



EUROPEAN COMMISSION

Brussels, 15.12.2023
SEC(2025) 119 final

REGULATORY SCRUTINY BOARD OPINION

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

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

{SWD(2025) 96 final}
{SWD(2025) 97 final}
{SWD(2025) 98 final}
{SWD(2025) 99 final}



Brussels,
RSB

Opinion

Title: Impact assessment / Roadworthiness package

Overall opinion: POSITIVE WITH RESERVATIONS

(A) Policy context

The 2014 Roadworthiness Package aims to ensure defective vehicles are not allowed on the roads and that they respect the environmental standards in place. This is done through periodic technical inspections (PTIs), roadside inspections, and rules on the registration of vehicle documents. The evaluation of the package identified enforcement shortcomings and a mismatch between the framework in place and technical and market developments. In this context, the Commission is working on a proposal to revise the rules.

(B) Summary of findings

The Board notes the additional information provided and commitments to make changes to the report.

However, the report still contains significant shortcomings. The Board gives a positive opinion with reservations because it expects the DG to rectify the following aspects:

- (1) The report is not sufficiently clear about the scale of the problem, the robustness of the underlying evidence and the assumptions made in the analysis.**
- (2) The report does not clearly explain the reasoning behind the packaging of options. It does not sufficiently bring out the key policy choices and the related trade-offs, including in terms of reduced fatalities and injuries. The costs and benefits implications of key safety measures are not clearly presented.**
- (3) The comparison of options is not sufficiently detailed and nuanced, including in terms of coherence with the ‘Vision Zero’ road safety policy framework.**

This opinion concerns a draft impact assessment which may differ from the final version.

(C) What to improve

(1) The report should make clear what the scale of the problems identified is, including regarding vehicles currently exempted, such as motorcycles, or not subject to a yearly PTI, such as vehicles older than 9 years. The strength and robustness of the evidence underpinning the analysis of the problems and impact analysis and of related estimations should be made more explicit. The report should clarify supporting assumptions when it comes to the contribution of defects in vehicles to road crashes and the link between road safety and inspections. The geographical distribution of the problems identified should also be better explained, with clear references to the situation in different Member States.

(2) The report should more clearly acknowledge any uncertainties related to the evidence and assumptions used, in particular in relation to the analysis of the impacts of the odometer fraud measure. A sensitivity analysis should be carried out to show how these limitations affect the overall cost-benefit analysis (looking for instance at the assumptions on the number of cars affected and the economic damage caused by odometer fraud). The report should be clearer about the assumptions used and why different data points (lower bound in some cases) were selected for the estimations. It should also clarify to what extent key assumptions were validated by independent experts and represent the state of the art on this matter. Similarly, the report should clarify the scale and geographical distribution of the problem when it comes to older cars, lighter vehicles and mopeds not being (sufficiently) tested for roadworthiness and the consequences of this.

(3) The report should explain more clearly the reasoning behind the packaging of options. It should clarify why certain policy measures, such as recording the odometer reading or registration of certificates in digital formats are not included in all policy packages. Given that the policy measure aimed at tackling odometer fraud is expected to bring by far the most significant net benefits, excluding this measure in some policy packages would make them underperforming by design. The report should provide a clear justification why this key measure should not be included in the set of measures common for all options. If an exclusion can be convincingly argued, the report should present variants for options 1a/b including the odometer measure to allow a fairer and more balanced comparison of options.

(4) The report should explain the reasoning behind advocating a non-binding measure for the testing of powerful motorcycles, despite its more limited potential beneficial impact on road safety. The explanation should also clarify why a non-binding measure is considered as an adequate measure exclusively in the safety case of powerful motorcycles but not for any other road safety problem area. When substantiating this reasoning, the report should make clear references to the evidence available from different Member States (which are currently applying a testing regime and which are not and what a non-binding or binding EU measure on this would bring).

(5) The report should present better the key policy choices and related trade-offs, in particular regarding the benefits and costs of several key road safety measures, including the mandatory yearly testing for older vehicles and the ending of the exemptions of motorcycles and light trailers. These measures are currently included as a bundle and assessed together only in the most ambitious option package 3. However, a complementary measure-by-measure benefit-cost assessment should allow the identification of potentially net beneficial measures in terms of overall reduced fatalities and injuries. As these are highly relevant for decision-making, the report should bring them out more clearly.

