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General Secretariat

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WORKING DOCUMENT

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 - Revised consolidated initial comments

Delegations will find attached **further revised** consolidated initial comments on the above-mentioned proposal from Austria, Belgium, Czech Republic, Germany, Estonia, Spain, Finland, Greece, the Netherlands, Portugal, Slovakia, Ireland, Luxembourg, Poland and **Romania.**

Proposal on Periodic roadworthiness tests and technical roadside inspection Deadline: ***14 May 2025***

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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Guidelines to be followed

Please kindly provide your contributions in the table below.

Drafting suggestions: you may use '**track changes**' or formatting (for example **bold-underline** for additions and ~~strike-through~~ for deletions, **where necessary, in a different colour**).

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments on … .docx**

Thank you for your cooperation!

Commission proposal	Drafting suggestions and Comments/ Questions
General comments	SK (Comments/ Questions): SK would like to place a general scrutiny reservation. Generally, we thank the Commission for the proposal, we want to be constructive and looking forward to the discussion. DE (Comments/ Questions): Germany must maintain its general reservation regarding the entire proposal. General remark: Changes amending directive 2014/47/EU are under futher examination. This particularly concerns the proposed provisions on remote recognition (Article 4a). We will issue a separate statement on this.

Commission proposal	Drafting suggestions and Comments/ Questions
	Further regulatory proposals: 1. Technical roadside inspections often involve the use of vehicle data that is read by the inspectors via the OBD interface. The problem of encrypting the OBD vehicle data stream in newly type-approved vehicles is becoming increasingly apparent. In our view, the problem of the encryption of the OBD vehicle data stream by vehicle manufacturers could be solved by including a requirement in the amended Directive 2014/47/EU that competent authorities be granted unrestricted, standardized, and non-discriminatory access to the direct vehicle data stream of vehicle OBD information in accordance with Article 61, as well as free access to repair and maintenance information in accordance with Article 63 of Regulation (EU) 2018/858, for the purpose of verifying technical roadside inspections (see Article 4 of the draft Directive 2014/45/EU). This also applies to other promising technologies such as OTA (Over the Air) and OBM (On-Board Monitoring System). 2. A legal basis for removal and confiscation of defective and tampered vehicle parts, analogous to the provisions of Article 38(3) of Regulation (EU) No. 165/2014 should be incorporated in the legal framework of Directive 2014/47/EU. During RSI, it is often necessary to retain damaged and tampered vehicle parts (control units, AdBlue emulators, brake parts, etc.) as evidence for the penalty proceedings, similar to tampered tachographs. AT (Comments/ Questions): AT reserves general scrutiny reservation IE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	IE retains its general scrutiny position – initial comments and expected challenges are outlined below.
2025/0097 (COD)	
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	DE (Comments/ Questions): With regard to "digitalization," Germany asks that consideration be given to the fact that an exception to the obligation to provide electronic vehicle registration and inspection certificates and to exchange data on these for law enforcement authorities (armed forces, police, border control) is necessary.
(Text with EEA relevance)	

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Commission proposal	Drafting suggestions and Comments/ Questions
THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,	
Having regard to the Treaty on the Functioning of the European Union, and in particular Article 91(1) thereof,	
Having regard to the proposal from the European Commission,	
After transmission of the draft legislative act to the national parliaments,	
Having regard to the opinion of the European Economic and Social Committee[1],	
Having regard to the opinion of the Committee of the Regions[2],	
Acting in accordance with the ordinary legislative procedure,	

[1] OJ C , , p. .
[2] OJ C , , p. .

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Commission proposal	Drafting suggestions and Comments/ Questions
Whereas:	
(1) Provisions regarding roadworthiness testing have been part of Union legislation for decades. They are however subject to gradual harmonisation. Union law to that effect was last revised in 2014 with the "Roadworthiness Package"[3]. To improve enforcement, consecutive revisions of those rules gradually extended the scope of vehicles to be tested and the scope of the harmonised rules, including those on roadside inspections and vehicle registration documents. They specified and updated the required test methods, procedures and related documents to reflect technological progress.	
(2) Directive 2014/45/EU sets out the minimum content and frequency of testing for each vehicle category, except for motorcycles, where Member States have a broader discretion. That Directive also sets out minimum requirements for the independence of testing centres and training of inspectors, testing equipment, and the content of the roadworthiness certificate. The validity of that certificate, as well as any other proof of testing, is to be recognised by Member States for the purposes of free circulation and re-registering a vehicle already registered in another Member State.	DE (Drafting suggestions): • Regarding recital 2: On the one hand, Directive 2014/45/EU specifies the minimum content of the tests, and on the other hand, follow-up checks should also be possible outside the member state of registration (see Article 9, paragraph 2). Therefore, in the view of Germany, "minimum content" should be replaced by "content." LU (Comments/ Questions):

[3] Directive 2014/45/EU of the European Parliament and of the Council of 3 April 2014 on periodic roadworthiness tests for motor vehicles and their trailers and repealing Directive 2009/40/EC (OJ L 127, 29.4.2014, p. 51, ELI: http://data.europa.eu/eli/dir/2014/45/oj), Directive 2014/47/EU of the European Parliament and of the Council of 3 April 2014 on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union and repealing Directive 2000/30/EC (OJ L 127, 29.4.2014, p. 134, ELI: http://data.europa.eu/eli/dir/2014/47/oj) and Directive 2014/46/EU of the European Parliament and of the Council of 3 April 2014 amending Council Directive 1999/37/EC on the registration documents for vehicles (OJ L 127, 29.4.2014, p. 129, ELI: http://data.europa.eu/eli/dir/2014/46/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
	The proposal suggests that only the minimum requirements for PTI should be defined. However, this approach may lead to inconsistencies in how inspections are conducted across different Member States. To ensure uniformity and reliability, detailed requirements should be established. LU (Comments/ Questions): The proposal suggests that only the minimum requirements for PTI should be defined. However, this approach may lead to inconsistencies in how inspections are conducted across different Member States. To ensure uniformity and reliability, detailed requirements should be established.
(3) Directive 2014/47/EU complements Directive 2014/45/EU by requiring Member States to carry out roadside inspections on heavy commercial vehicles above 3.5 tonnes, including buses, lorries, and their trailers with the aim of inspecting 5% of the Union fleet each year. Those inspections include an initial roadside inspection and, if deemed necessary by the inspector, a more detailed technical roadside inspection. The items tested in the detailed inspections are the same as those tested at periodic tests and may also include the inspection of cargo securing. Where a major or dangerous deficiency is found during a roadside inspection, the Member State where the inspection took place is required to notify the Member State of registration in order to enforce the repair of the vehicle that has been suspended from traffic.	PL (Comments/ Questions): How to interpret the provision concerning e*nforcement of the repair of the vehicle that has been suspended from traffic* after a roadside inspection in a Member State other than the country of registration: how the MS of registration is to enforce the repair of a vehicle suspended from traffic in a MS of inspection? It is proposed to notify the country of registration of the dangerous defect after the inspection, in order to avoid, for example, the issuing of another operating permit. Detection of a serious defect in a number that does not prohibit further use of the vehicle (number of defects resulting in a change of category to dangerous) - notification justified in order to enforce repair of a vehicle

Commission proposal	Drafting suggestions and Comments/ Questions
	that has been temporarily put into service (access to service, exit to garage and repairs).
(4) Due to rapid technological progress, some of the current rules for testing vehicles have become outdated and should be amended to adapt them to newer technologies and vehicles. The testing framework should further contribute to reducing emissions from transport and to accelerating and benefiting from digitalisation in the transport sector. The framework should also be better adapted to developments in evolving vehicle technology, fleet composition and testing methods.	PT (Comments/ Questions): In line with one of the stated objectives of this revision, that of including electric vehicles in its scope, a clearer reference to electric and hybrid powered vehicles (not just "**newerer** technologies and **vehicles**") should be made in this recital. LU (Comments/ Questions): The term "technology" in the text refers to various advancements in vehicle systems, including ADAS, emission control systems, digital interfaces, and connectivity features. However, the proposal does not provide practical solutions for implementing these goals in real-world testing scenarios. Ensuring that testing methods are effective, not time consuming and reliable in various conditions is crucial for achieving the desired outcomes. LU (Comments/ Questions): The term "technology" in the text refers to various advancements in vehicle systems, including ADAS, emission control systems, digital interfaces, and connectivity features. However, the proposal does not provide practical solutions for implementing these goals in real-world testing scenarios. Ensuring that

Commission proposal	Drafting suggestions and Comments/ Questions
	testing methods are effective, not time consuming and reliable in various conditions is crucial for achieving the desired outcomes.
	NL (Drafting suggestions): 5a) Testing during the life cycle of a vehicle should be relatively simple, quick and inexpensive, while at the same time effective in achieving the objectives of the Directives. NL (Drafting suggestions): 5a) Testing during the life cycle of a vehicle should be relatively simple, quick and inexpensive, while at the same time effective in achieving the objectives of the Directives.
(5) The digital transition is one of the Union's priorities. In the context of updating the current rules on testing vehicles, it is also important to harmonise, simplify and digitalise administrative procedures and to remove the remaining barriers to free movement. These barriers include the non-recognition of periodic technical inspections conducted in Member States other than the Member State of registration. This can impede the free movement of people within the Union and their right to take up residence in a Member State other than the one where the vehicle is currently registered.	DE (Drafting suggestions): • Regarding recital 5: The administrative procedures are not being fully harmonized, and this is not a regulation. Therefore, in the view of the German delegation, the word "harmonize" in the second sentence should be replaced by "largely harmonize." PL (Comments/ Questions): What happens when a roadworthiness test is conducted in a country where more restrictive technical conditions apply than the ones set in the directive? Example: Vehicle registered in a country that requires uniform tread pattern on one axle (e.g. Poland) to be tested in a country where this obligation does not apply (e.g. Germany).

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Commission proposal	Drafting suggestions and Comments/ Questions
(6) Some of the current emission test methods are inadequate for testing vehicles with modern air pollutant emission control technology and low baseline emissions. There is also potential to further reduce pollutant emissions through more appropriate tests and checks. Applying the best available test methods would help Member States reach stricter air quality standards, namely the limit values for the protection of human health set by Directive (EU) 2024/2881 of the European Parliament and of the Council[4], especially for fine particulate matter and nitrogen oxides (NO_X).	NL (Drafting suggestions): (6) Some of the current emission test methods are inadequate for testing vehicles with modern air pollutant emission control technology and low baseline emissions. There is also potential to further reduce pollutant emissions through more appropriate tests and checks. Applying the best available, proportionate and suitable test methods would help Member States reach stricter air quality standards, namely the limit values for the protection of human health set by Directive (EU) 2024/2881 of the European Parliament and of the Council[5], especially for fine particulate matter and nitrogen oxides (NO_X). EE (Comments/ Questions): Question towards Cion: What is the expected cost of the technical devices to measure NOx and PM? NL (Drafting suggestions): (6) Some of the current emission test methods are inadequate for testing vehicles with modern air pollutant emission control technology and low baseline emissions. There is also potential to further reduce pollutant emissions through more appropriate tests and checks. Applying the best available, proportionate and suitable test methods would help Member States reach stricter air quality standards, namely the limit values

[4] Directive (EU) 2024/2881 of the European Parliament and of the Council of 23 October 2024 on ambient air quality and cleaner air for Europe (recast), (OJ L, 2024/2881, 20.11.2024, ELI: http://data.europa.eu/eli/dir/2024/2881/oj).

[5] Directive (EU) 2024/2881 of the European Parliament and of the Council of 23 October 2024 on ambient air quality and cleaner air for Europe (recast), (OJ L, 2024/2881, 20.11.2024, ELI: http://data.europa.eu/eli/dir/2024/2881/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
	for the protection of human health set by Directive (EU) 2024/2881 of the European Parliament and of the Council[6], especially for fine particulate matter and nitrogen oxides (NO_X). LU (Comments/ Questions): The proposal advocates for applying the best available test methods to help Member States reach stricter air quality standards. However, it does not provide practical solutions for implementing these methods in real-world scenarios. Ensuring that testing methods are effective, cost effective and reliable in various conditions is crucial for achieving the desired outcomes. Moreover, it does not address the challenge of ensuring consistency and reliability in these tests across different Member States. IE (Comments/ Questions): NOx testing requires the vehicle to be under load, this would add extra time to the test and would not be feasible for vehicles over 3.5 tonnes. Further details would need to be provided. Consideration for OBM or OBD. Please see extract from 8.2.2.3. NOx Measurement of Annex I: “Vehicle preparation: [to be specified in accordance with the delegated acts referred to in Article 17]; - […] Measuring instrument preparation:

[6] Directive (EU) 2024/2881 of the European Parliament and of the Council of 23 October 2024 on ambient air quality and cleaner air for Europe (recast), (OJ L, 2024/2881, 20.11.2024, ELI: http://data.europa.eu/eli/dir/2024/2881/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
	— [to be specified in accordance with the delegated acts referred to in Article 17 or combined with PN testing above];" LU (Comments/ Questions): The proposal advocates for applying the best available test methods to help Member States reach stricter air quality standards. However, it does not provide practical solutions for implementing these methods in real-world scenarios. Ensuring that testing methods are effective, cost effective and reliable in various conditions is crucial for achieving the desired outcomes. Moreover, it does not address the challenge of ensuring consistency and reliability in these tests across different Member States.
(7) The number of fatalities and serious injuries on Union roads remains at an unacceptably high level, with 20 400 deaths in 2023. Therefore, further action is required in order to reach the targets for road safety set out in EU road safety policy framework 2021-2030[7].	
(8) Testing the roadworthiness of motorcycles has clear benefits for road safety. This has also been demonstrated by the number of Member States that already include motorcycles in their roadworthiness testing systems. As a result, the current possibility of an opt-out for motorcycles with an engine capacity above 125 cm^3 is no longer appropriate, and periodic testing should be mandatory for such vehicles without exception.	PT (Comments/ Questions): Portugal acknowledges the safety benefits associated with roadworthiness testing for motorcycles. However, we consider that the current framework, which allows Member States to apply an opt-out for motorcycles over 125 cm^3, continues to provide the necessary flexibility to accommodate national specificities. Portugal supports maintaining this

[7] SWD(2019) 283 final https://transport.ec.europa.eu/system/files/2021-10/SWD2190283.pdf.

Commission proposal	Drafting suggestions and Comments/ Questions
	possibility, as it allows for an evidence-based approach tailored to each Member State's road safety context and administrative capacity. FI (Drafting suggestions): (8) Testing the roadworthiness of motorcycles has clear benefits for road safety. This has also been demonstrated by the number of Member States that already include motorcycles in their roadworthiness testing systems. ~~As a result, the current possibility of an opt-out for motorcycles with an engine capacity above 125 cm3 is no longer appropriate, and periodic testing should be mandatory for such vehicles without exception.~~ FI (Comments/ Questions): **Justification:** See comments in Article 2.
(9) According to the feedback received from Member States and industry representatives, the current legal requirements aiming to ensure that the technical data needed to carry out periodic technical inspections are available to testing centres have proven to be ineffective. It is therefore necessary to specify that a minimum set of information should be made available free of charge and without undue delay to the competent authorities, which should then ensure that the testing centres authorised by them also have the required access.	IE (Comments/ Questions): We expect that full potential will not be realised until this is mandated at type-approval.
(10) The Member State of registration should recognise a temporary roadworthiness certificate issued by another Member State for a period of up to six months, provided that the subsequent periodic technical	NL (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
inspection is conducted in the Member State of registration. That will contribute to facilitating the free movement of people while respecting the basic requirement that vehicles are generally to be tested in the Member State of registration.	(10) For M1 vehicles, the Member State of registration should recognise a temporary roadworthiness certificate issued by another Member State for a period of up to six months, provided that the subsequent periodic technical inspection is conducted in the Member State of registration. That will contribute to facilitating the free movement of people while respecting the basic requirement that vehicles are generally to be tested in the Member State of registration. DE (Drafting suggestions): • Regarding recital 10: A real simplification would be mutual recognition for at least 12 months, also taking into account the cost/benefit aspects for citizens. The DEU therefore proposes amending this to 12 months. NL (Drafting suggestions): (10) For M1 vehicles, the Member State of registration should recognise a temporary roadworthiness certificate issued by another Member State for a period of up to six months, provided that the subsequent periodic technical inspection is conducted in the Member State of registration. That will contribute to facilitating the free movement of people while respecting the basic requirement that vehicles are generally to be tested in the Member State of registration. LU (Comments/ Questions): The proposal limits the recognition of temporary roadworthiness certificates to six months but does not explain why this period was chosen. Extending the duration beyond six months could further facilitate the free movement of people and reduce administrative burdens. However, it is crucial to ensure that extended periods do not compromise

Commission proposal	Drafting suggestions and Comments/ Questions
	vehicle safety. Detailed requirements and frequent checks may be necessary to maintain high safety standards over longer periods. LU (Comments/ Questions): The proposal limits the recognition of temporary roadworthiness certificates to six months but does not explain why this period was chosen. Extending the duration beyond six months could further facilitate the free movement of people and reduce administrative burdens. However, it is crucial to ensure that extended periods do not compromise vehicle safety. Detailed requirements and frequent checks may be necessary to maintain high safety standards over longer periods.
(11) For the same reason, a Member State of registration should be able to choose to recognise roadworthiness certificates issued by another Member State. If it does so, it should inform the other Member States and the Commission. The roadworthiness certificates concerned should be considered by all Member States as equivalent to certificates issued by the Member State of registration.	LU (Comments/ Questions): The proposal advocates for mutual recognition of roadworthiness certificates, but it does not provide practical solutions for implementing this. At the very least, guidelines or better-defined procedures should be established to ensure that conditions are met for mutual recognition of roadworthiness certificates. This would help standardize the process and ensure that concerned Member States adhere to the same standards LU (Comments/ Questions): The proposal advocates for mutual recognition of roadworthiness certificates, but it does not provide practical solutions for implementing this. At the very least, guidelines or better-defined procedures should be established to ensure that conditions are met for mutual recognition of

Commission proposal	Drafting suggestions and Comments/ Questions
	roadworthiness certificates. This would help standardize the process and ensure that concerned Member States adhere to the same standards
(12) To combat fraud related to the mileage of used vehicles, recording odometer readings is included in periodic roadworthiness testing. However, the effectiveness of the measure has been limited because the first test is only carried out four years after the first registration in most Member States and only every two years after that in many of them. To further tackle odometer fraud, Member States should ensure that odometer readings are taken whenever a service provider carries out maintenance or repair work on a vehicle and that the readings are recorded in a national database or register. Member States should make those readings available in an anonymised format to inspectors, the competent authorities and the holder of the registration certificate. In addition, Member States should require manufacturers to transmit the odometer readings of connected vehicles every three months. In order to enable consumers to detect odometer fraud before purchasing a vehicle, Member States should also inform consumers of the availability of odometer history to the holder of the registration certificate, in particular in the context of vehicle sales. To enhance the availability of statistics on vehicle use without additional reporting burden on national administrations, Member States should make the odometer readings available, in an anonymised form, to the national statistical institutes and to the Commission (Eurostat).	PT (Comments/ Questions): PT considers that information about odometer history should be made available in the EU database (in association with the VIN). However, we feel that this proposal should be better clarified in terms of how it will be implemented. NL (Drafting suggestions): (12) To combat fraud related to the mileage of used vehicles, recording odometer readings is included in periodic roadworthiness testing. However, the effectiveness of the measure has been limited because the first test is only carried out four years after the first registration in most Member States and only every two years after that in many of them. To further tackle odometer fraud, Member States should ensure that odometer readings are taken whenever an accredited service provider carries out maintenance or repair work on a vehicle and that the readings are recorded in a ~~national database or register~~ their national vehicle register. Member States should make those readings available in an anonymised format to inspectors, the competent authorities and the holder of the registration certificate. In addition, Member States should require manufacturers to transmit the odometer readings of connected vehicles every three months. In order to enable consumers to detect odometer fraud before purchasing a vehicle, Member States should also inform consumers of the availability of odometer history to the holder of the

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	registration certificate, in particular in the context of vehicle sales. To enhance the availability of statistics on vehicle use without additional reporting burden on national administrations, Member States should make the odometer readings available, in an anonymised form, to the national statistical institutes and to the Commission (Eurostat). NL (Comments/ Questions): To combat fraude related to the mileage of vehicles, we very much encourage the registration of odometer readings. In the proposal it is stated that the readings must be available to several parties such as the inspectors, the holder of registration certificate, the competent authorities and Eurostat. Just for clarification and point of discussion with MS: legal basis for this preferred in 2014/45 or 2014/46? ES (Comments/ Questions): Spain already has in place a system to register and collect odometer readings by PTI services during testing since 2014. Therefore, Spain considers quite relevant for road safety and consumers rights to include this obligation within the content of the directive, along with other readings coming from maintenance services and manufacturers. EE (Comments/ Questions): Question towards Cion: What is the expected cost of this on dealerships/repairshops?

Commission proposal	Drafting suggestions and Comments/ Questions
	Preliminarily questioning the value of this. DE (Comments/ Questions): • Regarding recital 12: The specifications for checking the odometer still need to be reviewed by experts. In this respect, Germany has a study reservation on the proposed text. NL (Drafting suggestions): (12) To combat fraud related to the mileage of used vehicles, recording odometer readings is included in periodic roadworthiness testing. However, the effectiveness of the measure has been limited because the first test is only carried out four years after the first registration in most Member States and only every two years after that in many of them. To further tackle odometer fraud, Member States should ensure that odometer readings are taken whenever an accredited service provider carries out maintenance or repair work on a vehicle and that the readings are recorded in a ~~national database or register~~ their national vehicle register. Member States should make those readings available in an anonymised format to inspectors, the competent authorities and the holder of the registration certificate. In addition, Member States should require manufacturers to transmit the odometer readings of connected vehicles every three months. In order to enable consumers to detect odometer fraud before purchasing a vehicle, Member States should also inform consumers of the availability of odometer history to the holder of the registration certificate, in particular in the context of vehicle sales. To enhance the availability of statistics on vehicle use without additional reporting burden on national administrations, Member States should make the odometer readings available, in an anonymised form, to the national statistical institutes and to the Commission (Eurostat).

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Comments/ Questions): To combat fraude related to the mileage of vehicles, we very much encourage the registration of odometer readings. In the proposal it is stated that the readings must be available to several parties such as the inspectors, the holder of registration certificate, the competent authorities and Eurostat. Just for clarification and point of discussion with MS: legal basis for this preferred in 2014/45 or 2014/46? LU (Comments/ Questions): For us, the implementation is likely to be very difficult. We are located at a crossroads between three countries, and European citizens move freely, including for services performed on vehicles. To address the issue of tracking odometer readings when a vehicle goes abroad for maintenance, it would be more appropriate to refer to existing services such as EUCARIS, which already provides a mileage service and facilitates the secure cross-border exchange of vehicle data.This database would be accessible to all approved stakeholders across Member States, ensuring that odometer readings are consistently recorded and tracked, regardless of where the maintenance occurs. This would require cooperation and approval from each Member State to ensure comprehensive and accurate data collection. While this measure aims to enhance the tracking of odometer readings, it inadvertently places non-connected cars at an advantage. Since the odometer readings of non-connected cars are not automatically

Commission proposal	Drafting suggestions and Comments/ Questions
	communicated to the Member States, there is a potential gap in the data collection process. This could lead to inconsistencies in tracking mileage, especially if these vehicles undergo maintenance or repair abroad, where odometer readings might not be recorded in the national database. Odometer blockers are devices that can prevent the recording of mileage, leading to potential fraud. The current proposal does not specify how the EU Commission plans to detect or prevent the installation of such devices. It is crucial for the effectiveness of this initiative that measures are put in place to identify and address the use of odometer blockers. IE (Comments/ Questions): We would welcome additional information and other MS experience on this point. This is a significant requirement on mechanics and vehicle repairers, many of of whom are small independent operators. The range and practicality of this measure needs further consideration. For instance would garages be required to manually enter a reading for every vehicle and how would errors be addressed? How would enforcement work? Most if not all member states do not have this function at present and it would require significant software development, verification processes where there is no national register of people authorised to repair or modify vehicles. Significant communication campaigns would be required nationally in each Member State. This requirement to take odometer readings at each repair far exceeds the scope of roadworthiness and is in the realm of consumer protection. The Commission has access to odometer readings directly from manufacturers and Member States for vehicles fitted with OBFCM

Commission proposal	Drafting suggestions and Comments/ Questions
	devices since 2021. Could this data be made available for the purposes outlined? LU (Comments/ Questions): For us, the implementation is likely to be very difficult. We are located at a crossroads between three countries, and European citizens move freely, including for services performed on vehicles. To address the issue of tracking odometer readings when a vehicle goes abroad for maintenance, it would be more appropriate to refer to existing services such as EUCARIS, which already provides a mileage service and facilitates the secure cross-border exchange of vehicle data.This database would be accessible to all approved stakeholders across Member States, ensuring that odometer readings are consistently recorded and tracked, regardless of where the maintenance occurs. This would require cooperation and approval from each Member State to ensure comprehensive and accurate data collection. While this measure aims to enhance the tracking of odometer readings, it inadvertently places non-connected cars at an advantage. Since the odometer readings of non-connected cars are not automatically communicated to the Member States, there is a potential gap in the data collection process. This could lead to inconsistencies in tracking mileage, especially if these vehicles undergo maintenance or repair abroad, where odometer readings might not be recorded in the national database. Odometer blockers are devices that can prevent the recording of mileage, leading to potential fraud. The current proposal does not specify how the EU Commission plans to detect or prevent the installation of such

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	devices. It is crucial for the effectiveness of this initiative that measures are put in place to identify and address the use of odometer blockers.
(13) Although electric vehicles, including hybrid electric vehicles, have been in circulation for many years, and their numbers have been steadily increasing, there are no harmonised rules on the roadworthiness testing of the high-voltage systems of such vehicles, resulting in Member States developing different test protocols. To ensure the safe operation of such vehicles throughout their useful life and avoid conflicting testing practices in the Member States, relevant test items should be included in the minimum requirements for the contents of and recommended methods for testing.	LU (Comments/ Questions): Requirements specifically for electric vehicles in inspector training are missing (e.g., high voltage training). LU (Comments/ Questions): Requirements specifically for electric vehicles in inspector training are missing (e.g., high voltage training). PL (Drafting suggestions): **Minimum qualification requirements for the personnel performing the tests should also be included.**
(14) Regulation (EU) 2019/2144 of the European Parliament and of the Council[8] requires the installation of a variety of advanced driver	NL

[8] Regulation (EU) 2019/2144 of the European Parliament and of the Council of 27 November 2019 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/858 of the European Parliament and of the Council and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009 of the European Parliament and of the Council and Commission Regulations (EC) No 631/2009, (EU) No 406/2010, (EU) No 672/2010, (EU) No 1003/2010, (EU) No 1005/2010, (EU) No 1008/2010, (EU) No 1009/2010, (EU) No 19/2011, (EU) No 109/2011, (EU) No 458/2011, (EU) No 65/2012, (EU)

Commission proposal	Drafting suggestions and Comments/ Questions
assistance systems, designed to avoid crashes and reduce casualties and severe injuries. However, the expected benefits will not be achieved if these systems deteriorate over time or are subject to tampering. Therefore, those new electronic systems should be included in periodic and roadside inspections to ensure that they deliver their expected safety benefits. To ensure the safe operation of automated vehicles and the testing of electronic safety systems throughout their useful life, relevant items to be tested should be included in the minimum requirements concerning the contents of and recommended methods for testing set out in the respective Annexes to Directives 2014/45/EU and 2014/47/EU.	(Drafting suggestions): Regulation (EU) 2019/2144 of the European Parliament and of the Council[9] requires the installation of a variety of advanced driver assistance systems, designed to avoid crashes and reduce casualties and severe injuries. However, the expected benefits will not be achieved if these systems deteriorate over time or are subject to tampering. Therefore, those new electronic systems, that cannot be disabled by the driver of the vehicle, should be included in periodic and roadside inspections to ensure that they deliver their expected safety benefits. To ensure the safe operation of automated vehicles and the testing of electronic safety systems throughout their useful life, relevant items to be tested should be included in the minimum requirements concerning the contents of and recommended methods for testing set out in the respective Annexes to Directives 2014/45/EU and 2014/47/EU. EE (Comments/ Questions): Questions toward Cion: How should they be tested? Through OBD or some standardised physical test/calibration (i.e as currently the systems are calibrated for an example after windshield change)?

