

Datum
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Swedish comments for the development of Directive 2014/47/EU

- PN measurement for LDV and HDV vehicles, as from Euro 5/V – diesel
SE- in favour to include the possibility to perform a roadside inspection of vehicles emission system functionality by means of PN measurement with portable equipment as soon as such equipment and method are developed, reliable and reasonably simple and fast. The equipment performance should be standardised. Method and threshold values should be harmonised, inclusion of the PN measurement in roadside inspection should be agreed among member states and introduced in the mandatory inspection scheme.
- NOx measurement by remote sensing equipment
SE- in favour to include the possibility to perform NOx measurement under the same condition as for PN-measurements and it should be agreed by member states and introduced in the mandatory inspection scheme.
The use of remote sensing and other non portable measurement system can be used for fleet monitoring, campaigns etc but not for inclusion in the mandatory inspection scheme under the directive 2014/47.
- Software status / integrity of safety- or emission relevant systems
SE- does not see the urgency or cost benefit to include inspection of software status. The basic view is that versions of vehicle systems, including software, which was accepted at the time of the type approval is valid through vehicle lifetime with the exemptions of updates that are deemed necessary after recall activities from manufacturer and reported in the Rapex system or in the case were tampering of emission systems are suspected.
- Other? BE: Plume chasing, Reading of board computer
SE- welcomes the possibility to perform emission inspection through other means on voluntary basis but not included in the 2014/47/EU. Readout of codes cannot be included in the directive until agreed common principles are established regarding how the readout should be done, which system to test and which codes of malfunction to take into consideration.

- Introduce new test methods for RSI based on ePTI, Use cases/Scope, Technical requirements
SE- is positive to include inspection of electronic system by means of verifying status of the monitoring systems, the vehicle self-check function, in system were such functionality exist. We cannot see the benefit of inspecting electronic systems and verifying functionality on a deeper level due to the complexity and unpredictable function of electronic system. Critical and important systems must be monitored all the driving time and periodic or roadside inspection are insufficient to guarantee road safety depending on complex electronic systems. To further enhance road safety it is recommended that monitoring systems are subject to further development of technical requirements at type approval level.
- Increasingly enable and use independent remote access (also type approval relevant)
SE- more information is needed, no position at this time.
- Cargo securing inspections to be carried out on the basis of harmonised principles, binding standards
SE- harmonised legislation regarding cargo securing should be developed. Introduction of requirement through inspection at roadside, as is today is not efficient. Some standards impose a lower level of safety compared to our previous national level. Difficult to know which standard is used and then to know against which standard to do the inspection. Availability of certain standards and uncertainty of what in the standard is legal requirement has led to an uncertain juridical situation.
- Extend the scope of application to N1 vehicles, M1 vehicles Motorhomes, 2- and 3-wheeled vehicles <125cm³? 50-125cm³
SE- positive to the inclusion of these categories but without quantitative requirements.
- electric vehicles should be included as well
SE- our interpretation is that electric vehicles are already included.
- micro mobility
SE- Our opinion is that more information is needed. These vehicles are not approved according harmonised technical requirement which mean that the requirement and test criteria are difficult to define at this moment.
- Improve test methods for RSI

SE- more information is needed to better understand which tests must be improved. Our general position in this matter is that requirements should be functional, harmonised and limited to a smaller number of inspections. Methods for inspections developed at the discretion of enforcement authorities or in a voluntary cooperation between member state authorities.

- **Noise**
SE- noise tests are difficult to perform in the roadside inspection due to a variety of reason, nearby traffic is one. Today assessment is instead based on the question if the equipment is altered or tampered with.
- **Empty vehicles – no braking test**
SE- our position is that empty vehicles are not imposing that big difficulty due to the requirement of load simulation equipment in permanent inspection sites. Mobile equipment for light duty vehicles has no load simulation but usually they have no problem due to low friction.
- **Electronic safety systems**
SE- we are positive to include inspection of electronic system by means of verifying status of the monitoring systems, the vehicle self-check function, in system were such functionality exist. We cannot see the benefit of inspecting electronic systems and verifying functionality on a deeper level due to the complexity and unpredictable function of electronic system. Critical and important systems must be monitored all the driving time and periodic or roadside inspection are insufficient to guarantee road safety depending on complex electronic systems. To further enhance road safety it is recommended that monitoring systems are subject to further development of technical requirements at type approval level.
- **Electronic storage and exchange of RSI-information on dangerous deficiencies detected, or on deficiencies resulting in a restriction or prohibition on the use the vehicle, including information on follow-up action taken by the MS of registration.**
SE- supports the inclusion of such information in the information exchange system

Electronic storage of roadside inspection reports in national databases and granting electronic access to RSI-relevant data to RSI authorities in other EU MS, by means of interlinking national databases.

SE- Results of inspections are reported to a data system and today this system has no access for other member states. The need for such functionality was not foreseen. A feasible solution would be to report results to an EU common database from which member states could collect information.

Improve administrative processes.

Handling prohibitions/suspensions. Self-cancelling prohibitions following PTI

SE- There are benefits to knowing remarks from previous inspections but more information is needed, no position at this time.

- New point, forum for interpretation

SE- It should be considered to introduce an EU Forum for interpretation of requirement in the time between revisions of the Roadworthiness packages.

Example: Interpretation of art 14. Is it good practice to apply point 1 and last sentence of point 3 at the same time? (Meaning vehicle must be repaired before continuing and also send report to registration member state requesting that same vehicle has to undergo a periodic inspection)