

# Revision of Roadworthiness Package - Open Public Consultation 2022

Fields marked with \* are mandatory.

## Introduction

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The Roadworthiness Package (RWP) is a set of EU rules aimed at establishing a single European area for technical inspections with an effective and more efficient inspection system. These EU rules consist of the following Directives:

- Directive 2014/45/EU on periodic roadworthiness tests for motor vehicles and their trailers;
- Directive 1999/37/EC of 29 April 1999 as amended by Directive 2014/46/EU on the Registration Documents for Vehicles;
- Directive 2014/47/EU on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union.

The main aim of the Periodic Roadworthiness Testing Directive is to improve road safety and the environment by setting minimum standards for periodic tests of vehicles and their trailers used on public roads in the EU.

The main aim of the Vehicle Document Registration Directive is to regulate the withdrawal and the cancellation of registration certificates of vehicles, to establish requirements on electronic registration databases, and the follow up of roadworthiness test results, re-registration and destruction of vehicles.

The main aim of the Roadside Inspection Directive is to improve road safety and the environment. The Directive establishes minimum requirements for technical roadside inspections of commercial vehicles circulating within the EU.

The European Commission is inviting the general public and stakeholders to express their opinion on the impact of these EU rules as well as on possible policy measures and potential impacts of their revision. Information received in this consultation will support the Evaluation and the Impact Assessment that the European Commission is currently carrying out.



## About you

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\*Language of my contribution ☐

☐ Bulgarian

☐ Croatian

☐ Czech

☐ Danish

☐ Dutch

☒ English

☐ Estonian

☐ Finnish

☐ French

☐ German

☐ Greek

☐ Hungarian

☐ Irish

☐ Italian

☐ Latvian

☐ Lithuanian

☐ Maltese

☐ Polish

☐ Portuguese

☐ Romanian

☐ Slovak

☐ Slovenian

☐ Spanish

☐ Swedish

\*I am giving my contribution as

☐ Academic/research institution

☐ Business association

☐ Company/business organisation

☐ Consumer organisation

☐ EU citizen

- ☐
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- X ☒ Public authority
- ☐ Trade union
- Other

\*First name

\*Surname

\*Email (this won't be published)

\*Country of origin

Please add your country of origin, or that of your organisation.

*This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.*

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| <input type="radio"/> Afghanistan         | <input type="radio"/> Djibouti           | <input type="radio"/> Libya         | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands       | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania             | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria             | <input type="radio"/> Ecuador            | <input type="radio"/> Luxembourg    | <input type="radio"/> Samoa                            |
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Barbuda