No 130/2012, (EU) No 347/2012, (EU) No 351/2012, (EU) No 1230/2012 and (EU) 2015/166 (OJ L 325, 16.12.2019, p. 1, ELI: http://data.europa.eu/eli/reg/2019/2144/oj).

[9] Regulation (EU) 2019/2144 of the European Parliament and of the Council of 27 November 2019 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/858 of the European Parliament and of the Council and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009 of the European Parliament and of the Council and Commission Regulations (EC) No 631/2009, (EU) No 406/2010, (EU) No 672/2010, (EU) No 1003/2010, (EU) No 1005/2010, (EU) No 1008/2010, (EU) No 1009/2010, (EU) No 19/2011, (EU) No 109/2011, (EU) No 458/2011, (EU) No 65/2012, (EU) No 130/2012, (EU) No 347/2012, (EU) No 351/2012, (EU) No 1230/2012 and (EU) 2015/166 (OJ L 325, 16.12.2019, p. 1, ELI: http://data.europa.eu/eli/reg/2019/2144/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
	What would be the extra cost for the consumer if testing facilities need additional equipment or the time concluding PTI will become longer? NL (Drafting suggestions): Regulation (EU) 2019/2144 of the European Parliament and of the Council[10] requires the installation of a variety of advanced driver assistance systems, designed to avoid crashes and reduce casualties and severe injuries. However, the expected benefits will not be achieved if these systems deteriorate over time or are subject to tampering. Therefore, those new electronic systems, that cannot be disabled by the driver of the vehicle, should be included in periodic and roadside inspections to ensure that they deliver their expected safety benefits. To ensure the safe operation of automated vehicles and the testing of electronic safety systems throughout their useful life, relevant items to be tested should be included in the minimum requirements concerning the contents of and recommended methods for testing set out in the respective Annexes to Directives 2014/45/EU and 2014/47/EU. LU (Comments/ Questions): If this is verified through a practical test (e.g., driving the vehicle on a test course), the time required to perform a PTI risks becoming too long.

[10] Regulation (EU) 2019/2144 of the European Parliament and of the Council of 27 November 2019 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/858 of the European Parliament and of the Council and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009 of the European Parliament and of the Council and Commission Regulations (EC) No 631/2009, (EU) No 406/2010, (EU) No 672/2010, (EU) No 1003/2010, (EU) No 1005/2010, (EU) No 1008/2010, (EU) No 1009/2010, (EU) No 19/2011, (EU) No 109/2011, (EU) No 458/2011, (EU) No 65/2012, (EU) No 130/2012, (EU) No 347/2012, (EU) No 351/2012, (EU) No 1230/2012 and (EU) 2015/166 (OJ L 325, 16.12.2019, p. 1, ELI: http://data.europa.eu/eli/reg/2019/2144/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
	The proposal suggests that reading out the OBD data is enough to confirm the functionality of ADAS. However, this overlooks the complexity of real-world conditions. Therefore, relying solely on OBD data is inadequate for ensuring the proper functioning of ADAS. It does not specify how these inspections should be conducted or what standards should be applied. Clear guidelines and standardized testing methods are essential to ensure these systems continue to deliver their expected safety benefits. The text refers to Regulation (EU) 2019/2144 and Directives 2014/45/EU and 2014/47/EU but does not provide details on the minimum requirements for testing. To ensure harmonised compliance and safety, it is crucial to outline specific testing criteria and methods that should be used. IE (Comments/ Questions): This is a needed addition to testing, however it is noted that the new item 10 in Annex I outlines 61 separate tests. This may prove burdensome and costly for national PTI schemes to implement. LU (Comments/ Questions): If this is verified through a practical test (e.g., driving the vehicle on a test course), the time required to perform a PTI risks becoming too long. The proposal suggests that reading out the OBD data is enough to confirm the functionality of ADAS. However, this overlooks the complexity of real-world conditions. Therefore, relying solely on OBD data is inadequate for ensuring the proper functioning of ADAS. It does not specify how these inspections should be conducted or what standards should be applied. Clear guidelines and standardized testing

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	methods are essential to ensure these systems continue to deliver their expected safety benefits. The text refers to Regulation (EU) 2019/2144 and Directives 2014/45/EU and 2014/47/EU but does not provide details on the minimum requirements for testing. To ensure harmonised compliance and safety, it is crucial to outline specific testing criteria and methods that should be used. PL (Comments/ Questions): Introducing mandatory control of electronic security systems into the scope of the PTI is complicated and costly. There are no standardised interfaces and protocols. The question is about the cost-benefit analysis. The scope already includes control of the e-call system. Is it known what the rejection rate is for this system? How many breaches related to the e-call system have occurred? A better solution is to keep mandatory control only when data is available.
(15) While road transport contributes to significant shares of harmful air pollutant emissions in particular NO_X and fine particles, the current testing methods for exhaust emissions are not adapted to more recent vehicles and technologies. Commission Recommendation (EU) 2023/688[11] 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	NL (Drafting suggestions): (15) While road transport contributes to significant shares of harmful air pollutant emissions in particular NO_X and fine particles, the current testing methods for exhaust emissions are not adapted to more recent vehicles and technologies. Commission Recommendation (EU)

[11] 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, (OJ L 90, 28.3.2023, p. 46, ELI: http://data.europa.eu/eli/reco/2023/688/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
tested during periodic technical 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 NO_X.	2023/688[12] 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 technical 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 NO_X~~. For NOx, these measures should be further examined. NL (Comments/ Questions): In the Road Worthiness Package it is proposed that a measurement to check NOx emissions must be carried out for the PTI of diesel vehicles. Prior to testing, the vehicle's exhaust aftertreatment system shall be warmed up to the conditions that allow effective abatement of NOx emissions by the selective catalytic reduction (SCR) unit of the vehicle by at least a 5-minute drive or an equivalent method. 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. A 5-minute warm-up drive does not fit within the way in which the PTI is carried out in many Member States. Such a NOx emission test (hot idle NOx test) can only be carried out as part of a Road Side Inspection. This should than be done as follows. Vehicles selected as high emitters by remote remote sensing should be stopped and then a check of the NOx emissions should be performed immediately. Such a check should consist of a hot idle NOx emission test on the exhaust and then a visual inspection of the emission control systems ans reading the OBD. By

[12] 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, (OJ L 90, 28.3.2023, p. 46, ELI: http://data.europa.eu/eli/reco/2023/688/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
	performing the remote sensing tests, the obligation of 5% RSI testing of heavy commercial vehicles and 2% RSI testing of light commercial vehicles can be fulfilled. NL (Drafting suggestions): (15) While road transport contributes to significant shares of harmful air pollutant emissions in particular NO_X and fine particles, the current testing methods for exhaust emissions are not adapted to more recent vehicles and technologies. Commission Recommendation (EU) 2023/688[13] 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 technical 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 NO_X~~. For NOx, these measures should be further examined. NL (Comments/ Questions): In the Road Worthiness Package it is proposed that a measurement to check NOx emissions must be carried out for the PTI of diesel vehicles. Prior to testing, the vehicle's exhaust aftertreatment system shall be warmed up to the conditions that allow effective abatement of NOx emissions by the selective catalytic reduction (SCR) unit of the vehicle by at least a 5-minute drive or an equivalent method. 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.

[13] 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, (OJ L 90, 28.3.2023, p. 46, ELI: http://data.europa.eu/eli/reco/2023/688/oj).

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	A 5-minute warm-up drive does not fit within the way in which the PTI is carried out in many Member States. Such a NOx emission test (hot idle NOx test) can only be carried out as part of a Road Side Inspection. This should than be done as follows. Vehicles selected as high emitters by remote remote sensing should be stopped and then a check of the NOx emissions should be performed immediately. Such a check should consist of a hot idle NOx emission test on the exhaust and then a visual inspection of the emission control systems ans reading the OBD. By performing the remote sensing tests, the obligation of 5% RSI testing of heavy commercial vehicles and 2% RSI testing of light commercial vehicles can be fulfilled. LU (Comments/ Questions): The proposal does not provide practical solutions for managing the extended duration of these tests. Ensuring that testing methods are both thorough and efficient is crucial to avoid excessive delays and inconvenience for vehicle owners. Perhaps the measurement of NOx should be reconsidered. IE (Comments/ Questions): See comment above on NOx. LU (Comments/ Questions): The proposal does not provide practical solutions for managing the extended duration of these tests. Ensuring that testing methods are both thorough and efficient is crucial to avoid excessive delays and

Commission proposal	Drafting suggestions and Comments/ Questions
	inconvenience for vehicle owners. Perhaps the measurement of NOx should be reconsidered. PL (Comments/ Questions): The amendments concerning emissions, including the specification of methods for measuring the particle number (PN) of spark-ignition engines and for measuring the oxides of nitrogen (NOX) of diesel and spark-ignition engines, are reasonable. However, it will be necessary to ensure a sufficiently long transposition period taking into account lengthy legislative procedures in the Member States and the need to raise sufficient funds to purchase relevant equipment (particle counter). It should be noted that there will be high costs for operators of vehicle testing stations associated with the new NOx measurement methods.
(16) Older vehicles tend to have more defects, are more frequently involved in crashes, and represent a higher proportion of high-emitting vehicles. Inspecting older cars and light commercial vehicles annually can contribute significantly to reducing crashes and harmful emissions. Cars and light commercial vehicles should therefore be inspected annually at the latest after 10 years from the date of first registration.	PT (Comments/ Questions): In Portugal, M1 vehicles are inspected every year, after 8 years from the date of first registration; N1 vehicles are inspected after two years from the date of first registration and then every year. NL (Drafting suggestions): (16) Older vehicles tend to have more defects, are more frequently involved in crashes, and represent a higher proportion of high-emitting vehicles. ~~Inspecting older cars and light commercial vehicles annually can contribute significantly to reducing crashes and harmful emissions.~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~Cars and light commercial vehicles should therefore be inspected annually at the latest after 10 years from the date of first registration.~~ ES (Comments/ Questions): The proposed new frequency is in place in Spain fro M1 and N1 vehicles since 2010. DE (Comments/ Questions): Regarding recital 16 and the annual inspection of vehicles over 10 years old: - Germany notes that very few accidents are caused by significant technical defects and therefore opposes the annual inspection of vehicles over 10 years old for road safety reasons. - The annual vehicle emissions and environmental performance tests are to be considered separately from this appraisal. In this regard, Germany enters a scrutiny reservation, and will comment on this aspect as soon as the Federal Government has reached a final opinion. NL (Drafting suggestions): (16) Older vehicles tend to have more defects, are more frequently involved in crashes, and represent a higher proportion of high-emitting vehicles. ~~Inspecting older cars and light commercial vehicles annually can contribute significantly to reducing crashes and harmful emissions. Cars and light commercial vehicles should therefore be inspected annually at the latest after 10 years from the date of first registration.~~ IE (Comments/ Questions):

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	Annual testing already incorporated in Ireland for passenger cars (M1) over 10 years from first registration PL (Comments/ Questions): Light commercial vehicles are used more intensively and should therefore be checked annually.
(17) Furthermore, since light commercial vehicles are used more intensively than private cars, often in densely populated areas, they should be inspected for emissions annually after one year from the date of first registration.	NL (Comments/ Questions): This has an impact on the registration and amount of vehicles to be tested. One and two year old vans are not to be expected that systems for controlling emissions are already defective. A more realistic approach is to start testing this from the third year after admission. In the Netherlands, diesel cars must go for the PTI from the third year after admission. NL (Comments/ Questions): This has an impact on the registration and amount of vehicles to be tested. One and two year old vans are not to be expected that systems for controlling emissions are already defective. A more realistic approach is to start testing this from the third year after admission. In the Netherlands, diesel cars must go for the PTI from the third year after admission. LU

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	(Comments/ Questions): Since the odometer should be tracked in all Member States, why not introduce a PTI based on the mileage covered for N1 vehicles? LU (Comments/ Questions): Since the odometer should be tracked in all Member States, why not introduce a PTI based on the mileage covered for N1 vehicles?
(18) In addition to scheduled periodic technical inspections, vehicles should also be subject to a roadworthiness test if the safety or environmental systems and components of the vehicle have been significantly altered or modified. This includes cases where there is a change of vehicle category or emission levels, for example following the installation of a particle filter or when a vehicle is converted to run on an alternative fuel.	NL (Drafting suggestions): (18) In addition to scheduled periodic technical inspections, vehicles ~~should~~ may also be subject to a roadworthiness test if the safety or environmental systems and components of the vehicle have been significantly altered or modified. This includes cases where there is a change of vehicle category or emission levels, for example following the installation of a particle filter or when a vehicle is converted to run on an alternative fuel. NL (Comments/ Questions): It is important that major changes are monitored. However, this should not be part of the PTI. The design for this should be determined by the Member States This is not feasible. Cars must be sent to the PTI by the competent authorities of a country. How should the competent authorities of a Member State find out that a vehicle has been significantly altered or modified?

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	Companies that modify emission and safety systems are, for example, chip tuning companies. Chip tuning companies often do not perform PTI inspections themselves. It cannot be expected that such companies will report changes to emission and safety systems to the competent authorities of a Member State. Furthermore, it is questionable whether a car will fail to pass the PTI emission inspection if for example a chip tuning modification has been carried out. It could well be that it simply passes the PTI emission test. The emission test in the PTI is often not effective enough to actually detect this type of manipulation. Requiring that vehicles with significantly altered or modified safety and environmental systems and components be submitted to the PTI, would reverse the current state of affairs. The PTI is precisely intended to detect these kinds of alterations or modifications. For illus .;/p[tration, the following example: Since 2017, there has been a ban on the removal of particulate filters in the Netherlands. However, this ban was difficult to enforce at the time because there were numerous companies and also private individuals who removed diesel particulate filters. However, it was only from 2023 with the introduction of the particle test in the PTI that the ban on removing diesel particutale filters could be properly enforced. With the particle test, a diesel car with a removed particulate filter will not pass the PTI. DE (Drafting suggestions): • Regarding recital 18: Germany supports the testing of vehicles “if the safety and environmental systems and components of the vehicle have

Commission proposal	Drafting suggestions and Comments/ Questions
	been significantly altered or modified." However, Germany believes that it must be determined whether the vehicle still complies with the (type) approval requirements after the modification. Germany does not consider a roadwortiness test alone to be sufficient in this case. To date, the assessment of modifications to vehicles has been part of the national regulations of the Member States. Germany has implemented extensively detailed regulations in this area. Germany therefore proposes that the assessment of modifications and conversions to vehicles remain within the competence of the Member States and that the recital should be deleted. NL (Drafting suggestions): (18) In addition to scheduled periodic technical inspections, vehicles ~~should~~ may also be subject to a roadworthiness test if the safety or environmental systems and components of the vehicle have been significantly altered or modified. This includes cases where there is a change of vehicle category or emission levels, for example following the installation of a particle filter or when a vehicle is converted to run on an alternative fuel. NL (Comments/ Questions): It is important that major changes are monitored. However, this should not be part of the PTI. The design for this should be determined by the Member States This is not feasible. Cars must be sent to the PTI by the competent authorities of a country. How should the competent authorities of a Member State find out that a vehicle has been significantly altered or modified?

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	Clarification request - could the additional PTI include vehicles that have an incident/accident whereby structural elements of the vehicle are affected?
(19) To facilitate the digital transition and to reduce costs for testing centres, roadworthiness certificates should be issued in a standardised electronic format. A paper printout of the roadworthiness certificate should also be issued to the person who presented the vehicle for testing upon request. Member States should accept both formats when the ownership of the vehicle is changed or when the vehicle is re-registered in another Member State. For similar reasons, the report of the more detailed roadside inspection should be issued in electronic format.	PT (Comments/ Questions): PT welcomes the adoption of harmonised periodic technical inspection and roadworthiness certificates. DE (Drafting suggestions): (19) To facilitate the digital transition and to reduce costs for testing centres, roadworthiness certificates should be issued in a standardised electronic format. A paper printout of the roadworthiness certificate should also be issued to the person who presented the vehicle for testing upon request. Member States should accept both formats when the ownership of the vehicle is changed or when the vehicle is re-registered in another Member State. For similar reasons, the report of the more detailed roadside inspection should be issued in electronic format**, preferably**. DE (Comments/ Questions): Even if the results of technical roadside checks have to be recorded in electronic registers, the basic possibility of issuing the driver with a paperbased report should be retained due to accessibility for the driver, LU (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years)
(20) It should be ensured that personal data processing for the implementation of this Directive complies with the data protection framework of the Union, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council[14]. In line with the principle of data protection by default, verification techniques not requiring transmission of personal data on individual certificates should be employed for the verification of roadworthiness certificates.	
(21) To provide for adequate follow-up of deficiencies where a vehicle fails a periodic technical inspection due to one or more major deficiencies in a Member State other than the Member State of registration, the result of the test and the deadline for the subsequent test should be notified to the Member State of registration and recorded in the vehicle register. The deadline for the subsequent test should be no more than two months and should take place in either Member State. In addition, when a vehicle has failed the periodic technical inspection due to one or more dangerous deficiencies, to avoid immediate risks to road safety or the environment, the Member State or competent authority should be able to decide that the vehicle in question is not to be used on public roads and request the	LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years)

[14] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (OJ L 119, 4.5.2016, p. 1, ELI: http://data.europa.eu/eli/reg/2016/679/oj).

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Member State of registration to suspend the vehicle's authorisation for use in road traffic, until the deficiencies are rectified. The suspension should be recorded in the vehicle register of the Member State of registration.	PL (Comments/ Questions): The two-month period of is too long. Additional restrictions should be included, e.g. banning the carriage of cargo or passengers depending on the defects found and their impact on the continued use of the vehicle.
(22) Tampering or manipulating any component of a vehicle should be considered to be a major or dangerous deficiency and therefore should be punishable by effective, proportionate, dissuasive and non-discriminatory penalties.	PT (Comments/ Questions): PT suggests as a possible measure the inibition of registering a vehicle with previous records in other Member State of major deficiencies or manipulation warnings NL (Drafting suggestions): Tampering or manipulating any component and/or system of a vehicle should be considered to be a major or dangerous deficiency and therefore should be punishable by effective, proportionate, dissuasive and non-discriminatory penalties. NL (Comments/ Questions): For effective follow-up of remote sensing and in the PTI it is important to have sufficient possibilities to signal such manipulation on components and software.

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	PTI stations in the Netherlands are not authorized to impose fines. This can only be done by official enforcement authorities such as the police. If the manipulation or tampering with a part of a vehicle is discovered by a PTI station, then a PTI station cannot impose a fine for this. If the police discover the manipulation or tampering during a Road Side Inspection, a fine can be imposed. DE (Comments/ Questions): The wording of this recital differs from that of Article 1(8) (concerning Article 9(4) of Directive 2014/45/EU) and Article 2(12) (concerning Article 14(4) of Directive 2014/47/EU). The provisions should be worded identically. Whether each type of conduct covered by the provisions is punishable remains to be examined. NL (Drafting suggestions): Tampering or manipulating any component and/or system of a vehicle should be considered to be a major or dangerous deficiency and therefore should be punishable by effective, proportionate, dissuasive and non-discriminatory penalties. NL (Comments/ Questions): For effective follow-up of remote sensing and in the PTI it is important to have sufficient possibilities to signal such manipulation on components and software. PTI stations in the Netherlands are not authorized to impose fines. This can only be done by official enforcement authorities such as the police. If the manipulation or tampering with a part of a vehicle is discovered by a

Commission proposal	Drafting suggestions and Comments/ Questions
	PTI station, then a PTI station cannot impose a fine for this. If the police discover the manipulation or tampering during a Road Side Inspection, a fine can be imposed. IE (Comments/ Questions): We believe that the proposed text should be more specific. Tampering with a windscreen washer or number plate light shouldn't be considered to be a dangerous deficiency.
(23) The current requirements set out in Directives 2014/45/EU and 2014/47/EU for Member States to cooperate with each other when implementing those Directives do not enable Member States to check a vehicle's legal and technical status in cross-border situations. To ensure greater effectiveness, including in such situations, Member States should assist one another in implementing the Directive more systematically. Therefore, it is necessary to set out rules on the exchange of information and vehicle data to allow Member States to consult each other's vehicle registers and roadworthiness databases, including the content of roadworthiness certificates and technical roadside inspection reports.	LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years)
(24) For the exchange of information on vehicles registered in the Union, the MOVE-HUB message exchange platform has been developed by the Commission to interconnect Member States' national electronic registers[15]. The platform currently hosts the interconnection of road transport undertaking registers (ERRU), driving licence registers	NL (Drafting suggestions): (24) For the exchange of information on vehicles registered in the Union~~, the MOVE-HUB message exchange platform has been developed~~

[15] Commission Implementing Regulation (EU) 2016/480 of 1 April 2016 establishing common rules concerning the interconnection of national electronic registers on road transport undertakings and repealing Regulation (EU) No 1213/2010 (OJ L 87, 2.4.2016, p. 4. ELI: http://data.europa.eu/eli/reg_impl/2016/480/oj).

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(RESPER), professional driver training registers (ProDriveNet), tachograph driver card registers (TACHOnet), and the notification of vehicle roadside inspection failures (RSI)[16].	~~by the Commission to interconnect~~ Member States~~' national electronic registers shall be connected via~~ shall use the highly secured European Vehicle and Driving License Information System (EUCARIS) through which they are already connected. ~~The platform currently hosts the interconnection of road transport undertaking registers (ERRU), driving licence registers (RESPER), professional driver training registers (ProDriveNet), tachograph driver card registers (TACHOnet), and the notification of vehicle roadside inspection failures (RSI)~~[17]~~.~~ ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. NL (Drafting suggestions):

[16] Commission Implementing Regulation (EU) 2017/2205 of 29 November 2017 on detailed rules concerning the procedures for the notification of commercial vehicles with major or dangerous deficiencies identified during a technical roadside inspection (OJ L 314, 30.11.2017, p. 3, ELI: http://data.europa.eu/eli/reg_impl/2017/2205/oj).

[17] Commission Implementing Regulation (EU) 2017/2205 of 29 November 2017 on detailed rules concerning the procedures for the notification of commercial vehicles with major or dangerous deficiencies identified during a technical roadside inspection (OJ L 314, 30.11.2017, p. 3, ELI: http://data.europa.eu/eli/reg_impl/2017/2205/oj).

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[18] Commission Implementing Regulation (EU) 2017/2205 of 29 November 2017 on detailed rules concerning the procedures for the notification of commercial vehicles with major or dangerous deficiencies identified during a technical roadside inspection (OJ L 314, 30.11.2017, p. 3, ELI: http://data.europa.eu/eli/reg_impl/2017/2205/oj).

Commission proposal	Drafting suggestions and Comments/ Questions
	Commission are already available within the EUCARIS network. We would therefore welcome the use of EUCARIS instead of MOVE-HUB or in parallel. PL (Comments/ Questions): 1. Implementation of MOVE-HUB (exchange of information and data) may require longer transposition period than one year following the adoption of implementing acts, due to necessary legal and operational adaptations. It is proposed to extend the proposed period. 2. Would it be possible to connect to the RAPEX system?
(25) The functionalities of the MOVE-HUB should be extended to enable the necessary exchange of information and vehicle data for the purposes of Directives 2014/45/EU and 2014/47/EU. Member States should therefore connect their electronic systems containing information on roadworthiness certificates and odometer history to MOVE-HUB. The exchange of information and data through the MOVE-HUB should be operational within one year after the adoption of the corresponding implementing acts pursuant to Article 16 of Directive 2014/45/EU and Article 18a of Directive 2014/47/EU.	PT (Comments/ Questions): One year to operationalize the MOVE-HUB system is insufficient, at least two. NL (Drafting suggestions): ~~(25) The functionalities of the MOVE-HUB should be extended to enable the necessary exchange of information and vehicle data for the purposes of Directives 2014/45/EU and 2014/47/EU. Member States should therefore connect their electronic systems containing information on roadworthiness certificates and odometer history to MOVE-HUB. The exchange of information and data through the MOVE-HUB should be operational within one year after the adoption of the corresponding~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~implementing acts pursuant to Article 16 of Directive 2014/45/EU and Article 18a of Directive 2014/47/EU.~~ ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. NL (Drafting suggestions): ~~(25) The functionalities of the MOVE-HUB should be extended to enable the necessary exchange of information and vehicle data for the purposes of Directives 2014/45/EU and 2014/47/EU. Member States should therefore connect their electronic systems containing information on roadworthiness certificates and odometer history to MOVE-HUB. The exchange of information and data through the MOVE-HUB should be operational within one year after the adoption of the corresponding implementing acts pursuant to Article 16 of Directive 2014/45/EU and Article 18a of Directive 2014/47/EU.~~ LU

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): We would like to highlight that EUCARIS already enables the secure exchange of vehicle and roadworthiness data between Member States. Given its existing functionalities and infrastructure, we would welcome the use of EUCARIS either alongside or instead of MOVE-HUB. Leveraging the EUCARIS network would help avoid duplication, reduce implementation delays, and ensure continuity in cross-border data exchang LU (Comments/ Questions): We would like to highlight that EUCARIS already enables the secure exchange of vehicle and roadworthiness data between Member States. Given its existing functionalities and infrastructure, we would welcome the use of EUCARIS either alongside or instead of MOVE-HUB. Leveraging the EUCARIS network would help avoid duplication, reduce implementation delays, and ensure continuity in cross-border data exchang
(26) Crises brought about by serious events, occurring inside or outside the Union, may significantly disrupt the operation of its roadworthiness system. During times of crisis, Member States should be able to extend the validity of roadworthiness certificates, including temporary roadworthiness certificates. Subject to the Commission's authorisation, Members States should be allowed to extend the administrative validity of expiring roadworthiness certificates and temporary roadworthiness certificates by six months. Where the crisis persists, it should be possible to further extend the validity.	

