

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

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 a physical measurement at the exhaust. 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. Additional technical development may still be required for fully harmonised NOx procedures, operating conditions and limit values. 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.

2. OBD cannot replace a physical tailpipe measurement

On-board diagnostics (OBD) can provide useful information, but they cannot be treated as a substitute for measuring the emissions actually leaving 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 Dieselgate, the Union should not establish a regulatory system that again relies primarily on information produced internally by the vehicle.

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 Dieselgate.

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. Remote sensing should be maintained as a common European requirement

The Council position would allow Member States to use **remote sensing technologies** but would not require their deployment. This approach would create an uneven enforcement landscape and leave substantial gaps in Member States' capacity to identify high-emitting or deliberately manipulated vehicles under real driving conditions.

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. Nevertheless, the legislation should establish an unequivocal obligation rather than merely indicating that Member States "may" use the technology.

5. Motorcycles should not remain subject to national opt-outs

Excluding motorcycles above 125 cm³ from periodic inspection as per recital 8 of the Council's position **is difficult to justify on either safety or environmental grounds**. Defects affecting braking, tyres, steering, suspension and lighting can have particularly serious consequences for motorcyclists, who are among the most vulnerable road users.

Inspections are also necessary to identify modified exhaust systems, excessive noise and defective or manipulated emissions controls. Information campaigns and alternative national measures may complement technical inspections, but they cannot replicate a physical examination of the vehicle.

Maintaining national opt-outs would result in materially different levels of protection across the Union and preserve an avoidable environmental and road-safety loophole. The Council should accept mandatory inclusion of category L vehicles above the relevant threshold, as supported by the Parliament.

6. An immediate technical correction for electric vehicles

The Council text must also correct the technical error concerning the permitted resistance value for electric vehicles. **The limit should be 0.1 ohm**, equivalent to 100 milliohms, as reflected in the Parliament's correction. A value of 100 ohms is technically inappropriate and could undermine the credibility and operability of the provision. This correction should be made before the text progresses further.

The central message for the Council is that the equipment sector is ready. **There is no market or technological basis for postponing PN testing for four years** or for leaving essential enforcement tools entirely to national discretion. A harmonised framework covering PN testing, remote sensing, motorcycles and meaningful N1 roadside-inspection targets would provide legal certainty, strengthen the internal market and deliver immediate road-safety and public-health benefits.

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.