



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT

Directorate C - Land
C.2 - Road safety

Brussels,
MOVE, C.2

4th MEETING OF THE EXPERT GROUP on ROADWORTHINESS AND VEHICLE REGISTRATION DOCUMENTS (RWEg)

MINUTES

Date: 11 February 2022

Time: 10:00 – 13:00

Venue: Videoconferencing

The meeting was chaired by the Head of Unit for Road Safety in DG MOVE, Ms. Claire Depré (there after referred to as “Chairwoman”) assisted by Mr. Philipp Troppmann and Mr Sylvester Carruth who are currently in charge of the roadworthiness files. Ms Vesna Valant, Deputy Head of Unit as well as Mr. Peter Szatmari, due to take over from Mr Troppmann also assisted to the meeting.

Participants: see attached list.

1. WELCOME & ADOPTION OF THE AGENDA

The Chairwoman welcomed all the participants. The draft agenda circulated prior to the meeting and was adopted without any changes.

2. ADOPTION OF THE MINUTES OF THE EXPERT GROUP MEETING OF 8 JULY 2021

The Commission proposed a further one week for participants to make comments on the draft minutes of the last meeting of RWEg held on 08.07.2021.

3. EMISSION MEASUREMENT FOR THE TECHNICAL INSPECTION OF VEHICLES

- i. PN-testing: Draft proposal for a guidance document

Prior to the discussion on the Draft Guidance Paper, the Commission (JRC) presented the recommendation for Particle Number measurement. The presentation touched upon the scope of vehicle concerned, the proposed regulatory limit for a pass/not passed test, a description of

PN-PTI instruments, the metrological requirements, the initial and subsequent verifications, and the measurement procedure. The presentation ended with a summary of the open points.

ii. Views & positions by Member States

The Commission invited participants to ask questions on the presentation. **SE** asked whether research focused on reference fuels only or also mix of fuels (with non-fossil additives). The Commission (JRC) replied test were carried out only on commercial fuels, which is also the case for the majority of type-approval tests. **CITA** sought further clarifications on the purpose of the document, namely whether it will take the form of guidelines or a recommendation. The Commission replied that, at the current stage, the document's objective is to reach a common understanding on PN measurements aiming at a harmonized approach across the European Union. The aim of the meeting is to provide Member States' experts with all necessary technical details and to provide transparency. The final form of the document is yet to be defined, without prejudice to the fact that Member States can use it on a voluntary basis. How the document is to be considered in the context of the roadworthiness package's revision is to be discussed at a later stage. **NL** communicated that more time is needed to analyse the document and provide comments on it, and NL will revert in written form. **CITA** drew attention to the fact that NL and DE already published proposals on PN measurements and invited the Commission to take into consideration potential consequences on these two MSs, such as non-compliance with the requirements of the Draft Guidance Paper in the coming years. The Commission reminded the Group that it is fully voluntary for Member States to introduce this testing (or not) and that the document is addressed primarily towards those Member States that are currently considering the introduction of particle measurements. The document also aims at being as compatible as possible with the decisions already taken by Member States. **DE** stated that the document should not be mandatory initially. DE is introducing PN measurement from 2023 for Euro6 and higher and it will replace the opacimeter measurement. DE understood that the Commission was inspired by the German approach in principle, and stated that research shows that this approach is suitable to identify defects or a removed DPF. With regards to the technical and metrological requirements such as the measurement procedure, DE is ready to comment and amend the guidance paper in detail by the end of the forthcoming week. In this respect, DE asked whether the guidance paper takes into account Directive 2014/32/EU on measurement instruments¹ or whether it should be brought into line with it.

The Commission then invited participants to comment the Draft Guidance Paper section by section.