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Commission proposal	Drafting suggestions and Comments/ Questions
(27) Given the increased number of light commercial vehicles in circulation within the Union, to promote a level playing field for commercial operators across the Union and to further improve their safety and environmental performance, light commercial vehicles should also be subject to roadside inspections.	ES (Comments/ Questions): Spain supports the extension of the scope to N1 category vehicles, given their road risk exposure ratio (crashes & victims per number of vehicles) which, in the case of Spain, is much higher than for N2-N3 vehicles.
(28) For roadside inspections, the screening of the exhaust emissions of large numbers of vehicles by using remote sensing equipment is an effective measure for identifying high-emitting vehicles. It increases detection rates significantly compared to mandatory test methods. Member States should therefore use remote sensing equipment systematically to screen large shares of the vehicle fleet in real on-road conditions. One single remote sensing measurement indicating high emissions above the legal limits could be related to various factors, such as temporary acceleration or a cold engine. However, multiple measurements systematically indicating significantly higher-than-average emissions could indicate a faulty emission control system or unauthorised modifications, such as tampering. Since such defects and modifications generate excessive emissions that pose risks to human health and the environment, they should be repaired, and any tampering should be sanctioned.	NL (Comments/ Questions): It is true that compared to the mandatory test methods of the PTI, remote sensing significantly increases the detection percentages of cars with increased emissions. As part of the Road Worthiness Package, it is proposed to send a vehicle that is identified as a high emitter by remote sensing for a subsequent PTI emission control. There, a car is then checked again with the standard emission control methods of the PTI. There is a good chance that a vehicle that is identified as a high emitter will then simply pass thi subsequent PTI emission control. After all, the detection rate of remote sensing is higher than that of the standard PTI test methods for emissions. This will then be experienced by the owner of the vehicle as if he was not sent to the PTI for nothing. Nothing is achieved for the environment either because the car classified as a high emitter can simply continue driving. Sending cars for a subsequent emission control after remote sensing can therefore only be done if much better control methods become available for the subsequent emission control. This applies in particular to petrol cars. The current four-gas emission test for petrol cars is only very limitedly capable of detecting cars with increased emissions. This is

Commission proposal	Drafting suggestions and Comments/ Questions
	certainly the case if petrol cars with twice as high emissions are classified as high emitters. ES (Drafting suggestions): ~~(28) For roadside inspections, the screening of the exhaust emissions of large numbers of vehicles by using remote sensing equipment is an effective measure for identifying high-emitting vehicles. It increases detection rates significantly compared to mandatory test methods. Member States should therefore use remote sensing equipment systematically to screen large shares of the vehicle fleet in real-on-road conditions. One single remote sensing measurement indicating high emissions above the legal limits could be related to various factors, such as temporary acceleration or a cold engine. However, multiple measurements systematically indicating significantly higher-than-average emissions could indicate a faulty emission control system or unauthorised modifications, such as tampering. Since such defects and modifications generate excessive emissions that pose risks to human health and the environment, they should be repaired, and any tampering should be sanctioned.~~ ES (Comments/ Questions): Neither the existing technology nor the environmental and traffic conditions allow for a solid measurement of emissions coming from one specific vehicle. Therefore, authorities will not have the legal certainty to impose any mandatory action or sanction on a specific vehicle. Therefore, if the proposed obligation is set out, there will be a clear breach of the legal system and the conditions related to any administrative measure, even questioning the jurisdiction of the authority. In this regard, any mandatory action or penalty on a citizen should be solid and proof-

Commission proposal	Drafting suggestions and Comments/ Questions
	based/certificate-based, proportionate and non-discriminatory so as to comply with the requisites of legal guarantee´s principle of any administrative decision imposing a restriction, burden or sanction. Given the uncertainty and the lack of reliability of the system and equipment, remote sensing related controls shall be deleted from the text. EE (Comments/ Questions): Questions to Cion: How would road conditions, weather etc affect the readings (i.e dust in the air, heavy winds, rain)? In case of attaching a trailer to a vehicle, the fuel consumption and emissions will go up drastically. How to ensure that the reading is correct or adequate? Preliminarily questioning the value of this. NL (Comments/ Questions): It is true that compared to the mandatory test methods of the PTI, remote sensing significantly increases the detection percentages of cars with increased emissions. As part of the Road Worthiness Package, it is proposed to send a vehicle that is identified as a high emitter by remote sensing for a subsequent PTI emission control. There, a car is then checked again with the standard emission control methods of the PTI. There is a good chance that a vehicle that is identified as a high emitter will then simply pass thi subsequent PTI emission control. After all, the detection rate of remote sensing is higher than that of the standard PTI test methods for emissions. This will then be experienced by the owner of the vehicle as if he was not sent to the PTI for nothing. Nothing is

Commission proposal	Drafting suggestions and Comments/ Questions
	achieved for the environment either because the car classified as a high emitter can simply continue driving. Sending cars for a subsequent emission control after remote sensing can therefore only be done if much better control methods become available for the subsequent emission control. This applies in particular to petrol cars. The current four-gas emission test for petrol cars is only very limitedly capable of detecting cars with increased emissions. This is certainly the case if petrol cars with twice as high emissions are classified as high emitters. LU (Comments/ Questions): Is the effectiveness of remote sensing proven? LU (Comments/ Questions): Is the effectiveness of remote sensing proven? PL (Comments/ Questions): 1) What about systems directly responsible for safety - e.g. braking system? Remote control of brake systems - temperature test? 2) Infrastructural constraints on remote sensing of emissions - e.g. measurements on single carriageway roads without opposite direction or outside built-up areas, windy weather conditions. How many remote measurements would warrant the necessary confirmation of remote sensing results by stationary measurement? Solution - Optionally, set the level of all stationary emissions inspections analogous to the technical

Commission proposal	Drafting suggestions and Comments/ Questions
	roadside inspections each year at a minimum of ...% of the total number of heavy commercial vehicles inspected on the road on its territory.
(29) As a result, such screening by remote sensing should form part of each Member State's roadside inspection system. For the screening to be effective, each Member State should screen the equivalent of at least 30% of its registered fleet of motor vehicles, including cars and motorcycles. On the basis of that remote sensing data, Member States should check the exhaust emissions and the noise level of any vehicle that is suspected to emit more than double the average level of similar vehicles, or more than 3 dB above the average level. That check could be carried out in a roadside inspection immediately after a remote sensing measurement or in a roadworthiness testing centre in the Member State of registration. For vehicles registered in another Member State, the competent authority where the remote sensing measurement took place should notify the measurement result and the result of any subsequent roadside inspection to the competent authority of Member State of registration.	PT (Comments/ Questions): What supports the 30% figure? NL (Comments/ Questions): Remote sensing ensures that cars are subjected to an interim emission check earlier than the regular PTI emission checks. If a member state already performs the regular PTI emission check annually, the added value of remote sensing is limited. FI (Comments/ Questions): **Comment:** Before requiring massive amount of remote sensing in members states, the Commision should further study the feasibility of this technology in wider climatic conditions. ES (Drafting suggestions): ~~(29) As a result, such screening by remote sensing should form part of each Member State's roadside inspection system. For the screening to be effective, each Member State should screen the equivalent of at least 30% of its registered fleet of motor vehicles, including cars and motorcycles. On the basis of that remote sensing data, Member States should check the exhaust emissions and the noise level of any vehicle that is suspected to emit more than double the average level of similar vehicles, or more than 3 dB above the average level. That check could be carried out in a~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~roadside inspection immediately after a remote sensing measurement or in a roadworthiness testing centre in the Member State of registration. For vehicles registered in another Member State, the competent authority where the remote sensing measurement took place should notify the measurement result and the result of any subsequent roadside inspection to the competent authority of Member State of registration.~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. NL (Comments/ Questions): Remote sensing ensures that cars are subjected to an interim emission check earlier than the regular PTI emission checks. If a member state already performs the regular PTI emission check annually, the added value of remote sensing is limited.
(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 registered in their territory.	PT (Comments/ Questions): It seems difficult to operationalize the 5% of the total number of vehicles, considering the resources available at national level.

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Commission proposal	Drafting suggestions and Comments/ Questions
(31) To promote digital transformation and to reduce costs in the transport sector, Member States should require their competent authorities to accept electronic evidence of roadside inspections.	PL (Comments/ Questions): Uniform rules for the inspection and enforcement of cargo securing procedures should be implemented in all Member States.
(32) Given that inadequate or dangerous cargo securing can pose a serious threat to road safety and to the environment, inspections of cargo securing should be a mandatory part of roadside inspections in all Member States.	ES (Comments/ Questions): Spain supports the inclusion of cargo securing checks within the revision of the directive. However, given the complexity and varietry of cargo types, some flexibility should be given to MS to start controlling this element, and even assess the possibility of developing this provision via an implementing act. DE (Drafting suggestions): (32) Given that inadequate or dangerous cargo securing can pose a serious threat to road safety and to the environment, inspections of cargo securing should **be performed in each Member State. On the decision of Member States, these checks can be made a mandatory part of roadside inspections** ~~in all Member States~~. DE (Comments/ Questions): Load securing checks are an important component of maintaining road safety. Numerous Member States have established requirements in their inspection policies that provide for load securing checks. From our perspective, Member States should be allowed to continue applying these inspection policies. The integration of load securing checks into technical roadside inspections should therefore remain optional.

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Commission proposal	Drafting suggestions and Comments/ Questions
(33) To ensure uniform conditions for the implementation of this Directive, implementing powers should be conferred on the Commission to specify: (a) the set of technical information and data necessary for roadworthiness testing that must be made available to the competent authorities, (b) interoperability features and security measures applicable to the QR codes introduced on roadworthiness certificates, (c) the necessary features and requirements for the format and content of the information and data to be exchanged, and (d) the format in which the data on periodic testing and roadside inspections are to be communicated. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council[19].	
(34) In order to achieve the objectives of this Directive, in particular to adapt the annexes to Directives 2014/45/EU and 2014/17/EU to any technical, operational or scientific developments, the power to adopt acts in accordance with Article 290 TFEU should be delegated to the Commission to (a) specify the methods for the PN measurement of positive ignition engines and for the NO_X measurement of compression and positive ignition engines; and (b) set the common limits for exhaust or noise emissions or both that should be used to identify high-emitting vehicles. It is of particular importance that the Commission carry out appropriate consultations during its preparatory work, including at expert level, and that those consultations be conducted in line with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making[20]. In particular, to ensure equal participation in the	NL (Comments/ Questions): The NOx test for positive ignition engines is to be developed for vehicles as of emission classes Euro VI, 6d-TEMP and newer. For these vehicles, the new NOx test and the four gas emissiontest in accordance with 8.2.2.2 should be performed. It is preferable that there will be one new test for these vehicles, in which the functioning of the three-way catalytic converter is checked on the basis of all gaseous components (CO, HC, NOx, CO_2 and O_2). So not that the old four-gas test should be performed supplemented with a separate new NOx test.

[19] Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission's exercise of implementing powers (OJ L 55, 28.2.2011, p. 13, ELI: http://data.europa.eu/eli/reg/2011/182/oj).

[20] OJ L 123, 12.5.2016, p. 1, ELI: http://data.europa.eu/eli/agree_interinstit/2016/512/oj.

Commission proposal	Drafting suggestions and Comments/ Questions
preparation of delegated acts, the European Parliament and the Council should receive all documents at the same time as Member States' experts, and their experts should systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.	Please see the amendments in the table in the Annex for the precise wording of this amendment regarding one test for checking three-way catalytic converters on petrol cars from Euro-6d onwards, measuring CO, HC, NOx and Lambda ES (Drafting suggestions): **To be reviewed and aligned to art. 291 TFEU** ES (Comments/ Questions): As these aspects are quite technical and sensitive, the definition of requirements, methods, values, etc. would require the intensive and active participation of MS experts, such as empowerment to the EC should be provided for in the form of implementing acts and not delegated acts as proposed. NL (Comments/ Questions): The NOx test for positive ignition engines is to be developed for vehicles as of emission classes Euro VI, 6d-TEMP and newer. For these vehicles, the new NOx test and the four gas emissiontest in accordance with 8.2.2.2 should be performed. It is preferable that there will be one new test for these vehicles, in which the functioning of the three-way catalytic converter is checked on the basis of all gaseous components (CO, HC, NOx, CO_2 and O_2). So not that the old four-gas test should be performed supplemented with a separate new NOx test. Please see the amendments in the table in the Annex for the precise wording of this amendment regarding one test for checking three-way

Commission proposal	Drafting suggestions and Comments/ Questions
	catalytic converters on petrol cars from Euro-6d onwards, measuring CO, HC, NOx and Lambda IE (Comments/ Questions): See comment above on NOx.
(35) The objectives of this Directive, namely, to improve road safety, facilitate the free movement of persons and reduce pollutant emissions cannot be sufficiently achieved by the Member States acting alone as national rules governing those vehicle checks would lead to diverging requirements. Consequently, such objectives are better achieved at Union level by laying down minimum common requirements and harmonised rules concerning periodic technical inspections and technical roadside inspections of vehicles circulating within the Union. Therefore, the Union may adopt measures, in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality as set out in that Article, this Directive does not go beyond what is necessary in order to achieve those objectives.	
(36) Although data on the operation of roadworthiness testing regimes is available at national level, such data is not available at Union level. That lack of data hampers the analysis and evaluation of the roadworthiness testing system. To address those shortcomings, Member States should, in the implementation of Directive 2014/45/EU, report regularly to the Commission key data on the number of testing centres in each Member State, the total number of vehicles inspected per category, the areas checked, the items failed, and information on roadworthiness tests conducted on vehicles registered in another Member State. On	LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes.

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Commission proposal	Drafting suggestions and Comments/ Questions
roadside inspections, the current reporting obligations on Member States should be reduced and simplified, with less frequent reporting required.	The proposed 2 year timeframe for compliance would be of concern. LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years)
(37) To minimise the administrative burden while ensuring the usefulness of the reported information, Member States should report on the implementation of Directives 2014/45/EU and 2014/47/EU every three years.	
(38) The roadworthiness system has a direct impact on road safety, noise and emissions and should therefore be reviewed periodically. On the basis of the input from Member States' authorities, the Commission should report to the European Parliament and Council on the effectiveness of the provisions of Directive 2014/45/EU, including those on the scope, frequency of testing and recognition of temporary roadworthiness certificates, and Directive 2014/47/EU, including that on remote sensing.	ES (Drafting suggestions): (38) The roadworthiness system has a direct impact on road safety, noise and emissions and should therefore be reviewed periodically. On the basis of the input from Member States' authorities, the Commission should report to the European Parliament and Council on the effectiveness of the provisions of Directive 2014/45/EU, including those on the scope, frequency of testing and recognition of temporary roadworthiness certificates, and Directive 2014/47/EU~~, including that on remote sensing.~~ ES (Comments/ Questions): See comments to recitals (28) and (29)

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Commission proposal	Drafting suggestions and Comments/ Questions
(39) The European Data Protection Supervisor was consulted in accordance with Article 42(1) of Regulation (EU) 2018/1725 and delivered an opinion on [DD/MM/YYYY].	
(40) In accordance with the Joint Political Declaration of 28 September 2011 of Member States and the Commission on explanatory documents[21], Member States have undertaken to accompany, in justified cases, the notification of their transposition measures with one or more documents explaining the relationship between the components of a directive and the corresponding parts of national transposition instruments. With regard to this Directive, the legislator considers the transmission of such documents to be justified.	
(41) Directive 2014/45/EU and 2014/47/EU should therefore be amended accordingly,	
HAVE ADOPTED THIS DIRECTIVE:	
	BE (Comments/ Questions): BE comments to the Annex I: **In Annex I, (1) (b) :** In point 2, the following point is added:

[21] OJ C 369, 17.12.2011, p. 14.

Commission proposal	Drafting suggestions and Comments/ Questions
	'(10) Electronic safety systems.'; This addition comprises 62 new items that are to be covered during testing. Currently, we have no harmonized system in place capable of extracting this information. We would be grateful if the European Commission could clarify how this requirement is intended to be implemented in practice and how it is expected to be operationally feasible. In the table, item 1.6 ('anti-lock braking system') has been removed from the 'braking equipment' category and relocated to 'electronic safety systems'. Similarly, item 2.6 ('Electronic Power Steering)' has been removed from the 'steering' category and has also been placed under 'electronic safety systems'. We would like to ask the Commission to provide the rationale for this reclassification. The exclusion of ABS from the 'braking equipment' category and of EPS from the 'steering' category appears inconsistent and could possibly cause confusion. BE comments to Annex III Point 3: How can a visual inspection be carried out on systems that are integrated into other parts and are invisible? In some parts of BE, it is forbidden to dismantle a part (cover, protection, wheels, etc.) to carry out inspections. If you consider what the Commission proposal in Chapter 10, most checks cannot be carried out. It concerns electronic systems that could be interconnected in the same control box (ABS, EBS, etc.). For certain types of vehicles it will be possible. Another important point is how much time these checks will take, and how to manage the flow of cars should the additional checks slow down the flow. If more checks have to be carried out this will also increase the cost of the controls.

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Commission proposal	Drafting suggestions and Comments/ Questions
	Point (xiv) in the table, items 4.1.1: There seems to be a X missing in point (a) With regards to the checks on software and hardware versions, how do you intend to gather information from all the manufacturers and how will they then be shared with the roadworthiness testing centres themselves? If the software/hardware version is not known, should penalties be imposed and how? Item 8.2.2: does it concern gasoline engines exclusively? Chapter 10: How is the Commission going to provide all roadworthiness test centres with all the data on software/hardware versions for all vehicles for every model and type and every brand, including non-EU vehicles? How will the Commission ensure the information is up-to-date? What is the purpose of this check? What risks to road safety do they pertain to? What should roadworthiness testing centres do if the information is unavailable or incorrect? How will the inspectors be able to know all the options on all types of vehicles? In our opinion, it is impossible for someone to know all the options on all the different models, so how would they be able to carry out an effective inspection? The commission wants all defects to be checked in all control boxes for all on-board systems. Is there a device capable of doing this for all types and manufacturers makes, including non-EU ones? The commission should put in place an identical protocol for all vehicles that will allow access to the defects in each system provided on all vehicles in a similar way. Does this protocol exist? Following a thorough review of Chapter 10, it currently appears that the implementation of the proposed controls is not feasible.

Commission proposal	Drafting suggestions and Comments/ Questions
	In most instances, the components in question consist of enclosures, wiring, and sensors/actuators, which may potentially be integrated into other systems. The systems are highly interconnected, with a single sensor potentially serving multiple functions across different systems. Furthermore, the sensors and actuators are not necessarily visible when embedded within mechanical parts. For example, this may include a steering actuator, an angular position sensor for the steering wheel, or actuators integrated within the ABS control unit. Some inspectors in BE do not work in operations equipped with the full range of manufacturer-specific tools required to inspect vehicles of a particular brand. Technical inspection services in Brussels, for example, are responsible for assessing vehicles of all makes and models. Consequently, it is essential to establish harmonised protocols applicable across all vehicles, in order to collect data on malfunctions affecting the various systems present in the vehicle. Lastly, it should be noted that technical inspection inspectors are not mechanics, and their role is not to perform diagnostics, but rather to verify the proper functioning of the different systems.
Article 1	
Amendments to Directive 2014/45/EU	
Directive 2014/45/EU is amended as follows:	

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Commission proposal	Drafting suggestions and Comments/ Questions
(1) Article 2 is amended as follows:	
(a) in paragraph 1, the sixth indent is replaced by the following:	
	RO (Drafting suggestions): — trailers designed and constructed for the carriage of goods or persons, as well as for the accommodation of persons, having a maximum mass exceeding **750 kg** ~~3,5 tonnes~~ – vehicle categories **O_2,** O 3 and O 4 ; RO (Comments/ Questions): Having in view that O_2 trailers are fitted with a braking system, would be recommended that these trailers be periodically checked
'– two- or three-wheel vehicles – vehicle categories L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm^3, or with a maximum continuous rated or net power above 11 kW;	SK (Comments/ Questions): We would like to ask the Commission, why the new criterion of net power above 11 kW was included.Wouldn't it be more appropriate to list exactly which subcategories are subject to PTI and which are not? Our understanding is that the intention is to exclude the L3e-A1 category. For more clarity, we think, it would be better to list the subcategories instead of adding the criterion of engine capacity. PL (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	It is required to clarify which of the listed conditions for L3e, L4e, L5e and L7e vehicles applies to electric vehicles.
– wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b and T4.3b the use of which mainly takes place on public roads with a maximum design speed exceeding 40km/h.’;	SK (Drafting suggestions): – wheeled tractors of category Tb the use of which takes place on public roads’; SK (Comments/ Questions): The new indent lists the tractor categories T1b, T2b, T3b, T4.1b, T4.2b and T4.3b. The letter b means that these are tractors over 40 km/h, so the addition "with a maximum design speed exceeding 40km/h" is redundant. Why not to state directly that these are categories Tb which includes all categories from T1b to T4.3b? The word *mainly* is problematic: „…the use of which **mainly** takes place on public roads…“. We believe that all the tractors used on public roads should be included (subject to PTI). Current formulation could be understood that if these tractors are used mainly off public roads (e.g. in fields, forests) and on public roads only sporadically, then the PTI obligation would not apply to these tractors. We would like to ask the Commission to clarify why there is such formulation and why not to include all tractors that are used on public roads? PT (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	)
	NL (Drafting suggestions): – wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b and T4.3b the use of which mainly takes place on public roads with a maximum design speed exceeding 40km/h.’;
	NL (Comments/ Questions): Tractors: Very difficult to determine whether they are mainly used on the terrain where activity takes place.
	NL (Comments/ Questions): Tractors: Very difficult to determine whether they are mainly used on the terrain where activity takes place.
	RO (Drafting suggestions): - wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b**,** ~~and~~ T4.3b **and T5** the use of which mainly takes place on public roads ~~with a maximum design speed exceeding 40km/h.~~
	RO (Comments/ Questions): There are T5 tractors in use, so they should be included.

Commission proposal	Drafting suggestions and Comments/ Questions
	All the mentioned tractors have a maximum speed exceeding 40 km/h by definition.
	RO (Drafting suggestions): **<u>- trailers and interchangeable towed equipments for tractors of categories Rb and Sb the use of which mainly takes place on public roads;</u>** RO (Comments/ Questions): The agricultural trailers with a maximum design speed exceeding 40km/h should also be subject of the PTI
(b) in paragraph 2, the seventh indent is deleted;	PT (Comments/ Questions): Portugal acknowledges the safety benefits associated with roadworthiness testing for motorcycles. However, we consider that the current framework, which allows Member States to apply an opt-out for motorcycles over 125 cm³, continues to provide the necessary flexibility to accommodate national specificities. Portugal supports maintaining this possibility, as it allows for an evidence-based approach tailored to each Member State's road safety context and administrative capacity. [as indicated in recital 8] NL (Drafting suggestions): ~~(b) in paragraph 2, the seventh indent is deleted;~~ FI

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): ~~(b) in paragraph 2, the seventh indent is deleted~~; FI (Comments/ Questions): **Justification:** i.e. Keep text from current directive. Currently according to IA 7 of 27 MSs have used this exemption. The effect on road safety and environment at European level from these 7 MS's are minimal but cost and administrative burden are high. Road safety statistics do not show significant differences between Finland and countries with similar conditions even if they have introduced PTI for motorcycles. Specially from a Finnish point of view it is important to note that a road side inspection and a enforcemet inspection are already in force and also all serious accident are studied by an accident investigation boby. Due to Finland's northern wheather conditions motorcycling is a hobby and concertrated in the three summer months. The current opt-out is well balanced as it enables better road safety measures for MS that all have their own conditions. We see that a union wide rule would not increase road safety in this case but would make us focus our scarce resources on actions that do not have any meaningfull effectiveness in Finland. The Commission has itself made this conclusion in the IA, and therefore the proposal seems unproportionate. BE (Comments/ Questions): BE: Point b is very important for BE NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): ~~(b) in paragraph 2, the seventh indent is deleted;~~ IE (Comments/ Questions): This will have significant implications for member states that do not current require motorcycles to undergo PTI due to alternative measures. The 2 year timeframe for implementation is a concern, notably where commercial contracts are in place for extended periods to provide other forms of PTI and where significant infrastructure change may be required to accommodate motorcycles at existing or new test centres.
	SK (Comments/ Questions): We would **propose to add a new indent**, to **allow for MS to exclude trolleybuses** from the scope of the directive 2014/45/EU. In 2014 – DG GROW provided an interpretation of the Directive 2007/46/EC, currently Regulation (EU) 2018/858, where trolleybuses are included within M3 category and they fall under the type approval regulations. Since trolleybus is a vehicle of M3 category, according to the Directive 2014/45(EU), they should be subject to PTI. This is not feasible in praxis, as trolleybus overhead line does not lead to the testing centre. We are not aware that trolleybuses are subject to PTI in any MS. That is why we would like to ask the Commission to comment on this issue. We would propose to take the trolleybuses out of the scope of the Directive 2014/45(EU) and leave this to the MS

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Commission proposal	Drafting suggestions and Comments/ Questions
(2) Article 3 is amended as follows:	
(a) the following point (6a) is inserted:	
'(6a) 'connected vehicle' means any vehicle with a device installed which is designed to allow a wireless connection or communication with external devices, vehicles, networks or services;';	NL (Comments/ Questions): We know that a vehicle is often equipped with such a device but just as often is not connected. There are all sorts of reasons for this. Perhaps this definition needs some finetuning. NL (Comments/ Questions): We know that a vehicle is often equipped with such a device but just as often is not connected. There are all sorts of reasons for this. Perhaps this definition needs some finetuning. IE (Drafting suggestions): '(6a) 'connected vehicle' means any vehicle with a device installed which is designed to allow a wireless connection or communication with external devices, vehicles, infrastructure, networks or services;'; IE (Comments/ Questions): Should this also include a reference to infrastructure?

