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General Secretariat

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NOTE

From: To:	General Secretariat of the Council Working Party on Land Transport
N° Cion doc.:	ST 8255/25 + ADD 1
Subject:	Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2014/45/EU on periodic roadworthiness tests for motor vehicles and their trailers and Directive 2014/47/EU on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union

Delegations will find attached the replies of the Commission to the initial questions and remarks made by Member States on the above proposal. The replies are presented in a separate (the last) column in the document.

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 **Updated: 21/05/2025 14:00**

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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	COM
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.	

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	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):	

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	AT reserves general scrutiny reservation	
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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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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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	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).	

[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).

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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.	Therefore, in the view of Germany, "minimum content" should be replaced by "content."	
(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.		
(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	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	

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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.	electric and hybrid powered vehicles (not just "**newerer** technologies and **vehicles**") should be made in this recital.	
	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."	
(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	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	

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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).	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?	Equipment cost Full NOx analyser ~EUR 2000; add-on kit integrated into existing PTI gas analysers: ~EUR 500; sensor replacement ~EUR 100-200 PN counter: ~EUR 5000.
(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[6].		
(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	PT (Comments/ Questions):	

[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).

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

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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.	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 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		

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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.		
(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 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.	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. 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.	
(11) For the same reason, a Member State of registration should be able to choose to recognise roadworthiness certificates issued by another		

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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.		
(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	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	An EU database would mean copying/synchronising with the national registers/databases (duplication in a way)

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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).	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). 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.	

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	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? 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.	Based on input from Car-Pass system manager and the European Parliament study[7], the costs for software updates are estimated at EUR 229 per garage in 2022 prices[8]. The maintenance costs for the software are estimated at 10% of the one-off costs. (see section 3.9.2. of Annex 4 of the IA, p143.)
(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		

[7] European Parliament (2018), Odometer Manipulation in motor vehicles in Europe, https://www.europarl.europa.eu/RegData/etudes/STUD/2018/615637/EPRS_STU%282018%29615637_EN.pdf

[8] The cost was estimated at EUR 200 per garage in 2018 prices. Using the harmonised index of consumer prices (HICP) from Eurostat, this is equivalent to EUR 229 per garage in 2022 prices.

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States, relevant test items should be included in the minimum requirements for the contents of and recommended methods for testing.		
(14) 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 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	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	

[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).

[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).

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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.	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)? What would be the extra cost for the consumer if testing facilities need additional equipment or the time concluding PTI will become longer?	Yes, visual, and through OBD, where the vehicle allows it and the necessary data is available (cf. Annex I new section 10.) The visual and OBD checks should not take significant additional time (cf. section 3.2.1 of Annex 4 of IA)
(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	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[12] was a first step in harmonising particle number measurement during	COM believes that it is possible to implement the test even if it is done by an individual garage/repair shop.

[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).

[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).

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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.	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	

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	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.	
(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. 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:	

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	- 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.	
(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.	
(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	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	

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emission levels, for example following the installation of a particle filter or when a vehicle is converted to run on an alternative fuel.	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? 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.	

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	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 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	

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	competence of the Member States and that the recital should be deleted.	
(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,	

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(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[13]. 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 Member State of registration to		

[13] 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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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.		
(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. 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	

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	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.	
(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.		

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(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[14]. 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)[15].	NL (Drafting suggestions): (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 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)[16].~~ 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.	MSs may continue to use EUCARIS and connect to MOVE-HUB via EUCARIS, but referring to EUCARIS only is not correct.

[14] 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).

[15] 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).

[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).

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	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.	
(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 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	

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	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.	
(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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(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	

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	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. 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	

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	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-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.	This question was already extensively addressed in the LTWP. Heavy rain or very strong winds may affect readings, but these would only dilute the concentration of any pollutant so may only result in not identifying actual high emitters. Pulling a trailer should not be an issue as the emission of polluants is compared to CO2 emissions, i.e. proportionate to fuel consumption.
(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,	PT (Comments/ Questions): What supports the 30% figure? NL	Multiple screening of (at least) 30% of the vehicle fleet could be reached by installing 250 remote sensing devices across the EU (cf. 3.21.1 of Annex 4 of the IA).