On sections 1 "Scope" and 2 "Terms and Definitions", **SE** said that opacity measurement is not suitable for newer vehicles, asked whether it is possible to expand the scope of PN measurements to Euro4 vehicles and to apply OBD without complying with the conditions

¹ Consolidated text: Directive 2014/32/EU of the European Parliament and of the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of measuring instruments (recast) (Text with EEA relevance) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014L0032-20150127>

laid out in the Annex to Regulation (EU) 2018/858. **SE** added that it welcomes the correlation with the type-approval legislation. **ES** suggested that there are two options to define the scope: either referring to vehicle categories as per the type-approval Regulation² or to those defined categories in the emission regulations³, depending on the work already done by JRC. **AT** agreed with **SE**'s comment on extending the scope to older vehicles and with **ES**'s comment on the type-approval Regulation being taken as a reference for vehicle categories. **CITA** communicated their intention to analyse the document in details and to send their comment in written form, supported **ES**'s comment on defining the scope according to M and N categories and Euro type. With regards to the definitions, **CITA** suggested adding a definition for "volatile particle remover". **EGEA** commented on the counting efficiency definition and supported the definition, adding their intention to provide comments in written form in the following days.

The Commission replied that the classification of type-approval legislation was used for the proposed scope and that the scope extension to all vehicles and Euro4 is excluded because there would not be a sufficiently strong legal basis (noting that PN measurement was introduced for Euro5C). In the absence of a link with the type-approval legislation, there would not be sufficient legal basis to make a pass/non pass decision after a PTI. The Commission added that the revised roadworthiness package will presumably be applicable in Member States in 4 or 5 years from now and that this is the reason for this intermediate solution in terms of guidance paper or recommendation.

Participants did not comment on sections 3 "Description of the instrument and inscription", 4 "Metrological requirements", and 5 "Technical requirements" of the Draft Guidance Paper.

On section 6 "Metrological controls", **AT** asked for further clarification on the term "traceable authority", asked whether measurement devices should be type-approved by an NMI, and if such type-approve device is valid in all EU Member States, asked whether this validation follows European or national regulation; and proposed to add "workshops of manufacturers" to "in the premises of the manufacturer" under the section on subsequent validation. The Commission will revert on the clarification of the term "traceable authority", and agreed on an amendment to the recommendation. **CITA** expressed concerns on the costs of subsequent verification noting that it is quite expensive on site and that an interval of 800h means more than twice a year. **CITA** suggested to start with one verification a year and, depending on the outcome, set a different frequency where needed.

On section 7 "Measurement procedure", **CITA**, expressed concerns on the 1 minute period of PN concentration emissions measurement, since some vehicles (such as Renault) close their EGR valve after 45 second, which would cause a change in the test results. **CITA** suggested

² Consolidated text: Regulation (EU) 2018/858 of the European Parliament and of the Council of 30 May 2018 on the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles, amending Regulations (EC) No 715/2007 and (EC) No 595/2009 and repealing Directive 2007/46/EC (Text with EEA relevance)Text with EEA relevance <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02018R0858-20210926>

³ https://ec.europa.eu/growth/sectors/automotive-industry/environmental-protection/emissions-automotive-sector_en

either to avoid snap acceleration or to have an acceleration shorter than 45 sec. The Commission will take into consideration the comment.

The Chairwoman asked if participants had further comments on the limits, taking into account those already received by DE. CITA supported the proposed limits. No other Member State commented.

The Commission invited participants to provide feedback on the Draft Guideline Paper within a period of 10 working days.

iii. NOx-testing: Latest update on ongoing works

The Commission (JRC) provided participants with an overview on the progress on NOx measurements during 2021. Different approaches, aimed at different objectives, are currently under assessment: Short loaded/unloaded tests, SEMS monitoring (continuous/spot), Hot idling test (unloaded), Plume chasing and OBM/vehicles sensors. Different stakeholders were consulted in the last months of 2021 and additional feedback is welcome.

NL noted that NOx issues often involve fraud and that the PTI is hardly a solution. CITA said that their own assessment would be complete in two to four weeks, and will be made available to the Commission as well as to interested Member States and stakeholders. The Commission replied that indeed NOx fraud is a complex issue and that it requires more complex solutions.

