

Position paper on Roadworthiness Package

**European Garage Equipment
Association**

EGEA's Position Paper on the EU Roadworthiness Package

Introduction

EGEA supports the Council's objective of ensuring that the revised **Roadworthiness Package** aims to guarantee technical roadside inspection can be implemented effectively across all Member States.

Implementation must be **realistic, technically sound and proportionate**. However, **flexibility** and extended transition periods **should not be used where the relevant technology is already mature, commercially available and successfully operating** in several European markets.

The negotiations provide an opportunity to establish a framework that **strengthens road safety and emissions enforcement** while giving inspection authorities, testing centres and equipment manufacturers the regulatory certainty needed to invest. In several key areas, such as particle-number testing, remote sensing and motorcycle inspections, **the Council's position risks maintaining enforcement gaps** that are no longer technically justified.

Main points of concern

1. Particle-number testing: a four-year delay is unnecessary

Why it matters: Traditional tests are not enough

Traditional opacity testing is no longer capable of assessing particulate emissions from many modern diesel vehicles. Vehicles equipped with defective, removed or **manipulated diesel particulate filters may still pass an opacity test**. Continuing to rely on this method therefore creates the appearance of emissions control without providing an effective means of identifying high-emitting vehicles.

Particle number (PN) testing addresses this deficiency through an exhaust physical measurement at the exhaust system. It is already in **operational use in Germany, Belgium and the Netherlands**. The results obtained in Belgium also demonstrate the effectiveness of the method: following the introduction of particle-number testing, the **failure rate for Euro 5a vehicles reportedly fell from 19.73% to 7.77%** over just 3 years. This indicates that the inspection requirement is changing vehicle-owner behaviour, encouraging repairs and reducing the number of vehicles operating with defective or manipulated particulate filters.

Against this background, **a general four-year implementation period (as established in article 9a of the Council's position) would unnecessarily postpone measurable air-quality and public-health benefits**. The final legislation should distinguish clearly between particle number (PN) and nitrogen oxide (NOx) testing.

We understand additional technical development may still be required for fully harmonised NOx procedures, operating conditions and limit values. Nonetheless, that work should not delay the introduction of particle-number testing, for which **sufficient operational experience already exists**.

The Council should therefore support mandatory **PN testing under a substantially accelerated timetable**. Member States that have already introduced the method should be able to continue

applying it, while the remaining Member States should be required to implement harmonised testing without an unjustified four-year delay.

OUR REQUEST TO THE COUNCIL

The Council should therefore support mandatory **PN testing under a substantially accelerated timetable**. Member States that have already introduced the method should be able to continue applying it, while the remaining Member States should be required to implement harmonised testing without an **unjustified four-year delay**.

2. OBD cannot replace a physical tailpipe measurement

Why it matters: OBD measurement is not suitable to detect all emissions

On-board diagnostics (OBD) can provide useful information, but they cannot be treated as a substitute for measuring the emissions produced by the vehicle. ASA data indicate that OBD checks fail to identify **89.5% of highly polluting vehicles detected** in Germany and 96.7% of those detected in Belgium.

Reliance on OBD alone **would leave authorities dependent on data generated by the vehicle** and its electronic systems. It would also increase the risk that deterioration, removal or deliberate manipulation of emissions-control equipment remains undetected. Following the experience of Dieseldgate, the Union should not establish a regulatory system that again relies primarily on information produced internally by the vehicle.

This is why we believe a modern inspection system requires independent verification. **The combination of OBD information and a physical exhaust measurement provide a stronger safeguard** against what could otherwise become a second Dieseldgate.

The **Council's mandate points in the same direction**: where a vehicle is suspected of being a high emitter, recital 28b provides that verification, at the roadside or in an inspection centre, follows physical test methods (PN measurement, opacity or the new NOx method, and a sound level meter for noise) rather than relying on information generated by the vehicle.

OUR REQUEST TO THE COUNCIL

We therefore ask the **Council to follow this correct approach and maintain a combination of OBD and physical measurement**.

3. Making efficiency testing of damping and suspension mandatory

Making the **efficiency testing of damping a mandatory requirement**, as proposed by the European Commission, would significantly strengthen the effectiveness and consistency of periodic technical inspections across the EU.

Requiring an **objective measurement of suspension performance** would therefore provide a more reliable indication of the vehicle's actual status and would help **identify safety-relevant deterioration** that may otherwise remain undetected through simple visual tests. To preserve

technological neutrality, we support the Commission's proposal to allow the use of either left/right comparison methods or measurements based on the oscillation or damping behaviour of the vehicle.

Removing the (X)² designation from point 5.3.2.1 of Annex I would therefore ensure that damping efficiency becomes a mandatory part of the EU minimum inspection requirements, while preserving sufficient **flexibility for technical innovation and national implementation**.

OUR REQUEST TO THE COUNCIL

Remove the (X)² designation from point 5.3.2.1 of Annex I, so that damping efficiency becomes part of the EU minimum inspection requirements.

4. Remote sensing should be maintained as a common European requirement

The Council's mandate already recognises the **value of remote sensing**. It states that experience in some Member States shows that detection rates increase significantly compared with conventional testing methods, and that the technology can be used systematically to screen large shares of the vehicle fleet in real on-road conditions.

Why it matters: a mature technology that can facilitate harmonisation between Member States

Remote sensing does not replace periodic technical inspection. It provides a complementary enforcement layer by screening vehicles on the road and referring suspicious or high-emitting vehicles for targeted inspection. Its principal value lies in determining whether a vehicle's emissions performance during an inspection corresponds to its actual performance in normal traffic.

This is particularly important where emissions-control systems have been configured to function correctly only during an inspection. Manipulation involving selective catalytic reduction systems or AdBlue can be difficult to detect **when the vehicle is tested under predictable conditions**. Mandatory remote sensing provides an independent in-use check and allows authorities to target enforcement resources efficiently.

EGEA believes implementation can be progressive, based on common technical standards, pilot phases and appropriate data-protection safeguards. However, we encourage the Council to make full use of these tools, so that remote-sensing data are comparable across Member States.

OUR REQUEST TO THE COUNCIL

Maintain **remote sensing as a common European requirement** and make full use of the tools already in the Council's mandate so that remote-sensing data are comparable across Member States.

Who are we?

The European Garage Equipment Association (EGEA) is **formed by 11 national professional associations and 2 companies representing the interests of both manufacturers and importers of garage equipment**. Our mission is to empower our associations' members to lead the automotive aftermarket by delivering **best-in-class equipment and services**.

We keep our members ahead of emerging vehicle technologies, legislation, and standardisation requirements, helping them remain competitive in the garage and test equipment supply, servicing, and calibration sectors **while enabling their customers to benefit from the highest standards of safety and protection** on the road.