Argentina



Armenia



Aruba



Australia



Austria



Ethiopia



Falkland Islands



Faroe Islands



Fiji



Finland



Malta



Marshall Islands



Martinique



Mauritania



Mauritius



Sierra Leone



Singapore



Sint Maarten



Slovakia



Slovenia

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<input type="radio"/> Bahrain	<input type="radio"/> French Polynesia	<input type="radio"/> Micronesia	<input type="radio"/> South Africa
<input type="radio"/> Bangladesh	<input type="radio"/> French Southern and Antarctic Lands	<input type="radio"/> Moldova	<input type="radio"/> South Georgia and the South Sandwich Islands
<input type="radio"/> Barbados	<input type="radio"/> Gabon	<input type="radio"/> Monaco	<input type="radio"/> South Korea
<input type="radio"/> Belarus	<input type="radio"/> Georgia	<input type="radio"/> Mongolia	<input type="radio"/> South Sudan
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<input type="radio"/> Bolivia	<input type="radio"/> Grenada	<input type="radio"/> Namibia	<input type="radio"/> Sweden
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<input type="radio"/> Bosnia and Herzegovina	<input type="radio"/> Guam	<input type="radio"/> Nepal	<input type="radio"/> Syria
<input type="radio"/> Botswana	<input type="radio"/> Guatemala	<input checked="" type="radio"/> X Netherlands	<input type="radio"/> Taiwan
<input type="radio"/> Bouvet Island	<input type="radio"/> Guernsey	<input type="radio"/> New Caledonia	<input type="radio"/> Tajikistan
<input type="radio"/> Brazil	<input type="radio"/> Guinea	<input type="radio"/> New Zealand	<input type="radio"/> Tanzania
<input type="radio"/> British Indian Ocean Territory	<input type="radio"/> Guinea-Bissau	<input type="radio"/> Nicaragua	<input type="radio"/> Thailand
<input type="radio"/> British Virgin Islands	<input type="radio"/> Guyana	<input type="radio"/> Niger	<input type="radio"/> The Gambia
<input type="radio"/> Brunei	<input type="radio"/> Haiti	<input type="radio"/> Nigeria	<input type="radio"/> Timor-Leste
<input type="radio"/> Bulgaria	<input type="radio"/> Heard Island and McDonald Islands	<input type="radio"/> Niue	<input type="radio"/> Togo
<input type="radio"/> Burkina Faso	<input type="radio"/> Honduras	<input type="radio"/> Norfolk Island	<input type="radio"/> Tokelau
<input type="radio"/> Burundi	<input type="radio"/> Hong Kong	<input type="radio"/> Northern Mariana Islands	<input type="radio"/> Tonga
Cambodia	Hungary	North Korea	<input type="radio"/> Trinidad and Tobago

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| <input type="radio"/> Cameroon                               | <input type="radio"/> Iceland     | <input type="radio"/> North Macedonia          | <input type="radio"/> Tunisia                                    |
| <input type="radio"/> Canada                                 | <input type="radio"/> India       | <input type="radio"/> Norway                   | <input type="radio"/> Turkey                                     |
| <input type="radio"/> Cape Verde                             | <input type="radio"/> Indonesia   | <input type="radio"/> Oman                     | <input type="radio"/> Turkmenistan                               |
| <input type="radio"/> Cayman Islands                         | <input type="radio"/> Iran        | <input type="radio"/> Pakistan                 | <input type="radio"/> Turks and<br>Caicos Islands                |
| <input type="radio"/> Central African<br>Republic            | <input type="radio"/> Iraq        | <input type="radio"/> Palau                    | <input type="radio"/> Tuvalu                                     |
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| <input type="radio"/> Christmas Island                       | <input type="radio"/> Italy       | <input type="radio"/> Paraguay                 | <input type="radio"/> United Kingdom                             |
| <input type="radio"/> Clipperton                             | <input type="radio"/> Jamaica     | <input type="radio"/> Peru                     | <input type="radio"/> United States                              |
| <input type="radio"/> Cocos (Keeling)<br>Islands             | <input type="radio"/> Japan       | <input type="radio"/> Philippines              | <input type="radio"/> United States<br>Minor Outlying<br>Islands |
| <input type="radio"/> Colombia                               | <input type="radio"/> Jersey      | <input type="radio"/> Pitcairn Islands         | <input type="radio"/> Uruguay                                    |
| <input type="radio"/> Comoros                                | <input type="radio"/> Jordan      | <input type="radio"/> Poland                   | <input type="radio"/> US Virgin Islands                          |
| <input type="radio"/> Congo                                  | <input type="radio"/> Kazakhstan  | <input type="radio"/> Portugal                 | <input type="radio"/> Uzbekistan                                 |
| <input type="radio"/> Cook Islands                           | <input type="radio"/> Kenya       | <input type="radio"/> Puerto Rico              | <input type="radio"/> Vanuatu                                    |
| <input type="radio"/> Costa Rica                             | <input type="radio"/> Kiribati    | <input type="radio"/> Qatar                    | <input type="radio"/> Vatican City                               |
| <input type="radio"/> Côte d'Ivoire                          | <input type="radio"/> Kosovo      | <input type="radio"/> Réunion                  | <input type="radio"/> Venezuela                                  |
| <input type="radio"/> Croatia                                | <input type="radio"/> Kuwait      | <input type="radio"/> Romania                  | <input type="radio"/> Vietnam                                    |
| <input type="radio"/> Cuba                                   | <input type="radio"/> Kyrgyzstan  | <input type="radio"/> Russia                   | <input type="radio"/> Wallis and<br>Futuna                       |
| <input type="radio"/> Curaçao                                | <input type="radio"/> Laos        | <input type="radio"/> Rwanda                   | <input type="radio"/> Western Sahara                             |
| <input type="radio"/> Cyprus                                 | <input type="radio"/> Latvia      | <input type="radio"/> Saint Barthélemy         | <input type="radio"/> Yemen                                      |
| <input type="radio"/> Czechia                                | <input type="radio"/> Lebanon     | <input type="radio"/> Saint Helena             | <input type="radio"/> Zambia                                     |
|  |                                   | Ascension and Tristan da Cunha                 |  |
| <input type="radio"/> Democratic<br>Republic of the<br>Congo | <input type="radio"/> Lesotho     | <input type="radio"/> Saint Kitts and<br>Nevis | <input type="radio"/> Zimbabwe                                   |
| <input type="radio"/> Denmark                                | <input type="radio"/> Liberia     | <input type="radio"/> Saint Lucia              |  |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of**

transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

☐ I agree with the [personal data protection provisions](#)

## A: Additional information about the respondent

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1) Please indicate if you represent a specific interest:

- ☐ Inspection bodies
- ☐ Testing equipment manufacturers
- ☐ Vehicle and equipment manufacturers/ suppliers
- ☐ Automotive/ motorcycle federations
- ☐ Automobile clubs
- ☐ Other (please specify below\*) ☐ No

specific interest

\* The Ministry of Infrastructure and Water Management is the Dutch Ministry competent for all policy related to transport. The ministry bears policy responsibility for the policy field in which public authorities such as the RDW and ILT carry out public tasks.

The RDW (Netherlands Vehicle Authority) contributes to ensuring that road transport in the Netherlands is as safe, clean, economically viable and well-regulated as possible. Our tasks lie in the areas of the licensing of vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles, supervision and control, registration and information provision, and issuing documents. We are responsible for the implementation of the periodic inspections in the Netherlands and the supervision thereof and responsible for the necessary changes in the vehicle registration database.

## B: General assessment of current EU rules on roadworthiness

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2. In your view, to what extent have the current EU rules on roadworthiness (all three Directives) been effective in improving road safety and contributing to the reduction of road fatalities and serious injuries in road transport in the EU?

☐ Very effective

☒ Effective

☐ Neutral

☐ Less effective

☐ Not effective

☐ I do not know / No opinion



3. In your opinion, how relevant are the current EU rules on periodic roadworthiness testing and technical roadside inspections in improving road safety?

	Very relevant	Relevant	Neutral	Less relevant	Not relevant	not know / No opinion
Periodic testing of high-speed tractors and heavy motorcycles	<input type="radio"/>	<input type="radio"/>	x	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum standards for testing centres, facilities and equipment	<input type="radio"/>	x	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum standards for inspectors' competence, training and objectivity	<input type="radio"/>	x	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Categorising deficiencies during the periodic inspection as either minor, major, or dangerous deficiencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	x	<input type="radio"/>	<input type="radio"/>
Obliging Member States to perform roadside tests on a minimum share of commercial vehicles each year	x	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different time intervals between periodic tests, according to the age of vehicle, and vehicle type	<input type="radio"/>	x	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. In your opinion, how relevant are the current EU rules on periodic roadworthiness testing and technical roadside inspections in reducing air pollutant emissions?

	Very relevant	Relevant	Neutral	Less relevant	Not relevant	not know / No opinion
Periodic testing of high-speed tractors and heavy motorcycles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	x	<input type="radio"/>	<input type="radio"/>
Establishing minimum standards for testing centres, facilities and equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	x	<input type="radio"/>	<input type="radio"/>
Minimum standards for inspectors' competence, training	<input type="radio"/>	x	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

and objectivity						
Categorising deficiencies during the periodic inspection as either minor, major, or dangerous deficiencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>
Obliging Member States to perform roadside tests on a minimum share of commercial vehicles each year	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different time intervals between periodic tests, according to the age of vehicle, and vehicle type	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. In your opinion, how relevant are the current EU rules on the registration documents for vehicles in facilitating free movement of goods and people within the EU?

