



**Opinion of the European Economic and Social Committee**

**Proposal for a Directive of the European Parliament and of the Council amending  
Directive 2014/45/EU on periodic roadworthiness tests for motor vehicles and their trailers and  
Directive 2014/47/EU on the technical roadside inspection of the roadworthiness of commercial  
vehicles circulating in the Union**

and

**Proposal for a Directive of the European Parliament and of the Council on the registration  
documents for vehicles and vehicle registration data recorded in national vehicle registers and  
repealing Council Directive 1999/37/EC**

(COM(2025) 180 final – 2025/0097 (COD))

and

COM(2025) 179 final – 2025/0096 (COD))

(C/2026/39)

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Advisor	Antonio POLICA
Referral	European Parliament, 10.7.2025 Council of the European Union, 4.6.2025
Legal basis	Articles 91(1) and 304 of the Treaty on the Functioning of the European Union
Section responsible	Transport, Energy, Infrastructure and the Information Society
Adopted in section	4.9.2025
Adopted at plenary session	18.9.2025
Plenary session No	599
Outcome of vote (for/against/abstentions)	96/3/0

## 1. Conclusions and recommendations

1.1. The EESC considers road safety to be a priority because it protects life, reduces the number of injuries and prevents damage to people, goods and infrastructure. Road safety is a matter not only of technical standards but also of social responsibility and good governance. It must be at the heart of sustainable mobility strategies, in line with the objective of zero road casualties by 2050. This is essential to ensure that people can travel, work and live without unnecessary and avoidable risks. It requires well-trained, responsible drivers, vehicles that are in excellent technical condition and high-quality, safe road infrastructure.

1.2. The EESC welcomes the Commission's proposal to revise the roadworthiness testing package, as this is necessary in order to increase road safety, protect the environment and facilitate the digital transition in the transport sector, so that the right to free movement of goods and persons can be fully exercised.

1.3. The EESC stresses the need for a systemic approach which, in addition to improving the technical characteristics of vehicles, also enhances the training of operators in the sector, improves the quality of road infrastructure and ensures integrated and participatory governance of the safety system.

1.4. The Committee calls on the Commission and the Member States to lay down support measures to ensure that adapting to the new rules does not exacerbate social inequalities, particularly when it comes to low-income households and micro-enterprises. To this end, it recommends introducing incentives, such as social leasing or forms of financial support such as the Social Climate Fund, which are essential in order to renew the European car fleet and guarantee access for all to more modern, sustainable, safe vehicles.

1.5. The EESC recommends proportionate, non-discriminatory derogations, such as the exclusion from annual testing from the tenth year of registration for private vehicles with a low mileage, in order to avoid excessive burdens on users, especially in environments with limited transport options.

1.6. The EESC considers it essential to include all motorised two-wheel vehicles in compulsory roadside inspections, harmonising European minimum requirements in order to increase the safety of a group that is particularly at risk of being involved in serious and fatal accidents.

1.7. The Committee stresses the urgent need to standardise tests for electric vehicles and advanced driver assistance systems and to ensure the availability of qualified technicians and modern equipment in inspection centres, and recommends the establishment of a European framework for the training and certification of inspection staff.

1.8. The Committee calls for the mutual recognition of PTIs to be extended and made effective through a European platform for sharing technical vehicle data, in accordance with the highest standards of data protection.

1.9. The EESC supports the adoption of harmonised risk indicators for roadside inspections and the expansion of load securing requirements, recommending a fair distribution of responsibilities throughout the logistics chain.

1.10. The EESC calls on the Commission to actively involve the social partners, economic operators and civil society at all stages of implementation of the legislative package, in order to ensure that individuals and businesses fully accept and grasp the importance of the rules and their implementation.

## 2. Introduction

2.1. This package aims to strengthen the EU regulatory framework on road safety, environmental protection and the digitalisation of vehicle documents, and includes the revision of three directives on:

- periodic roadworthiness tests for vehicles (PTIs);
- vehicle registration documents (VRDs); and
- roadside inspections of commercial vehicles (RSIs).