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Commission proposal	Drafting suggestions and Comments/ Questions
(b) point (10) is replaced by the following:	
'(10) 'approval' means a procedure whereby a Member State certifies that a vehicle satisfies the relevant administrative provisions and technical requirements referred to in Regulations (EU) No 167/2013, (EU) No 168/2013 and (EU) 2018/858;';	IE (Drafting suggestions): '(10) 'approval' means a procedure whereby a Member State's approval authority certifies that a vehicle satisfies the relevant administrative provisions and technical requirements referred to in Regulations (EU) No 167/2013, (EU) No 168/2013 and (EU) 2018/858;'; IE (Comments/ Questions): Should it be specified that the approval authority carries out this requirement?
(c) point (12) is replaced by the following:	
'(12) 'roadworthiness certificate' means a roadworthiness test report issued by the competent authority or a testing centre;';	FI (Comments/ Questions): **Question:** Should the definition of a 'roadworthiness certificate' mention also that it means a digital and a physical certificate? DE (Drafting suggestions): • Regarding the amendment to Article 3, point 12: Germany prefers the original definition of the term "roadworthiness certificate" in Directive

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Commission proposal	Drafting suggestions and Comments/ Questions
	2014/45/EU, which includes the addition: "containing the result of the roadworthiness test;" and cannot see the need to delete this addition in the proposed amendment.
(d) the following point (12a) is inserted:	
(12a) 'temporary roadworthiness certificate' means a roadworthiness certificate issued by the competent authority, or a testing centre established in a Member State other than the Member State of registration of the vehicle in accordance with Article 4(3);';	NL (Drafting suggestions): (12a) 'temporary roadworthiness certificate' means a roadworthiness certificate issued by the competent authority, or a testing centre established in a Member State other than the Member State of registration of the vehicle in accordance with Article 4(3) and which has a validity of 6 months;'; FI (Comments/ Questions): **Question:** Can the Commission confirm, that also this temporary PTI-certificate sholud also be given as a digital certificate? This means that the European digital identity wallet should support this use case in the future. What plans exists to develop the European digital identity wallet? We are supportive of this development, but would like to have more information. DE (Drafting suggestions): • With regard to the new introduced definition of "temporary roadworthiness certificate" (point 12a in Article 3), Germany (also) sees the need for clarity to add or insert the following: "containing

Commission proposal	Drafting suggestions and Comments/ Questions
	the result of the roadworthiness test;" NL (Drafting suggestions): (12a) 'temporary roadworthiness certificate' means a roadworthiness certificate issued by the competent authority, or a testing centre established in a Member State other than the Member State of registration of the vehicle in accordance with Article 4(3) and which has a validity of 6 months;'; ;
(3) Article 4 is replaced by the following:	BE (Comments/ Questions): BE: How can mutual recognition by other Member States be ensured? Is it necessary to issue a specific certificate, either in paper or digital format?
'Article 4	
Responsibilities	

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Commission proposal	Drafting suggestions and Comments/ Questions
1. Each Member State shall ensure that vehicles registered in its territory are periodically tested in accordance with this Directive.	
2. Without prejudice to paragraphs 3 and 4, roadworthiness tests shall be carried out by the Member State of registration of the vehicle, by a public body entrusted with that task by that Member State or by bodies or establishments designated and supervised by that Member State, including authorised public or private bodies.	
3. In the case of M_1 vehicles, roadworthiness tests may also be carried out in a Member State other than the Member State of registration of the vehicle. The result of such roadworthiness test shall be included on a temporary roadworthiness certificate, which shall be valid for six months. The competent authority shall communicate the result of the test to the Member State of registration, which shall record it in the national vehicle register. However, unless the Member State of registration recognises roadworthiness certificates issued by the Member State concerned in accordance with paragraph 4, the subsequent roadworthiness test shall take place in the Member State of registration of the vehicle.	SK (Comments/ Questions): Regarding **paragraphs 3 and 4**, we understand that the temporary PTI should help for example the citizens working abroad. However, this is not specified, the provision is general and we still think that there is a risk of seeking PTI in neighbouring MS due to possibly less strict conditions. This we see as very problematic. If there can be only one PTI in a different MS as is the MS of registration of the vehicle, the following sentence is unclear: "*However, unless the Member State of registration recognises roadworthiness certificates issued by the Member State concerned in accordance with paragraph 4, the subsequent roadworthiness test shall take place in the Member State of registration of the vehicle.*". According to this sentence, a subsequent PTI will only be carried out in the State of registration of the vehicle if the Member State of registration has not recognised this inspection. If Member States have to take the initiative and not recognise PTI abroad, we consider this to be an increase in bureaucracy and we will not be able to support such provisions. We would like to ask the Commission to clarify the exact

Commission proposal	Drafting suggestions and Comments/ Questions
	steps on how this PTI in another Member State is to work and what the Member State of registration of the vehicle must do in order for the PTI to be carried out again in the State of registration of the vehicle. PT (Comments/ Questions): PT welcomes this measure but considers it should be extended to all M and N vehicles. NL (Drafting suggestions): 3. In the case of M_1 vehicles, roadworthiness tests may also be carried out in a Member State other than the Member State of registration of the vehicle. The result of such roadworthiness test shall be included on a temporary roadworthiness certificate, which shall be valid for six months. The competent authority shall communicate the result of the test to the Member State of registration, which shall record it in the national vehicle register. However, unless the Member State of registration recognises roadworthiness tests carried out and certificates issued by the Member State concerned in accordance with paragraph 4, the subsequent roadworthiness test shall take place in the Member State of registration of the vehicle. NL (Comments/ Questions): Has impact on data sharing and how we currently register PTI Possible danger of 'PTI tourism' or race to the bottom. How do you check the requirement 'once in another country, then again mandatory in country of registration'? For a foreign vehicle, can you

Commission proposal	Drafting suggestions and Comments/ Questions
	check on the spot in the register of the MS of registration whether the vehicle was inspected there last time? If the member states recognise the roadworthiness certificate, is this on the basis of mutual recognition? *"However, unless the Member State of registration recognises roadworthiness certificates issues by the Member State concerned in accordance with paragraph 4[…]":* Current Directive already holds the obligation to mutually recognise roadworthiness certificates (Article 8(3)). Isn't this new Article meant to recognise the actual PTI carried out in another MS (and hence the subsequent certificate)? Leads to confusion as it is currently formulated. DE (Drafting suggestions): Mutual recognition for only six months does not appear to be effective. For citizens abroad, the examination carried out there should be useful and not lead to an additional burden. Against this background, the proposed time limits appear too short. Taking into account the different time limits in the Member States, Germany considers that this period should be 12 months. DE (Comments/ Questions): Furthermore, the persons responsible for and addressees of the action described in the sentence "The competent authority shall notify the result of the examination to the Member State of registration, which shall enter

Commission proposal	Drafting suggestions and Comments/ Questions
	it in the national vehicle register" are not clearly enough defined at this point. Who is the competent authority? BE (Comments/ Questions): BE: Is this temporary certificate based on the period consistent with the dates and frequencies of the inspections? Does it not have an impact on the reference date (immatriculation)? AT (Drafting suggestions): The competent authority shall communicate the result of the test to the Member State of registration, which shall record it in the **appropriate** national ~~vehicle~~ register. AT (Comments/ Questions): It should be regulated that certain data has to be recorded and provided for certain administrative procedures but the technical detail should be at the discretion of the Member State. NL (Drafting suggestions): 3. In the case of M_1 vehicles, roadworthiness tests may also be carried out in a Member State other than the Member State of registration of the vehicle. The result of such roadworthiness test shall be included on a temporary roadworthiness certificate, which shall be valid for six months. The competent authority shall communicate the result of the test to the Member State of registration, which shall record it in the national vehicle register. However, unless the Member State of registration

Commission proposal	Drafting suggestions and Comments/ Questions
	recognises roadworthiness tests carried out and certificates issued by the Member State concerned in accordance with paragraph 4, the subsequent roadworthiness test shall take place in the Member State of registration of the vehicle. NL (Comments/ Questions): Has impact on data sharing and how we currently register PTI Possible danger of 'PTI tourism' or race to the bottom. How do you check the requirement 'once in another country, then again mandatory in country of registration'? For a foreign vehicle, can you check on the spot in the register of the MS of registration whether the vehicle was inspected there last time? If the member states recognise the roadworthiness certificate, is this on the basis of mutual recognition? *"However, unless the Member State of registration recognises roadworthiness certificates issues by the Member State concerned in accordance with paragraph 4[…]":* Current Directive already holds the obligation to mutually recognise roadworthiness certificates (Article 8(3)). Isn't this new Article meant to recognise the actual PTI carried out in another MS (and hence the subsequent certificate)? Leads to confusion as it is currently formulated. LU (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Why are only M1 vehicles allowed to have roadworthiness tests carried out in a Member State other than the Member State of registration, and not L category vehicles, which are also subject to PTI? LU (Comments/ Questions): Why are only M1 vehicles allowed to have roadworthiness tests carried out in a Member State other than the Member State of registration, and not L category vehicles, which are also subject to PTI? PL (Comments/ Questions): Remarks: 1) Member State of registration of the vehicle may refuse to recognise the provisional certificate of conformity, if the vehicle is found to be in non-compliance with the technical conditions; 2) Member State may set a shorter period of validity than 6 months for the provisional certificate of conformity; 3) Consideration should be given to extending this regulation to N1 vehicles with a reference mass not exceeding 2610 kg (see REGULATION (EC) No 715/2007 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 June 2007 on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information); (4) the designation of the M1 vehicle category should apply only to vehicles used for private purposes. RO (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	This kind of PTI should be available for all vehicle categories subject of the PTI
4. Member States may recognise a roadworthiness certificate, other than the temporary roadworthiness certificate referred to in paragraph 3, issued by a Member State other than the Member State of registration of the vehicle. In such cases, that roadworthiness certificate shall be considered equivalent to the roadworthiness certificate issued by the Member State of registration. Member States which decide to recognise a roadworthiness certificate issued by another Member State shall inform the Commission and the other Member States accordingly.	SK (Comments/ Questions): On sharing the information on roadworthiness tests between MSs. In SK the information system monitors each vehicle to see whether the test has been carried out. If not, the owner is automatically fined. Could the Commission explain, how the exchange of information (between MS) will take place, and how the refusal to recognise certificate by the state should be handled? How will the vehicle owner find out that such a roadworthiness certificate has been refused and that he needs to undergo a roadworthiness test in the state of registration? This can be problematic, since the vehicle owner has a roadworthiness certificate. PT (Comments/ Questions): PT considers that further information on purposes and conditions should be established/provided in this provision. NL (Drafting suggestions): 4. Member States may recognise a roadworthiness test and certificate, other than the temporary roadworthiness certificate referred to in paragraph 3, carried out and issued by a Member State other than the Member State of registration of the vehicle. In such cases, that roadworthiness certificate shall be considered equivalent to the roadworthiness certificate issued by the Member State of registration. Member States which decide to recognise a roadworthiness test carried

Commission proposal	Drafting suggestions and Comments/ Questions
	out and a certificate issued by another Member State shall inform the Commission and the other Member States accordingly. NL (Comments/ Questions): Current Directive already holds the obligation to mutually recognise roadworthiness certificates (Article 8(3)). Isn't this new Article meant to recognise the actual PTI carried out in another MS (and hence the subsequent certificate)? Leads to confusion as it is currently formulated. FI (Comments/ Questions): **Question:** Is a temporary roadworthiness certificate valid in light of the Wienna Convention on road traffic, if the PTI is done in another country than the country of registration? CZ (Comments/ Questions): On this point, it is not clear what other proof of roadworthiness might be involved, since under paragraph 3, Member States may carry out periodic roadworthiness tests on vehicles not registered in a Member State only for category M1. Or does this provision also allow periodic roadworthiness tests to be carried out on categories of vehicles not registered in a Member State other than those referred to in paragraph 3, on the basis of a communication from the Member State to the Commission on the recognition of such tests? NL (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	4. Member States may recognise a roadworthiness test and certificate, other than the temporary roadworthiness certificate referred to in paragraph 3, carried out and issued by a Member State other than the Member State of registration of the vehicle. In such cases, that roadworthiness certificate shall be considered equivalent to the roadworthiness certificate issued by the Member State of registration. Member States which decide to recognise a roadworthiness test carried out and a certificate issued by another Member State shall inform the Commission and the other Member States accordingly. NL (Comments/ Questions): Current Directive already holds the obligation to mutually recognise roadworthiness certificates (Article 8(3)). Isn't this new Article meant to recognise the actual PTI carried out in another MS (and hence the subsequent certificate)? Leads to confusion as it is currently formulated.
5. The Commission shall adopt implementing acts to specify the set of technical information necessary for roadworthiness testing of the items to be tested, on the use of the recommended test methods, and to establish detailed rules concerning the data format, and the procedures for accessing the relevant technical information. Such technical information may include, in particular, instructions and data on the use of the electronic vehicle interface, diagnostic trouble codes, and software versions, and descriptions and illustrations of warning indicators or tell-tales.	SK (Comments/ Questions): **Para 5 and 6:** We believe that the order of paragraphs 5 a 6 should be changed – first, the obligation for manufacturer to make the information available, then the authorisation for the Commission to adopt an implementing act which sets out the specifications of the technical information required for PTI (maybe also the Council legal service could comment on this). Currently, there is the Implementing regulation 2019/621 in forece. Does the Commission plan issue a new implementing regulation and repeal this one? What is the Commission's intention?

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Commission proposal	Drafting suggestions and Comments/ Questions
	FI (Comments/ Questions): **Question:** We support the goal of enhancing access to vehicle data in PTI. However, we are concerned that regulations on vehicle data are becoming fragmented. Could the Commission utilize its existing powers under EU Regulation 2018/858 to establish detailed rules on the data format and procedures for accessing relevant technical information? DE (Comments/ Questions): • Amendment to Article 4 (paragraph 5): The need for european requirements is supported. However, as these requirements may involve considerable implementation costs and the power delegated on the Commission is very general, Germany considers that the implementing acts in paragraph 5 need to be clarified and limited. IE (Comments/ Questions): The rationale is supported, but we note its full potential will not be realised until diagnostic trouble codes and software versions are standardised and are mandated at type-approval. PL (Comments/ Questions): Representatives of Member States must be involved in drawing up these implementing acts.

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Commission proposal	Drafting suggestions and Comments/ Questions
Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).	
6. In accordance with the principles laid down in Regulation (EU) 2018/858, vehicle manufacturers shall make available the set of technical information referred to in paragraph 5 free of charge, and without undue delay, to relevant competent authorities, in a non-discriminatory manner and in a machine-readable format. Those competent authorities shall make that technical information available to the testing centres authorised by them.	SK (Comments/ Questions): We like the obligation for the manufacturers to make the information available free of charge. Currently, this is not the case. As a whole, we see very problematic the practical functioning of this system for PTIs as currently proposed in paragraphs 5 and 6. There are many manufacturers. They have different ways of making information available, there are different search systems. This is not practical for PTI. It would be complicated for the PTI inspector to look up the information, study them and then carry out PTI when a vehicle comes for PTI. We think, it might be better, if the manufacturers make the information available to a single Commission repository, where the information would be saved and available. When a vehicle arrives for a PTI, the information could be provided online, via MOVE-HUB based on the VIN number. In one place, the Commission would collect information from manufacturers and through MOVE-HUB it would be provided to the Member States, who in turn would provide it to the testing centers. In para 6, there is a reference to the Regulation (EU) 2018/858. This regulation is to apply for some vehicles of category L and Tb for which the Regulation (EU) 2018/858 does not apply. Could the Commission clarify how these principles should apply to L and Tb category vehicles, since Regulation (EU) 2018/858 does not apply to these categories? FI (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Question: Can the Commission give a more detailed descripition on, how the "competent authority" would make data available to the test centers? Couldn't the test centers have direct access to this vehicle data and instruction from teh manufacturers in similar fashion as repair and maintnance operators? Have you considered making use of the SERMI-scheme? We fear, that in countries where PTI-centers are privately owned this kind of "two-step-access" might create issues later on. ES (Comments/ Questions): Support, the format of this technical information should be harmonized and structured DE (Drafting suggestions): Germany supports the provision of the relevant data by manufacturers. In the case of imports of individual new vehicles into the EU, e.g. via small import companies specialized in this area, the provision of the relevant data is not clearly regulated. This also remains open in Regulation (EU) 2018/858. In DEU's view, importers should also be designated as responsible for these individual new vehicles, as it is not easy to address a manufacturer outside the EU in this case. DE (Comments/ Questions): In addition, Germany considers the national implementation of this obligation in the respective regulations of the member states to be difficult to enforce against manufacturers and importers. This could be an obstacle to the effective implementation of the amendment to the directive. Should this not be addressed by a regulation at EU level? BE

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): BE: The major difficulty is also the harmonization of data, especially given the multitude of vehicle manufacturers and vehicle models. What would be the cost for the competent authority, to the organization responsible for the digital development ? And what are the deadlines? AT (Comments/ Questions): Making available the technical information is only possible for the authorities, if the implementing acts referred to in paragraph 5 include sufficient provisions regarding standardisation and format of this information. IE (Drafting suggestions): In accordance with the principles laid down in Regulation (EU) 2018/858, vehicle manufacturers shall make available the set of technical information referred to in paragraph 5 free of charge, and without undue delay, to relevant competent authorities or authorised testing centres, in a non-discriminatory manner and in a machine-readable format. Those competent authorities shall make that technical information available to the testing centres authorised by them. IE (Comments/ Questions): The proposed text introduces an additional layer of bureaucracy. The information should be made available directly from the manufacturers to the authorised testing centres.

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Commission proposal	Drafting suggestions and Comments/ Questions
	RO (Drafting suggestions): 6. ~~In accordance with the principles laid down in Regulation (EU) 2018/858, vehicle~~ **Vehicle** manufacturers shall make available the set of technical information referred to in paragraph 5 free of charge, and without undue delay, to relevant competent authorities, in a non-discriminatory manner and in a machine-readable format. Those competent authorities shall make that technical information available to the testing centres authorised by them. RO (Comments/ Questions): R (EU) 2018/858 is applicable only for M, N, O categories.
7. Member States shall ensure that the responsibilities for keeping a vehicle in a safe and roadworthy condition are set out in national law.’;	
(4) the following Article 4a is inserted:	
‘*Article 4a*	SK (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	We welcome the introduction of Art. 4a. We think it is necessary to have national registers and record odometer readings in different situations. We also don't think that this is burdensome for the repair and maintenance services (In SK, we have such a national register and we also enter data from Roadside inspection into it, since there, too, odometer data is recorded according to Directive 2014/47/EU. Insurance companies record odometer data when they have carried out vehicle inspections. Professional car dealers record odometer data, also rental companies, court experts etc. The commission has proposed to record the odometer readings only by testing centres and in connection with repair and maintenance works. Why other situations were not included? **We believe that other actors should be added, which deal with the vehicle during its life cycle.** We do not believe that such an adjustment will bring increased costs to service facilities and repair shops (in SK suppliers of information systems for services have adjusted the systems in a way that the system itself sends this data to the service station after accepting the order, without any burden for the service station.) BE (Comments/ Questions): BE: **Very good idea and good news for the fight against fraud**
Recording of odometer readings	FI (Comments/ Questions): **Question:** Has the Commission considered, that this reguirement has something in common with reguirements regarding information on

Commission proposal	Drafting suggestions and Comments/ Questions
	software (SW) updates and how information on SW-versions should/might be updated into a national registeries? At the moment such information is missing from national vehicle registries, but this question has been on the MVWG agenda. DE (Comments/ Questions): Regarding the newly inserted Article 4a: DEU supports the fundamental approach against the manipulation of odometers. The measures contained in the proposed amendment require intensive examination in Germany. Germany therefore reserves the right to review the obligations for the administration, trade, and service providers set out in this article Art. 4a para. 2 lit. b: Wherever the obligations of the holder of the registration document are regulated, the owner should also be listed as an alternative legal entity. This is already fulfilled in Art. 22 para. 1 lit. a and must also be added here in Art. 4a.
1. Each Member State shall take the measures necessary to enable the recording of odometer readings in a national database or in the national vehicle register. They shall require that, in addition to testing centres, any service provider who issues an invoice or other document in connection with any repair or maintenance work carried out on a vehicle, records the odometer reading in that database or national vehicle register when that work is carried out. Member States shall also require vehicle manufacturers to transmit the odometer readings of connected vehicles which they have produced every three months starting from the date of first registration of the vehicle.	SK (Comments/ Questions): We would like to ask the Commission to explain the last sentence: "*Member States shall also require vehicle manufacturers to transmit the odometer readings of connected vehicles which they have produced every three months starting from the date of first registration of the vehicle.*" How should this work, which data should the manufacturer send every 3 months, and to whom? If this is the data that the manufacturer has from authorized service centers, then based on the previous sentence, the service center will provide this data directly so this would create a duplicity. NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): 1. Each Member State shall take the measures necessary to enable the recording of odometer readings in a national database or in the national vehicle register. They shall require that, in addition to testing centres, any accredited service provider who issues an invoice or other document in connection with any repair or maintenance work carried out on a vehicle, records the odometer reading in that database or national vehicle register when that work is carried out. Member States shall also require vehicle manufacturers to transmit the odometer readings of connected vehicles which they have produced every three months starting from the date of first registration of the vehicle. NL (Comments/ Questions): '*records the odometer reading in that database or national vehicle register* ' Will this also work for repairs carried out in a country other than country of registration? *"require vehicle manufacturers to transmit the odometer readings of connected vehicles"* In favour but how will OEMs know which vehicles drive around in which Member State in order to be able to transmit odometer readings there? GR (Comments/ Questions): This specific provision should be given an additional implementation period (2 years) in relation to the rest provisions, due to the need for workshops to adapt.

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Commission proposal	Drafting suggestions and Comments/ Questions
	FI (Drafting suggestions): 1. Each Member State shall take the measures necessary to enable the recording of odometer readings in a national database or in the national vehicle register. They shall require that, in addition to testing centres, any service provider who issues an invoice or other document in connection with any repair or maintenance work carried out on a vehicle, records the odometer reading in that database or national vehicle register when that work is carried out. ~~Member States shall also require vehicle manufacturers to transmit the odometer readings of connected vehicles which they have produced every three months starting from the date of first registration of the vehicle.~~ FI (Comments/ Questions): **Comment**: text 'any repair or maintenance work carried out on a vehicle' might need a clear definition also in this directive. Is i.e. car wash or buying spare parts considered mantenance work? **Question:** Could the Commision produce a reference architecture description ect. that would help MSs in their analysis? This proposal needs more analysis due to its effects to businesses and costs it will create to different counterparts also to public authorities. **Comment:** Requiring manufacturers to transmit odometer readings should be done by the commision and redings should be delivered to Member State of registration via MOVE-HUB. There cannot be 27 different ways/interfaces for manufacturers to deliver the odometer

Commission proposal	Drafting suggestions and Comments/ Questions
	reading. In Eucaris there is a batch functionality that might be able to handle such a use case. EE (Comments/ Questions): Question towards Cion: What is the expected cost for consumers if manufacturers have to reprogram their systems so that connected vehicles would automatically (in accordance with GDPR) send odometer data to MS? AT (Drafting suggestions): Member States shall also require vehicle manufacturers **or their representatives** to transmit the odometer readings of connected vehicles… AT (Comments/ Questions): It is defficult for Member States to impose obligations on manufacturers and enforce them which are not seated within the territory of this Member State. At least this provision should refer to the manufacturer's representatives, too. NL (Drafting suggestions): 1. Each Member State shall take the measures necessary to enable the recording of odometer readings in a national database or in the national vehicle register. They shall require that, in addition to testing centres, any accredited service provider who issues an invoice or other document in connection with any repair or maintenance work carried out on a vehicle, records the odometer reading in that database or national vehicle register when that work is carried out. Member States shall also

Commission proposal	Drafting suggestions and Comments/ Questions
	require vehicle manufacturers to transmit the odometer readings of connected vehicles which they have produced every three months starting from the date of first registration of the vehicle. NL (Comments/ Questions): '*records the odometer reading in that database or national vehicle register* ' Will this also work for repairs carried out in a country other than country of registration? *"require vehicle manufacturers to transmit the odometer readings of connected vehicles"* In favour but how will OEMs know which vehicles drive around in which Member State in order to be able to transmit odometer readings there? LU (Comments/ Questions): For us, the implementation is likely to be very difficult. Very complexe to manage the database (e.g. in case false odometer data is put in the data base by mistake) IE (Comments/ Questions): As this proposal is entering into the realm of consumer protection, there is a question on if this is perhaps beyond the scope of this directive. While understanding the rationale and commendable intent, it will be onerous to implement, identify and register all vehicle mechanics and repairers and to require them to enter the data at every repair. This approach will

Commission proposal	Drafting suggestions and Comments/ Questions
	require significant changes to IT systems and current data managamemnt processes. The proposed 2 year timeframe for compliance would be of concern. LU (Comments/ Questions): For us, the implementation is likely to be very difficult. Very complexe to manage the database (e.g. in case false odometer data is put in the data base by mistake) PL (Comments/ Questions): Required clarification that: a Member State defines a list of entities obliged to provide information on the status of the meter. In order to ensure quality and reduce the number of actors, the subject should not be identified directly. RO (Drafting suggestions): 1. Each Member State shall take the measures necessary to enable the recording of odometer readings **from the testing centers** in a national database or in the national vehicle register. ~~They shall require that, in addition to testing centres, any service provider who issues an invoice or other document in connection with any repair or maintenance work carried out on a vehicle, records the odometer reading in that database or national vehicle register when that work is carried out. Member States shall also require vehicle manufacturers to transmit the odometer readings of connected vehicles which they have produced every three months starting from the date of first registration of the vehicle.~~

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Commission proposal	Drafting suggestions and Comments/ Questions
	RO (Comments/ Questions): Excessive administrative and financial burden for authorities and economic operators; may be considered at a later stage
2. Member States shall make the odometer history of vehicles registered by them available to inspectors, to the holder of the registration certificate and to competent authorities in the Member States responsible for roadworthiness testing, vehicle registration, and vehicle approval.	SK (Comments/ Questions): This paragraph states to whom the data is made available. The meaning of this provision is unclear. Why is the data made available to the competent authorities responsible for vehicle registration or vehicle approval? Why does the registration authority or approval authority need the data on the odometer history? The data is important for the vehicle owner or buyer. (In SK, if a car dealer wants to know the history of odometer data for a specific vehicle, he must enter the current odometer value and after that, the entire history is made available to him). A mention that data from this register is also provided to other Member States when the vehicle is re-registered is missing. We believe that this should be explicitly stated here. NL (Drafting suggestions): 2. Member States shall make the odometer history of vehicles registered by them available ~~to inspectors,~~ to the holder of the registration certificate and competent authorities upon re-registration. Member States shall provide the results of the assessment of the odometer history to inspectors and to competent authorities in the Member States responsible for roadworthiness testing, ~~vehicle registration,~~ and vehicle approval.