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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.	(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 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.~~	As such, it is significant share and also a realistic target. The higher the share of screened fleets, the more effective the measure.

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	DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording.	
(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.	
(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.		
(32) Given that inadequate or dangerous cargo securing can pose a serious threat to road safety and to the environment, inspections of cargo securing	ES (Comments/ Questions):	

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should be a mandatory part of roadside inspections in all Member States.	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.	
(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		

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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[17].		
(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	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	

[17] 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).

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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[18]. In particular, to ensure equal participation in the 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.	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.	
(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		

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

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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 roadside inspections, the current reporting obligations on Member States should be reduced and simplified, with less frequent reporting required.		
(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.		

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(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)	
(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[19], Member States have undertaken to accompany, in justified cases, the notification of their transposition measures with one or more documents explaining the		

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

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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: *'(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	The potential list of items of electronic safety systems ot be tested was discussed with Member States' and industry experts in the Roadworthiness Expert Group. It is proposed to move some items already included in Annex I into the new section 10 regrouping all electronic safety systems. It is acknowledged that some vehicles may not allow extracting (all) the relevant

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	('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. 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	information, which is the reason why the proposed method of testing is drafted in a specific way. It should indeed not be required to dismantle parts of the vehicle. As per the introductory part of Annex I, "where a method of testing is indicated as visual, it means that, in addition to looking at the items concerned, the inspector shall also, if appropriate, handle them, evaluate their noise or use any other appropriate means of inspection not involving the use of equipment." Visual inspection includes looking at the dashboard, malfunction indicator lights (warning device).

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	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. 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	This part of access to data provisions will have to be worked out in an implementing act amending/revising Commisison Regulation 2019/621. Item 8.2.2. refers to positive ignition engines. Access to vehicle data necessary for testing is already an issue today. This however does not take away the importance of checking electronic safety systems. Even though they are design to function very safely, as with any vehicle system, over time, with the use of the vehicle (including possible small damages), these systems may also fail to work as when they were new. In fact, if such a safety system is not working properly while being relied on by the driver, the consequences can be dramatic.

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	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.	If the necessary information is not available, it may not be possible to perform the check. A standard has been developed by PTI experts in cooperation with the automotive industry precisely for reading such data using the vehicle interface (cf. introductory part of Annex I). It should thus be possible to build devices that are capable to perform such checks. It should not be required to dismantle the vehicle, visual/manual inspection, complemented, where possible, with the use of the vehicle interface should suffice. The testing of these systems was discussed with Member States and industry experts in the Expert Group on Roadworthiness.
Article 1		

From: SK, PT, NL, GR, FI, ES, EE, DE, CZ, BE, AT **Updated: 21/05/2025 14:00**

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
Amendments to Directive 2014/45/EU		
Directive 2014/45/EU is amended as follows:		
(1) Article 2 is amended as follows:		
(a) in paragraph 1, the sixth indent is replaced by the following:		
'– 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.	COM chose to add the EV equivalent of the existing limit of 125 cm3, but could indeed refer to the sub-categories as an alternative.
– 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):	Correct RE: the categories.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	– 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):) 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.';	The word "mainly" is part of the existing legal text in force, but indeed it can give room for interpretation.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	NL (Comments/ Questions): Tractors: Very difficult to determine whether they are mainly used on the terrain where activity takes place.	
(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 (Drafting suggestions): ~~(b) in paragraph 2, the seventh indent is deleted~~; FI	

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	(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	
	SK (Comments/ Questions):	

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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	
(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):	

Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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.	
(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;';		
(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 2014/45/EU, which includes the	It could mention digital and physical, but this becomes clear from Article 8, so not absolutely necessary, in our view. COM proposal would only align with the new definition (12a). Annex II provides for the content in any case.

Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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	Yes, this is the idea. Based on the European Digital Identity Framework, the EUDIW will be available in all MSs from end 2026, to enable citizens and businesses to safely request, store and share key digital documents.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	(also) sees the need for clarity to add or insert the following: "containing the result of the roadworthiness test;"	
(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?	Does the question refer to paragraph 4? Roadworthiness certificates are to be recognised across the EU. Member States need to communicate any new specimen to the Commission, which must publish those (Art 8(3)). For the temporary certificate, only the validity may defer from standard certificates.
'Article 4		
Responsibilities		

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 **Updated: 21/05/2025 14:00**

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
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	COM believes that the limited validity of the certificate should deter PTI tourism. Also, as explained below, the next PTI is to be taken in the MS of registration. Paragraph 4 provides for the option for the MS of registration to recognise PTIs taken another MS on a wider scale (not only based on para 3). Should the MS

Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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 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.	of registration use this option described in para 4 in the case of M1 vehicles, the next PTI after a temporary certificate may again be taken abroad – more generally, the provisions of paragraph 3 become irrelevant in that case.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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. 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	The result of the test taken abroad has to be communicated to the MS of registration; it will be clear also from the expiry date that it is a temporary certificate, so MS of registration can require testing in one of its own centres. Recognition may be unilateral. It is up to the MS of registration to decide whether or not to recognise certificates issued by other MSs, and which ones. Indeed, it is about PTIs taken in another MS, certified by a certificate issued by that other MS.

Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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 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):	"competent authority" refers to the authority of the MS in which the PTI took place responsible for issuing roadworthiness certificates. The validity of the temporary certificates would indeed affect the anniversary of the PTI (thereby potentially helping to spread some of the demand to less busy periods, i.e. away from summer months). Changing the date of next PTI can stop the same problem happening again the next time the PTI is due.

Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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.	
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.	Notification and exchange of information should take place in accordance with Articles 8(8) and 16. It should perhaps be clarified that the recognition under this paragraph is not meant to apply to a single roadworthiness certificate, but to roadworthiness certificates issued by a given MS (the use of plural may suit better). Vehicle owners should therefore be aware in which other MSs (if any) they may take their PTI.

Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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. 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	That is indeed the purpose. The certificate should be considered valid by other MSs, too, indeed. This is intended by the wording of paragraph 4. Indeed: - Paragraph 3 requires that MSs recognise a temporary certificate for M1; - paragraph 4 allows MSs to recognise PTI taken in another MS for any category.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	communication from the Member State to the Commission on the recognition of such tests?	
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? 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	The intention is to amend or repeal and replace that implementing regulation. DG MOVE is in contact with DG GROW, which is in charge of Regulation 2018/858, about possible changes to that Regulation. Should no such detailed rules be established under that Regulation, specific implementing rules will have to be developed for vehicle inspection under this Directive.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	(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.	
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	If considered necessary, reference to Regulations (EU) 167/2013 and 168/2013 could be

Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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): **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	added. (COM proposal only replaced existing reference to the type-approval rules applicable to M and N category vehicles.) How the competent authority would make the information available to its testing centres could be best defined by that authority itself, depending on any national specificity. The issue with testing centres trying to access data directly from manufacturers is described above by SK. A system similar to SERMI could also be considered. As it is, the SERMI approach may not be best suited for the purpose of PTI.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	(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 (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	Does DE mean the need for an implementing regulation or a regulation by the European Parliament and Council? The detailed rules would have to be defined in the amended implementing regulation.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	(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.	
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): 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	

