/7/25 (REV7)	Comments/ Questions
(30) Directive 2014/47/EU specifies a minimum share of heavy commercial vehicles to be tested at the roadside each year in the Union but sets no target at Member State level, with the result that it is difficult to ensure the enforcement of that minimum share. To ensure that roadside inspections of commercial vehicles contribute to improved road safety and reduced air pollution across the Union, each Member State should carry out a total number of initial technical roadside inspections every year, corresponding to at least 5% of the total number of heavy commercial vehicles**, In addition, Member States should carry out initial technical roadside inspections of light commercial vehicles of category N1 corresponding to at least 10% of the total number of initial technical roadside inspections of heavy commercial vehicles**~~, and to at least 0.5% of the total number of light commercial vehicles of category N1, registered in their territory~~.	PT considers that the goal of conducting a total number of initial technical roadside inspections annually, corresponding to at least 5% of all heavy commercial vehicles, imposes implementation constraints. PT believes that a more moderate and realistic initial approach should be adopted, by setting a target of 1%.

Directive 2014/45/EU

'Article 4

Responsibilities

ST 12271/7/25 (REV7)	Comments/ Questions
4. In the case of M_1 and N1 vehicles, roadworthiness tests may, in accordance with Article 8, also be carried out in a Member State other than the Member State of registration of the vehicle. The Member State of registration shall recognise the validity of an EU temporary roadworthiness certificate issued in that other Member State.	As indicated in previous comments, PT considers this measure should be extended to all M and N vehicles.

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Article 8

Roadworthiness certificate and EU temporary roadworthiness certificate

ST 12271/7/25 (REV7)	Comments / Questions
3a. Member States shall communicate any new specimen of the roadworthiness certificate or EU temporary roadworthiness certificate, and the description of the set of data issued to roadworthiness certificates as electronic attestations of attributes to the Commission and to the other Member States without undue delay. The Commission shall publish those specimens and descriptions of the sets of data.	As indicated before, PT is in favour of the adoption of a standard EU template / format. A unique template would promote administrative efficiency, facilitate mutual recognition, simplify enforcement and reduce the possibility of forgery. This proposal has been repeatedly put forward by PT but has not been retained. PT would welcome receiving information on the rationale for not adopting a standard EU template.

Article 16

Exchange of data between Member States' authorities

ST 12271/7/25 (REV7)	Comments / Questions
2. Member States shall interconnect their electronic systems on data contained in roadworthiness certificates, EU temporary roadworthiness certificates and on odometer history through the MOVE-HUB electronic system developed by the Commission in such a way that the competent authorities and authorised testing centres of any Member State are able to consult the relevant database or the national vehicle register of any other Member State in real time. c. The obligation laid down in subparagraph (b) shall be **considered fulfilled where** ~~met if~~ Member States use their own applications or third-party applications**,** including European Car and Driving Licence Information System (EUCARIS), to exchange ~~vehicle~~ data and to connect to the MOVE-HUB electronic system.	PT's proposal is to recognise EUCARIS as the communication system. EUCARIS is a consolidated and reliable system for data exchange between contracting states and/or Member States, which already provides technical solutions for all data exchange purposes provided for in the RWP. EUCARIS enables Member States to exchange data directly with each other, which is more conducive to data protection. Mandatory connection to MOVE-HUB would create a duplicate structure, increasing implementation and maintenance costs. EUCARIS is already consolidated, which would be advantageous in terms of the Directive's rapid implementation.

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Directive 2014/47/EU

'Article 9a

Remote sensing

ST 12271/7/25 (REV7)	Comments/ Questions
1. Member States may use remote sensing technology to screen motor vehicles for their air pollutant and noise emissions and may on the basis of remote sensing select vehicles for an initial technical roadside inspection. Member States may also use remote sensing to identify potentially high-emitting vehicles, the emissions of which may be verified in a testing centre as defined in Directive 2014/45/EU. Member States that use remote sensing technology shall notify the Commission. 2. The Commission may, based on information provided by Member States using remote sensing in accordance with Article 20(3), adopt implementing acts laying down a set of common remote sensing limits for exhaust or noise emissions, or for both, and associated accuracy requirements such as repeated measurement, to be used to identify high-emitting vehicles which need follow-up in another Member State in accordance with 18(3); different requirements may be set for fixed or mobile remote sensing equipment, or plume chasing, and limits may be set for identifying vehicles with defective emission control systems and vehicles with tampered emission control systems. **Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 23(2).**';	PT welcomes the use of remote sensing to monitor pollutant and noise emissions as a means of identifying vehicles for PTI or RSI. The potential for EU funding to support the acquisition of these technologies should be evaluated.

'Article 18a

Exchange of data between Member States' authorities

ST 12271/7/25 (REV7)	Comments/ Questions
(b) Member States shall interconnect their electronic systems on data contained in roadworthiness certificates and on odometer history through the MOVE-HUB electronic system developed by the Commission, in such a	PT's proposal is to recognise EUCARIS as the communication system.

way that the competent authorities of any Member State are able to consult the relevant database or national vehicle register of any other Member State in real time. (c) The obligation laid down in subparagraph (b) shall be **considered fulfilled** ~~**where**met if~~ Member States use their own applications or third-party applications, including European Car and Driving Licence Information System (EUCARIS), to exchange ~~vehicle~~ data and to connect to the MOVE-HUB electronic system.	EUCARIS is a consolidated and reliable system for data exchange between contracting states and/or Member States, which already provides technical solutions for all data exchange purposes provided for in the RWP. EUCARIS enables Member States to exchange data directly with each other, which is more conducive to data protection. Mandatory connection to MOVE-HUB would create a duplicate structure, increasing implementation and maintenance costs. EUCARIS is already consolidated, which would be advantageous in terms of the Directive's rapid implementation.

ANNEX I

ST 12271/7/25 (REV7)	Comments/ Questions
in point 2, the following point is added: '(10) ADAS and other safety related systems.';	Due to the large number of new electronic systems to be tested, PT notes that questions remain regarding the overall impact on PTI duration, the consequences for the public and PTI centre operators, as well as the demand for technical solutions to support additional OBD tests.

ASSESSMENT OF DEFICIENCIES OF VEHICLES

As regards point 3. CONTENTS AND METHODS OF TESTING; ASSESSMENT OF DEFICIENCIES OF VEHICLES, PT highlights the importance of ensuring consistency between RSI and PTI provisions as regards the risk classification of deficiencies (inconsistencies have been detected between Directive 2014/45/EU and 2014/47/EU).