	Very relevant	Relevant	Neutral	Less relevant	Not relevant	Not know / No Opinion
Obligation on Member States to recognise roadworthiness certificates upon change of ownership	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6. Please provide your opinion below on how effective are the current EU rules on periodic roadworthiness testing and technical roadside inspections in improving road safety?

	Very effective	effective	Neutral	Less effective	Not effective	Not know / No opinion
Periodic testing of high-speed tractors and heavy motorcycles	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum standards for testing centres, facilities and equipment	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum standards for inspectors' competence, training	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

and objectivity						
Categorising deficiencies during the periodic tests as either minor, major, or dangerous deficiencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>
Obliging Member States to perform roadside tests on a minimum share of commercial vehicles each year	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different time intervals between periodic tests, according to the age of vehicle, and vehicle type	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Please provide your opinion below on how effective are the current EU rules on periodic roadworthiness testing and technical roadside inspections in reducing air pollutant emissions?

	Very effective	Effective	Neutral	Less effective	Not effective	I don't know / No opinion
Periodic testing of high-speed tractors and heavy motorcycles	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum standards for testing centres, facilities and equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>
Minimum standards for inspectors' competence, training and objectivity	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Categorising deficiencies during the periodic tests as either minor, major, or dangerous deficiencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>
Obliging Member States to perform roadside tests on a minimum share of commercial vehicles each year	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different time intervals between periodic tests, according to the age of vehicle, and vehicle type	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. Please provide your opinion below on how effective are the current EU rules on the registration documents for vehicles in facilitating free movement of goods and people within the EU?

	Very effective	Effective	Neutral	Less effective	Not effective	I don't know / No opinion
Obligation on Member States to recognise roadworthiness certificates upon change ownership	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## C: Main problems to address

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Recent regulatory provisions on emissions and safety show the technical limits of current roadworthiness testing methods. With the introduction of advanced vehicle safety features and significantly strengthened emission legislation, vehicles will attain even higher levels of technical complexity. To keep pace with these trends, fundamentally new approaches in the field of vehicle testing and inspection methods are needed.

A possible future revision of the Roadworthiness Package would address the issues in the following areas:

- The lack of adequate methods to test electronic safety & driver assistance systems in technical roadside inspections;
- Vehicles with alternative powertrain technologies (eg. hybrid, full-electric, hydrogen) may require particular testing methods for their safety;
- Vehicles circulating on the roads with defects or with tampered components or software adversely impacting road safety and the environment;
- Relevant vehicle data are not sufficiently available to enforcement authorities in the EU Member States for cross-border traffic.

9. In your opinion, how important is that the following problems are addressed, in case of the revision of the EU roadworthiness rules?

	Very relevant	Moderately important	Neutral	Low importance	Not important	Do not know / No opinion
Methods for Periodical Technical Inspections (PTI) of vehicles to test electronic safety & driver assistance systems in vehicles	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of relevant vehicle data to enforcement authorities in the EU Member States in cross-border traffic	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicles circulating on the roads with defects or tampered components	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Do you have any further comment on the functioning and/or problems related to any of these EU roadworthiness rules?

1000 character(s) maximum

- Current EU legislation does not sufficiently take into account the rapid development of vehicles, making legislation quickly outdated.
- Regulations should offer opportunities and flexibility to innovate given the rapid development of vehicles (e.g. introduction of PN-measurement)
- PTI based on the use of a vehicle is difficult to enforce (e.g. tractors)
- The questions related to tractors and motorcycles are very difficult to answer as they are combined in one question. In the Netherlands motor cycles are currently not part of the PTI scope, tractors are. It is therefore rather difficult to give a clear answer to these questions
- Emission requirements of tractors are not covered by the 2014/45/EU. Tractors are not approved under the directive/regulation mentioned in 2014/45/EU Annex III 8.2.2 note 7 and therefore opacity measurement is not applicable.
- Comment re. question 9 'availability of relevant vehicle data to enforcement authorities in the EU Member States in cross-border traffic' → Why is this only relevant for cross-border traffic?