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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**	COM modelled its proposal on the BE and NL systems. Further economic operators could also be included, if agreed.
Recording of odometer readings	FI (Comments/ Questions): **Question:** Has the Commission considered, that this reguirement has something in common with reguirements regarding information on 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.	No, COM has not considered this, but is open to suggestions.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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	This provision is also based on the practice in BE. It is up to the MS to determine the best way to communicate this information. In BE, the law requires the manufacturers communicate it upon request of the operator in charge of the system via an application provided by the operator.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	(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):	Not specifically provided for the in the proposal, but could be included, too, to close possible loopholes. The readings should be communicated to the MS of registration based on VIN and/or number plate. (cf. BE law linked above)

Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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. 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.	Car-wash or buying spare parts should not be considered as repair. Please see BE and NL examples, incl. legislation referred to above; as well as comments from SK.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	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 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.	It may not be necessary for manufacturers to connect to MOVE-HUB (it is in fact an interface between authorities). Re EE: It is not expected that manufacturers would have to reprogramme their systems as they can already provide the information to BE. There should be no extra cost to consumers.
2. Member States shall make the odometer history of vehicles registered by them available to	SK (Comments/ Questions):	

Commission proposal	Drafting suggestions and Comments/ Questions	COM
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.	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.	The data is to be made available to authorities for the purpose of re-registration, so that the odometer history can be carried over between national registers. In many cases, vehicle sales happen cross-border. The specific case of re-registration could indeed be mentioned (it is mentioned in the proposed Article 15 of the Directive repealing Directive 1999/37/EC).
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	The data does not need to be made public. Potential buyers only need to be made aware of

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	odometer data to a 'buyer' means, that the data should be publicly available to all in paragraph 2.	the possibility for them to request such information from the seller.
4. Member States shall also make available the odometer data stored in the national databases and 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*.	SK (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?	Statistical offices already have access to national vehicle registers. Should the odometer data be stored in a separate database, statistical offices should have access to that in the same way. Statistical offices already use odometer data (today only available in a limited way, notably from PTI), for the purpose of estimating transport activity statistics (in vkm). Yes, data are anonymised (though statistical offices are already used to treating personal data)

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* 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).’;		
(5) Article 5 is replaced by the following:		
‘Article 5		
Date and frequency of testing	SK (Comments/ Questions):	

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	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?	While vehicle aging has a continuously increasing effect on the appearance of defects and thus on the failure rates at PTI, official reports as well as scientific studies indicate a marked increase especially after the age of 10. This comes out clearly also from e.g. ADAC reports, where the increase in failure rates is significant already after 6 years, but it becomes even more important after 10 years, even in the case of the best performing models. Also, according to the study by the University of Zilina, 2/3 of the crashes linked to vehicle defects happened during the

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	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? 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	second half (i.e. second year) of validity of the roadworthiness certificate. While in the case of vehicles younger than 10 years this proportion was only 45%, it was 87% in the case of vehicles older than 10 years. Yes, it is. Emission checks after 1 year would apply to light commercial vehicles which are often used very intensively, possibly even more intensively than heavy-duty vehicles, which are already subject to PTI annually. Vans also show higher shares of defective emission control systems than cars.

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	(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 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	The impact assessment contains relevant information: section 3.14 of annex 4 describes the costs (though the equipment costs related to NOx testing was significantly overestimated). Benefits are described in section 4.2.9 of that annex. The share of high-emitters in the EU fleet would be reduced by 17% for vehicles under 4 years old.

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	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.	
(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;		
(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	Yes – please see reply to similar question above above.

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	clarification. We would prefer to **delete** this **and simply name the category Tb** (without specifying T1b-T4.3.b). 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.	
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 subsequent roadworthiness certificate shall be counted as from the expiry date of the temporary roadworthiness certificate issued as a result of that test.	SK (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.	

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
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 (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	
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**	In certain MSs, post-crash checks are done by other services. The deletion does not

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	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. 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	prevent MSs to apply such a provision. Significant changes need to be approved. The owner/holder can be required to declare such modifications. It seems that NL and DE have different views of what significant modifications entail. What is meant under this provision are legally possible modifications (not tampering).