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Drafting suggestions): 2. Member States shall make the odometer history of vehicles registered by them available ~~to inspectors,~~ to the holder of the registration certificate and competent authorities upon re-registration. Member States shall provide the results of the assessment of the odometer history to inspectors and to competent authorities in the Member States responsible for roadworthiness testing, ~~vehicle registration,~~ and vehicle approval. IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. RO (Drafting suggestions): 2. Member States shall make the odometer history of vehicles registered by them available ~~to inspectors,~~ to the holder of the registration certificate and to competent authorities in the Member States responsible for roadworthiness testing~~,~~ **and** vehicle registration~~, and vehicle approval~~. RO (Comments/ Questions): The odometer history should not be available to the inspectors – protection of personal data. See 2.1
	RO

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): **2.1. Member States shall ensure that, for the purposes of checking the odometer, where an odometer is normally fitted, the information included in the previous roadworthiness test is made available to the inspectors as soon as it is available electronically.** RO (Comments/ Questions): Existing Article 8 (6) For PTI is not relevant to make available all the odometer readings. In RO opinion, the odometer reading from the last PTI is sufficient.
3. Member States shall take appropriate measures to inform potential buyers of second-hand vehicles, about the availability of odometer history referred to in paragraph 2.	FI (Comments/ Questions): **Question**: Can the Commission please explain, what this means? 'Buyers' are not in scope of paragraph 2. To give the odometer data to a 'buyer' means, that the data should be publicly available to all in paragraph 2. IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern.
4. Member States shall also make available the odometer data stored in the national databases and national vehicle registers referred to in	SK

Commission proposal	Drafting suggestions and Comments/ Questions
paragraph 1, in an anonymised form including only the first 10 characters of the vehicle identification number, to the national statistical institutes and to the Commission (Eurostat) in accordance with Articles 17a and 17b of Regulation (EC) No 223/2009*.	(Comments/ Questions): The meaning of this paragraph on making the data available for statistics offices and Eurostat is unclear. Could the Commission provide clarification? In which way should the data be made available? (In SK there are approximately 2.7 million passenger vehicles registered, but more than 10 million odometer records are added to the national registry annually.) NL (Comments/ Questions): With what purpose? FI (Comments/ Questions): **Question:** If the first 10 characters of the VIN are kept as a reference, is the data anonymised? NL (Comments/ Questions): With what purpose? IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. RO (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	4. Member States shall also make available the odometer data stored in the national databases ~~and~~ **or in the** national vehicle registers referred to in paragraph 1, in an anonymised form including only the first 10 characters of the vehicle identification number, to the national statistical institutes and to the Commission (Eurostat) in accordance with Articles 17a and 17b of Regulation (EC) No 223/2009*. RO (Comments/ Questions): Correlation with paragraph 1
* Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities (OJ L 87, 31.3.2009, p. 164, ELI: http://data.europa.eu/eli/reg/2009/223/oj).’;	IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern.
(5) Article 5 is replaced by the following:	

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Commission proposal	Drafting suggestions and Comments/ Questions
'Article 5	
Date and frequency of testing	SK (Comments/ Questions): We would like to flag that this article is **very sensitive**, especially regarding the date and frequency for M1 and N1 categories. The position will be subject to decision on higher level.
1. Vehicles shall be subject to a roadworthiness test at least within the following intervals, without prejudice to the period of flexibility applied in Member States under paragraph 4:	
(a) vehicles of category M_1 and N_1: four years after the date on which the vehicle was first registered, and thereafter every two years until 10 years after the date on which the vehicle was first registered, and thereafter annually; however, vehicles of category N_1 shall also be subject to a roadworthiness test for the items listed in Section 8.2 of Annex I, one year after the date on which the vehicle was first registered, and thereafter annually;	SK (Comments/ Questions): Why 10 years - how was this number picked and why doesn't it reflect average age of vehicles in EU? PT (Comments/ Questions): For vehicles registered in other Member States, the reference is the date of first registration. But this provision does not mention vehicles registered outside EU: is the date of first registration also the reference date for vehicles previously registered in third countries?

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Drafting suggestions): however, vehicles of category N_1 shall also be subject to a roadworthiness test for the items listed in Section 8.2 of Annex I, three year after the date on which the vehicle was first registered, and thereafter annually; NL (Comments/ Questions): the article indicates that older vehicles show more defects as they get older, what is the expectation and reason that vehicles must be checked for emissions after only 1 year? One and two year old vans are not to be expected that systems for controlling emissions are already defective. A more realistic approach is to start testing this from the third year after admission. In the Netherlands, diesel cars must go for the PTI from the third year after admission. FI (Comments/ Questions): **Question:** We would appreciate more detail cost and benefit calculation on annual emmision tests for N1-vehicles that are under four years old? ES (Comments/ Questions): We have some concerns (potential cost benefit ratio) on the annual emission testing for N1 from the registration date. DE (Comments/ Questions): Re the amendment to point (a) of Article 5(1): In the past, the Federal Government had always emphasised to the European Commission that

Commission proposal	Drafting suggestions and Comments/ Questions
	while it supports the evolution of Directive 2014/45/EU, new testing and measurement procedures must be suitable for the performance of exhaust emission tests, feasible at all testing centres, as well as effective and efficient to avoid disproportionately high additional costs for vehicle keepers. Regarding the inspection requirements for vehicles 10 years or older: In general, Germany notes with regard to safety requirements that only very few accidents are caused by significant technical defects. The Commission itself acknowledges this in the middle of page 1 (explanatory memorandum) of this proposal: “Due to EU type-approval rules and a well-developed system of technical inspections during a vehicle’s lifetime, vehicle defects are the cause of only a small percentage of road crashes in the EU.” Self-diagnosis includes brake wear indicators, battery monitoring in electric cars and problems with sensors. Manufacturers are also increasingly using more robust technologies for components that have previously been subject to faults, such as LED lighting and electric parking brakes. In this respect, Germany rejects the mandatory reduction of the inspection interval for vehicles older than 10 years on the basis of road safety considerations. The review of the environmentally relevant aspects of point (a) of Article 5(1) has not yet been completed. Germany will comment on the proposed annual tests as soon as the Federal Government has formed a final opinion on the annual monitoring of exhaust and noise emissions. NL (Drafting suggestions): however, vehicles of category N_1 shall also be subject to a roadworthiness test for the items listed in Section 8.2 of Annex I, three year after the date on which the vehicle was first registered, and thereafter annually; NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): the article indicates that older vehicles show more defects as they get older, what is the expectation and reason that vehicles must be checked for emissions after only 1 year? One and two year old vans are not to be expected that systems for controlling emissions are already defective. A more realistic approach is to start testing this from the third year after admission. In the Netherlands, diesel cars must go for the PTI from the third year after admission. PL (Comments/ Questions): PL does not agree with carrying out an emissions test every year for N1 category vehicles. The extension of this obligation to N1 category vehicles simultaneously covers all vehicles with a maximum permissible weight of up to 3.5 t, including those with passenger car characteristics (M1 category). 1) The provision should not apply to vehicles used as commercial vehicles. 2) Comment on the second part of the sentence: - Consideration should be given to specifying that the test of section 8.2 of Annex 1 (Exhaust emissions) applies to N1 vehicles with a reference mass exceeding 2610 kg (see REGULATION (EC) No 715/2007 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 June 2007 on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information).
	RO

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): **vehicles of category O_2, Rb and Sb: four years after the date on which the vehicle was first registered, and thereafter every two years;** RO (Comments/ Questions): Correlation with the new proposals at Article 2
(b) vehicles of category M_1 used as taxis or ambulances, vehicles of categories M_2, M_3, N_2, N_3, O_3 and O_4: one year after the date on which the vehicle was first registered, and thereafter annually;	PL (Comments/ Questions): 1) Why is category N1 not indicated in the first part of point b? In PL, ambulances can be category N1. 2) It is proposed that M3 category vehicles should be subject to roadworthiness tests one year from the date of the vehicle's first registration and every six months thereafter.
(c) wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b and T4.3b the use of which mainly takes place on public roads for commercial road haulage purposes: four years after the date on which the vehicle was first registered, and thereafter every two years.	SK (Comments/ Questions): Could the Commission explain the part "*the use of which mainly takes place on public roads for commercial road haulage purposes*"? Tractors are mostly used for agricultural or forestry work and not for commercial road haulage, as category N3 trucks or category O4 semi-trailers. We also have concers regarding the word "*mainly*": "….***mainly*** *takes place on public roads…*". If these vehicles are used mainly in the field or in the forest and only sporadically on public roads, then this does not apply to them? We would welcome clarification. We would prefer to **delete** this **and simply name the category Tb** (without specifying T1b-T4.3.b).

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Drafting suggestions): (c) wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b and T4.3b the use of which mainly takes place on public roads for commercial road haulage purposes: four years after the date on which the vehicle was first registered, and thereafter every two years. RO (Drafting suggestions): (c) wheeled tractors of categories T1b, T2b, T3b, T4.1b, T4.2b**,** ~~and~~ T4.3b **and T5** the use of which mainly takes place on public roads ~~for commercial road haulage purposes~~: four years after the date on which the vehicle was first registered, and thereafter every two years. RO (Comments/ Questions): See comments on Article 2 (1) The type of use can not be verified at the PTI
	RO (Drafting suggestions): **(d) L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm3 or with a maximum continuous rated or net power above 11 kW: four years after the date on which the vehicle was first registered, and thereafter every two years.** RO (Comments/ Questions): The minimum frequency should be harmonized at the EU level
For the purposes of point (a) of the first subparagraph, in the case of the roadworthiness tests referred to in Article 4(3), the expiry date of the	SK

Commission proposal	Drafting suggestions and Comments/ Questions
subsequent roadworthiness certificate shall be counted as from the expiry date of the temporary roadworthiness certificate issued as a result of that test.	(Comments/ Questions): On how how the period should be calculated if a previous PTI was carried out in another Member State - given our general reservations and concerns we cannot support this paragraph. AT (Comments/ Questions): The frequency of testing is defined as multiples of full years. If the expiry date of the subsequent roadworthiness certificate shall be counted as from the expiry date of the temporary roadworthiness certificate, this would deviate from the original frequency. In AT, the date of the periodic technical inspection is on the anniversary of the first registration. This date can only be rescheduled with the permission of the registration authority. PL (Comments/ Questions): Member State of registration of the vehicle should “have a say” in recognising the expiry date of the temporary certificate of fitness.
2. Member States shall establish appropriate intervals within which vehicles of categories L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm3 or with a maximum continuous rated or net power above 11 kW, are to be subject to a roadworthiness test.	NL (Drafting suggestions): 2. ~~Member States shall establish appropriate intervals within which vehicles of categories L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm3 or with a maximum continuous rated or net power above 11 kW, are to be subject to a roadworthiness test.~~ NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): If the interval of category L is left to the Member States, there may be a proliferation of intervals and with that also the possibility of future mutual recognition. BE (Comments/ Questions): **BE:** Article 5(2) seems to have been numbered wrong + very important for BE NL (Drafting suggestions): 2. ~~Member States shall establish appropriate intervals within which vehicles of categories L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm3 or with a maximum continuous rated or net power above 11 kW, are to be subject to a roadworthiness test.~~ NL (Comments/ Questions): If the interval of category L is left to the Member States, there may be a proliferation of intervals and with that also the possibility of future mutual recognition. RO (Drafting suggestions): ~~2. Member States shall establish appropriate intervals within which vehicles of categories L3e, L4e, L5e and L7e with an engine capacity of more than 125 cm3 or with a maximum continuous rated or net power above 11 kW, are to be subject to a roadworthiness test.~~ RO

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): See paragraph 1 (d)
3. Notwithstanding the date of a vehicle's last roadworthiness test, vehicles shall undergo a roadworthiness test when the safety and environmental systems and components of the vehicle have been significantly altered or modified.	SK (Comments/ Questions): In the current Directive, there is an option for a **MS to determine that vehicles are subject to PTI if the vehicle has been involved in a road accident that has affected the main safety components of the vehicle**. In SK, this criterion applies, and it is important to us, we think, it should remain in art. 5. Could the Commission explain why this was deleted? NL (Drafting suggestions): 3. NL (Comments/ Questions): This is not feasible. Cars must be sent to the PTI by the competent authorities of a country. How should the competent authorities of a Member State find out that a vehicle has been significantly altered or modified? Companies that modify emission and safety systems are, for example, chip tuning companies. Chip tuning companies often do not perform PTI inspections themselves. It cannot be expected that such companies will report changes to emission and safety systems to the competent authorities of a Member State.

Commission proposal	Drafting suggestions and Comments/ Questions
	Furthermore, it is questionable whether a car will fail to pass the PTI emission inspection if for example a chip tuning modification has been carried out. It could well be that it simply passes the PTI emission test. The emission test in the PTI is often not effective enough to actually detect this type of manipulation. Requiring that vehicles with significantly altered or modified safety and environmental systems and components be submitted to the PTI would reverse the current state of affairs. The PTI is precisely intended to detect these kinds of alterations or modifications. For illustration, the following example: Since 2017, there has been a ban on the removal of particulate filters in the Netherlands. However, this ban was difficult to enforce at the time because there were numerous companies and also private individuals who removed particulate filters. However, it was only from 2023 with the introduction of the particle test in the PTI that the ban on removing diesel particutale filters could be properly enforced. With the particle test, a diesel car with a removed particulate filter will not pass the PTI. DE (Drafting suggestions): Germany supports the testing of vehicles “if the safety and environmental systems and components of the vehicle have been significantly altered or modified.” However, from the German point of view, it must then be determined whether this vehicle still complies with the (type) approval requirements after the modification. A pure roadworthiness test is not considered sufficient by Germany in this case. If so, this paragraph could be deleted and regulated by national provisions. CZ

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Are these cases where the vehicle has been rebuilt and additional approval is sought or other cases? BE (Comments/ Questions): BE: Very good but how will it be known whether the vehicle has been altered or modified? NL (Drafting suggestions): 3. NL (Comments/ Questions): This is not feasible. Cars must be sent to the PTI by the competent authorities of a country. How should the competent authorities of a Member State find out that a vehicle has been significantly altered or modified? Companies that modify emission and safety systems are, for example, chip tuning companies. Chip tuning companies often do not perform PTI inspections themselves. It cannot be expected that such companies will report changes to emission and safety systems to the competent authorities of a Member State. Furthermore, it is questionable whether a car will fail to pass the PTI emission inspection if for example a chip tuning modification has been carried out. It could well be that it simply passes the PTI emission test.

Commission proposal	Drafting suggestions and Comments/ Questions
	The emission test in the PTI is often not effective enough to actually detect this type of manipulation. Requiring that vehicles with significantly altered or modified safety and environmental systems and components be submitted to the PTI would reverse the current state of affairs. The PTI is precisely intended to detect these kinds of alterations or modifications. For illustration, the following example: Since 2017, there has been a ban on the removal of particulate filters in the Netherlands. However, this ban was difficult to enforce at the time because there were numerous companies and also private individuals who removed particulate filters. However, it was only from 2023 with the introduction of the particle test in the PTI that the ban on removing diesel particutale filters could be properly enforced. With the particle test, a diesel car with a removed particulate filter will not pass the PTI. IE (Comments/ Questions): The previous text was 'may'. Now it has moved to 'shall'. This is a considerable change. It is not always possible to determine when the safety and environmental systems and components of the vehicle have been significantly altered or modified. Until there's a system in place to capture these changes, this will be difficult to enforce. PL (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	It is proposed to clarify what kind of 'systems' are referred to.
4. Member States or competent authorities may establish a reasonable period during which the roadworthiness test is to be carried out, not exceeding the intervals laid down in paragraph 1.';	PL (Comments/ Questions): It is proposed to clarify the term 'reasonable period'.
(6) Article 6 is amended as follows:	
(a) paragraph 1 is replaced by the following:	
'1. For vehicle categories falling within the scope of this Directive, with the exception of categories L3e, L4e, L5e and L7e, Member States shall ensure that roadworthiness tests cover at least the areas referred to in point 2 of Annex I.';	RO (Drafting suggestions): '1. For vehicle categories falling within the scope of this Directive~~,~~ ~~with the exception of categories L3e, L4e, L5e and L7e,~~ Member States shall ensure that roadworthiness tests cover at least the areas referred to in point 2 of Annex I.'; RO

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): The areaes of the test should be harmonized also for L vehicles, with the necessary amendments in Annex I.
(b) paragraph 3 is replaced by the following:	
'3. For vehicle categories L3e, L4e, L5e and L7e, with an engine capacity of more than 125 cm^3 or with a maximum continuous rated or net power above 11 kW, Member States shall determine the areas, items and appropriate methods of testing.';	IE (Drafting suggestions): 3. For vehicles in categories L3e, L4e, L5e and L7e that either: – have an engine capacity greater than 125 cm^3, or – have a maximum continuous rated power or net power output exceeding 11 kW, Member States shall define the specific areas, items, and appropriate methods of testing. IE (Comments/ Questions): It's unclear whether: • The 11 kW power threshold applies to all L3e–L7e vehicles, or • It's only an alternative to the 125 cm^3 condition — i.e. does the test apply if *either* threshold is met, regardless of category type? Also, "maximum continuous rated or net power" combines two different concepts (continuous power vs. net power), which could be better defined or separated. RO

Commission proposal	Drafting suggestions and Comments/ Questions
	(Drafting suggestions): ~~3. For vehicle categories L3e, L4e, L5e and L7e, with an engine capacity of more than 125 cm^3 or with a maximum continuous rated or net power above 11 kW, Member States shall determine the areas, items and appropriate methods of testing.~~ RO (Comments/ Questions): See comments on paragraph 1
(c) the following paragraph 4 is added:	
'4. The Member State of registration may decide not to require the testing of items 8.1 or 8.2 of point 3 of Annex I to this Directive during the roadworthiness test of a vehicle where that vehicle successfully passed a corresponding exhaust test or noise test, or both, involving the checking of item 8.1 or 8.2 or both of point 3 of Annex to Directive 2014/47/EU during the six months preceding the due date of the roadworthiness test.';	NL (Comments/ Questions): Does this mean that N1 would in that case not need a yearly emission test? ES (Drafting suggestions): 4. The Member State of registration may decide not to require the testing of items 8.1 or 8.2 of point 3 of Annex I to this Directive during the roadworthiness test of a vehicle where that vehicle successfully passed a corresponding exhaust test or noise test, or both, **during a more detailed technical roadside inspection** involving the checking of item

Commission proposal	Drafting suggestions and Comments/ Questions
	8.1 or 8.2 or both of point 3 of Annex to Directive 2014/47/EU during the six months preceding the due date of the roadworthiness test.'; ES (Comments/ Questions): Added just to make clear that this exemption will only be applicable if a more detailed technical roadside inspection is carried out. NL (Comments/ Questions): Does this mean that N1 would in that case not need a yearly emission test? IE (Comments/ Questions): It is not clear if the 3rd party service needs to meet the standard as the PTI centre and who polices these? RO (Drafting suggestions): ~~4. The Member State of registration may decide not to require the testing of items 8.1 or 8.2 of point 3 of Annex I to this Directive during the roadworthiness test of a vehicle where that vehicle successfully passed a corresponding exhaust test or noise test, or both, involving the checking of item 8.1 or 8.2 or both of point 3 of Annex to Directive 2014/47/EU during the six months preceding the due date of the roadworthiness test.'~~

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Commission proposal	Drafting suggestions and Comments/ Questions
(7) Article 8 is replaced by the following:	
'Article 8	
Roadworthiness certificate	
1. Member States shall ensure that testing centres or, where relevant, the competent authorities, which have carried out a roadworthiness test on a vehicle issue a roadworthiness certificate for that vehicle indicating at least the standardised elements of the corresponding harmonised Union codes as laid down in Annex II. Member States shall ensure roadworthiness certificates are issued as electronic attestations of attributes to European Digital Identity Wallets in accordance with Regulation (EU) No 910/2014 of the European Parliament and of the Council**.	SK (Comments/ Questions): According to this paragraph, the roadworthiness certificates indicate "*at least the standardised elements of the corresponding harmonised Union codes as laid down in Annex II*.". There are no harmonised codes in Annex II, only the order of points from 1 to 10 – what in our opinion are not harmonised codes. **The harmonised codes are given in the Registration Documents Directive in the current Directive 1999/37/EC** and also in the new proposal submitted by the Commission. We believe that the same harmonised codes should be used and Annex II to Directive 2014/45/EU should be amended accordingly. Could the commission clarify this? (the Working Party dealing with the End-of-Life Vehicles proposal has similary added harmonised codes based on the Registration Documents Directive to the template certificate of destruction).

Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Comments/ Questions): NL would be interested to hear other MS' points of view on added value EiD wallets when expiry date PTI is also an item on the (digital) registration certificate. FI (Comments/ Questions): **Question:** Will it be possible to receive an electronic roadworthiness certificate from the testing centre that is different from the country that issued the digital identity wallet? **Question:** We see that the "use case" where the driver is not a owner or holder of a vehicle is "not supported" in the European Digital Identity Wallets scheme at the moment. Could the commission clarify this, do you share this concern and do you see a need to expand the consept somehow? This will have implications on our final position on application timelines. DE (Comments/ Questions): Regarding the amendment to Article 8: Germany welcomes digitalization. The detailed provisions of Article 8 require intensive review in Germany. Due to the mandatory ISO 17020 accreditation for inspection bodys in Germany, the provisions on digitization and data protection should be in line with the accreditation rules. This can only be assessed after a technical review by the relevant authorities (including the Federal Motor Transport Authority*). * Kraftfahrt-Bundesamt NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): NL would be interested to hear other MS' points of view on added value EiD wallets when expiry date PTI is also an item on the (digital) registration certificate. LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) LU (Comments/ Questions): We welcome the proposal but the proposed time frame is too short; a longer period should be considered. (e.g. min 5 years) RO (Drafting suggestions): 1. Member States shall ensure that testing centres or, where relevant, the competent authorities, which have carried out a roadworthiness test on a vehicle issue a roadworthiness certificate for that vehicle indicating at least the standardised elements of the corresponding harmonised Union codes as laid down in Annex II. ~~Member States shall ensure roadworthiness certificates are issued as electronic attestations of attributes to European Digital Identity Wallets in accordance with Regulation (EU) No 910/2014 of the European Parliament and of the Council**.~~ RO (Comments/ Questions): RO does not support the mandatory introduction of the electronic certificate; the standard certificate should be the paper certificate.

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Commission proposal	Drafting suggestions and Comments/ Questions
Member States shall ensure that roadworthiness certificates contain the information necessary for authentication and validation of those certificates.	RO (Comments/ Questions): See comments on paragraph 1
Member States shall inform the Commission of trusted issuers of roadworthiness certificates which they shall keep up to date. The Commission shall make a list of those issuers publicly available through a secure channel and in an electronically signed or sealed form suitable for automated processing.	NL (Comments/ Questions): Member States should be able to decide who they consider trusted issuers (always authorities) NL (Comments/ Questions): Member States should be able to decide who they consider trusted issuers (always authorities) RO (Comments/ Questions): See comments on paragraph 1
2. Member States shall require that testing centres or, where relevant, the competent authorities, provide, on request, a certified printout of the roadworthiness certificate to the person presenting the vehicle for testing. Those printouts shall be user-friendly and shall contain an interoperable [barcode][QR code], which allows the verification of its authenticity, validity and integrity. By six months after the adoption of the implementing acts referred to in paragraph 9, the [barcode][QR code] shall comply with the technical specifications set out	FI (Comments/ Questions): **Comment:** We see that we should not develop physical certificates as they will become marginalized after the digitalisation of the certificate. RO (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
in those implementing acts. The information contained in the certificate shall also be displayed in human-readable form and shall be provided in at least the official language or languages of the issuing Member State.	See comments on paragraph 1
3. Notwithstanding Article 5, in the case of re-registration of a vehicle already registered in another Member State, each Member State shall recognise the roadworthiness certificate issued by that other Member State, whether in electronic or paper format, as if it had itself issued that certificate, provided that the roadworthiness certificate is still valid in terms of the frequency intervals established for periodic roadworthiness tests by the re-registering Member State. Member States shall communicate any new specimen of the 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.	SK (Comments/ Questions): This paragraph deals with **re-registration** of vehicles and recognition of the roadworthiness certificate. We think this provision is missing a text, that the roadworthiness certificate does not always have to be recognised, if the competent authority considers that the vehicle has defects. We would like to refer to Point 3 of the judgment of the Court of Justice of 24 January 2019 in **case C-326/17**, where recognition of roadworthiness certificates from abroad may be refused if there is a suspected risk to road safety. We would like to ask why this has not been reflected in the provision? The last two sentences on the specimen of certificates should, in our opinion, be in a separate paragraph (as this does not follow the introductory part of paragraph 3.) RO (Drafting suggestions): 3. Notwithstanding Article 5, in the case of re-registration of a vehicle already registered in another Member State, each Member State shall recognise the roadworthiness certificate issued by that other Member State, whether in electronic or paper format, as if it had itself issued that certificate, provided that the roadworthiness certificate **corresponds to Annex II and** is still valid in terms of the frequency intervals established for periodic roadworthiness tests by the re-

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Commission proposal	Drafting suggestions and Comments/ Questions
	registering Member State. Member States shall communicate any new specimen of the 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. RO (Comments/ Questions): Not all existing PTI certificates correspond to the EU format
4. In addition to the provisions of paragraph 3, Member States shall recognise the validity of a roadworthiness certificate, whether in electronic or paper format, where there is a change in ownership of a vehicle having a valid proof of periodic roadworthiness test.	BE (Comments/ Questions): BE: Does this mean that it will be possible to register a vehicle with the roadworthiness certificate of the previous owner and hence without en new roadworthiness tests until the end of the validity of said certificate, or will it require a new validity date?
5. The Member State of registration shall recognise the validity of a temporary roadworthiness certificate issued in another Member State.	PL (Comments/ Questions): It seems that it is the Member State of registration of the vehicle that should have a say in recognising the expiry date of the temporary certificate of roadworthiness.

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Commission proposal	Drafting suggestions and Comments/ Questions
6. Testing centres shall communicate electronically to the competent authority of the Member State concerned, the information included in the roadworthiness certificates which they issue. Such communication shall take place within a reasonable time after each roadworthiness certificate is issued. Member States shall determine the period during which the competent authority is to retain that information. The duration of that period shall not be less than 36 months, without prejudice to the national tax systems of the Member States.	NL (Comments/ Questions): What is the authority concerned? After all, there are two involved: the one in the country of inspection and the one in the country of registration. Do you perhaps get that a foreign PTI has to be reported to the authority in the country of origin? FI (Comments/ Questions): **Comment:** Text "a reasonable time after each roadworthiness certificate is issued" is vague. At least the information should be communicated in same time to the national authority or the authority in another EU country. NL (Comments/ Questions): What is the authority concerned? After all, there are two involved: the one in the country of inspection and the one in the country of registration. Do you perhaps get that a foreign PTI has to be reported to the authority in the country of origin?
7. Member States shall ensure that the information included in the previous roadworthiness certificate is made available to the inspectors.	AT (Drafting suggestions): Member States ~~shall ensure~~ **may decide** that the information included in the previous roadworthiness certificate is made available to the inspectors.