2.2. The package aims to help meet the EU road safety targets of reducing fatalities and serious injuries by 50 % by 2030, and of there being zero fatalities and serious injuries by 2050 ('Vision Zero'). Although the number of people killed or seriously injured on the roads has fallen <sup>(1)</sup>, the objectives set will be difficult to achieve with the current regulatory framework. According to the Commission, the new measures will save 7 000 lives <sup>(2)</sup> and prevent more than 65 000 serious injuries over the period 2026-2050 <sup>(3)</sup>.

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<sup>(1)</sup> In 2023, 20 400 people were killed in road crashes in the EU (a decrease of 1 % on 2022, and a 10 % reduction in respect of the baseline year of 2019), [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_24\\_1361](https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1361).

<sup>(2)</sup> The European Commission estimates that it can save the lives of around 290 people per year, with avoided external costs of around EUR 3 billion per year.

<sup>(3)</sup> COM(2025) 180 final, p. 10.

2.3. The proposals take into account major technological and environmental developments in the mobility sector and introduce:

- **annual testing of cars and vans that are more than ten years old;**
- roadworthiness testing for **electric vehicles** and **advanced electronic safety systems;**
- **new emission test methods;**
- **measures to combat odometer fraud;**
- **digital registration and PTI certificates**, through a **European platform for sharing the data;**
- **mutual recognition of PTIs** carried out in other Member States for a period of up to six months;
- **enhanced roadside inspections**, including vans and using risk indicators to select the vehicles to be inspected.

### 3. General comments

3.1. The EESC welcomes the Commission's proposal for the revision of the Directives on periodic roadworthiness tests, vehicle registration and roadside inspections as a necessary step forward in bolstering road safety, reducing pollution and driving digitalisation in the transport sector.

3.2. The EESC points out, however, that when it comes to road accidents, vehicle efficiency is only one of the risk factors, going hand in hand with human error and road quality <sup>(4)</sup>. In 2024, the European Court of Auditors analysed in depth the procedures for implementing the Safe System, highlighting that between 2014 and 2020 the EU provided EUR 6.6 billion for road safety projects, which was not nearly sufficient to reach the targets for reducing serious and fatal accidents <sup>(5)</sup>. Mutually-reinforcing measures are therefore needed both in terms of bolstering the training system for drivers, operators and inspectors and as regards investing in upgraded and safer roads.

3.3. The Committee stresses the importance of ensuring that the new rules are properly implemented by all Member States, and of avoiding divergences in their application that could undermine the shared objective of reducing fatalities and serious injuries <sup>(6)</sup>.

3.4. The EESC considers it essential that the new provisions provide for effective checks on electric vehicles and advanced driver assistance systems (ADAS), and on automated vehicles in due course. To this end, tests need to be provided for on battery integrity, the efficiency of charging systems and the proper functioning of electronic safety systems through efficient methods such as OBD (on-board diagnostics) port checks.

3.5. The EESC points out that the effectiveness of the new tests depends on the availability of qualified technicians and up-to-date equipment in test centres. However, several Member States have a shortage of modern facilities to carry out tests and of suitably qualified technicians. The Committee is concerned about a possible increase in costs for citizens and recommends support measures to ensure that the changes to roadworthiness testing are sustainable for both operators and users.

<sup>(4)</sup> According to the European Commission, defective vehicles are responsible for a relatively small number of accidents, between 2 % and 4 % (varying between countries), and around 1,5 % of road deaths. Human error alone is the primary factor in accidents, including fatal accidents, in around 90 % of cases. The state of road infrastructure and climatic conditions account for fewer accidents (4 %-7 % and 1 %-3 % respectively) and are 'contributing' or 'aggravating' factors.

<sup>(5)</sup> *Special Report 04/2024: Reaching EU road safety objectives. Time to move up a gear*, European Court of Auditors, 2024.

<sup>(6)</sup> Opinion of the European Economic and Social Committee on the 'Roadworthiness Package containing the following three documents: Proposal for a Regulation of the European Parliament and of the Council on periodic roadworthiness tests for motor vehicles and their trailers and repealing Directive 2009/40/EC' COM(2012) 380 final – 2012/0184 (COD), 'Proposal for a Directive of the European Parliament and of the Council amending Council Directive 1999/37/EC on the registration documents for vehicles' COM(2012) 381 final – 2012/0185 (COD) and the 'Proposal for a Regulation of the European Parliament and of the Council on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union and repealing Directive 2000/30/EC' COM(2012) 382 final – 2012/0186 (COD) (OJ C 44, 15.2.2013, p. 128), point 1.2.