4. REVISION OF THE ROADWORTHINESS PACKAGE

i. State of play & summary of the public feedback received on the IIA⁴

The Commission gave an update on the status of work. The tender for the study for the back-to-back evaluation and impact assessment has been published and the closing date is on March 15. Two of the preselected contractors have signalled their interest to bid. The membership of the evaluation committee is in place and the evaluation will be completed as quickly as possible, taking into account the complexity of the files made of three Directives in a back-to-back format.

ii. IIA feedback, and Presentation of a draft scoping paper on items for RWP revision

The commission presented the analysis of public feedback on the Inception Impact Assessment by explaining the statistics on user type, country of origin and outlining the analysis methodology. The Commission provided an overview on the main points that arose in the public feedback under the three main objectives of the revision: Road Safety, Data Exchange & Handling, and Green & Sustainable Mobility and informed participants that all input was duly considered in the drafting process of the scoping paper.

⁴ Inception Impact Assessment, see also https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13132-Vehicle-safety-revising-the-EU%E2%80%99s-roadworthiness-package_en

iii. Views & positions by Member States

The Commission services highlighted that the Draft Scoping Paper represents an indicative starting point, not prejudging future Commission positions. The document therefore aims at stimulating debate and it will be still subject to changes. The Draft Scoping Paper includes possible new dimensions and extensions of existing provisions. The Commission invited participants to comment on the document, one Directive at a time.

On Periodic Technical Inspections (Directive 2014/45/EU), **DE** asked for an assessment of the nature of the legal act (i.e. Directive or Regulation) considering the current limitations as regards EU harmonisation and mutual recognition. **SE** referred to the need to address the new requirements of Regulation 2019/621⁵, such as eCall. **SE** also favoured an assessment of the legal nature of the future legislation for its implications on mutual recognition as did **DE**. Finally, **SE** raised the issue of how to deal with vehicles that are no longer in conformity with their type approval. **CITA** asked, from a procedural point of view, to merge the discussion on the topic of Annex I of Directive 2014/45/EU (referring to methods of testing and reason for failure) and of Regulation 2019/621 (the implementing regulation), otherwise it is unclear how to structure the inspection. The Commission noted the need expressed by **SE** and also informed participants that DG GROW and DG CNECT are working on the implementing legislation on eCall and proposed to invite them to the next expert group meeting. The Commission also referred to the eCall implementation platform. **ACEA** agreed with **CITA**'s comment on implementing measures. **CITA** commented on the nature of the legal act, arguing that a Directive is best suited for this package because it best addresses the different systems, education of inspectors, and scopes within each Member State. Secondly, a Directive allows Member States to develop new technologies and improve the PTI system. The Commission stated that it is important to measure all impacts of the decision of the nature of the legal act. **EUCARIS** shared that they have already defined an electronic format for data exchange and that this can be used as a starting point. **FI** referred to extending the scope to 2 and 3 wheeled vehicles pointing out that it is a sensitive e topic in **FI** and a source for ongoing discussion. **ACEA** said that they will be happy to provide an update on progress on ISO 20730 (vehicle interface for ePTI) at the next opportunity and on how the work activity of this group can be accelerated in this regard. **FIA** expressed support for a Directive to implement PTI provisions to address all the needs of different Member States. **FSD Zentrale Stelle** said that they have in general a problem with data delivery by the OEM. This is not a special issue for eCall but applies both for technical information and for software.

On Directive 2014/47/EU), **SE** raised the need to harmonise further, since some vehicles coming from other countries have different PTI requirements and make the system sometimes dysfunctional. The Commission argued that an increased degree of harmonisation is important to citizens in that nowadays they are obliged to return to their home countries for PTI and often must respect requirements that are stricter in some countries than in others. The Commission invited experts to refer to measures that have become obsolete.