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	submitted to thePTI 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 (Comments/ Questions): Are these cases where the vehicle has been rebuilt and additional approval is sought or other cases?	

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	BE (Comments/ Questions): BE: Very good but how will it be known whether the vehicle has been altered or modified?	Yes, that is the idea. It would be sufficient to require the owner to declare such modifications.
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.’;		
(6) Article 6 is amended as follows:		
(a) paragraph 1 is replaced by the following:		

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
'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.';		
(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.';		
(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):	Yes, if the roadside check took place during the preceding 6 months.

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	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 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.	
(7) Article 8 is replaced by the following:		
'Article 8		
Roadworthiness certificate		

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
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). 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?	This refers to existing text in force, the proposal did not change it. In the context of roadworthiness certificates, these have been considered harmonised codes, even though they are very simple. This use case should be feasible to cover but COM is still

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	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	verifying this internally (DG CNECT).
Member States shall ensure that roadworthiness certificates contain the information necessary for authentication and validation of those certificates.		
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)	

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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 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.	FI (Comments/ Questions): **Comment:** We see that we should not develop physical certificates as they will become marginalized after the digitalisation of the certificate.	
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	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	The intention of the provisions under this point is to ensure that RW certificates are recognised between MS when the vehicle is

Commission proposal	Drafting suggestions and Comments/ Questions	COM
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.	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.)	re-registered in another MS without questioning the results of valid PTI.
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?	It is indeed the first case. As long as the certificate is valid, the fact that ownership changes should not trigger an invitation to PTI.
5. The Member State of registration shall recognise the validity of a temporary roadworthiness certificate issued in another Member State.		
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	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?	It is indeed the MS of registration.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
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.	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.	The quoted part is existing text in force, but could indeed be improved.
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. 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.		

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
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	In general COM aims to adopt implementing acts asap (there will be a couple of them for the whole package). Timetable (after entry into force): - Implementing acts: at the latest 2 yrs - Transposition: 2 yrs - Compliance of barcode/QR code on roadworthiness cert.: at the latest 30 months - Application of data exchange: at the latest 3 yrs - First new (3-year) reports by 31 March 2030.
(a) securely issuing and verifying the certificates referred to paragraphs 1 and 2;		
(b) ensuring the protection and security of personal data;		

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(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	COM
(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	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):	

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State where the vehicle failed the initial test, or in the Member State of registration.	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**	COM is ready to discuss and respond to any specific questions.

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	AT (Comments/ Questions): See above	
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 **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 2014/47/EU,	

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	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	If a vehicle has a dangerous deficiency, it cannot travel long distances (it may not be allowed to travel at all), unless it is transported. Yes, that is the idea. In fact this is necessary if undergoing PTI in a MS other than the MS of registration is possible.

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Commission proposal	Drafting suggestions and Comments/ Questions	COM
	unnecessary burden for the vehicle owner to bring back the vehicle to the Member State requested the suspension.	
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 (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	The actual mileage may be found out by looking at the information of certain components (e.g. km-s run since last replacement of…). Odometer manipulation is already prohibited and punishable under the current rules (Article 8(6)). This does not mean that it is the last owner that has just presented the vehicle for PTI that may have to be punished. If manipulation becomes obvious, it means that there is a trace of higher mileage than what is shown by the odometer. It is not for the PTI stations to impose a fine, but they should

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	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?	record and communicate such cases to the competent authority. Please see answers provided above. At least in some cases, it is possible to recover the correct mileage. If tampering and manipulation needs to be defined, COM is ready to help with that.
*** 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):	

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	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.	COM is available to discuss this with MSs if it is considered necessary.
(9) Article 16 is replaced by the following:		
'*Article 16*		
Exchange of data between Member States' authorities		
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	The use of EUCARIS was discussed together with the use of MOVE-HUB in the impact assessment (see e.g. section

