



# POLICY POSITION ON THE REVISION OF THE ROADWORTHINESS LEGISLATION

ENVIRONMENT

CONNECTING VEHICLES

SAFEGUARDING MOBILITY

ROAD SAFETY

## Our position

The FIA European Bureau welcomes the inception impact assessment report, published by the European Commission in October 2021, which lists excellent objectives and suggests important underlying principles that we fully support.

The revision of the roadworthiness package must effectively and efficiently deal with increased **safety requirements** as a first pillar arising from the General Safety Regulation. The introduction of Euro 7 and the 'Fit for 55 Package' drive the transition towards a **green and sustainable mobility** as a second pillar, which will require environmental performance monitoring, but shall also take the consumer principles and privacy rights into account. The third pillar, data handling, and **access to in-vehicle data, functions, and resources** by competent, independent service providers, shall be accommodated together with **vehicle security**, as data access and a high-level security over the vehicle's lifetime are not mutually exclusive. **Ensuring vehicles' lifetime compliance** within these three pillars is of paramount importance for the FIA, its Mobility Clubs, and their members.



We understand that vehicles become increasingly complex due to all these requirements; our request of lifetime compliance with approval requirements, among others by roadworthiness testing, should not lead to excessive costs for the citizens, be it as consumers or as taxpayers. Therefore, we urge the Commission to make sure that the revised roadworthiness package will preserve **affordability**, by minimising costly measures without compromising on safety, security, or environmental protection.

## Background

The EU Sustainable and Smart Mobility Strategy (SSMS) of 09 December 2020 calls, among others, for adjusting the EU Roadworthiness legislative framework, and for updating the legal package for technical progress. Objectives of the SSMS include ensuring lifetime compliance of vehicles with state-of-the-art emission and safety standards<sup>1</sup>. The Strategy also confirms commitment to implementing the 2017 Valetta Declaration on Road Safety<sup>2</sup> that calls for 50% reduction of casualties and serious injuries by 2030, and targets almost zero fatalities by 2050 (Vision Zero).

The Roadworthiness package consists of 3 acts that are fully applicable in the EU since 2018:

- Directive 2014/45/EU on Periodic roadworthiness tests for motor vehicles and their trailers ('PTI Directive')
- Directive 2014/46/EU amending Directive 1999/37/EC on registration documents of vehicles
- Directive 2014/47/EU on technical roadside inspection of the roadworthiness of commercial vehicles circulating in the EU ('RSI Directive')

The Commission started evaluating the provisions currently in force and, at the same time, is working on the revision of the package, starting with a first, public consultation in September 2021, and aiming to adopt a legislative proposal by mid-2023. The revision of the package follows the ordinary legal procedure (Codecision).

## Roadworthiness basics

The Roadworthiness package must fit the related needs of the individual Member States to keep well-functioning testing frameworks, and to improve less-effective ones. It is of high importance that a good coordination between type-approval and the roadworthiness package is considered and made consistent. In face of new, sophisticated technology, attention should be paid to the basic principles: the testing during the life cycle of a vehicle should be relatively simple, quick, and inexpensive, whilst effective in achieving the objectives of the Directive.

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<sup>1</sup> Flagship 1, action 7 of the SSMS commits to improve emissions testing in roadworthiness checks. Flagship 9, action 66 assesses the need for a proposal to require efficient exchange of odometer readings across the EU.

<sup>2</sup> <https://eumos.eu/valletta-declaration-improving-road-safety/>



Implementation of Regulation (EU) 2019/621 on electronic Periodic Technical Inspection (ePTI) seems to be more difficult than expected; revising the provisions of this regulation and integrating more precise provisions into the upcoming roadworthiness directive should be considered.

This paper outlines some recommendations ahead of the revision of the Roadworthiness package, focussing mainly on Periodical Technical Inspection (PTI).

## **Requests and recommendations ahead of the Roadworthiness package revision**

### **Minimise costs for citizens**

There are many new requirements in type-approval with respect to vehicle safety, security, and environmental performance; there are even more measures that can be anticipated to be part of forthcoming Commission proposals, such as those regarding automated driving, connectivity, and collaborative, intelligent transport systems (ITS). There is a high risk that monitoring and maintaining all these new systems and functionalities will lead to an increase of costs for European citizens, be it as consumer or as taxpayer. We urge the Commission to ensure that all new measures being envisaged as part of the revision of the Roadworthiness package will have minimal cost implications for the citizens. Mobility should remain accessible and affordable, and any new measures must be proportionate and cost-effective for citizens.

