Council of the European Union
General Secretariat

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**Interinstitutional files:**
**2025/0097 (COD)**

**Brussels, 08 July 2025**

**WK 6746/2025 REV 2 ADD 1**

**LIMITE**

**TRANS**
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**WORKING DOCUMENT**

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| From: | General Secretariat of the Council |
| To: | Working Party on Land Transport |
| 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<br>- Revised consolidated initial comments<br>= Comments from Germany on ANNEX 1 |

Delegations will find attached comments from **Germany** on the ANNEX I to the above-mentioned proposal.

The following comments and questions from Germany refer to **st 8255/25 ADD 1** (ANNEXES to the 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).

Germany reserves the right to make further comments, including on those elements of the RWP on which we do not comment in this statement. This statement covers only the annex amending Directive 2014/45/EU and is not yet complete even for that annex.

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| **Commission proposal** | **Comments/ Questions** |
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| **ANNEX I**<br><br>Annexes I, III and IV to Directive 2014/45/EU are amended as follows:<br><br>(c) point 3 is amended as follows:<br><br>(i) the heading and the introduction are replaced by the following:<br><br>'3. CONTENTS AND METHODS OF TESTING, REASONS FOR FAILURE, AND ASSESSMENT OF DEFICIENCIES OF VEHICLES<br><br>The test shall cover at least the items, and use the minimum standards and the recommended methods, listed in the table set out in this point.<br><br>The components and systems of the vehicle shall be inspected visually or by means of the electronic interface, or both, where applicable, using the following inspection criteria:<br><br>(a) the inspection of the fitment includes *the evaluation of any relevant diagnostic trouble codes* and an examination of whether the fitted systems and components comply for example, with the following:<br><br>– | Who determines the PTI-relevancy of the diagnostic trouble codes (DTC´s)? Is that obliged to the individual member state? |
| 1.2.2. Efficiency<br>…<br>"Less than 50 % of the above values reached" | Hyphen above "Less than 50 % of the above values reached" necessary, to separate this, because this sentence is also necessary for the numbers above (= the other vehicle categories). |

<table>
<tr><td colspan="2">Germany proposes some changes in 1.4.2 due to new technology in the market:</td></tr>
<tr><td colspan="2"><table>
<tr><td rowspan="3">1.4.2. Efficiency</td><td rowspan="3">Test with a brake tester. If not possible, then by a road test using either an indicating or deceleration recording instrument or with the vehicle on a slope of known gradient or for park lock devices with a start-up test while the system is activated.</td><td>Does not give, for all vehicles, a braking ratio of at least 16 % in relation to the maximum authorized mass.</td><td></td><td>X</td><td></td></tr>
<tr><td>Less than 50 % of the above braking effort values reached.</td><td></td><td></td><td>X</td></tr>
<tr><td>Park lock device not working.</td><td></td><td></td><td>X</td></tr>
</table></td></tr>
<tr><td>1.7 new<br>1.7. Electric regenerative braking)</td><td>Do we have any requirements about the condition of an electric vehicle for this test? If the battery is 100% full, there will be no regenerative braking.</td></tr>
<tr><td>4.1.2. Alignment<br><br>(i) M,N,O categories (Regulation No 48 UN/ECE [2016/1723], point 6.2.6.1.2):<br>— h ≤ 0,8m: upper limit -0.5%; lower limit -2.5%<br>— 0.8 < h ≤ 1m: upper limit -0.5%; lower limit -3%<br>— h > 1m: upper limit -1% e inferior -3%<br>— h > 1.2m, category N3G (all-terrain): upper limit -1.5%; lower limit -3.5%<br>(ii) L category (Commission Delegated Regulation (EU) No 3/2014 and Regulation No 53 UN/ECE):<br>— upper limit -0.5%<br>— h ≤ 0,8m: lower limit -2,5%<br>— h > 0.8m: lower limit -3,0% (-2,5% on L3e category)<br>(iii) T category (Regulation No 86 UN/ECE):<br>— upper limit -0.5%<br>— h ≤ 1,2m: lower limit -4%<br>h > 1,2m: lower limit -6%</td><td>The requirements in 4.1.2 i) – iii) need clarification. Can it be assumed that Annex 5 of UN-R 48 is the relevant procedure for checking the alignment, because of the reference to Annex 5 in 6.2.6.1.2 of UN-R 48? Therefore, different load conditions are necessary during the check of the headlamp alignment. The same concerns are for points ii) an iii).<br><br>Germany proposes to delete the whole text after the first sentence under a) : “Aim of a headlamp not within limits laid down in the requirements[1].”</td></tr>
<tr><td>4.14 High-voltage systems<br>4.14.1 Electrical safety<br>Visual inspection complemented by using the vehicle interface</td><td>Starting at this item the term “vehicle interface” is used in parallel. It should be consistent throughout the document: “electronic vehicle interface”.</td></tr>
<tr><td>4.14.2 Traction battery cover</td><td>Does “cover” include the battery enclosure as well? If not, please add “and enclosure”.</td></tr>
<tr><td>4.14.4.6 Charging cable<br>(b) Charging cable not provided</td><td>There are no obligations to carry a charging cable in the vehicle (until now). Therefore “not providing a charging cable” can’t be a defect.</td></tr>
<tr><td>4.14.5.2. Traction motor</td><td>Measurement of equipotential bonding requires a special</td></tr>
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| | measurement equipment (four wire resistance meter). Do we have requirements for this measurement equipment? See also 14.4.3 (Ohm meter). |
| 4.14.5.3 Electronic converters, motor, and inverter | Motor is already covered by 4.14.5.2.<br>Suggestion: Rename to "4.14.5.3 Power electronics"<br>Justification: now every component is covered by this new general term. |
| 5.2.3. Tyres<br>…<br>(a) Tyre size, load capacity, approval mark or speed category not in accordance with the requirements1 and affecting road safety or environmental performance. | What is the meaning of "affecting … environmental performance"? |
| 7.11. Odometer, if available<br>Visual inspection, and/or using electronic interface (OBD or OBM) | Why not "using electronic interface" instead of "using electronic interface (OBD or OBM)? Consistency? |
| 8.1.1. Noise suppression system<br>For L-category vehicles powered by internal combustion engines, visual inspection and measurement of noise emitted by stationary vehicle using a sound level meter.<br>…. | DE generally supports the further development of health protection regarding noise. However, DE is critical of the specific proposed expansion of HU requirements for vehicles in class L as proposed by COM. |

