



## **Independent and high-level inspection standards for vehicles are in the interest of road safety, consumers and the environment.**

The *Draft Regulation on the periodic roadworthiness tests for motor vehicles and their trailers and repealing Directive 2009/40/EC* aims at making Europe's roads safer. This goal is in line with the objectives of the EU as defined in the *White Paper of 2011* (points 39 and 40 as well as Initiative 16 "Towards a zero-vision on road safety") and in the *Policy orientations on road safety 2011-2020* (Objective 4: "Safer vehicles" as well *MEMO/10/343 1. Improved Safety Measures for Vehicles* ).

We welcome the fact that the EU acknowledges the Periodical Technical Inspection (PTI) of vehicles to be a major contributor to road safety and environmental protection. Numerous proposals contained in the draft regulation are likely to generate an improvement in road safety. Moreover, the extension of the scope for emission checks is a step in the right direction (Recital 6). However, there is further need for clarification to ensure the highest level and rate of innovation and improvement in the field of the PTI. This is explicitly in the interest of all road users.

### **We especially welcome the following aspects:**

#### **I. Vehicle categories to be inspected, especially motorcycles:**

It is important to introduce mandatory inspections for additional vehicle categories. The Commission states, for instance, that 8% of motorcycle accidents are related to, or aggravated by, technical defects, either directly or indirectly. The introduction of Europe-wide inspections, especially of heavy motorcycles - which has so far taken place in many, but not all, Member States - will reduce the number of accidents. An independent inspection of all technical components will be ensured.

#### **II. Equipment of testing centres and inspected items:**

Harmonised rules for the equipment of testing centres will help to improve vehicle safety. Nowadays, it is necessary to inspect the vehicle's electronic features. Modern vehicles are equipped with driver assistance systems, upon which the driver must be able to rely at any time. A significant portion of these systems is responsible for vehicle safety and should therefore be fully functional at all times. Electronic components have become an integral part of vehicles and need to be inspected together with the traditional test items.

#### **III. Data and information exchange:**

We welcome the Commission's initiative, which calls on Member States to develop their national databases which should lead to the creation of an EU-wide database to facilitate information exchange. A central database is a simple and non-bureaucratic way of monitoring the results of the PTI and ensuring independent and reliable inspections.



## **We believe that the following aspects require improvements:**

Experience has shown that innovations by the Member States which go beyond the minimum requirements improve road safety and environmental protection ("best practices"). Such innovations have proven to be an efficient driver for the periodic adaptation of EU minimum requirements to social and technological progress. The Draft Regulation should explicitly enable the Member States to implement binding mandatory provisions beyond the minimum requirements.

### **I. Independence of the inspectors as a guarantee for impartial testing and adequate consumer protection:**

The Regulation should provide for stricter provisions regarding the separation of vehicle inspection and repairs in the interest of consumer protection according to international standards (ISO/IEC 17020 Type A). Most of the Member States have opted for a clear separation between inspection and repairs according to the dual (or third party) system, in which the inspection and the repair cannot be carried out by the same entity in order to avoid any conflict of interest. This system has been successfully applied as an elementary pillar of statutory inspections in technical areas over decades. Most of the Member States with a dual system have a significantly lower rate of deadly accidents per capita. Member States should therefore explicitly be requested to avoid conflicts of interest between the operators of vehicle inspections and the operators of vehicle repairs, as separate legal entities, in order to ensure consumer protection and effective vehicle safety (Recital 13 and Article 12.4).

### **II. Enabling higher qualification requirements:**

The Draft Regulation defines minimum requirements concerning the qualification of inspectors, which is a step in the right direction. Nevertheless, some Member States already have higher standards and should have the right to keep them. Member States with currently lower standards should however be able to emulate those Member States with the highest standards. Member States should further be allowed to define additional requirements for the qualification and training of inspectors where specific national situations make these necessary. The minimum requirements should be considered as the minimum objective to be achieved by Member States that currently have lower requirements, but should not lead to a lowering of standards in general (Article 12 and Annex VI).

## **Conclusion**

1. Very high, uniform inspection standards are required to achieve the EU road safety objectives. The proposed Regulation points in the right direction.
2. We welcome the definition of minimum requirements for the qualification and training of inspectors and are convinced that this will lead to an improvement in inspectors' qualifications if Member States are explicitly enabled to define requirements beyond the minimum standards set in the proposed Regulation.
3. In order to guarantee additional safety on Europe's roads along with adequate consumer protection, strict separation of inspection and repair should be encouraged in the proposed Regulation.