3.6. The Committee agrees with the proposal to revise the frequency of testing in order to harmonise the legislation at European level. In particular, bringing in mandatory annual PTIs for vehicles older than ten years, based on statistical evidence linking the age and mileage of vehicles to an increased risk of accidents, would appear to be a balanced compromise between the measures taken by the different Member States in this area, provided that it is complemented and balanced by measures incentivising the replacement of older vehicles and that it takes into account their actual use.

3.7. The EESC considers that the proposed rule, on its own, is not sufficient to solve the problem at its root, which lies not in the intrinsic safety of the vehicles, but in people's limited ability to replace their vehicles (<sup>7</sup>). This point, previously highlighted in the EESC opinion (<sup>8</sup>), is backed up by the Commission's recommendation on **Transport Poverty** (<sup>9</sup>), which states that the purchase and maintenance of a vehicle is prohibitively expensive for millions of citizens. Moreover, the different levels of development and well-being across the Member States mean that vehicles on the road are much older in some countries than in others, with disparities and serious repercussions in terms of road safety and environmental impact.

3.8. The Committee finds it unacceptable that the poorest and most vulnerable are also the most exposed to road-related dangers. Therefore, to ensure that this new rule is properly applied, the EESC calls for its introduction to be backed up by special **incentive schemes and social leasing** (<sup>10</sup>), primarily aimed at helping vulnerable families and micro-enterprises affected by the green transition to purchase new vehicles, including through financial instruments such as the Social Climate Fund (<sup>11</sup>).

3.9. The EESC points to the importance of motor vehicles in rural areas, where there are often no alternative means of public transport. In these areas, old and second-hand cars are particularly prevalent, but are used for short journeys. Since the safety of a vehicle cannot be measured solely by its age but also by its actual use, the EESC proposes introducing a derogation from the rule on annual testing as of the 10th year after registration for four-wheel private vehicles that are driven less than 10 000 km per year.

3.10. The EESC welcomes the inclusion of light commercial vehicles (LCVs) in roadside inspections, given their increasing use in urban freight transport and their significant involvement in serious accidents, comparable to heavy goods vehicles (HGVs) (<sup>12</sup>). The Committee calls for the extension of these inspections to motorcycles and mopeds (PTWs), which are also involved in a significant number of serious and fatal road accidents (<sup>13</sup>).

3.11. The Committee supports the measures to combat odometer fraud, which harms the transparency of the second-hand market and undermines road safety. It stresses the importance of creating interoperable digital systems for the sharing of technical and vehicle-history data between Member States (single European register (<sup>14</sup>)). This measure is also of particular social importance, as the second-hand market thrives most among those with less financial means; it will help to disrupt a dynamic whereby already vulnerable individuals are more exposed to unsafe purchases.

3.12. The EESC supports the digitalisation and mutual recognition of registration and PTI certificates, and calls for the latter to be recognised for longer than the six months provided for, with appropriate safeguards. This recognition must be effective and without practical obstacles, and the testing authorities must be properly informed to avoid disputes or

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(<sup>7</sup>) ACEA Report, *Vehicles on European Roads 2025*. In 2023, the average age of the car fleet in Europe increased to 12,5 years, ranging from 17,5 years in Greece to eight years in Luxembourg.

(<sup>8</sup>) Opinion of the European Economic and Social Committee on 'Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Europe on the move – Sustainable mobility for Europe: safe, connected and clean' (COM(2018) 293 final) (OJ C 62, 15.2.2019, p. 254), point 1.9.

(<sup>9</sup>) C(2025) 3068. In 12 Member States, more than 30 % of low-income households with children cannot afford a car.

(<sup>10</sup>) COM(2025) 95, p. 8.

(<sup>11</sup>) Regulation (EU) 2023/955 of the European Parliament and of the Council of 10 May 2023 establishing a Social Climate Fund and amending Regulation (EU) 2021/1060 (OJ L 130, 16.5.2023, p. 1).

(<sup>12</sup>) ETSC report *Pin Flash 39*, 2020. The figures for 2018 were around 6 000 fatalities in accidents involving LCVs and HGVs, accounting for 11 % and 14 % respectively of all road deaths.