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	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. Could the European Commission clarify the existence of this system?	2.2.4. and point 1 (PMC7) in annex 7), and at the LTWP of 17 June. Member States can continue to use EUCARIS for the transmission of data via the MOVE-HUB, which is also an established system, used e.g. for the purposes of RSI, ERRU and TACHOnet. The use of MOVE-HUB for message routing over EUCARIS is based on the following considerations: ·The Commission has the competence to enforce the application of EU legislation; ·MOVE-HUB can monitor the exchange for compliance with the legislation; ·The Commission can ensure network integrity, security and follow-up message exchange errors with Member States.
Member States shall provide access to vehicle registration data, data regarding the content of the	CZ (Comments/ Questions):	

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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.	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.	Through the MOVE-HUB, with the option to connect to the hub via EUCARIS or other applications.
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	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-	

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relevant database or the national vehicle register of any other Member State in real time.	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.~~ 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):	As explained during the LTWP of 17 June, MOVE-HUB is a

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	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 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.	data exchange platform to connect national registers. It works using search requests and notifications sent to a single or multiple other MSs. It is already in use in road transport. It will require 1-2 years to implement new provisions (messages). COM has considered this carefully and, as explained at LTWP on 17 June, believes that message routing via MOVE-HUB should cause no more burden than e.g. via EUCARIS.
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	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?	COM will aim to adopt implementing acts asap (there will be a couple of them for the whole package). Timetable (after EIF): - Implementing acts: at the latest 2 yrs - Transposition: 2 yrs - Compliance of barcode/QR code on

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with the examination procedure referred to in Article 19(2).	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). 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.	roadworthiness cert.: at the latest 30 months - Application of data exchange: at the latest 3 yrs - First new (3-year) reports by 31 March 2030.
3. The electronic systems interconnections provided for in paragraph 1 shall be operational	ES	

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within one year after the adoption of the implementing acts referred to in paragraph 2.’;	(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.	The interconnections are needed for the transmission of data via MOVE-HUB.
(10) Article 17 is amended as follows:		
(a) the first indent is replaced by the following:		

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'– 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;';		
(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.';	

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	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. 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	It does apply, but there is no need for delegated acts in that case as it is already fully defined. As explained during the LTWP of 17 June, COM believes that a suitable method to measure NOx emissions from compression

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	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 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.	ignition engines (diesel) has been developed by its Joint Research Centre (cf. Item 8.2.3.3. in Annex I). Only the self-checks of the instrument need to be further specified for vehicles equipped with such engines.

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(11) Article 20 is replaced by the following:		
'*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.';		

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(12) the following Article 20a is inserted:		
'*Article 20a*		
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.	Re AT: Today, there is no official reporting about the key figures describing PTI in the Member States. Direct reporting from the MSs will allow COM to have an accurate and complete picture of the situation in the MSs. This will help evaluate existing rules and to assess the expected impacts of possible future policies without the need for ad hoc data collection that is not able to provide the same level of accuracy.
(a) the number of testing centres per Member State;		

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(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;		
(e) the number, category and [failure rate][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	
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		

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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).’;		
(13) Article 22 is replaced by the following:		

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'*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.	
1. For the purposes of this Article, the following definitions shall apply:		
(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;		

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(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.	It is COM. In our view, it is clear that MSs may turn to COM with their requests, based on which COM takes a decision to authorise (or not) the measures considered by one or more MSs.
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.		

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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.		
6. The measures adopted by the Member States on the basis of this Article shall be immediately notified to the Commission, which shall 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.	COM is ready to organise expert group meetings to analyse the details of Annex I.