Germany proposes a new test item for passenger-carrying vehicles categories M2, M3

| Item | Method | Reasons for failure | Asseament of deficiencies | | |
|---|---|---|---|---|---|
| | | | Minor | Major | Dangerous |
| 9.13. Alarm and fire suppression system | | | | | |
| 9.13.1. Alarm system (if fitted, in accordance with EU type approval legislation) | Visual inspection and by operation (where appropriate) and/or using electronic interface | a) Not operational at all, not working properly. | | X | |
| | | b) System indicates failure via the electronic vehicle interface. | | X | |
| | | c) Missing | | X | |
| | | d) Not in accordance with requirements [1)] | | X | |
| | | a) Missing, activated. | | X | |

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| 9.13.2. Fire suppression system (if fitted, in accordance with EU type approval legislation) | Visual inspection and/or using electronic interface | b) System indicates failure via the electronic vehicle interface. | | X | |
| | | c) Not in accordance with requirements[1)] | | X | |
| | | d) Detection agent vessel, propellant gas vessel, extinguishing agent vessel pressure-less, empty. | | X | |
| | | e) Vessel inspection and exchange period(s) expired. | | X | |

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| 10. Electronic Safety Systems | Germany proposes to add text in item 10:<br>10. Electronic Safety Systems (if fitted, in accordance with EU type approval legislation) |
| 10.20 Taillight switching<br>Description: Depending on operating status and/or failure of the illuminants, lighting functions are taken over by other luminaires. | This "fail safe issue" needs to be discussed. Germany proposes to delete this item, because it does not cover the normal use of the vehicle. |
| 10.33 Endurance brake<br>Description: an additional braking system that can maintain braking over a period of time without a significant reduction in performance, for example in accordance with UNECE-R 13 and Regulation (EU) 2019/2144. | "(j) Other failure…"<br>should be replaced by "(h) Other failure…" |
| 10.48 Automatic eCall<br>…(method):<br>The verification of the minimum set of data (MSD) includes checking whether:<br>- the mandatory fields are filled with plausible information;<br>- the deviation between in-vehicle system (IVS) location and true location is less than 150 meters. The calculation can be done according to point 2.5 of Annex I of Commission Delegated Regulation (EU) 2017/79;<br>- the deviation between the MSD timestamp and the timestamp of the reading is less than 60s. | The verification of the minimum set of data seems to be complicated. Do you have any expectations about costs and the time duration for performing this verification? |
| 10.51 Acoustic vehicle alerting<br>Description: at low speed, the system generates an external, specific sound in order to warn, for example pedestrians.<br>….<br>(g) System or components not operating, or implausible operative, or not respecting type-approved noise levels | The defect "not respecting type approval noise levels" needs a measuring method, which is not common for PTI. Therefore Germany proposes to delete the text. |

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| (2) Annex III is amended as follows:<br>(a) in section I 'Facilities and equipment', the first paragraph is amended as follows:<br>(i) points (9) and (10) are replaced by the following:<br>'(9) A Class II sound level meter, if sound level is measured;<br>(10) A 4-gas analyser in accordance with Directive 2014/32/EU of the European Parliament and of the Council*; | What is the difference to the current version of (9)? |
| Annex III | 1. Missing equipment:<br>• damping test equipment (item 5.3.2.1)?<br>• Resistance Meter(item 4.14.4.3)?<br>2. Calibration of damping test equipment (item 5.3.2.1) and Resistance Meter (item 4.14.4.3) missing? if mandatory? |

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