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Commission proposal	Drafting suggestions and Comments/ Questions
	AT (Comments/ Questions): In AT, it was decided not to provide the results of previous roadworthiness tests to the inspectors in order to avoid any influence on the inspector's unbiasedness and to guarantee that every vehicle is inspected in the same way.
8. Member States shall ensure that the results of the roadworthiness test are notified, or made available electronically, as soon as possible to the authority responsible for registration of the vehicle. That notification shall contain the information included in the roadworthiness certificate.	
9. By [date of entry into force + 2 years], the Commission shall adopt implementing acts to lay down the technical specifications and rules regarding the following:	SK (Comments/ Questions): There is a **deadline 2 years** for the Commission to issue and implementing act. That is the same deadline as for the transposition. There is no transitional period for Member States to apply this implementing act. Could the Commission explain to us what the timetable is and how it should be applied? ES (Comments/ Questions): Not clear when it becomes mandatory to MS
(a) securely issuing and verifying the certificates referred to paragraphs 1 and 2;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(b) ensuring the protection and security of personal data;	
(c) laying down the common data structure of roadworthiness certificates;	
(d) issuing and verifying a valid, secure and interoperable [barcode][QR code];	
(e) notifying trusted issuers of roadworthiness certificates.	
Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).	
_____	
** Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (OJ L 257, 28.8.2014, p. 73, ELI: http://data.europa.eu/eli/reg/2014/910/oj)’;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(8) Article 9 is replaced by the following:	
'*Article 9*	
Follow-up of deficiencies	
1. In the case of minor deficiencies only, the test shall be deemed to have been passed, the deficiencies shall be rectified, and the vehicle shall not be re-tested.	
2. In the case of major deficiencies, the test shall be deemed to have been failed. The Member State or the competent authority shall decide on the period during which the vehicle in question may be used before it is required to undergo another roadworthiness test, which shall take place not later than two months after the initial test. The result of the test and the time limit until the subsequent test shall be notified to the Member State of registration and recorded in the vehicle register in accordance with Article 3a(1) of Council Directive 1999/37/EC***. That subsequent test may take place in the Member State where the vehicle failed the initial test, or in the Member State of registration.	NL (Comments/ Questions): Hence in the case of PTI abroad: the MS of inspection determines the period within which a retest must take place, the MS of registration must receive the inspection results and expiry date, the second inspection may still take place in that same foreign MS. In terms of implementation, this becomes quite complicated DE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	n the view of Germany, the "possibility of re-inspections in the Member State where the vehicle failed the initial test or in the Member State of registration" requires a uniform European "list of deficiencies." However, Member States have so far been free to add additional "deficiencies" at national level. Germany has numerous national "deficiencies" that should not simply be removed. This requires extensive additions to the harmonized "deficiencies" in the annex to the Directive or a clear provision within the proposed amendment on how to deal with national deficiencies of other Member States in the event of a re-inspection. Appropriate deadlines for implementation should be set for this. BE (Comments/ Questions): BE: We would be grateful if the European Commission could provide some clarification on the following point: *"The result of the test and the time limit until the subsequent test shall be notified to the Member State of registration and recorded in the vehicle register in accordance with Article 3a(1) of Council Directive 1999/37/EC***".* AT (Drafting suggestions): The result of the test and the time limit until the subsequent test shall be notified to the Member State of registration and recorded in the ~~vehicle register in accordance with Article 3a(1) of Council Directive 1999/37/EC~~ **appropriate national database** AT (Comments/ Questions): See above NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Hence in the case of PTI abroad: the MS of inspection determines the period within which a retest must take place, the MS of registration must receive the inspection results and expiry date, the second inspection may still take place in that same foreign MS. In terms of implementation, this becomes quite complicated
3. In the case of dangerous deficiencies, the test shall be deemed to have been failed. The Member State or the competent authority may decide that the vehicle in question is not to be used on public roads and that the authorisation for its use in road traffic is to be suspended for a limited period of time, without requiring a new process of registration. Such request for suspension shall be notified to the Member State of registration and the suspension shall be recorded in the vehicle register in accordance with Article 3a(1) of Directive 1999/37/EC. When the deficiencies are rectified, a new roadworthiness certificate shall be issued without delay testifying that the vehicle is in a roadworthy condition. The new certificate shall be issued by the competent authority that requested the suspension.	SK (Drafting suggestions): 3. In the case of dangerous deficiencies, the test shall be deemed to have been failed. The Member State or the competent authority shall decide that the vehicle in question is not to be used on public roads and that the authorisation for its use in road traffic is to be suspended for a limited period of time, without requiring a new process of registration. Such request for suspension shall be notified to the Member State of registration and the suspension shall be recorded in the vehicle register in accordance with Article 3a(1) of Directive 1999/37/EC. When the deficiencies are rectified, a new roadworthiness certificate shall be issued without delay testifying that the vehicle is in a roadworthy condition. The new certificate shall be issued by the competent authority that requested the suspension. SK (Comments/ Questions): According to paragraph 3 if a vehicle has **dangerous deficiencies**, *"…Member State or the competent authority authority **may** decide that the vehicle in question is not to be used on public roads*,". In our opinion, the word "may" should be changed to "shall" to be in line with Directive

Commission proposal	Drafting suggestions and Comments/ Questions
	2014/47/EU, as it also states that if a vehicle has a dangerous deficiency, it cannot be used in road traffic. Could the Commission clarify the meaning of the last sentence: "*The new certificate shall be issued by the competent authority that requested the suspension.*"? If a vehicle was assessed with a dangerous deficiency during the PTI, a new PTI can also be carried out by another testing centre. We do not understand why it should be the same authority that issued the suspension. NL (Comments/ Questions): Is the Member State or the competent authority also authorized in case of dangerous deficiencies to suspend the authorisation for its use in road traffic if it concerns a vehicle from another Member State? AT (Drafting suggestions): The new certificate shall be issued by the competent authority that requested the suspension **or by the Member State of registration**. AT (Comments/ Questions): In cases where the vehicle is brought to the Member State of registration to rectify the deficiencies, it would be an unnecessary burden for the vehicle owner to bring back the vehicle to the Member State requested the suspension. NL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Is the Member State or the competent authority also authorized in case of dangerous deficiencies to suspend the authorisation for its use in road traffic if it concerns a vehicle from another Member State? PL (Comments/ Questions): In PL's view, the second part of paragraph 3 is not clear. It needs clarification as to why the competent authority has to notify the Member State of registration of the fact that a vehicle cannot be used on public roads. Furthermore, it is questionable that the issue of a new roadworthiness certificate is restricted only to the competent authority that requested the stoppage. It seems reasonable to allow the issuing of a new roadworthiness certificate also by the Member State of registration.
4. In the case of obvious tampering or manipulation of any component of the vehicle, including its emission control system, silencer, safety-related systems, or odometers, with the aim of reducing or misrepresenting the distance record of a vehicle, such tampering or manipulation shall be considered as a major or dangerous deficiency and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties.	SK (Comments/ Questions): We see as problematic manipulation with odometers – we do not know how to remove such manipulation. If the kilometers have been tampered, it cannot be restored to its original state, since the actual mileage is not known. If the odometer has been tampered with, it is important for the buyer to know this. However, this cannot be restored to its original state. Some vehicle owners may purchase a vehicle with a tampered odometer

Commission proposal	Drafting suggestions and Comments/ Questions
	(unknowingly) and they will not be able to ensure the removal of this manipulation. Could the Commission clarify this odometer manipulation? What to do next with such a vehicle? NL (Drafting suggestions): and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties NL (Comments/ Questions): PTI stations in the Netherlands are not authorized to impose fines. This can only be done by official enforcement authorities such as the police. If the manipulation or tampering with a part of a vehicle is discovered by a PTI station, then a PTI station cannot impose a fine for this. If the police discover the manipulation or tampering during a Road Side Inspection, a fine can be imposed. FI (Comments/ Questions): **Comment**: If tampering of odometer is found and PTI is failed, how can the vehicle ever pass a PTI? How should odometer reading be corrected or reported as tampered? What, if the odometer has broke down and repaired? CZ (Comments/ Questions): The provision is too general and does not define what is meant by tampering and manipulation. This could lead to different application of this provision across Member States. So what cases does this provision cover?

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Drafting suggestions): and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties NL (Comments/ Questions): PTI stations in the Netherlands are not authorized to impose fines. This can only be done by official enforcement authorities such as the police. If the manipulation or tampering with a part of a vehicle is discovered by a PTI station, then a PTI station cannot impose a fine for this. If the police discover the manipulation or tampering during a Road Side Inspection, a fine can be imposed. IE (Drafting suggestions): In the case of obvious tampering or manipulation of any component of the vehicle, including its emission control system, silencer, safety-related systems, batteries, battery management systems or odometers, with the aim of reducing or misrepresenting the distance record of a vehicle, such tampering or manipulation shall be considered as a major or dangerous deficiency and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties. IE (Comments/ Questions): Batteries and battery management systems should be included in the definition of tampering or manipulation PL (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	The provision is vague because for penalties to be effective, proportionate, dissuasive and non-discriminatory across the EU this will be difficult to enforce.
*** Council Directive 1999/37/EC of 29 April 1999 on the registration documents for vehicles, (OJ L 138, 1.6.1999, p. 57, ELI: http://data.europa.eu/eli/dir/1999/37/oj)’;	
	AT (Comments/ Questions): Article 10: As Article 10 was not modified, the Commission is asked to reflect on wether a digitalisation of the proof of test is not intended or if a pure digital proof of test is already admissible under the current provisions.
(9) Article 16 is replaced by the following:	
‘*Article 16*	
Exchange of data between Member States’ authorities	

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Commission proposal	Drafting suggestions and Comments/ Questions
1. Member States shall assist one another in the implementation of this Directive. They shall exchange information and data in particular with the aim of checking, at the time of roadworthiness testing, the vehicle's legal and technical status, where necessary in the Member State in which it is registered.	DE (Comments/ Questions): • Regarding the amendment to Article 16: DEU welcomes the "exchange of data between the authorities of the Member States." However, the provisions contained in Article 16 require detailed review. Germany has therefore a study reservation on the proposed text. •Art. 16 introduces the obligation for MS to connect their vehicle registers to the MOVE-HUB platform for data exchange. However, the vehicle registers of the Member States are already interconnected via EUCARIS, see, for example, Article 5g of Directive (EU) 2015/413. EUCARIS has proven to be a reliable system for the secure, EU-wide exchange of vehicle and personal data in various areas of application. It is cost-effective and expandable. Did the Commission examine the use of EUCARIS for the purposes of Directive 2015/45/EU in its impact assessment? Why should this system not also be sufficient for the exchange of PTI data? The use and adaptation of an already established system is likely to be more cost-effective and sustainable than setting up a new system. Member States must continue to be able to use EUCARIS. BE (Comments/ Questions): BE: MOVE-HUB? We don't know about MOVE-HUB. Does this system already exist? On the other hand, we know EUCARIS. Its purpose is the exchange of vehicle data between Members States.

Commission proposal	Drafting suggestions and Comments/ Questions
	Could the European Commission clarify the existence of this system?
Member States shall provide access to vehicle registration data, data regarding the content of the certificates of conformity, the last roadworthiness certificate, any technical roadside inspection report, and the odometer history of the vehicle stored in national databases, to the competent authorities of and testing centres authorised by other Member States.	CZ (Comments/ Questions): Through which platform this data will be provided? The MOVE-HUB electronic system, according to the wording of the following paragraph, does not take into account the transmission of most of this data. AT (Drafting suggestions): Member States shall provide access to vehicle registration data, ~~data regarding the content of the certificates of conformity,~~ the last roadworthiness certificate, any technical roadside inspection report **of the last [3] years**, and the odometer history of the vehicle stored in national databases, to the competent authorities of and testing centres authorised by other Member States. AT (Comments/ Questions): The Certificate of Conformity will be publicly available acc. to the framework Regulation (EU) 2018/858, so there is no need to exchange this data. The exchange of RSI reports should be limited to a reasonable period of time and should also be only obligatory for reports generated after entry into force of this Directive. RO (Drafting suggestions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	Member States shall provide access to vehicle registration data, ~~data regarding the content of the certificates of conformity,~~ the last roadworthiness certificate, any technical roadside inspection report, and the odometer history of the vehicle stored in national databases, to the competent authorities of ~~and testing centres authorised by~~ other Member States. **The competent authorities make available the necessary information to their authorised testing centers.** RO (Comments/ Questions): For administrative and security reasons, the direct access should be available only to the competent authorities. Even the title refers to the exchange of data between MS authorities. The exchange of the CoC data are subject of other EU provisions
Member States shall interconnect their electronic systems on 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.	NL (Drafting suggestions): Member States shall use a specifically designed and highly secured software application of the European Vehicle and Driving Licence Information System (EUCARIS) in its up-to-date version to exchange information on roadworthiness certificates and on odometer history, 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.~~shall interconnect their electronic systems on 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~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~consult the relevant database or the national vehicle register of any other Member State in real time.~~ ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. BE (Comments/ Questions): BE: Will it be possible to allow access to other interested authorities such as the police and others that should have access to the data? How will MOVE-HUB function and when will it be ready for use? AT (Comments/ Questions): The Commission is asked to consider that data exchange is already mandatory via different platforms (EUCARIS for eCOC). AT does not

Commission proposal	Drafting suggestions and Comments/ Questions
	favour any specific platform but urges to find a solution which imposes as little burden on Member States as possible and avoids duplications of IT solutions. NL (Drafting suggestions): Member States shall use a specifically designed and highly secured software application of the European Vehicle and Driving Licence Information System (EUCARIS) in its up-to-date version to exchange information on roadworthiness certificates and on odometer history, 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.~~shall interconnect their electronic systems on 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.~~ IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. RO (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Member States shall interconnect their electronic systems on 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. **The competent authorities make available the necessary information to their authorised testing centers.** RO (Comments/ Questions): For administrative and security reasons, the direct access should be available only to the competent authorities. Even the title refers to the exchange of data between MS authorities.
2. By [PLEASE INSERT DATE: 2 years after the entry into force of this directive], the Commission shall adopt implementing acts laying down the necessary arrangements for the implementation of the functionalities of the MOVE-HUB electronic system and specifying the minimum requirements for the format and content of the information and data to be exchanged by Member States regarding vehicles subject to roadworthiness testing. Those implementing acts shall ensure the protection of personal data and shall be adopted in accordance with the examination procedure referred to in Article 19(2).	SK (Comments/ Questions): The Commission has 2 years to issue an implementing act - same period as for transposition by the Member States. Paragraph 3 states that Member States have one year to apply this, however we believe that this implementing act should already be applicable at the time of the transposition. Could the Commission clarify the timetable? It is not clear, what will happen in the period between mandatory transposition and the start of application of the implementing act? If the Member States will be able to use existing systems such as EUCARIS (which will be able to connect to MOVE-HUB), we would like to include this clarification at least in the Recitals. (This has been similarly amended in the End-of-Life Vehicles Regulation).

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Commission proposal	Drafting suggestions and Comments/ Questions
	NL (Drafting suggestions): 2. By [PLEASE INSERT DATE: 2 years after the entry into force of this directive], the Commission shall adopt implementing acts laying down the necessary arrangements for the implementation of the functionalities ~~of the MOVE-HUB electronic system~~ and specifying the minimum requirements for the format and content of the information and data to be exchanged by Member States regarding vehicles subject to roadworthiness testing. Those implementing acts shall ensure the protection of personal data and shall be adopted in accordance with the examination procedure referred to in Article 19(2). ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): See previous comment. NL (Drafting suggestions): 2. By [PLEASE INSERT DATE: 2 years after the entry into force of this directive], the Commission shall adopt implementing acts laying down the necessary arrangements for the implementation of the functionalities ~~of the MOVE-HUB electronic system~~ and specifying the minimum requirements for the format and content of the information and data to be exchanged by Member States regarding vehicles subject to roadworthiness testing. Those implementing acts shall ensure the protection of personal data and shall be adopted in accordance with the examination procedure referred to in Article 19(2).

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Commission proposal	Drafting suggestions and Comments/ Questions
	IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern.
3. The electronic systems interconnections provided for in paragraph 1 shall be operational within one year after the adoption of the implementing acts referred to in paragraph 2.’;	ES (Drafting suggestions): The electronic systems interconnections provided for in paragraph 1 shall be operational within ~~one year~~ **two years** after the adoption of the implementing acts referred to in paragraph 2.’; To be reviewed ES (Comments/ Questions): See previous comment. More time to make this functional by MS is clearly needed, if eventually decided to mandate MOVE-HUB interconnection. CZ (Comments/ Questions): Does the whole of paragraph 1 apply or just the part that governs the transmission of information via the MOVE-HUB? The time limit of 1 year to become operational seems insufficient. IE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern. PL (Comments/ Questions): The indicated period may not be sufficient to prepare the full functionality of the electronic system.
(10) Article 17 is amended as follows:	
(a) the first indent is replaced by the following:	
'– update only the vehicle category designations referred to in Article 2(1), Article 5(1) and (2), and Article 6(1) and (2) as appropriate in the event of changes to the vehicle categories resulting from amendments to the type-approval legislation referred to in Article 2(1), without affecting the scope and frequency of testing;';	

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Commission proposal	Drafting suggestions and Comments/ Questions
(b) the third indent is replaced by the following:	
'– adapt point 3 of Annex I, following a positive assessment of the costs and benefits involved, in respect of the list of test items, methods, reasons for failure and assessment of deficiencies;';	
(c) the following fourth indent is added:	
'– specify the methods for the particle number (PN) measurement of positive ignition engines and for the nitrogen oxides (NO_X) measurement of compression and positive ignition engines provided for in Section 8.2 of point 3 of Annex I.';	NL (Drafting suggestions): specify the methods for the particle number (PN) measurement of positive ignition engines, for the nitrogen oxides (NO_X) measurement of compression ignition engines and the nitrogen oxides (NO_x) and other gaseous components of positive ignition engines provided for in Section 8.2 of point 3 of Annex I.'; NL (Comments/ Questions): The NOx test for positive ignition engines is to be developed for vehicles as of emission classes Euro VI, 6d-TEMP and newer. For these vehicles, the new NOx test and the four gas emissiontest in accordance with 8.2.2.2. should be performed. It is preferable that there will be one new test for these vehicles, in which the functioning of the three-way catalytic converter is checked on the basis of all gaseous components (CO, HC,

Commission proposal	Drafting suggestions and Comments/ Questions
	NOx, CO_2 and O_2). So not that the old four-gas test should be performed supplemented with a separate new NOx test. GR (Comments/ Questions): Particle number (PN) measurement should also apply to compression engines. FI (Drafting suggestions): '– specify the methods for the particle number (PN) measurement of positive ignition engines ~~and for the nitrogen oxides (NOx) measurement of compression and positive ignition engines~~ provided for in Section 8.2 of point 3 of Annex I.'; FI (Comments/ Questions): **Justification:** Powers to adapt NOx measurement by delegated acts should not be given to the Commission as proposed. The temperatures outside of Type Approval tests should be properly verified before NOx measurement can be introduced in this directive. Ambient temperatures during PTI is a unsolved problem at the moment. DE (Comments/ Questions): Re the new fourth indent in Article 17: An in-depth expert review is required of the Commission's powers to adopt delegated acts specifying the "methods for the particle number (PN) measurement of positive ignition engines and for the nitrogen oxides (NOX) measurement of compression and positive ignition engines provided for in Section 8.2 of point 3 of Annex I". As this could entail high adaptation costs, Germany believes that separate deliberation on the authorization to introduce new

Commission proposal	Drafting suggestions and Comments/ Questions
	measurement and testing procedures is required. Germany will comment on this at a later date. AT (Comments/ Questions): Contrary to PN measurements, at the time being, there is no suitable procedure available for measuring NOx at PTI. Therefore, a review clause considering the possibility of introducing NOx measurements and limits at PTI should be introduced to avoid an obligation that cannot be fulfilled by Member States/authorities/testing centres. NL (Drafting suggestions): specify the methods for the particle number (PN) measurement of positive ignition engines, for the nitrogen oxides (NO_X) measurement of compression ignition engines and the nitrogen oxides (NO_x) and other gaseous components of positive ignition engines provided for in Section 8.2 of point 3 of Annex I.'; NL (Comments/ Questions): The NOx test for positive ignition engines is to be developed for vehicles as of emission classes Euro VI, 6d-TEMP and newer. For these vehicles, the new NOx test and the four gas emissiontest in accordance with 8.2.2.2. should be performed. It is preferable that there will be one new test for these vehicles, in which the functioning of the three-way catalytic converter is checked on the basis of all gaseous components (CO, HC, NOx, CO_2 and O_2). So not that the old four-gas test should be performed supplemented with a separate new NOx test. IE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	NOx testing requires the vehicle to be under load, this would add extra time to the test and would not be feasible for vehicles over 3.5 tonnes. Further details would need to be provided. Consideration for OBM or OBD. Please see extract from 8.2.2.3. NOx Measurement of Annex I: "Vehicle preparation: [to be specified in accordance with the delegated acts referred to in Article 17]; - […] Measuring instrument preparation: — [to be specified in accordance with the delegated acts referred to in Article 17 or combined with PN testing above];" PL (Comments/ Questions): 1) It is necessary to indicate the assumptions for NOx measurement 2) It is required that experts from the Member States participate in the development of the implementing regulations.
(11) Article 20 is replaced by the following:	

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Commission proposal	Drafting suggestions and Comments/ Questions
'*Article 20*	
Reporting	
By [two years from the date referred to in Article 20a(1)], the Commission shall submit a report to the European Parliament and the Council on the implementation and effects of this Directive, in particular as regards the effectiveness of the provisions on its scope, notably in relation to L-category vehicles, the frequency of testing, the mutual recognition of roadworthiness certificates in cases of re-registration of vehicles originating from another Member State, and the recognition of temporary roadworthiness certificates. The report shall also analyse whether it is necessary to update the Annexes, particularly in the light of technical progress and practices.';	
(12) the following Article 20a is inserted:	
'*Article 20a*	

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Commission proposal	Drafting suggestions and Comments/ Questions
Communication of information to the Commission	
1. By 31 March 2030, and by 31 March every three years thereafter, Member States shall communicate to the Commission through the online reporting platform referred to in Article 28 of Regulation (EU) 2018/1999 of the European Parliament and of the Council**** ('e-platform'), the data collected relating to each of the previous three calendar years and concerning the vehicles inspected in their territory. Those data shall include the following (per calendar year):	DE (Comments/ Questions): • Regarding the new Article 20a: From Germany's point of view, there is no fundamental objection to the transfer of information to the Commission. The procedure laid down for the online reporting platform needs to be examined by the competent authorities in Germany, which means that no assessment can be made at this stage. AT (Comments/ Questions): Commission is kindly asked to explain the purpose of this data collection: which kind of analysis should be done with the collected data, which consequences may arise. IE (Comments/ Questions): This approach will require significant changes to IT systems and current data managamemnt processes,as well as national legislation beyond the scope of this directive to implement. The proposed 2 year timeframe for compliance would be of concern.
(a) the number of testing centres per Member State;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(b) the total number of vehicles inspected;	
(c) the number of vehicles inspected per category;	
(d) the areas checked, and the items failed, in accordance with point 3 of Annex I to this Directive;	RO (Drafting suggestions): (d) the **failure rate** **per category** ~~areas checked, and the items failed, in accordance with point 3 of Annex I to this Directive;~~ RO (Comments/ Questions): Administrative burden
(e) the number, category and [failure rate][test result] of vehicles tested registered in another Member State.	RO (Drafting suggestions): (e) the number, category and [failure rate **per category**]~~[test result]~~ of vehicles tested registered in another Member State.
The first report shall cover the years 2027, 2028 and 2029, separately.	ES (Comments/ Questions): Given that the format will be defined in implementing acts, more time is needed, first year to be included in the reporting should be postponed PL

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): The dates indicated for the adoption of the first report are unrealistic and need to be postponed. It should be borne in mind that each Member State will implement the Directive on a different date.
2. The Commission shall adopt implementing acts laying down the format to be used by Member States for communication of the data referred to in paragraph 1 through the e-platform. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19(2).	
The Commission shall report to the European Parliament and to the Council regarding the data collected pursuant to paragraph 1.	
**** Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI : http://data.europa.eu/eli/reg/2018/1999/oj).';	

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Commission proposal	Drafting suggestions and Comments/ Questions
(13) Article 22 is replaced by the following:	
‘*Article 22*	
Extension of validity of roadworthiness certificates in case of crisis	DE (Comments/ Questions): On the new Article 22: Germany welcomes the new options available to Member States and the Commission in the event of a crisis. A detailed examination of this has not yet been possible. RO (Drafting suggestions): **Extension of validity of roadworthiness certificates <u>and inspectors certificates</u> in case of crisis** RO (Comments/ Questions): That extension should be applied also for the inspectors certificates
1. For the purposes of this Article, the following definitions shall apply:	

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(a) 'crisis situation' means an exceptional, unexpected and sudden, natural or human -made event of extraordinary nature and scale that takes place inside or outside of the Union, with significant direct or indirect impacts on the area of road transport and that also prevents or significantly impairs the possibility for the owners or holders of vehicles registered in the Member States or relevant national authorities from carrying out roadworthiness tests;	
(b) 'crisis period' means the period during which a Member State is authorised by the Commission, in accordance with the procedure referred to in paragraph 2, to adopt the measures referred to in this Article.	
2. In the event of a crisis situation covering all or part of the territory of a Member State, that Member State may refer the matter to the Commission, by means of a duly motivated request, with a view to the adoption of a decision authorising that Member State to adopt the measures referred to in this Article for all or part of its territory. Such measures may be applied for a maximum period of six months. The Commission may authorise the measures to be extended, at the request of the Member State, for additional periods of six months, as long as the crisis situation persists.	SK (Comments/ Questions): It is not clear who issues the decision, is it the Commission or the Member State? The provision says that Member State may refer the matter to the Commission. However, it does not state what the Commission will do and by when. According to paragraph 6, the measures are adopted by Member States and it is the Commission who publishes them. Additional clarifications are needed.

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3. The Commission may decide that the crisis period started before the matter was referred by the Member State in question pursuant to paragraph 2.	
4. If the Commission receives duly motivated requests by two or more Member States relating to a single crisis situation covering all or part of their territories, it may adopt a single decision applying to all of those Member States.	
5. Notwithstanding Article 5(1), Article 10(1) and point 8 of Annex II, the competent authorities of the Members States may extend the period of validity of roadworthiness certificates of all or certain categories of vehicles that have expired or would otherwise expire during the crisis period, for a maximum period of six months. That period may be renewed for successive additional periods of six months, as long as the crisis persists and the Commission authorises it.	RO (Drafting suggestions): Notwithstanding Article 5(1), Article 10(1)**, Article 13(1), point 2 b) of Annex IV** and point 8 of Annex II, the competent authorities of the Members States may extend the period of validity **of inspectors certificates and** of roadworthiness certificates of all or certain categories of vehicles that have expired or would otherwise expire during the crisis period, for a maximum period of six months. That period may be renewed for successive additional periods of six months, as long as the crisis persists and the Commission authorises it. RO (Comments/ Questions): That extension should be applied also for the inspectors certificates
6. The measures adopted by the Member States on the basis of this Article shall be immediately notified to the Commission, which shall	

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inform the other Member States and publish a notice in the Official Journal of the European Union.'; 	
(14) Annex I, Annex III and Annex IV are amended in accordance with Annex I to this Directive.	SK (Comments/ Questions): We would like to ask, whether expert meeting is planned to analyse the whole Annex I to analyse whether other changes are necessary. We would see added value in such a meeting. NL (Comments/ Questions): ANNEX 10. ELECTRONIC SAFETY SYSTEMS – What is the role of the manufacturer in these safety systems in checking the software and self-diagnostics, especially with connected vehicles? Many of these systems can be switched off and do not have to be used by the driver, so it is proportional to make only those systems mandatory during the technical inspection that cannot be switched off.