⁵ Commission Implementing Regulation (EU) 2019/621 of 17 April 2019 on the technical information necessary for roadworthiness testing of the items to be tested, on the use of the recommended test methods, and establishing detailed rules concerning the data format and the procedures for accessing the relevant technical information (Text with EEA relevance.) <https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ%3AL%3A2019%3A108%3ATOC&uri=uriserv%3AOJ.L.2019.108.01.0005.01.ENG>

On vehicle registration documents (Directive 1997/37/EC), **EUCARIS** shared their support to the Commission's proposal to have national registers and exchange data between them instead of building one central register. **CITA** said that documents for registration need to include reference to the expiration of the type approval to which they refer, since the document may be issued on a given date and the registration of the vehicle may arrive later. Secondly, CITA suggested combining the information defined in the Regulation 2019/621 with the information during the registration process. **DE** welcomed the initiative on the digitalisation of documents. On electronic storage, in DE there is already legislation in this regard and the data is stored in the German national vehicle register. German authorities are able to provide other Member States with this data but it should be regulated as by whom, when and under which conditions requested data can be exchanged. Secondly, on new data to be included in the register (such as odometer data), DE is in principle able to provide those data. Third, it is not always clear what the Commission means by the term "major accident". If this point is to be introduced into the legislation, there is a need to define what a major damage is, who determines the existence of it, and who is responsible for communicating it to the national register. Fourth, on vehicle status, Germany can determine whether the vehicle is registered or deregistered. On End of Life, suspension, export or destruction, these statuses need to be better defined. Especially on End of Life there is a need for the connection to a database and to better explain the recycling certificates. DE's proposal is to create such a register and implement it in the existing vehicle register. Fifth, on digitalisation of documents, German citizens can already register their vehicles online, but a paper document must still be sent to the citizen. Germany would welcome the possibility to introduce only a digital document. To this end, there are two main possibilities: either they are issued by local authority, similar to what happens already for paper documents, or they are issued using the central data register. Germany would prefer the second option. The Commission (DG MOVE) said that it is closely working with DG ENV on End of Life vehicles. On how to treat the digital documents issues, the Commission stated that first it must be agreed upon whether to move in that direction, and afterwards implementation options will be discussed. **EUMOS** is open to share their own experience on document digitalisation and how these are shared along the supply chain. Their suggestions is to first introduce a simple and working solution rather than aiming at the perfection of the system. **NL** said that registration documents and driving licences are already available in digital form, accessible from a mobile device. If there is interest, NL can organise a demonstration. The Commission said that this issue will be examined. The Commission said that similar work is ongoing for the digitalisation of driving licences (in conjunction with the work on European digital identities (eIDAS), which can benefit the discussion around roadworthiness as well. **EUCARIS** indicated their support for the vehicle registration data to be part of the revision. **EUCARIS** hoped that the work done on harmonisation and data quality in the past 20 years by **EUCARIS** and **EReg** will be taken into account. **DE** said that Germany received informant from the Commission according to which EU law would not allow the member states to introduce digital documents as an alternative to paper documents, even if restricted only to national (e.g. German) territory. In addition, this expert group focuses on PTI but appears set to start working on vehicle documents and registration rules. Germany proposed to dedicate sufficient time to discuss vehicle documents and registration.

The Commission will consider the setting up of dedicated meetings on vehicle documents and registration, PTI and RSI to enable deeper exchanges on key issues related each of the three Directives.

The Commission invited participants to provide feedback on the Draft Scoping Paper within 10 working day time.

5. ANY OTHER BUSINESS

The Commission updated participants on the ongoing work on in-vehicle data within the Commission. New legislation called the “Data Act” is in preparation in DG CNECT and it is relevant in that it governs data access in B2G relationships, with possible implications for roadworthiness testing. The legislative proposal is expected to be adopted by the Commission until the end of the month.