(6) The comparison of the revised set of options needs to be more nuanced and granular. To allow a more coherent effectiveness comparison of options the report should present one clear set of specific objectives avoiding overlaps with the general objectives. Regarding coherence, the report needs to demonstrate why packages 2 and packages 3 are scored the same, despite the significant differences with respect to contributing to the Vision Zero road safety goals. The comparison overview Table 25 should be reworked to allow a detailed overview of quantitative and qualitative key impacts, so that the key differences between the options become more obvious. On this basis, the report should better justify the choice of the preferred option, while being clear on the key trade-offs between options in terms of efficiency, effectiveness and coherence.

The Board notes the estimated costs and benefits of the preferred option(s) in this initiative, as summarised in the attached quantification tables.

Some more technical comments have been sent directly to the author DG.

(D) Conclusion

The DG must revise the report in accordance with the Board's findings before launching the interservice consultation.

If there are any changes in the choice or design of the preferred option in the final version of the report, the DG may need to further adjust the attached quantification tables to reflect this.

Full title	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, Directive 2014/47/EU on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Union, and Directive 1999/37/EC on the registration documents for vehicles
Reference number	PLAN/2021/10932
Submitted to RSB on	20 November 2023
Date of RSB meeting	13 December 2023

ANNEX: Quantification tables extracted from the draft impact assessment report

The following tables contain information on the costs and benefits of the initiative on which the Board has given its opinion, as presented above.

If the draft report has been revised in line with the Board's recommendations, the content of these tables may be different from those in the final version of the impact assessment report, as published by the Commission.

I. Overview of Benefits (total for all provisions) – Preferred Option (PO2)		
<i>Description</i>	<i>Amount</i>	<i>Comments</i>
Direct benefits		
Administrative costs savings for Member States administrations, expressed as present value over 2026-2050, relative to the baseline	EUR 5.23 billion	Administrative cost savings for national administrations due to issuing the roadworthiness certificates in electronic format only, the interlinking of national vehicle registers, the time saved for the re-registration of a vehicle in another Member State, and due to avoiding the costs of printing, distribution and handling of paper/plastic registration certificates, estimated at EUR 5.23 billion, expressed as present value over 2026-2050.
Administrative costs savings for businesses (PTI centres), expressed as present value over 2026-2050, relative to the baseline	EUR 1.64 billion	Administrative costs savings for PTI centres due to the access to relevant technical information (data governance) estimated at EUR 1.64 billion, expressed as present value over 2026-2050.
Benefits for businesses (PTI centres) from additional technical inspections, expressed as present value over 2026-2050, relative to the baseline	EUR 2.32 billion	Benefits from additional periodic technical inspections for PTI centres due to the extension of scope of PTI and more frequent testing of certain vehicle categories. Estimated at EUR 2.32 billion expressed as present value over 2026-2050.
Administrative costs savings for other businesses (vehicle owners) expressed as present value over 2026-2050, relative to the baseline	EUR 1.29 billion	Administrative costs savings for other businesses (vehicle owners) due to the possibility to avoid emission testing at PTI in case the vehicle passed a roadside inspection or was in line with the emission limits during a screening by remote sensing. The savings are estimated at EUR 1.29 billion, expressed as present value over 2026-2050.
Benefits for other businesses (vehicle owners) due to avoided odometer fraud	EUR 96.1 billion	Benefits for other businesses (vehicle owners) due to mandatory recording and reporting to a national central database of vehicle mileage, whenever a vehicle undergoes repair/maintenance or in the case of tyre changes/replacement which helps reducing odometer fraud, estimated at EUR 96.1 billion ,