### **Enhance environmental performance monitoring and testing**

The new roadworthiness package must replace the currently applied methodology to measure Particle Mass (the opacity test) with Particle Number (PN) counting for all vehicle types. Also, with respect to NO<sub>x</sub> testing, we would like to propose a simple and inexpensive methodology that is based on continuous in-vehicle NO<sub>x</sub> monitoring, as well as diagnostics of the measurement device (on-board NO<sub>x</sub> sensor) and associated control system. During roadworthiness testing, the integrity of the on-board NO<sub>x</sub> control system, as well as the correct operation of the NO<sub>x</sub> sensor, shall be verified. NO<sub>x</sub> testing based on higher internal connection of existing in-vehicle collected information (type-approval relevant), and a periodical test of the NO<sub>x</sub> sensor will guarantee a lifetime NO<sub>x</sub> compliance with regulatory requirements, without the need for test stations to invest in very expensive test equipment, such as chassis dynamometers. Emission-related defects, and manipulations, can be easily detected by using the full functionality of Onboard Diagnostics (OBD) as a standard testing method and, possibly, by further introduction of Onboard Monitoring (OBM) functionalities foreseen in Euro 7 emission legislation; this would help avoiding the introduction of unnecessary expensive testing methods.



## **Increase vehicle safety**

The General Safety Regulation (EU) 2019/2144 mandates many new safety features, among them several Advanced Driver Assistance Systems (ADAS). The Commission must ensure consistency between type-approval and future roadworthiness requirements, allowing for these mandatory systems to be checked and remain effective and efficient over the lifetime of the vehicle; these checks should be limited to the vehicle's self-diagnosis and some simple tests using external measurement equipment when the vehicle is stationary: no test bench measurements or test drives need be conducted. For this purpose, it is critical that authorized access to in-vehicle data and functions remains possible for PTI stations and inspection bodies.

## **Consider dedicated requirements for electric- and hybrid-vehicles**

To guarantee electrical safety of battery-electric, hybrid, plug-in hybrid, and fuel cell vehicles, high-voltage components must be regularly inspected, and this requirement must be added to Annex I of the relevant directives. OBD diagnosis is the appropriate testing method for a wide range of safety relevant high-voltage components.

## **Ensure integral security, and access to in-vehicle data and functions**

The relevant diagnostic data and functions must be made accessible for the inspection bodies free of charge. these inspection bodies must also be able to access the in-vehicle data streams directly, without restrictions or blocking mechanisms put in place by the vehicle manufacturers.

Consumers should be in control of all non-mandatory data and empowered to give/withdraw consent and optin / opt-out at any time. FIA believes that the delicate balance between the highest level of security over the vehicle's lifetime, and access to in-vehicle data and functions for authorised parties, can be achieved through the Secure OnBoard Telematics Platform (S-OTP) <sup>3</sup>

## **Protect against local and near-by security risks at the source**

FIA and its Mobility Clubs have been highlighting for already over a decade that the root cause of odometer system manipulation, leading to mileage fraud, is the absence of state-of-the-art type-approval requirements for local and nearby security, and their effective enforcement. We believe that rather than trying to address these problems in roadworthiness legislation, type approval legislation and its enforcement must be strengthened.

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<sup>3</sup> [https://www.fiaregion1.com/wp-content/uploads/2020/06/20200615\\_FIA\\_vehicle\\_security\\_report.pdf](https://www.fiaregion1.com/wp-content/uploads/2020/06/20200615_FIA_vehicle_security_report.pdf)



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### **Fédération Internationale de l'Automobile (FIA) European Bureau**

The FIA European Bureau, based in Brussels, is a consumer body comprising 101 Mobility Clubs that represent over 36 million members from across Europe, the Middle East and Africa. The FIA represents the interests of our members as motorists, riders, pedestrians, and passengers. We work to ensure safe, affordable, clean, and efficient mobility for all. Learn more at [www.fiaregion1.com](http://www.fiaregion1.com).

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