## D: Policy measures

This section aims at identifying potential policy measures to overcome initially identified problems in view of a possible revision of the EU rules.

### 11. In your opinion, how important is it to include the following provisions in revising the EU rules on periodic roadworthiness testing

	Very important	Moderately important	Neutral	Low importance	Not important	No opinion/ Do not know
Extending the rules to powered two- and three-wheelers (L-category vehicles)	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Methods to test the functioning of safety-relevant electronic components, advanced driver assistance systems (ADAS) and automated functions	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods for measuring exhaust emissions, for example particle number (PN) and nitrogen oxides (NOx)	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods to test vehicles with alternative powertrain technologies (hybrid, full-electric, hydrogen)	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods for reading out on-board data stored in the vehicles	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extending (or clarifying) existing rules on access to in-vehicle data for the purpose of periodic roadworthiness testing, with data protection safeguards	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electronic Periodical Technical Inspection (ePTI) of vehicles	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods for tackling odometer fraud	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring that safety- and environment-relevant software updates have been done, e.g., as a result of vehicle recalls	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory data exchange of roadworthiness certificate data to verify their validity during the re-registration of a vehicle in another EU Member State	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



New measures to enable a vehicle owner to obtain a valid roadworthiness certificate, to be accepted throughout the EU, in a Member State other than the Member State of registration of the vehicle	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to specifically tackle noise-related tampering / non-compliance problems in two- and three-wheelers and quads (L-category vehicles)	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. In your opinion, how important is it to include the following provisions in revising the EU rules on technical roadside inspections?

	Very important	Moderately important	Neutral	Low importance	Not important	No opinion /Do not know
Extending the rules to other vehicles, (e.g., light commercial vehicles, and passenger vehicles, including cars, powered two- and three-wheelers (N1, M1 and L-category vehicles)	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extended emission testing (e.g., NOx and PN), including the use of remote sensing equipment	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Follow-up in the Member States of registration in case of a prohibition or suspension abroad	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory checks during roadside inspections of commercial vehicles to ensure the safe securing of cargo	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Granting roadside inspection authorities access to electronic data	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extending (or clarifying) existing rules on access to in-vehicle data for the purpose of technical roadside inspections, with data protection safeguards	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to specifically tackle noise-related tampering / non-compliance	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

problems in vehicles inspected at the roadside						
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13. In your opinion, how important is it to include the following provisions in revising the EU rules on the registration documents for vehicles?

	Very important	Moderately important	Neutral	Low importance	Not important	No opinion / Do not know
Improved exchange of roadworthiness data between Member States in electronic format	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Full digitalisation of registration documents	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adding odometer data to the vehicle register	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adding data on major accidents of a vehicle to the vehicle register	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. Do you have any suggestions for new provisions to be included in the EU roadworthiness rules, other than the possible policy measures at questions 11 to 13 above? Maximum 1000 characters

1) Life time compliance

- There is a need to have a continued link between manufacturers, authorities, repair and maintenance market and vehicle owners throughout the lifecycle of the vehicle in order to ensure lifetime compliance of the emission and safety control systems. During type approval there should already be a strong and clear link to maintenance, in service conformity, market surveillance, PTI and enforcement authorities in order to have the complete lifecycle of the vehicle in scope. The Netherlands is also pushing for life time compliance in light of the soon to be published Euro 7 proposal;
- It would involve simple checks and test procedures developed at type approval level that may have a limited scope but will be appropriate for checking at PTI and road side inspections the applicable emission levels and safety control systems. The checks on the emission and safety control system should be made effective, i.e., robust, simple and stringent, throughout the lifetime of the vehicle. The PTI has a 100% coverage of vehicles in use and is in potential an effective instrument to monitor the performance of the emission and safety control system throughout its lifetime;
- Vehicles should not be allowed to be altered, throughout the lifetime of the vehicle, in a way that the original functioning of the emission and safety control system is decreased or changed. It should be easy to check any deviations or alterations during PTI or a road side inspection.


























