

Position Paper on the Roadworthiness Package

Perspective of Automotive Mobility Europe, representing European Car Dealers and Repairers.

Short summary: *AME generally welcomes the proposed revision that allows national Periodic Technical Inspection (PTI) solutions to be maintained. AME's main position is that the PTI should help to increase road safety and benefit the environment. At the same time the PTI should remain affordable, cost-efficient, and reliable. Our recommendations to the European Commission focus on these conditions and will enable Member States to retain the flexibility to shape their national test systems.*

Background

With the Roadworthiness Package, the European Commission has proposed revisions to the rules governing the Periodic Technical Inspection (PTI) of vehicles. The purpose of the PTI is to prevent unsafe and unnecessarily polluting vehicles from using public roads. The PTI checks include the brakes, suspension, lighting and a number of emission-related issues. Regular, high-quality periodic inspections help ensure vehicles are in good technical condition.

The PTI system varies throughout the European Union. From independent inspection stations to workshops which will be in charge of carrying out the PTI tests. After the inspection, the workshop will repair any deficiencies which are identified during the inspection.

Opportunities

Maintain the different national PTI systems and preserve the freedom of Member States to design their own inspection frequencies. Keep the PTI affordable, cost-efficient, and reliable.

Risks and concerns

1. Disproportionate investments due to noise, NOX, ADAS and shock-absorber testing.
2. Extra annual emission inspection for N1 vehicles.
3. Including e-call in the PTI (2G and 3G).

Recommendations & Solutions

- Enable specialised PTI certification tracks.
- Continue recruitment efforts by recognising professional experience.
- Withdraw the proposal for a mandatory shock absorber test or allow Member States to decide whether to implement such a test themselves.
- Do not impose the use of a roller test bench for NOx testing. Measuring emissions during a roadside inspection would be more effective and practical.
- Extension of the recognition of technical inspections carried out in other Member States for light commercial vehicles.
- Preserve the freedom of Member States to design their own inspection frequencies.

- Member States must take measures to ensure vehicles actually undergo technical inspections.
- AME considers an additional separate annual emission inspection for N1 vehicles unnecessary. These emission checks should be integrated into the regular PTI rather than implemented as a separate yearly requirement.
- A roadside inspection is more effective in tackling noise pollution.
- Do not include the e-call in the PTI due to the 2G or 3G network switch off in the coming years.
- Avoid excessive complexity in inspections related to ADAS systems.
- Assess how a check, such as visual inspection complimented with an integration test via an in-vehicle integration point (OBD connector), can be incorporated into the current PTI. In addition, AME is in favour of a readout obligation for these non-switchable systems, if possible.

Conclusion

AME generally welcomes the proposed revision where both PTI-systems can be maintained. However, we would like to make several recommendations to further improve the proposed directive, with a view to road safety, affordability for consumers and the investments required from certified (independent) PTI stations.

About AME

Automotive Mobility Europe (AME) is a European alliance uniting national associations and European dealer councils representing the automotive distribution and mobility services sector. Our members include both authorised dealership networks and independent repairers, together forming a vital part of Europe's mobility ecosystem.