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	Where is it ensured that the data from the vehicle is available and can be read-out in a simple way with an interface? And where can the controller see if the software integrity and version are correct? Regarding testing the charging cable for EV's, NL is not in favore of testing this item because the charging cable isn't an mandatory item in type-approval and therefore the charging cable isn't always in the vehicle at the PTI. Question about the suspension/shockabsorbertest. It was optional in the 2014/45. In the proposal, the test is mandatory again. In the table of equipment, the shock absorber test equipment is missing. Is it a typo or is the test indeed mandatory in the proposal? DE (Comments/ Questions): Re the amendments to Annex I, Annex III and Annex IV: Germany welcomes the adaptations to technological progress in the safety-relevant requirements. However, this also requires a detailed review and, in principle, the introduction of new environmentally relevant measurement and testing procedures. CZ (Comments/ Questions): In Annex I, some inspection tasks require the use of special equipment, but the Directive does not specify these as equipment for technical inspection stations (see 4.14.4.3 and 5.3.2.1). If the inspection stations do

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	not have to be equipped with such equipment, will they not have to carry out such checks? In relation to the requirements for the inspector to check the high voltage systems of the vehicle, is the assumption that all such checks will be either visual or via OBD? AT (Comments/ Questions): Electronic safety systems should be limited to the systems required by type-approval regulations and being type approved. For systems like adaptive cruise control or automatic light, there are no harmonised requirements, inspection of these items is disproportionate. It is of utmost importance that the use and characteristic of the electronic interface is sufficiently definied and standardised by this Directive. Testing centres will only be able to use the electronic interface if it is possible to prescribe the use of a diagnostic interface according to standard [XYZ] via national provisions. If national authorities have to gather relevant information from every single manufacturer, transform this information into specifications for manufacturers of diagnostic interfaces and make the testing centres use a diagnostic interface developed according to national specifications, smaller Member States like AT will not be able to handle these obligations. NL (Comments/ Questions): ANNEX 10. ELECTRONIC SAFETY SYSTEMS –

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	What is the role of the manufacturer in these safety systems in checking the software and self-diagnostics, especially with connected vehicles? Many of these systems can be switched off and do not have to be used by the driver, so it is proportional to make only those systems mandatory during the technical inspection that cannot be switched off. Where is it ensured that the data from the vehicle is available and can be read-out in a simple way with an interface? And where can the controller see if the software integrity and version are correct? Regarding testing the charging cable for EV's, NL is not in favore of testing this item because the charging cable isn't an mandatory item in type-approval and therefore the charging cable isn't always in the vehicle at the PTI. Question about the suspension/shockabsorbertest. It was optional in the 2014/45. In the proposal, the test is mandatory again. In the table of equipment, the shock absorber test equipment is missing. Is it a typo or is the test indeed mandatory in the proposal?

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Article 2	
Amendments to Directive 2014/47/EU	DE (Comments/ Questions): • Regarding the amendments to Directive 2014/47/EU (part of the article): It has not been possible to carry out a review at short notice, which is why Germany must reserve the right to review this provision as a whole.
Directive 2014/47/EU is amended as follows:	
(1) Article 1 is replaced by the following:	
'Article 1	
Subject matter	
This Directive lays down minimum requirements for a regime of technical roadside inspections of the roadworthiness of commercial	ES (Drafting suggestions):

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vehicles, and for remote sensing of vehicles, circulating within the territory of the Member States.’;	This Directive lays down minimum requirements for a regime of technical roadside inspections of the roadworthiness of commercial vehicles, ~~and for remote sensing of vehicles,~~ circulating within the territory of the Member States.’; ES (Comments/ Questions): As pointed out in the comments to recitals (28) and (29), given the lack of legal certainty and the impossibility of determining the specific responsible subject using measures and values obtained by remote sensing systems so as to adopt mandatory measures on citizens by public authorities, remote sensing controls shall be deleted from the text and its scope. Technology is not mature and reliable.
(2) Article 2 is amended as follows:	
(a) paragraph 1 is amended as follows:	
(i) the following point (aa) is inserted:	
‘(aa) motor vehicles designed and constructed primarily for the carriage of goods, having a maximum mass not exceeding 3.5 tonnes – vehicle category N1;’;	

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(ii) the following second subparagraph is added:	
‘Article 4a shall also apply to motor vehicles designed and constructed primarily for the carriage of persons and their luggage comprising not more than eight seating positions in addition to the driver’s seating position – vehicle category M1, and to two-, three- or four-wheel motor vehicles referred to in Article 4 of Regulation (EU) No 168/2013 of the European Parliament and of the Council***** – vehicle category L.	SK (Comments/ Questions): This new subparagraph stipulates that Article 4a shall apply to vehicles of category M1 and L. We would like to ask why such construction of Article was chosen. Why hasn't the scope of the entire directive changed for category M1 and category L vehicles? Article 4a, paragraph 2 allows for roadside inspection and Article 10 applies – then Annex II automatically applies as well and also the vehicle assessment in Article 12. *De facto* the other articles apply for category M1 and category L too. ES (Drafting suggestions): ~~‘Article 4a shall also apply to motor vehicles designed and constructed primarily for the carriage of persons and their luggage comprising not more than eight seating positions in addition to the driver’s seating position – vehicle category M1, and to two-, three- or four-wheel motor vehicles referred to in Article 4 of Regulation (EU) No 168/2013 of the European Parliament and of the Council***** – vehicle category L.~~ ES (Comments/ Questions): See comment to article 1.

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	IE (Comments/ Questions): Scrutiny regarding the extension of scope. While it might provide road safety benefit, it will have significant implications nationally in terms of the costs required to amend IT systems, train and equip inspectors to carry out these inspections, and for national police services to enforce.
———————————	
***** Regulation (EU) No 167/2013 of the European Parliament and of the Council of 5 February 2013 on the approval and market surveillance of agricultural and forestry vehicles (OJ L 60, 2.3.2013, p. 1, ELI: http://data.europa.eu/eli/reg/2013/167/oj).’;	
(b) paragraph 2 is replaced by the following:	
‘2. This Directive shall not affect the right of Member States to carry out technical roadside inspections on vehicles not referred to in paragraph 1, and to check other aspects of road transport and safety, or to carry out inspections in places other than public roads. Nothing in this Directive shall prevent a Member State from limiting the use of a particular type of vehicle to certain parts of its road network for reasons of road safety.’;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(3) Article 3 is amended as follows:	
(a) point (11) is replaced by the following:	IE (Comments/ Questions): Correction - should this not be point (13) and not point (11) that is referenced?
'(11) 'roadworthiness certificate' means a roadworthiness test report as defined in Article 3, point (12), of Directive 2014/45/EU;';	SK (Drafting suggestions): '(13) 'roadworthiness certificate' means a roadworthiness test report as defined in Article 3, point (12), of Directive 2014/45/EU;'; SK (Comments/ Questions): Current definition is in point 13. IE (Comments/ Questions): As above.
(b) point 18 is deleted;	SK (Comments/ Questions): Could the Commission explain why was this definition deleted?

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(c) the following points (21) and (22) are added:	
'(21) 'remote sensing' means the screening of vehicles by measuring on-road exhaust emissions, including nitrogen oxides and particulate matter, or noise levels of vehicles passing in the proximity of fixed or mobile roadside equipment, or by plume chasing in the case of screening vehicles for air pollutant emissions;	ES (Drafting suggestions): ~~'(21) 'remote sensing' means the screening of vehicles by measuring on-road exhaust emissions, including nitrogen oxides and particulate matter, or noise levels of vehicles passing in the proximity of fixed or mobile roadside equipment, or by plume chasing in the case of screening vehicles for air pollutant emissions;~~ ES (Comments/ Questions): See comment to article 1. AT (Drafting suggestions): 'remote sensing' means the screening of vehicles by measuring on-road exhaust emissions, including nitrogen oxides and particulate matter, ~~or noise levels of vehicles passing in the proximity of fixed or mobile roadside equipment,~~ or by plume chasing in the case of screening vehicles for air pollutant emissions; AT (Comments/ Questions): Noise measurements are highly complex. The surrounding and surrounding noises are of highest importance and cannot be controlled during noise measurements on public roads. No measurement method is known suitable for this purpose. Noise measurements on public roads can identify the noise exposure of the public and the environment but they are

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	not suitable for assessing individual vehicles or the fleet of specific vehicle types.
(22) 'plume chasing' means the measuring of on-road air pollutant emissions of vehicles followed by a chasing vehicle equipped with an appropriate sampling device and measuring instrument.';	
(4) Article 4 is replaced by the following:	
'Article 4	
Roadside inspection system	
The technical roadside inspection system shall include the use of remote sensing as referred to in Article 4a, initial technical roadside inspections as referred to in Article 10(1), and more detailed technical roadside inspections as referred to in Article 10(2).'	ES (Drafting suggestions): ~~The technical roadside inspection system shall include the use of remote sensing as referred to in Article 4a, initial technical roadside inspections as referred to in Article 10(1), and more detailed technical roadside inspections as referred to in Article 10(2).'~~

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	ES (Comments/ Questions): See comment to article 1. DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. IE (Comments/ Questions): Not insurmoutable but expect to have challenges in implementing this. Implementation will depend on equipment used to enforce and may require extensive changes to police powers for national road authorities. Plume chasing vehicles or WIM sites with ANPR recognition. We would have to use technology to decrease the enforcement burden. There is a significant road infrastructure implication here and the 2 year time frame for implementation will be a serious issue.
(5) the following Article 4a is inserted:	ES (Drafting suggestions): ~~(5) the following Article 4a is inserted:~~

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Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Comments/ Questions): The whole article is to be deleted. See comment to art. 1
‘*Article 4a*	ES (Drafting suggestions): ~~‘*Article 4a*~~
Remote sensing	SK (Comments/ Questions): This article proposes Remote sensing. We do not have experience with this technology in SK. We would like to kindly ask the Commission if it could make a separate presentation on how such devices work, how much they cost and how the whole system should work? ES (Drafting suggestions): ~~**Remote sensing**~~ BE (Comments/ Questions): BE: To date, we are not aware of any system approved by the metrology of a Member State for the remote sensing. The control and the sanction are not done in relation to the vehicle's

Commission proposal	Drafting suggestions and Comments/ Questions
	specifications but in relation to the limits set in a legal framework relating to the environment. Could the European Commission inform us about the availability of technology approved by the metrology?
1. Member States shall use remote sensing technology to screen motor vehicles for their air pollutant and noise emissions. Each year, each Member State shall take the measures necessary to screen the equivalent of at least 30 % of the fleet of motor vehicles registered in its territory using that technology.	SK (Comments/ Questions): At least 30 % of the vehicles from the entire vehicle fleet should be checked using Remote Sensing. Could the Commission explain why 30 %? We think that this is a high number, if we count the entire vehicle fleet registered in SK (motorcycles, passenger cars, buses, trucks, trailers, tractors and non-road mobile machinery). NL (Drafting suggestions): Each year, each Member State shall take the measures necessary to screen the equivalent of at least 30 % of the fleet of motor vehicles registered in its territory using that technology. The 30% remote sensing obligation does not apply to Member States in which for light vehicles with positive ignition the PTI is carried out annually from the fourth year after first registration, for light vehicles with compression ignition the PTI is carried out annually from the third year after first registration and for heavy vehicles the PTI is carried out annually from the first year of registration NL (Comments/ Questions):

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	The purpose of inspections using remote sensing is that for vehicles that are classified as high emitters, an early measurement can be performed to verify the emissions. However, if vehicles in a Member State already undergo the PTI annually, the added value of remote sensing inspections are limited. This is because in that case, for a vehicle that is classified as a high emitter, the regular PTI emission check must be performed after an average of six months. Member States that already perform PTI checks annually should therefore be exempted from the obligation for 30% remote sensing inspections of the vehicle fleet. For Member States that perform PTI annually, it is useful though to carry out remote sensing measurements in the form of plume chasing in order to fulfil the obligatio for 5% RSI control of heavy commercial vehicles and 2% RSI control of light commercial vehicles. Remote sensing in de form of plume chasing provides better accuracy than remote sensing than remote sensing with fixed portal setups because a vehicle's emissions can be measured for a longer period of time. If plume chase measurements are to be performed to meet the 5% and 2% RSI obligation for heavy and light duty commercial vehicles, respectively, these tests should be aimed at screening the NOx emissions of diesel vehicles In this case if a vehicle is identified as a high emitter by remote sensing, the test to verify NOx emissions must be performed immediately after the remote sensing measurement. The subsequent Road Side inspection to verify the NOx-emssions should be done by means of a so-called 'hot idle NOx test' directly after the vehicle has been stopped. Furthermore, also the OBD should be read and a visual inspection of the vehicle must be carried out to detect manipulation devices or other indications of manipulation.

Commission proposal	Drafting suggestions and Comments/ Questions
	In the Road Worthiness Package this test is now proposed for the PTI of vehicles as of emission classes Euro 6d-TEMP and Euro VI and newer. (NOx measurement in accordance with 8.2.3.3). However, for execution within the PTI 'the hot idle NOx test' is not suitable, as it can only be done after a warm-up drive of at least 5 minutes outside the PTI station. The hot idle NOx test is however very suitable for Road Side Inspections FI (Comments/ Questions): **Comment:** We are looking into this remote sensing as we have no experience on it. Generally speaking we have our concern on the readiness and availabilty of this technology and also the cost for our authorities. Preliminary we see the targets in RSI difficult. ES (Drafting suggestions): ~~1. Member States shall use remote sensing technology to screen motor vehicles for their air pollutant and noise emissions. Each year, each Member State shall take the measures necessary to screen the equivalent of at least 30 % of the fleet of motor vehicles registered in its territory using that technology.~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. AT (Drafting suggestions): Each year, each Member State shall take the measures necessary to screen the equivalent of at least ~~30~~ **3** % of the fleet of motor vehicles registered in its territory using that technology

Commission proposal	Drafting suggestions and Comments/ Questions
	AT (Comments/ Questions): AT has experience with remote sensing measurements. During a measurement campaign, 3,800 motor vehicles have been measured per day on average. 30 % of the fleet would mean 2,000,000 measurements leading to 528 days of measurement per year which is an unrealistic high number. NL (Drafting suggestions): Each year, each Member State shall take the measures necessary to screen the equivalent of at least 30 % of the fleet of motor vehicles registered in its territory using that technology. The 30% remote sensing obligation does not apply to Member States in which for light vehicles with positive ignition the PTI is carried out annually from the fourth year after first registration, for light vehicles with compression ignition the PTI is carried out annually from the third year after first registration and for heavy vehicles the PTI is carried out annually from the first year of registration NL (Comments/ Questions): The purpose of inspections using remote sensing is that for vehicles that are classified as high emitters, an early measurement can be performed to verify the emissions. However, if vehicles in a Member State already undergo the PTI annually, the added value of remote sensing inspections are limited. This is because in that case, for a vehicle that is classified as a high emitter, the regular PTI emission check must be performed after an average of six months. Member States that already perform PTI checks annually should therefore be exempted from the obligation for 30% remote sensing inspections of the vehicle fleet.

Commission proposal	Drafting suggestions and Comments/ Questions
	For Member States that perform PTI annually, it is useful though to carry out remote sensing measurements in the form of plume chasing in order to fulfil the obligatio for 5% RSI control of heavy commercial vehicles and 2% RSI control of light commercial vehicles. Remote sensing in de form of plume chasing provides better accuracy than remote sensing than remote sensing with fixed portal setups because a vehicle's emissions can be measured for a longer period of time. If plume chase measurements are to be performed to meet the 5% and 2% RSI obligation for heavy and light duty commercial vehicles, respectively, these tests should be aimed at screening the NOx emissions of diesel vehicles In this case if a vehicle is identified as a high emitter by remote sensing, the test to verify NOx emissions must be performed immediately after the remote sensing measurement. The subsequent Road Side inspection to verify the NOx-emssions should be done by means of a so-called 'hot idle NOx test' directly after the vehicle has been stopped. Furthermore, also the OBD should be read and a visual inspection of the vehicle must be carried out to detect manipulation devices or other indications of manipulation. In the Road Worthiness Package this test is now proposed for the PTI of vehicles as of emission classes Euro 6d-TEMP and Euro VI and newer. (NOx measurement in accordance with 8.2.3.3). However, for execution within the PTI ‘the hot idle NOx test’ is not suitable, as it can only be done after a warm-up drive of at least 5 minutes outside the PTI station. The hot idle NOx test is however very suitable for Road Side Inspections LU (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	30% is a lot. Will have a great impact on RSI operations as the volume of vehicles to be checked will rise significantly IE (Comments/ Questions): The proposal here will require technology to be added to the existing/new WIM/enforcement sites on the motorway network. There is a significant road infrastructure implication here and the 2 year time frame for implementation will be a serious issue. LU (Comments/ Questions): 30% is a lot. Will have a great impact on RSI operations as the volume of vehicles to be checked will rise significantly
2. Member States shall use the results of such remote sensing to identify high-emitting vehicles. However, a vehicle shall not be considered to have failed or passed a roadside inspection on the basis of a single remote sensing measurement.	ES (Drafting suggestions): ~~2. Member States shall use the results of such remote sensing to identify high-emitting vehicles. However, a vehicle shall not be considered to have failed or passed a roadside inspection on the basis of a single remote sensing measurement.~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. AT (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments/ Questions
	However, a vehicle shall not be considered to have failed or passed a roadside inspection on the basis of **exceeding below limits during** a single remote sensing measurement. AT (Comments/ Questions): This sentence should be limited to the "screening limits". Other methods of remote measurements are possible where limits can be defined describing the technical condition of a vehicle. Scientific studies are ongoing. For the identification of high-emitting vehicles, it is necessary to read, record, store and process the license plate (or other attributes) of individual vehicles. This data is personal data and therefore protected by the GDPR. Provisions on how to rate such data processing in accordance with GDPR should be included in this Directive, otherwise it will be exteremely difficult for the Member States to enforce these provisions.
Member States shall take the measures necessary to verify the exhaust emissions, the noise level or both of any vehicle that, based on remote sensing data of at least three measurements of that vehicle within a period of six months, is suspected to emit above a certain level. For exhaust emissions, that level shall be double the average level for vehicles belonging to the same vehicle category, emission class, and having the same type of ignition, namely positive or compression ignition. For noise, the level shall be 3 dB above the average level for vehicles belonging to the same vehicle category.	FI (Comments/ Questions): **Comment:** Identifing vehicles to exhaust emission or noise level may prove to be difficult and legally unstable. Measures to verify emission may be difficult to execute in the proposed way. ES (Drafting suggestions): ~~Member States shall take the measures necessary to verify the exhaust emissions, the noise level or both of any vehicle that, based on remote sensing data of at least three measurements of that vehicle within a period~~

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	~~of six months, is suspected to emit above a certain level. For exhaust emissions, that level shall be double the average level for vehicles belonging to the same vehicle category, emission class, and having the same type of ignition, namely positive or compression ignition. For noise, the level shall be 3 dB above the average level for vehicles belonging to the same vehicle category.~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording CZ (Comments/ Questions): Is there any real data from operation that can be used to determine the reliability of such a system that would justify requiring an emergency inspection of a vehicle that is detected as non-compliant? What is meant by average values of vehicles belonging to the same category, and have these values already been established? AT (Drafting suggestions): Member States shall take the measures necessary to verify the exhaust emissions~~, the noise level or both~~ of any vehicle that, based on remote sensing data of at least three measurements of that vehicle within a period of six months, is suspected to emit above a certain level. For exhaust emissions, that level shall be double the average level for vehicles belonging to the same vehicle category, emission class, and having the same type of ignition, namely positive or compression ignition. ~~For noise, the level shall be 3 dB above the average level for vehicles belonging to the same vehicle category.~~

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	AT (Comments/ Questions): See above IE (Comments/ Questions): We foresee significant issues arising in practically implementing this. For example large amounts of data will need to be captured and stored, vehicles tracked using a network of ANPR cameras, and then if current WIM sites were to be equipped with exhaust emissions and noise equipment, how would the target vehicle be identified it two vehicle were to pass the sensing similtaneoulsy. Then there would be the issue of having to notify operators to take vehicles to a PTI centre to have the verification measurements taken. Many won't show up and then what do we do, waste time chasing them around the road network. Also how would we know what levels to apply to a particular make and model of vehicles before taking enforcement action which unless something changes would involve proceedings in court system. There is a very significant burden on member states associated with this amendment.
Such verification by Member States may take place as follows:	ES (Drafting suggestions): ~~Such verification by Member States may take place as follows:~~ DE

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. IE (Comments/ Questions): It will be important to maintain some flexibility, i.e. word 'may' is key here.
(a) immediately after a remote sensing measurement, as part of a technical roadside inspection carried out in accordance with Article 10, including a noise or exhaust emission test or both in accordance with point 3, item 8 of Annex II;	ES (Drafting suggestions): ~~(a) immediately after a remote sensing measurement, as part of a technical roadside inspection carried out in accordance with Article 10, including a noise or exhaust emission test or both in accordance with point 3, item 8 of Annex II;~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. AT (Drafting suggestions): including a**n** ~~noise or~~ exhaust emission test IE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	Significant enforcement and motorway operator resources would be required here. Traffic Mgmt plans for these operations typically cost in the region of €10K to implement. There will be very significant implications for member states in respect of this amendment. The 2 year time frame for compliance is a major issue.
(b) within 15 days from the last remote sensing measurement in a testing centre referred to in Article 12 of Directive 2014/45/EU, for vehicles registered in the Member State where the remote sensing measurements took place, following notification of the owner by the competent authority within five days from the last remote sensing measurement.	NL (Comments/ Questions): In the Netherlands there is doubt whether it is effective to call up cars to be tested within 15 days after the last remote sensing measurement. If a vehicle is identified as a high emitter by remote sensing, the test to verify emissions should be performed immediately after the remote sensing measurement. The 15-day period offers the opportunity for manipulated vehicles to be restored. For vehicles that have been chip-tuned, the original setting can be restored. Vehicles with AdBlue manipulation can be returned to their original state. For vehicles that make a lot of noise, the original muffler can be refitted. The measurement to verify the emissions should therefore be performed by means of an Roas Side Inspection immediately after the remote sensing measurement. ES (Drafting suggestions): ~~(b) within 15 days from the last remote sensing measurement in a testing centre referred to in Article 12 of Directive 2014/45/EU, for vehicles registered in the Member State where the remote sensing measurements took place, following notification of the owner by the~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~competent authority within five days from the last remote sensing measurement.~~ NL (Comments/ Questions): In the Netherlands there is doubt whether it is effective to call up cars to be tested within 15 days after the last remote sensing measurement. If a vehicle is identified as a high emitter by remote sensing, the test to verify emissions should be performed immediately after the remote sensing measurement. The 15-day period offers the opportunity for manipulated vehicles to be restored. For vehicles that have been chip-tuned, the original setting can be restored. Vehicles with AdBlue manipulation can be returned to their original state. For vehicles that make a lot of noise, the original muffler can be refitted. The measurement to verify the emissions should therefore be performed by means of an Roas Side Inspection immediately after the remote sensing measurement. IE (Comments/ Questions): We foresee significant practical difficulties implementing this.
3. Regarding vehicles registered in another Member State, the competent authority shall notify the competent authority of the Member State of registration of the remote sensing measurements and of any subsequent technical roadside inspection, through the contact points referred to in Article 17 of this Directive. Where no subsequent roadside inspection took place, the Member States of registration shall request the holder of the vehicle registration certificate to present the vehicle in any	SK (Comments/ Questions): If a vehicle has been registered via Remote Sensing as not complying, a PTI should be carried out. We can agree that this should be the procedure.

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Commission proposal	Drafting suggestions and Comments/ Questions
testing centre referred to in Article 12 of Directive 2014/45/EU at the latest 45 days after the notification received from the Member State where the remote sensing measurements took place.	Could the Commission explain how was the deadline – 45 days – set? If a Member State receives a notification that a vehicle has been recorded in another Member State as making excessive noise, the obligation to subject the vehicle to a PTI must be notified to the vehicle owner in some way. An official letter must be delivered. If delivery is not made, how does the vehicle owner learn that he/she must go for a PTI? Could the Commission explain to us how this notification is envisaged? NL (Comments/ Questions): How long does the competent authority have to notify the competent authority of the Member State of registration? The obligation to have the emissions verified in the country of registration within 45 days can become a problem for vehicles that are driven abroad for a long time. A vehicle that is classified as a high emitter vehicle abroad, must be returned to the country of registration. Back home a PTI emissins check has to be done. There is then also a great chance that the vehicle will simply be approved during the emissions test in the country of registration, especially if it is a petrol vehicle. The journey back home will then have been made 'for nothing'. For vehicles classified as high emitter abroad, the verification check must therefore be carried out immediately after the remote sensing measurement in the country where the remote sensing measurement was carried out. ES (Drafting suggestions): ~~3. Regarding vehicles registered in another Member State, the competent authority shall notify the competent authority of the Member State of registration of the remote sensing measurements and of any subsequent technical roadside inspection, through the contact points~~

Commission proposal	Drafting suggestions and Comments/ Questions
	~~referred to in Article 17 of this Directive. Where no subsequent roadside inspection took place, the Member States of registration shall request the holder of the vehicle registration certificate to present the vehicle in any testing centre referred to in Article 12 of Directive 2014/45/EU at the latest 45 days after the notification received from the Member State where the remote sensing measurements took place.~~ NL (Comments/ Questions): How long does the competent authority have to notify the competent authority of the Member State of registration? The obligation to have the emissions verified in the country of registration within 45 days can become a problem for vehicles that are driven abroad for a long time. A vehicle that is classified as a high emitter vehicle abroad, must be returned to the country of registration. Back home a PTI emissins check has to be done. There is then also a great chance that the vehicle will simply be approved during the emissions test in the country of registration, especially if it is a petrol vehicle. The journey back home will then have been made 'for nothing'. For vehicles classified as high emitter abroad, the verification check must therefore be carried out immediately after the remote sensing measurement in the country where the remote sensing measurement was carried out. IE (Comments/ Questions): Clarification required - how will these notifications be done, i.e. what IT system, and then if an owner is written to and decides to ignore the notification how will it be enforced.

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Commission proposal	Drafting suggestions and Comments/ Questions
4. Member States may also verify the exhaust emissions, the noise level, or both, of any vehicle that is suspected to emit more than double, or more than 3 dB above, the average levels referred to in paragraph 2 based on only one or two remote sensing measurements. Such verification shall take in accordance with paragraph 3.’;	ES (Drafting suggestions): ~~4. Member States may also verify the exhaust emissions, the noise level, or both, of any vehicle that is suspected to emit more than double, or more than 3 dB above, the average levels referred to in paragraph 2 based on only one or two remote sensing measurements. Such verification shall take in accordance with paragraph 3.’;~~ AT (Drafting suggestions): Member States may also verify the exhaust emissions~~, the noise level, or both,~~ of any vehicle that is suspected to emit more than double~~, or more than 3 dB above,~~ the average levels IE (Comments/ Questions): In order to underatke an accurate noise measurement on a vehicle, a large open space with a hard surface is required to minimise background noise. Hence PTI centres may not be suitable. A noise expert may need to be consulted in due course.
(6) in Article 5, paragraphs 1 and 2 are replaced by the following:	BE (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	BE: N1 vehicles are 10 times more numerous than N2+N3 vehicles. Even with a target of 2% of checks for N1s, the number of road checks will be multiplied by 4 or 5. This represents a challenge both for the police and the financial costs of these road controls. Could the European Commission inform us about the costs of these road controls?
'1. For vehicles referred to in Article 2(1), points (a), (b), (c) and (d), Member States shall carry out a total number of initial technical roadside inspections, per calendar year, corresponding to at least 5 % of the total number of those vehicles that are registered in their territory.	DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording.
2. For vehicles referred to in of Article 2(1), point (aa), Member States shall carry out a total number of initial technical roadside inspections, per calendar year, corresponding to at least 2 % of the total number of those vehicles that are registered in their territory.';	SK (Comments/ Questions): Article 5 paragraph 2 sets the number of roadside inspections for category N1 vehicles. This should be 2% of vehicles registered in a given state. Could the Commission explain how this number (2%) was set? The number of category N1 vehicles is much higher than that of other categories where the limit was 5%. For SK, the proposal of 2% for category N1 is very high. With our current capacities, we will not be able to ensure this, unless the number of inspectors is increased, which will mean a higher administrative burden for the state.

