

Position paper on Roadworthiness Package

European Garage Equipment
Association

Position Paper on the EU Roadworthiness Package

Introduction

EGEA welcomes the European Parliament's support for **mandatory remote sensing, the inclusion of motorcycles** in periodic roadworthiness testing and meaningful roadside-inspection targets for category N1 vehicles. These elements recognise that modern vehicle enforcement requires physical testing, real-world emissions oversight and common minimum requirements across the European Union.

However, the Parliament's position on **particle number (PN) and nitrogen-oxide (NOx) testing risks undermining that ambition**. Allowing Member States to decide whether to introduce these tests on the basis of national circumstances or costs would create a **fragmented system** in which the protection of citizens' health depends on where they live.

During negotiations with the Council, Parliament should therefore defend its strongest provisions while correcting the principal weakness in its mandate: particle-number testing must become mandatory throughout the EU, without a national opt-out.

Main points of concern

1. Fine particles are a public-health issue, not an optional technical matter

The case for mandatory PN testing extends beyond the technical effectiveness of vehicle inspection. The ultrafine particles (UFPs) emitted by vehicles with defective, removed or manipulated particulate filters penetrate deeply into the respiratory system and can enter the bloodstream.

A recent study carried out by the University of McGill **links exposure to ultrafine particles with cardiovascular and respiratory mortality, lung cancer and vascular dementia**.¹ These effects make PN testing a direct public-health intervention. Reducing emissions from parts of the existing fleet can produce immediate benefits by lowering citizens' exposure to pollutants associated with serious and irreversible disease.

An optional system is therefore incompatible with the Union's health and environmental objectives. Member States should not be permitted to decide that identifying gross particulate emitters is unnecessary or too costly. **Air pollution does not remain within national borders**, and vehicles routinely circulate between Member States. A vehicle that would fail a modern PN test in Belgium or Germany should not be allowed to operate without equivalent scrutiny simply because it is registered in another Member State.

We therefore call for the Parliament to position in favour of mandatory PN testing as a European minimum standard comparable to other core roadworthiness requirements. National authorities may determine administrative arrangements, but the underlying obligation should apply throughout the Union.

Concerns about the capacity of the inspection sector do not justify national discretion. Particle number technology is already deployed successfully in Germany, Belgium and the Netherlands. This is not an experimental market. The equipment exists, inspection personnel are using it and practical experience is available to support harmonised implementation. **Regulatory certainty would allow**

¹ Scott Weichenthal et al., 'Long-Term Exposure to Outdoor Ultrafine Particles and Black Carbon and Effects on Mortality in Montreal and Toronto, Canada', Health Effects Institute, 2024.

manufacturers to scale production further and enable inspection centres to plan investment and training.

The Belgian experience also shows that testing changes outcomes. The reported **failure rate for EURO 5a vehicles declined from 19.73% to 7.77%** in only 3 years after the introduction of PN testing. This development indicates that effective inspections prompt maintenance, repairs and filter replacement, progressively removing the highest-emitting vehicles from the road.

Parliament should therefore reject both national opt-outs and any attempt to subject PN testing to the same timetable as less mature NO_x testing. The two pollutants can be addressed through differentiated technical pathways. EGEA admits further work on NO_x methodologies should continue, but **it should not become a procedural reason for delaying mandatory PN measurement.**

2. Preventing a second Dieselgate requires independent measurement

The final legislation **must not rely exclusively on OBD data**. OBD systems are useful diagnostic tools, but they report information generated within the vehicle and may not reveal the emissions actually produced at the tailpipe.

According to figures provided by ASA, **OBD checks failed to detect 89.5% of highly polluting vehicles identified in Germany** and 96.7% of those identified in Belgium. A framework based primarily on OBD would therefore leave most gross emitters outside effective enforcement.

Parliament should insist that **emissions compliance be independently verified through physical measurement**. Otherwise, the Union risks creating the conditions for a second Dieselgate: a system in which vehicles appear compliant electronically while producing excessive emissions in operation.

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 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.**

4. Parliament should defend mandatory remote sensing

Parliament's position requiring Member States to **establish remote sensing systems should be preserved during trilogue negotiations**. The Council's voluntary wording would result in limited and inconsistent deployment, reducing the value of the system as a European enforcement network.

Remote sensing is essential because a periodic inspection captures the vehicle at one specific moment and under predictable conditions. **Deliberately manipulated systems may be temporarily restored before an inspection**, while software or hardware configurations may ensure that emissions controls operate correctly only during the test.

This is particularly relevant to manipulation of AdBlue and selective catalytic reduction systems. **Remote sensing allows authorities to assess emissions under real driving conditions and to direct suspicious vehicles to a targeted technical inspection.** It is the only practical road-based safety net capable of verifying that an inspection result reflects the vehicle's normal operation.

EGEA believes Parliament can support proportionate phase-in arrangements, common standards and evaluation mechanisms. However, **it should not accept the removal of the underlying obligation.**

5. Motorcycles must not become a negotiating concession

Parliament should also defend the mandatory inclusion of motorcycles above 125 cm³ and resist pressure to reinstate national opt-outs. Excluding category L vehicles would create an unjustifiable gap in a package intended to improve both safety and emissions performance.

Motorcycle defects involving tyres, brakes, steering, lighting and suspension create acute risks for riders and other road users. PTIs also provide a means of identifying excessive noise, modified exhaust systems and non-compliant emissions controls.

If the EU accepts that vehicle emissions and noise affect cardiovascular, respiratory and neurological health, it cannot exclude an entire vehicle category for political reasons. **Alternative road-safety policies can complement PTIs.** They are not an equivalent replacement for examining the mechanical condition and environmental performance of the vehicle.

Consequently, **EGEA requests the Parliament to preserve a scientific approach whose obligations would primarily benefit motorcyclists and other road users.**

6. Maintain the technical correction for electric vehicles

The European Parliament should retain its correction of the electric-vehicle resistance limit and require its inclusion in the final compromise. **The correct value is 0.1 ohm.**

Parliament enters the negotiations with a strong position on **remote sensing, motorcycles and N1 roadside inspections.** It should use that position to secure an agreement based on European obligations rather than national discretion. Mandatory PN testing, independent physical emissions measurement, remote sensing and the inclusion of motorcycles **are not excessive requirements.** They are the minimum components of a credible modern roadworthiness system.

The industry is ready, the equipment is available and operational experience already exists. The decisive issue is therefore not technical feasibility but political willingness. Parliament should ensure that concerns about flexibility or preparedness do not result in continued exposure to avoidable ultrafine-particle emissions and another decade of uneven enforcement.

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.