2) Plume chasing within Roadside Inspections

- Consideration could be given to incorporating plume chasing checks as a roadside inspection. With plume chasing, the emissions are measured by a measuring car that follows the car to be checked on the road. By expanding the scope to other vehicles categories and to emissions and sound checks, sustainability, in addition to safety, will be given a fixed value within the roadside inspections.

## E: Impacts

15. How would you assess the likely impact of the following potential measures, if these were included in the EU rules?

	Fully positive	Somewhat positive	Neutral	Somewhat negative	Fully negative	No opinion / Do not know
Making more vehicles subject to periodic inspections	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Making more vehicles subject to roadside inspections	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Methods to test the functioning of safety-relevant electronic components, advanced driver assistance systems (ADAS) and automated functions	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods for measuring exhaust emissions, for example particle number (PN) and NOx measurements, during periodic inspections	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extending (or clarifying) existing rules on access to in-vehicle data for the purpose of periodic inspections and roadside inspection	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods for measuring exhaust emissions, for example particle number (PN) and NOx measurements, during roadside inspections, including the use of remote sensing equipment	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods to test vehicles with alternative powertrain technologies (hybrid, full-electric, hydrogen)	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods for reading out on-board data stored in the vehicles	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electronic Periodical Technical Inspection (ePTI) of vehicles	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New methods for tackling odometer fraud	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring that safety- and environment-relevant software updates have been done, e.g., as a result of vehicle recalls	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory exchange of roadworthiness certificate data to verify their validity during the re-registration of a vehicle in another EU Member State	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Follow-up in the Member States of registration in case of a prohibition or suspension abroad	X					
Mandatory checks during roadside inspections of commercial vehicles to ensure the safe securing of cargo	X					
Improved exchange of roadworthiness data between Member States in electronic format	X					
Full digitalisation of registration documents	X					
Adding data on major accidents of a vehicle to the vehicle register	X					

16. Do you have any comment on other potential impacts (not mentioned above) of the possible policy measures? Maximum 1000 characters

We believe that question 15 is not very well formulated. It is not specified what kind of impact is meant (e.g. related to costs, road safety, emissions) and it also not clear whether with impact something positive or negative is meant. We have now answered the question from a road safety and environmental perspective, but the feasibility of different policy measures (e.g. making more vehicle categories subject to technical inspections) is something that should be carefully examined.

## F: EU added value

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17. To what extent do you agree with following statements?

(For the purpose of answering some of the questions below, please note that EU “Regulations” are EU rules which are directly binding on Member States across the EU, whereas EU “Directives” are EU rules implemented through national laws. Currently, the EU rules on periodic testing, registration documents, and roadside inspections, are implemented through Directives.)

	Fully Agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	No Opinion
The objectives of the revision of the EU rules on roadworthiness could be better accomplished through deployment of non-legislative tools based on guidance or recommendations by the Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>

The objectives on periodic roadworthiness testing could be achieved better through a Regulation rather than a Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
The objectives on technical roadside inspections could be achieved better through a Regulation rather than a Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
The objectives on registration of documents could be achieved better through a Regulation rather than a Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
The EU rules on roadworthiness have added value for citizens and businesses, compared to what could be achieved by Member States at national and/or regional and international level	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



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## Section F: Final remarks

18. You may want to add further comments to the replies already provided (maximum 2000 characters):

The Netherlands welcomes the revision of the RWP which comes at a good time. Many new developments will have an impact on how we will test vehicles in the future. The General Safety Regulation outlines new safety features for vehicles. Furthermore, upcoming legislative developments such as Euro 7/VII and changes in RRR (Triple R) and End-of-Life Vehicles (ELV), show that this is an excellent timing to ensure lifetime compliance with a comprehensive testing and surveillance scheme for vehicles. Inspections need to be better adapted to potential tampering with safety or emission related systems. Finally, vehicle data and digitalization play an increasingly important role. The improvement of data exchange between the Member States (MS), the digitalization of registration documents and further harmonization of the re-registration process will most likely result in better transparency and prevention of fraud and reduce administrative burdens.

19. If you would like to attach a document to complement or to support your reply you can do so here (box to upload a document):

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

### Contact

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