The same topic is under consideration in DG GROW in the context of the type-approval legislation. A call for evidence enabling stakeholders to provide feedback on the Commission intended measure will be published on the Commission “Have You Say Portal”, in the coming weeks. Participants are invited to make use of this opportunity.

Mr. Philipp Troppmann announced that he is leaving the Unit and thanked all participants for the fruitful interactions. Mr. Peter Szatmari, who will take over from Mr Troppmann, introduced himself to the expert group.

6. NEXT STEPS

The Commission invited Member States to provide comments in the next 10 working days on PN Draft Guidance Paper as well as on the Draft Scoping Paper. The Commission will circulate “save the date” notification for the next meeting and will look at revising the documents based on the discussion today and comments to be received.

List of Participants

1. Member States (Type D Members)

BELGIQUE/BELGIË (BE) (Belgium)	Departement Mobiliteit en Openbare Werken Service public régional de Bruxelles
БЪЛГАРИЯ (BG) (Bulgaria)	Executive Agency “Automobile Administration” under Ministry of Transport, Information Technology and Communications
ČESKO (Czechia)	Ministry of Transport
DEUTSCHLAND (DE) (Germany)	Federal Ministry of Transport and Digital Infrastructure Bundesanstalt für Straßenwesen (BASt)
EESTI (EE) (Estonia)	Estonian Road Administration - Technical Department
ÉIRE/IRELAND (IE) (Ireland)	Road Safety Authority
ΕΛΛΑΔΑ (Greece)	Ministry of Infrastructure and Transport
ESPAÑA (ES) (Spain)	Spanish Ministry of Industry, Trade and Tourism
FRANCE (FR) (France)	Ministère de la Transition écologique et solidaire
HRVATSKA (HR) (Croatia)	Center for Vehicles of Croatia Ministry of Interior
ITALIA (IT) (Italy)	Ministry of Infrastructure and Transport
LATVIJA (LV) (Latvia)	Road Traffic Safety Directorate
LIETUVA (LT) (Lithuania)	Permanent Representation of Lithuania
LUXEMBOURG (LU) (Luxembourg)	Ministère de la Mobilité et des Travaux publics - Département de la Mobilité et des Transports
MAGYARORSZÁG (Hungary)	Ministry for Innovation and Technology
NEDERLAND (NL) (Netherlands)	RDW
ÖSTERREICH (AT) (Austria)	Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology

POLSKA (PL) (Poland)	Regional Inspectorate for Road Transport in Bydgoszcz Ministry of Infrastructure - Unit for Control Stations and Special Carriage
ROMÂNIA (RO) (Romania)	Directorate Driving Licenses' Regime and Registration of Vehicles State Inspectorate for Control in Road Transport
SLOVENSKO (SK) (Slovakia)	Ministry of Transport and Construction of the Slovak Republic, State Transport Office S-EKA - Technical services of emission control TESTEK – Technical servise for technical inspection
SUOMI/FINLAND (FI) (Finland)	Finnish Transport and Communications Agency
SVERIGE (SE) (Sweden)	Swedish Transport Agency

2. Organizations (Type C Members)

EGEA	EGEA European Garage Equipment Association
CITA	International Motor Vehicle Inspection Committee
EUCARIS	European car and Driving Licence Information System
ACEA	European Automobile Manufacturers Association
ETRMA	European Tyre & Rubber Manufacturers Association
EUMOS	European Safe Logistics Association
FIA	Fédération Internationale de l'Automobile
ATVEA	All Terrain Vehicle Industry European Association
CEMA	European Agricultural Machinery Organization
CORTE	Confederation of Organisations in Road Transport Enforcement

3. Observers

ÍSLAND (Iceland)	ICETRA
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NOREG/NORGE (Norway)	The Norwegian Public Roads Administration
SUISSE/SVIZZERA/SCHWEIZ (Switzerland)	Eidgenössisches Departement für Umwelt, Verkehr, Energie und Kommunikation UVEK, Bundesamt für Strassen ASTRA
FSD	FSD Zentrale Stelle