(<sup>13</sup>) PTWs (powered two-wheelers) are involved in around 17 % of deaths on European roads, while accounting for 3 % of total traffic. In Italy, France and Spain, motorcycles are involved in more than 25 % of urban deaths. Roadside inspections carried out in Austria and Sweden have found that more than 20 % of these vehicles had serious defects.

(<sup>14</sup>) OJ C 44, 15.2.2013, p. 128, point 1.3.

unjustified penalties. The EESC calls on the Commission to create a European platform for exchanging this data that is easily accessible to all users while ensuring a high level of protection of personal data and privacy. If this change is properly and fully implemented, it will help to tackle fraud and simplify the bureaucracy in this area, while reducing the financial burden for individuals and businesses and preventing duplicated testing.

3.13. The EESC stresses the importance of ensuring that the new digital processes of data collection, technical inspection and certification of vehicles are safe, interoperable and legally reliable throughout the EU. In this context, qualified trust service providers (QTSPs) under the eIDAS2 Regulation can ensure the authenticity, non-alterability and traceability of data, as well as facilitate automated cross-border checks. This information should be integrated into the Digital Identity Wallet (EUDI wallet) which all European citizens should have by 2026, allowing checks to be carried out by road authorities even where there is no network connection (offline).

3.14. The Committee supports the adoption of risk indicators (for RSIs) at European level to optimise the effectiveness of roadside inspections, with vehicles selected on the basis of objective and proportionate criteria, such as the type of vehicle, the history of infractions, the age of the vehicle and the type of activity carried out <sup>(15)</sup>.

3.15. The EESC calls on the Commission and the Member States to actively involve the social partners, economic operators and civil society organisations in the implementation phase, particularly as regards the training of operators, the technical adaptation of infrastructure and user awareness.

#### 4. Specific comments

4.1. **Roadworthiness tests on electric vehicles and ADAS systems.** The EESC recommends establishing clear and updated technical standards for the testing of electric vehicles, plug-in hybrids and advanced driver assistance systems. These standards will have to ensure the functional safety of hardware components and provide for software integrity checks, in line with the 2019 General Safety Regulation.

4.2. **Combined emissions testing:** The EESC supports the mandatory introduction of the direct measurement of PM and NO<sub>x</sub> emissions at the exhaust pipe, as a complementary tool to checks via the OBD system, this being a more effective way of detecting polluting vehicles and possible tampering with emission control systems. The Committee recommends that these tests be standardised and harmonised at EU level to ensure uniform treatment and technical reliability. In addition, to prevent these new rules becoming an excessive burden on citizens, the EESC recommends that their introduction be accompanied by clear and proportionate procedures and, where necessary, forms of financial support for the most vulnerable sections of society.

4.3. **Remote sensing of pollutant emissions.** The EESC supports the adoption of this new technology, which could be used in addition to the periodic roadworthiness tests, making it possible to identify problematic vehicles outside testing centres. However, as this technology is not yet 100 % reliable, the EESC recommends waiting until it is fully developed before using it for imposing penalties or requesting that action be taken (testing). Furthermore, transparency must be ensured regarding the penalty system and the public must be informed about how these checks will work, in order to avoid surprises and to guarantee the right to due process.

4.4. **Motorcycles and mopeds (PTWs).** The Committee supports the full inclusion of all powered two-wheelers (including those ≤ 125 cc) in mandatory roadworthiness testing, given their vulnerability. The Committee recommends harmonising the minimum requirements for the testing, particularly in countries that do not currently provide for such inspections.

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<sup>(15)</sup> Avoid unnecessary inspections of vehicles and operators that have been compliant in the past, focusing on those with a high risk profile. Approach is in line with the European road safety directives [Directive 2006/22/EC of the European Parliament and of the Council of 15 March 2006 on minimum conditions for the implementation of Council Regulations (EEC) No 3820/85 and (EEC) No 3821/85 concerning social legislation relating to road transport activities and repealing Council Directive 88/599/EEC (OJ L 102, 11.4.2006, p. 35) and Directive (EU) 2020/1057 of the European Parliament and of the Council of 15 July 2020 laying down specific rules with respect to Directive 96/71/EC and Directive 2014/67/EU for posting drivers in the road transport sector and amending Directive 2006/22/EC as regards enforcement requirements and Regulation (EU) No 1024/2012 (OJ L 249, 31.7.2020, p. 49)].