Commission proposal	Drafting suggestions and Comments/ Questions
	We would prefer not to set the limit of 2%. The Member State should ensure an appropriate number of checks. FI (Comments/ Questions): **Comment:** For category N1 the target of 2% in practise means doubling the amount of initial checks. Authorities perfoming the checks do not currently have the resources required for this massive increase in RSI activity. ES (Comments/ Questions): Spain supports the extension of the scope of the directive to N1 category vehicles, although a detailed justification on the specific target value is needed. DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording. AT (Drafting suggestions): corresponding to at least ~~2~~**1** % of the total number AT (Comments/ Questions): 2 % would mean an increase of the minimum required number of inspections of 56 % in AT which seems disproportionate. IE

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Meeting this target will not be achievable without major resourcing and co-operation with other bodies, and even still, raise significant concerns re. achievability. In Ireland, 2% of the current LCV polualtion based on 2024 CVRT states would be circa 9,000 to 10,000 LCVs. Currently we carry out circa 2,000 LCV inspections per year with our current staffing complement having regard to the min HGV volumes required.
(7) in Article 6, paragraph 1 is replaced by the following:	SK (Comments/ Questions): The current Article 6 has no paragraph numbering. There are only four subparagraphs. Can the Commission clarify which subparagraphs are to be replaced and which remain?
'For the attribution of a risk profile to an undertaking, Member States may use the criteria set out in Annex I. That information shall be used to perform checks on undertakings with a high risk rating score more closely and more often. The risk rating system shall be operated by the competent authorities of the Member States.	

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Commission proposal	Drafting suggestions and Comments/ Questions
For vehicles referred to in Article 2(1), points (a) to (c), Member States shall ensure that the information concerning the number and severity of deficiencies set out in Annex II and, where applicable, Annex III to this Directive found on vehicles operated by individual undertakings is introduced into the risk rating system established pursuant to Article 9 of Directive 2006/22/EC.';	
(8) in Article 7, paragraph 1 is replaced by the following:	
'1. Member States shall require drivers to have at their disposal the roadworthiness certificate corresponding to the most recent periodic roadworthiness test in electronic format, or a certified printout thereof, and the report of the most recent technical roadside inspection. Member States shall require their authorities to accept electronic evidence of such roadworthiness tests and inspections.';	FI (Comments/ Questions): **Comment:** The driver of these vehicles rarely is the holder or owner of the vehicle. How can the digital documents be issued to a fleet of drivers? ES (Drafting suggestions): '1. Member States ~~shall~~ may require drivers to have at their disposal the roadworthiness certificate corresponding to the most recent periodic roadworthiness test in electronic format, or a certified printout thereof, and the report of the most recent technical roadside inspection. Member States shall require their authorities to accept electronic evidence of such roadworthiness tests and inspections.'; ES

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): This provision introduces a useless administrative burden to citizens. If inspectors and police officers have digital access to registration database, what is the reason to impose such an obligation to citizens? AT (Comments/ Questions): The provisions for having a roadworthiness certificate at the driver's proposal and the obligation for the authorities to accept electronic certificates should consider cases where there is no network connection at the location of the inspection: who is responsible in this case?
(9) Article 9 is replaced by the following:	
'Article 9	
Selection of vehicles for initial technical roadside inspection	
When identifying vehicles to be subject to an initial technical roadside inspection, inspectors may select, as a priority, vehicles operated by	ES

Commission proposal	Drafting suggestions and Comments/ Questions
undertakings with a high-risk profile in accordance with the criteria set out in Annex I to this Directive or as referred to in Directive 2006/22/EC. Vehicles may also be selected randomly for inspection, or where there is a reasonable suspicion that the vehicle presents a risk to road safety or to the environment, including on the basis of remote sensing.'; 	(Drafting suggestions): When identifying vehicles to be subject to an initial technical roadside inspection, inspectors may select, as a priority, vehicles operated by undertakings with a high-risk profile in accordance with the criteria set out in Annex I to this Directive or as referred to in Directive 2006/22/EC. Vehicles may also be selected randomly for inspection, or where there is a reasonable suspicion that the vehicle presents a risk to road safety or to the environment~~, including on the basis of remote sensing~~.'; ES (Comments/ Questions): See comment to art. 1
(10) in Article 10, paragraph 1, the second subparagraph is amended as follows:	NL (Drafting suggestions): An initial technical roadside inspection of a vehicle may consist of a remote sensing measurement bij plume casing, NL (Comments/ Questions): It should be determined here that the 5% RSI requirement for heavy commercial vehicles and 2% RSI requirement for light commercial vehicles can be fulfilled by plume chase measurements in which the NOx emissions of diesel vehicles are measured. In case of detecting n high emitter, a more detailed technical roadside inspection can be done by

Commission proposal	Drafting suggestions and Comments/ Questions
	stopping the vehicle and then immediately doing a hot idle NOx test, followed by reading the OBD and a visual inspection. NL (Drafting suggestions): An initial technical roadside inspection of a vehicle may consist of a remote sensing measurement bij plume casing, NL (Comments/ Questions): It should be determined here that the 5% RSI requirement for heavy commercial vehicles and 2% RSI requirement for light commercial vehicles can be fulfilled by plume chase measurements in which the NOx emissions of diesel vehicles are measured. In case of detecting n high emitter, a more detailed technical roadside inspection can be done by stopping the vehicle and then immediately doing a hot idle NOx test, followed by reading the OBD and a visual inspection.
(a) point (a) is replaced by the following:	
'(a) shall check the latest roadworthiness certificate and technical roadside inspection report, where available, in accordance with Article 7(1) and Article 18a(1);';	
(b) point (c) is replaced by the following:	

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Commission proposal	Drafting suggestions and Comments/ Questions
'(c) shall carry out a visual assessment of the securing of the vehicle's cargo in accordance with Article 13;';	SK (Comments/ Questions): The Commission proposes that a visual assessment of the securing of the vehicle's cargo must be carried out on each vehicle during the initial technical roadside inspection. This would mean that every single lorry or semi-trailer, whether it is a roller unit vehicle or box truck, must be opened and the cargo carried must be checked. We cannot imagine that every single vehicle will be checked for securing the cargo. Could the Commission explain to us why this change is proposed? If a cargo check were to be carried out on every single vehicle, the number of checks carried out for the same capacities would be lower. DE (Drafting suggestions): '(c) **may** carry out a visual assessment of the securing of the vehicle's cargo in accordance with Article 13;'; DE (Comments/ Questions): The mandatory introduction of load securing inspections in this specific form is viewed critically. Already today, the traffic control service checks the load securing regulations in accordance with Section 22 of the German Road Traffic Act (StVO) and the specifications of VDI 2700, as well as the relevant DIN EN standards, during every complete inspection. Since the follow-up measures in the event of a complaint regarding load securing would significantly bind technical experts, efforts must be made to ensure that the inspection of load securing during technical roadside

Commission proposal	Drafting suggestions and Comments/ Questions
	inspections remains a "optional provision" (see Article 13, old version), provided that a member state already incorporates extensive and therefore sufficient load securing inspections into its inspection plan. German inspection services has always taken this into account. IE (Comments/ Questions): Appropriate authority in Ireland is already considering this, but it will require additional inspection resources for which funding will be needed.
(11) Article 13 is replaced by the following:	
'Article 13	
Inspection of cargo securing	
1. During roadside inspections, vehicles shall be subject to an inspection of their cargo securing in accordance with Annex III, in order to ensure that the cargo is secured in such a way that it does not interfere with safe driving, or pose a threat to life, health, property or the environment. Checks shall be carried out to verify that during all kinds of	ES (Drafting suggestions): 1. **Not later than [36 months after the entry into force of this directive],** during roadside inspections, vehicles shall be subject to an

Commission proposal	Drafting suggestions and Comments/ Questions
operation of the vehicle, including emergency situations or uphill starting manoeuvres:	inspection of their cargo securing in accordance with Annex III, in order to ensure that the cargo is secured in such a way that it does not interfere with safe driving, or pose a threat to life, health, property or the environment. Checks shall be carried out to verify that during all kinds of operation of the vehicle, including emergency situations or uphill starting manoeuvres: DE (Drafting suggestions): 1. During roadside inspections, vehicles **may** be subject to an inspection of their cargo securing in accordance with Annex III, in order to ensure that the cargo is secured in such a way that it does not interfere with safe driving, or pose a threat to life, health, property or the environment. Checks shall be carried out to verify that during all kinds of operation of the vehicle, including emergency situations or uphill starting manoeuvres DE (Comments/ Questions): See above
(a) loads can only minimally change their position relative to each other, against walls or surfaces of the vehicle;	
(b) loads cannot leave the cargo space or move outside the loading surface.	

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Commission proposal	Drafting suggestions and Comments/ Questions
2. Without prejudice to the requirements applicable to the transport of certain categories of goods, such as goods covered by Directive 2008/68/EC of the European Parliament and of the Council******, cargo securing and inspection of the securing of cargo shall be carried out in accordance with the principles and, where appropriate, the standards laid down in Section I of Annex III to this Directive. The latest version of the standards laid down in point 5 of that Section may be used.	
3. The follow-up procedures referred to in Article 14 shall also apply in the case of major or dangerous deficiencies related to cargo securing.	DE (Drafting suggestions): 3. The follow-up procedures referred to in Article 14 **may** also apply in the case of major or dangerous deficiencies related to cargo securing. DE (Comments/ Questions): See above
4. Member States shall ensure that personnel involved in cargo securing checks are appropriately trained for that purpose.	
****** Directive 2008/68/EC of the European Parliament and of the Council of 24 September 2008 on the inland transport of dangerous goods (OJ L 260, 30.9.2008, p. 13, ELI: http://data.europa.eu/eli/dir/2008/68/oj).’;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(12) in Article 14, the following paragraph 4 is added:	
'4. Obvious tampering or manipulation of any component of the vehicle, including its emission control system, silencer and safety-related systems, shall be considered as major or dangerous deficiencies and shall be punishable by effective, proportionate, dissuasive and non-discriminatory penalties.';	
(13) in Article 16, paragraph 2 is replaced by the following:	
'2. On completion of a more detailed inspection, the inspector shall draw up a report in accordance with Annex IV. Member States shall ensure that the driver of the vehicle is provided with an electronic copy of the inspection report.';	FI (Comments/ Questions): **Comment:** How will this digital report be provided to the vehicle owner/holder? DE (Drafting suggestions): 2. On completion of a more detailed inspection, the inspector shall draw up a report in accordance with Annex IV. Member States shall

Commission proposal	Drafting suggestions and Comments/ Questions
	ensure that the driver of the vehicle is provided with a~~n electronic~~ copy of the inspection report, **preferably in electronic format.**'; DE (Comments/ Questions): Even if the results of technical roadside checks have to be recorded in electronic registers, the basic possibility of issuing the driver with a paperbased report should be retained due to accessibility for the driver, AT (Comments/ Questions): When there is no network connection at the location of the inspection, it could be impossible to provide an electronic copy of the inspection report. IE (Comments/ Questions): Appropriate authority in Ireland has already commenced a project to implement this change
(14) in Article 18, paragraph 1 is replaced by the following:	
'1. In cases where major or dangerous deficiencies, or deficiencies resulting in a restriction or prohibition on the use the vehicle, are found in a vehicle not registered in the Member State of inspection, the contact	PT (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
point shall notify the results of the inspection to the contact point of the Member State of registration of the vehicle. That notification shall contain the elements of the roadside inspection report as set out in Annex IV and shall be communicated to the contact point of the Member State of registration through the messaging system (RSI system) referred to in Article 3 of Commission Implementing Regulation (EU) 2017/2205*******.	All Member States should have access to those results, as vehicles can cross multiple countries. NL (Drafting suggestions): 1. In cases where major or dangerous deficiencies, or deficiencies resulting in a restriction or prohibition on the use the vehicle, are found in a vehicle not registered in the Member State of inspection, the contact point shall notify the results of the inspection to the contact point of the Member State of registration of the vehicle. That notification shall contain the elements of the roadside inspection report as set out in Annex IV and shall be communicated to the contact point of the Member State of registration ~~through the messaging system (RSI system) referred to in Article 3 of Commission Implementing Regulation (EU) 2017/2205~~*******] NL (Drafting suggestions): 1. In cases where major or dangerous deficiencies, or deficiencies resulting in a restriction or prohibition on the use the vehicle, are found in a vehicle not registered in the Member State of inspection, the contact point shall notify the results of the inspection to the contact point of the Member State of registration of the vehicle. That notification shall contain the elements of the roadside inspection report as set out in Annex IV and shall be communicated to the contact point of the Member State of registration ~~through the messaging system (RSI system) referred to in Article 3 of Commission Implementing Regulation (EU) 2017/2205~~*******]

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Commission proposal	Drafting suggestions and Comments/ Questions
The Commission shall adopt implementing acts laying down detailed rules concerning the procedures for the notification of vehicles with major or dangerous deficiencies to the contact point of the Member State of registration pursuant to the first subparagraph of this Article. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 23(2).	
******* Commission Implementing Regulation (EU) 2017/2205 of 29 November 2017 on detailed rules concerning the procedures for the notification of commercial vehicles with major or dangerous deficiencies identified during a technical roadside inspection, (OJ L 314, 30.11.2017, p. 3, ELI: http://data.europa.eu/eli/reg_impl/2017/2205/oj).’;	NL (Drafting suggestions): ~~******* Commission Implementing Regulation (EU) 2017/2205 of 29 November 2017 on detailed rules concerning the procedures for the notification of commercial vehicles with major or dangerous deficiencies identified during a technical roadside inspection, (OJ L 314, 30.11.2017, p. 3, ELI: http://data.europa.eu/eli/reg_impl/2017/2205/oj).’;~~ NL (Drafting suggestions): ~~******* Commission Implementing Regulation (EU) 2017/2205 of 29 November 2017 on detailed rules concerning the procedures for the notification of commercial vehicles with major or dangerous deficiencies identified during a technical roadside inspection, (OJ L 314, 30.11.2017, p. 3, ELI: http://data.europa.eu/eli/reg_impl/2017/2205/oj).’;~~
(15) the following Article 18a is inserted:	
‘*Article 18a*	DE

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Article 18a introduces an obligation for Member States to connect their vehicle registers to the MOVE-HUB platform for data exchange. However, the vehicle registers of the Member States are already connected via EUCARIS, cf. for example Article 5g of Directive (EU) 2015/413. EUCARIS has proven to be a reliable system for the secure, EU-wide exchange of vehicle and owner data in various areas of application. It is cost-effective and expandable. Questions: 1. Did the Commission examine the use of EUCARIS for the purposes of Directive 2015/47/EU in its impact assessment? 2. Why should this system not be sufficient for the exchange of RSI report data? Using and adapting an already established system is likely to be more cost-effective and sustainable than setting up a new system. Member States must continue to be able to use EUCARIS. IE (Comments/ Questions): Proposed changes make sense but will require an impact assessment from the relevant PTI Authorities. Significant costs will be incurred and significant development/testing resources will be needed to implement it. The 2 year timeframe for compliance would be of concern.
Exchange of data between Member States' authorities	

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Commission proposal	Drafting suggestions and Comments/ Questions
1. Member States shall assist one another in the implementation of this Directive. They shall exchange information and data in particular with the aim of checking, at the time of roadside inspection of a vehicle, its legal and technical status, where necessary, in the Member State in which it is registered.	
Member States shall provide access to data regarding the content of the certificates of conformity, the last roadworthiness certificate, any technical roadside inspection report, and the odometer history of the vehicle, stored in national databases, to the competent authorities of other Member States.	AT (Drafting suggestions): Member States shall provide access ~~to data regarding the content of the certificates of conformity,~~ the last roadworthiness certificate, any technical roadside inspection report **of the last [3] years**, and the odometer history of the vehicle stored in national databases, to the competent authorities of other Member States. AT (Comments/ Questions): The Certificate of Conformity will be publicly available acc. to the framework Regulation (EU) 2018/858, so there is no need to exchange this data. The exchange of RSI reports should be limited to a reasonable period of time and should also be only obligatory for reports generated after entry into force of this Directive.

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Commission proposal	Drafting suggestions and Comments/ Questions
Member States shall interconnect their electronic systems on roadworthiness certificates and on odometer history through the MOVE-HUB electronic system developed by the Commission, in such a 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.	SK (Comments/ Questions): Can the Commission clarify why the odometer history is necessary for the purpose of roadside inspections? PT (Comments/ Questions): PT points out the importance of having harmonised certificates - information. NL (Drafting suggestions): Member States shall use a specifically designed and highly secured software application of the European Vehicle and Driving Licence Information System (EUCARIS) in its up-to-date version to exchange information] ~~Member States shall interconnect their electronic systems on roadworthiness certificates and on odometer history through the MOVE-HUB electronic system developed by the Commission, in such a 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.~~ ES (Drafting suggestions): To be reviewed ES (Comments/ Questions):

Commission proposal	Drafting suggestions and Comments/ Questions
	As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. AT (Comments/ Questions): The Commission is asked to consider that data exchange is already mandatory via different platforms (EUCARIS for eCOC). AT does not favour any specific platform but urges to find a solution which imposes as little burden on Member States as possible and avoids duplications of IT solutions. NL (Drafting suggestions): Member States shall use a specifically designed and highly secured software application of the European Vehicle and Driving Licence Information System (EUCARIS) in its up-to-date version to exchange information] ~~Member States shall interconnect their electronic systems on roadworthiness certificates and on odometer history through the MOVE-HUB electronic system developed by the Commission, in such a 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.~~

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Commission proposal	Drafting suggestions and Comments/ Questions
2. By [PLEASE INSERT DATE: 2 years after the entry into force of this directive], the Commission shall adopt implementing acts laying down the necessary arrangements for the implementation of the functionalities of the MOVE-HUB electronic system and specifying the minimum requirements for the format and content of the information and data to be exchanged by Member States regarding the vehicles subject to roadside inspections. Those implementing acts shall ensure the protection of personal data and shall be adopted in accordance with the examination procedure referred to in Article 23(2).	NL (Drafting suggestions): By [PLEASE INSERT DATE: 2 years after the entry into force of this directive], the Commission shall adopt implementing acts laying down ~~the necessary arrangements for the implementation of the functionalities of the MOVE-HUB electronic system and specifying the minimum requirements for~~ the format and content of the information and data to be exchanged by Member States regarding the vehicles subject to roadside inspections. Those implementing acts shall ensure the protection of personal data and shall be adopted in accordance with the examination procedure referred to in Article 23(2). ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. NL (Drafting suggestions): By [PLEASE INSERT DATE: 2 years after the entry into force of this directive], the Commission shall adopt implementing acts laying down

Commission proposal	Drafting suggestions and Comments/ Questions
	~~the necessary arrangements for the implementation of the functionalities of the MOVE-HUB electronic system and specifying the minimum requirements for~~ the format and content of the information and data to be exchanged by Member States regarding the vehicles subject to roadside inspections. Those implementing acts shall ensure the protection of personal data and shall be adopted in accordance with the examination procedure referred to in Article 23(2).
3. The electronic systems interconnections provided for in paragraph 1 shall be operational within one year after the adoption of the implementing acts referred to in paragraph 2.’;	ES (Drafting suggestions): To be reviewed ES (Comments/ Questions): As a general comment, a sound approach on the convergence between MOVE-HUB and Eucaris platforms should be defined so as to rationalize operating and implementing costs by MS. Spain is of the opinion that Eucaris should continue to be the platform for exchanging information since (i) it is currently used for similar purposes by MS; (ii) MS have in place systems and platforms for connecting via Eucaris and accordingly, investments are made; and (iii) it will be used for exchanging eCoC. IE (Comments/ Questions): Implementation timeline appears to be overly ambitious. Suggest 24 momths should be the minimum.

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Commission proposal	Drafting suggestions and Comments/ Questions
(16) Article 20 is replaced by the following:	
'*Article 20*	
Communication of information to the Commission	
1. By 31 March 2030 and by 31 March every three years thereafter, Member States shall communicate to the Commission, through the online reporting platform referred to in Article 28 of Regulation (EU) 2018/1999 of the European Parliament and of the Council********, ('e-platform'), the data collected relating to each of the previous three calendar years and concerning the vehicles inspected in their territory. Those data shall include the following information, per calendar year:	FI (Comments/ Questions): **Question:** Will there be a interface available and when?
(a) the total number of vehicles inspected;	
(b) the number of vehicles inspected per category;	

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Commission proposal	Drafting suggestions and Comments/ Questions
(c) the country of registration of each vehicle inspected;	
(d) in the case of more detailed inspections, the areas checked and the items failed, in accordance with point 10 of Annex IV of this Directive;	
(e) the results of the remote sensing measurements carried out in accordance with Article 4a of this Directive.	ES (Drafting suggestions): ~~(e) the results of the remote sensing measurements carried out in accordance with Article 4a of this Directive.~~ ES (Comments/ Questions): See comments to art. 1
The first report shall cover the years 2027, 2028 and 2029, separately.	
2. The Commission shall adopt implementing acts laying down detailed rules concerning the format for communicating the data referred to in paragraph 1 through the e-platform. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 23(2). Until the entry into force of such rules, Member States shall use the standard reporting form set out in Annex V.	

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Commission proposal	Drafting suggestions and Comments/ Questions
The Commission shall report the data collected to the European Parliament and to the Council.	
******** Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI : http://data.europa.eu/eli/reg/2018/1999/oj).’;	
(17) Article 21 is amended as follows:	
(a) the second and third indents are replaced by the following:	

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Commission proposal	Drafting suggestions and Comments/ Questions
'– update point 3 of Annex II in respect of methods in the event that more efficient and effective test methods become available, without extending the list of items to be tested;	
– adapt point 3 of Annex II, following a positive assessment of the costs and benefits involved, in respect of the list of test items, methods, reasons for failure and assessment of deficiencies in the event of a modification of mandatory requirements relevant for type-approval in Union safety or environmental legislation;';	
(b) the following fourth and fifth indents are added:	ES (Drafting suggestions): (b) the following fourth ~~and fifth~~ indent~~s~~ is ~~are~~ added: ES (Comments/ Questions): See comments to art. 1
'– set common [remote sensing] limits for exhaust or noise emissions, or for both, to be used to identify high-emitting vehicles, based on the results communicated by the Member States to the Commission in accordance with Article 20(1), point (e); different limits may be set for identifying vehicles with defective emission control systems and vehicles with tampered emission control systems;	ES (Drafting suggestions): ~~'– set common [remote sensing] limits for exhaust or noise emissions, or for both, to be used to identify high-emitting vehicles, based on the results communicated by the Member States to the Commission in accordance with Article 20(1), point (e); different limits may be set for identifying vehicles with defective emission control systems and vehicles with tampered emission control systems;~~

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Commission proposal	Drafting suggestions and Comments/ Questions
	ES (Comments/ Questions): See comments to art. 1bremote sensing CZ (Comments/ Questions): Have exhaust and noise emission limits already been set? If so, what are they? Have the methods for measuring particulate matter and NOx been established? If so, can supporting documents be provided? IE (Comments/ Questions): These limits will need to be set in advance of any enforcement activity taking place.
– specify the methods for the particle number (PN) measurement of positive ignition engines and for the nitrogen oxides (NO_X) measurement of compression and positive ignition engines required pursuant to Section 8.2 of point 3 of Annex II.’;	AT (Comments/ Questions): Contrary to PN measurements, at the time being, there is no suitable procedure available for measuring NOx at PTI. Therefore, a review clause considering the possibility of introducing NOx measurements and limits at PTI should be introduced to avoid an obligation that cannot be fulfilled by Member States/authorities/testing centres. IE (Comments/ Questions): These limits will need to be set in advance of any enforcement activity taking place.

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Commission proposal	Drafting suggestions and Comments/ Questions
(18) Article 24 is replaced by the following:	
'*Article 24*	
Reporting	
By [two years from the date referred to in Article 20(1)], the Commission shall submit a report to the European Parliament and the Council on the implementation and effects of this Directive. The report shall analyse, in particular, its effect in terms of improvement of road safety and reduction in emissions.';	
(19) Annexes II, III, IV, and V are amended in accordance with Annex II to this Directive.	SK (Comments/ Questions):

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Commission proposal	Drafting suggestions and Comments/ Questions
	Annexes require more detailed examination. We would like to ask, whether expert meeting is planned on annex I to analyse whether other changes are necessary.
Article 3	
1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [PLEASE INSERT DATE: 2 years following the entry into force of this Directive]. They shall immediately communicate the text of those measures to the Commission.	SK (Drafting suggestions): 1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [PLEASE INSERT DATE: **the first day of the month following** 2 years **after the date of** entry into force of this Directive]. They shall immediately communicate the text of those measures to the Commission. SK (Comments/ Questions): If Member States are to connect to MOVE-HUB, while the details will depend on implementing acts issued by the Commission, the transposition period of two years is short and a longer period of at least three years will be needed. We propose to set the transposition deadline to first day of the month following 2 years (or 3 years should the transposition period be prolonged) after the date of entry into force. Similar text was used also for *End of Life Vehicle Regulation*. DE

Commission proposal	Drafting suggestions and Comments/ Questions
	(Comments/ Questions): Given the new exhaust and noise emission measurements mentioned in the proposal, the suggested transition period appears too short. An appropriate transition period should be defined. IE (Drafting suggestions): 1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [PLEASE INSERT DATE: **3 years** following the entry into force of this Directive]. They shall immediately communicate the text of those measures to the Commission. IE (Comments/ Questions): The 2 year timeframe for compliance is a concern given the extent of data reporting, required system integration and infrastructure required.
When Member States adopt those measures, they shall contain a reference to this Directive or be accompanied by such a reference on the occasion of their official publication. Member States shall determine how such reference is to be made.	
2. Member States shall communicate to the Commission the text of the main measures of national law which they adopt in the field covered by this Directive.	

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Commission proposal	Drafting suggestions and Comments/ Questions
Article 4	
This Directive shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.	
Article 5	
This Directive is addressed to the Member States.	
Done at Brussels,	
For the European Parliament *For the Council*	
The President *The President*	

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT, NL, LU, IE, LU, PL, RO **Updated: 09/07/2025 16:24**

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