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	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. 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	Self-diagnosis has obvious advantages, it is however not always effective. It has been relied on e.g. for emission control and proved not to be accurate. The case of safety systems is different as the consequences can be dramatic. It is all the more important to make sure that what can be checked is checked. For the data to be available from the vehicle, type-approval has to make sure it is accessible. In addition, detailed PTI-specific rules may be necessary so that the data is provided for this purpose (cf. impl. act revising Regulation 2019/621). The question refers to Item 5.3.2.1. efficiency testing of damping. The intention is to make the test mandatory

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	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 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,	(equipment – suspension tester – should be added in Annex III). Item 4.14.4.3 (measuring ground continuity using an ohmmeter) is marked with an X, i.e. not mandatory. For item 5.3.2.1, pls see above. For most of the items, yes. In some cases, operation or another device may be needed (see items with X).

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	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.	
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.	

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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 vehicles, and for remote sensing of vehicles, circulating within the territory of the Member States.';	ES (Drafting suggestions): 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	

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	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;';		
(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-,	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	The proposal contains no requirement e.g. to carry out a

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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.	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.	certain number of roadside inspections on M1 or L-category vehicles. Remote sensing, however, can screen every vehicle that passes by. It would thus be a missed opportunity not to consider the results of those measurements. The other articles only apply as a follow-up of remote sensing.
***** 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).';		

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(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.';		
(3) Article 3 is amended as follows:		
(a) point (11) is replaced by the following:		
'(11) 'roadworthiness certificate' means a roadworthiness test report as defined in Article 3, point (12), of Directive 2014/45/EU;';	SK (Drafting suggestions):	

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	'(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.	
(b) point 18 is deleted;	SK (Comments/ Questions): Could the Commission explain why was this definition deleted?	
(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.	

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	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 not suitable for assessing individual vehicles or the fleet of specific vehicle types.	COM would refer to the results of relevant experiments, such as: - In Paris - In Rotterdam (https://nemo-cities.eu/remote-sensing-device-for-noise/)
(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.';		

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(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).'~~ 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.	

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(5) the following Article 4a is inserted:	ES (Drafting suggestions): ~~(5) the following Article 4a is inserted:~~ 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	A presentation was held at the LTWP on 17 June 2025. Specific examples of the functioning, including links to relevant projects, and indications about costs were presented.

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	(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 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?	The idea is not to directly sanction high-emitting vehicles, but to screen a large part of the fleet and to identify the most problematic cases, to be able to address those by subsequent verification (tailpipe check at the roadside or in a testing centre). See above.
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	It is a significant share of the fleet, but it appears to be possible to screen such high number of vehicles using a relatively limited number of devices. One device may screen tens of thousands of vehicles per day.

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	(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. 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	

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	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 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	

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	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 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.	The number of vehicles that can be screened depends on where the equipment is installed. Based on the AT experience, two remote sensing devices

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		would be sufficient to reach the target in AT.
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): 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.	

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	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 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	Pls see e.g. Flemish Government decree: https://etaamb.openjustice.be/fr/decret-du-21-fevrier-2025_n2025002227.html

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	(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.~~ AT (Comments/ Questions): See above	Please refer to the presentation made on 17 June. The average values will depend on the results of the individual measurements of the exhaust plumes (or noise levels) of the screened vehicles.

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Such verification by Member States may take place as follows:	ES (Drafting suggestions): ~~Such verification by Member States may take place as follows:~~ DE (Comments/ Questions): Currently under further review - we reserve to comment on this and, if necessary, suggest alternative wording.	
(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	
(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	NL (Comments/ Questions):	

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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.	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 competent authority within five days from the last remote sensing measurement.~~	COM agrees that it is best to verify the emissions on the spot at the roadside. However, there is much more limited capacity in the MSs to carry out roadside checks than checks at inspection centres. Even if manipulated vehicles may be turned back to their original state, the measure had achieved its objective, at least partly. It can also deter manipulation.
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,	SK (Comments/ Questions):	

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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 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.	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. 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.	Since this paragraph is about vehicles registered in another MS, a longer deadline was proposed to allow for the owner/holder to take the vehicle to an inspection centre. The competent authority of the MS of registration invites the holder of the certificate for a PTI. That notification should take place immediately after the vehicle has been identified as potential high-emitter.