4.5. **Frequency of testing.** The EESC's recommendations:

- private cars, vans and motorised two-wheel vehicles should be tested annually from the tenth year of registration. Vehicles with a mileage of less than 10 000 kilometres per year should be excluded; these vehicles should remain subject to the current two-year testing obligation;
- vehicles for commercial use, both freight and passenger vehicles, should be subject to more stringent and frequent annual tests, depending on their intensity of use and risk category. This is because more than a quarter of fatal road accidents involve this category of vehicles <sup>(16)</sup>.

4.6. The Committee notes that, although aggregated data are lacking at European level, in many Member States there has been an exponential increase in serious and fatal accidents involving delivery riders together with other logistics workers. The EESC points out that the not always transparent management of employment relationships and the classification of workers as false self-employed mean that large multinationals do not take responsibility for the safety of vehicles, shifting the cost and responsibility onto the workers, exposing them to serious risks often for the sake of precarious and poorly paid jobs. In this connection, we call for close monitoring of the implementation of the Platform Workers Directive in order to ensure that these workers can fully exercise the right to health and safety at work.

4.7. **Expansion of the 'safety strand'.** The EESC is in favour of the PTI being expanded to 62 vehicle systems/components. This includes fitting loudspeakers, which allow mobile phones to be used safely when driving, preventing one of the main causes of accidents related to driver distraction <sup>(17)</sup>. The Committee stresses the importance of ongoing training for the operators and of clear guidelines for identifying and assessing defects, to ensure that the rules are applied properly and consistently. The EESC calls for effective and proportionate testing to protect the safety and financial interests of citizens. Applying the rules too rigidly or inconsistently could unduly increase the number of test failures, with the additional and unjustified costs that would entail for motorists.

4.8. **Training and certification of inspection staff.** The EESC recommends that the Commission establish a common European framework for the training, certification and ongoing professional development of staff involved in PTIs and roadside inspections, with a particular focus on new digital and environmental technologies. It is crucial that inspectors carry out testing in accordance with a standard procedure for the safety, security and protection of individuals, workers and businesses.

4.9. **Controls at borders with third countries.** The EESC stresses the importance of strict, harmonised controls in order to ensure a level playing field and genuine enforcement of European standards on load safety and technical compliance of vehicles.

4.10. **Cargo securing obligations for transport companies.** The EESC supports the Commission's proposal, but points to the need to ensure that responsibilities are distributed fairly throughout the logistics chain, avoiding responsibilities being passed on only to the transporter. It therefore recommends that, when it comes to transport operators, EU legislation should require them to:

- provide suitable vehicles and equipment (compliant anchorage points, anti-slip mats, load bars, nets and all devices complying with the EN 12195-1 standard);
- maintain fixtures and loading surfaces to withstand driving stresses;
- train their drivers, with specific modules on securing techniques and the forces involved (braking, turning), in addition to explicitly covering the provisions of Directive 2003/59/EC <sup>(18)</sup>;

<sup>(16)</sup> ETSC *PIN Flash Report 33*, 2017. In 2016, more than 40 % of road deaths in the EU involved people commuting to or from work, or transport professionals. More than a quarter of fatal accidents are caused by the latter.

<sup>(17)</sup> According to the Commission, 25 % of driver distraction-related accidents are due to improper mobile phone use.

<sup>(18)</sup> Directive 2003/59/EC of the European Parliament and of the Council of 15 July 2003 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers, amending Council Regulation (EEC) No 3820/85 and Council Directive 91/439/EEC and repealing Council Directive 76/914/EEC (OJ L 226, 10.9.2003, p. 4)

- properly distribute the load, with the company's schedule factoring in the time needed for securing and checking;
- provide the driver with detailed documentation on the particular features of each load;
- ensure coordination of shippers, checking prior to departure that loading has been carried out in accordance with safety standards and in compliance with the legal and technical requirements.

Brussels, 18 September 2025.

*The President*  
*of the European Economic and Social Committee*  
Oliver RÖPKE

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