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	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 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.~~	
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):	

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	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	
(6) in Article 5, paragraphs 1 and 2 are replaced by the following:	BE (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?	Based on ACEA figures, there are around 30 million N1 vehicles vs 7.2 million N2+N3. The costs were calculated in the impact assessment, pls see section 3.23 of Annex 4.
'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	SK	

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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.’;	(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. 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	During the reporting period 2021-2022, the equivalent of 16.8% of the heavy-duty vehicle fleet was subject to roadside inspections in the EU. With the number of N1 vehicles about 4 times that of HDVs, 2% seems to be a significant but not unrealistic share of the fleet to be checked. The related investment/recruitment needs were estimated in the impact assessment (section 3.23 of Annex 4).

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	(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.	
(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?	Indeed, it is a mistake. The first subparagraph is replaced.
'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		

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rating score more closely and more often. The risk rating system shall be operated by the competent authorities of the Member States.		
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):	The certificate may be in electronic or paper format (printout).

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	‘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 (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?	This point is valid as long as inspectors and police officers indeed have access to the relevant information (see below case of no network connection mentioned by AT). Showing an electronic certificate may not necessarily require network connection, it can hold a minimum set of information offline. In any case, the driver cannot be held responsible for lack of network connection.

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(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 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 (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	

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(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 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);’;		

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(b) point (c) is replaced by the following:		
'(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	Only a visual check is required by this provision (initial inspection). The consequences of incorrectly secured cargo, and the frequency of such cases (up to 25% of truck accidents), are described in section 2.1.1 of the impact asseessment.

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	(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 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.	
(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	ES (Drafting suggestions):	

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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:	1. **Not later than [36 months after the entry into force of this directive],** 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 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;		

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(b) loads cannot leave the cargo space or move outside the loading surface.		
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.		

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****** 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).’;		
(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:		

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'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 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.	It could be provided the same way as an electronic roadworthiness certificate may be sent today (e.g. by email).

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(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 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*******.	PT (Comments/ Questions): 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 ~~through the messaging system (RSI system) referred to in Article 3 of Commission Implementing Regulation (EU) 2017/2205*******~~]	Please note that this is an already existing provision and it is specified in the implementing act.
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		

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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).';~~	
(15) the following Article 18a is inserted:		
'*Article 18a*	DE (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	

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	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 2014/47/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.	Please see explanation provided above for Directive 2014/45/EU. Also, Directive 2014/47/EU already makes use of MOVE-HUB via the RSI notification system (pls see Article 18 and corresponding Implementing Regulation 2017/2205). As explained above, EUCARIS can be used to connect to the hub, which is also an existing system.
Exchange of data between Member States' authorities		
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		

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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.	
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	SK (Comments/ Questions): Can the Commission clarify why the odometer history is necessary for the purpose of roadside inspections?	It can help police officers / inspectors identify possible fraud.

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vehicle register of any other Member State in real time.	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): 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,	

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	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.	Please see above under Directive 2014/45/EU.
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):	

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	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.	
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.	

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(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?	Yes, this is to be defined in the implementing act that is to be adopted asap.
(a) the total number of vehicles inspected;		
(b) the number of vehicles inspected per category;		

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(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		

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into force of such rules, Member States shall use the standard reporting form set out in Annex V.		
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:		

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(a) the second and third indents are replaced by the following:		
'– 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	

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'– 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;~~ 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?	No limits have been set, only relative thresholds have been included in Article 4a (i.e. above the double of the average of vehicles screened in the given vehicle category).
– 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	

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	introducing NOx measurements and limits at PTI should be introduced to avoid an obligation that cannot be fulfilled by Member States/authorities/testing centres.	
(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.';		

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(19) Annexes II, III, IV, and V are amended in accordance with Annex II to this Directive.	SK (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.	As above, COM is ready to organise such meetings.
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.	

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	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 (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.	
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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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		

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 **Updated: 21/05/2025 14:00**

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