I. Overview of Benefits (total for all provisions) – Preferred Option (PO2)		
<i>Description</i>	<i>Amount</i>	<i>Comments</i>
		expressed as present value over 2026-2050.
Adjustment costs savings for citizens (vehicle owners) expressed as present value over 2026-2050, relative to the baseline	EUR 2.1 billion	Adjustment cost savings for citizens due to the recognition of PTI certificates issued by a Member State other than Member State of registration of up to six months, as a result of avoided travel costs back to the country of vehicle registration for a PTI. Estimated at EUR 2.1 billion relative to the baseline (expressed as present value over 2026-2050).
Administrative costs savings for citizens (vehicle owners) expressed as present value over 2026-2050, relative to the baseline	EUR 591.9 million	Administrative costs savings for citizens due to not requiring emission testing at PTI after the vehicle has successfully passed a screening by remote sensing, estimated at up to EUR 591.9 million, expressed as present value over 2026-2050.
Benefits for citizens (vehicle owners) due to avoided odometer fraud	EUR 53.3 billion	Benefits due to the obligation for Member States to record odometer readings in a national database, as well as to make them available to other Member States in the case of a re-registration of a vehicle in order to reduce odometer fraud. Estimated at around EUR 53.3 billion, expressed as present value over 2026-2050.
Improvement in the functioning of the internal market		Positive impact on the functioning of the internal market is expected due to the measures related to improving the availability and exchange of vehicle-related information, making the roadworthiness certificate available in electronic format, harmonising testing methods, the frequency of testing, requirements for the improvement of the PTI and the scope of testing. Harmonising vehicle registration documents across Member States will help to verify the vehicle's characteristics, and its registration status in the country of origin. This can help addressing potential obstacles to re-registration in another EU Member State where the vehicle is reported stolen, or its registration certificate is suspected of being fraudulent.
Benefits for citizens and administration due to 'digital by default'		The mandatory electronic format of roadworthiness certificates should have a positive impact on digital transformation in the EU. For the process of re-registration, it will save

I. Overview of Benefits (total for all provisions) – Preferred Option (PO2)		
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		time and costs for authorities and citizens by moving away from information and data exchange via e-mail, which is less efficient and time consuming. A digital registration certificate should help reduce time and costs for authorities and citizens by making access and exchange of the relevant information easier, faster.
Increase in employment of PTI and RSI inspectors, relative to the baseline	<p>PTI inspectors: 2,626 additional full time inspectors in 2030 and 2,053 in 2050, relative to the baseline</p> <p>RSI inspectors: 204 additional full time inspectors in 2030 and 243 in 2050, relative to the baseline</p>	Preferred policy option will lead to additional inspections and the need for additional inspectors PTI and RSI to perform them due to extension of vehicle scope or increase in testing frequency for particular vehicle categories (such as annual emission testing of vans, the noise testing of motorcycles and extension of RSI to vans). As well as the increase in the number of inspectors employed, there will be benefits from the additional training for the inspectors that will be needed to be able to deliver the new testing methods. The demand for additional and new testing equipment will lead to an increase in production-related jobs within Member States. There will also be employment opportunity related to providing ongoing maintenance for the new testing equipment.
<i>Indirect benefits</i>		
Reduction in the number of fatalities and serious injuries relative to the baseline (cumulative over 2026-2050)	4,452 lives saved and 37,777 serious injuries avoided	Indirect benefit to society at large. Significant positive effects on road safety are expected, in particular due to the more effective identification of vehicles with major and dangerous defects in the fleet, which should lead to the reduction of road crashes caused by technical defects and, as a result, to reduced fatalities and injuries. Measures which relate to better implementation and enforcement of the roadworthiness legislation will also contribute. The impacts are estimated at 4,452 lives saved and 37,777 serious injuries avoided over the 2026-2050, relative to the baseline.
Reduction in external costs of accidents (fatalities and serious injuries), expressed as	EUR 49.5 billion	Indirect benefit to society at large, due to the lives saved and injuries avoided. The reduction in the external costs of accidents is

I. Overview of Benefits (total for all provisions) – Preferred Option (PO2)		
<i>Description</i>	<i>Amount</i>	<i>Comments</i>
present value over 2026-2050, relative to the baseline		estimated at EUR 49.5 billion, expressed as present value over the 2026-2050 horizon (in 2022 prices) relative to the baseline.
Reduction of air pollutant emissions (kilo tonnes of NOx and PM2.5 avoided) (cumulative over 2026-2050)	Air pollutants reduction: 4,119.5 kilo-tonnes of NOx and 206.2 kilo-tonnes of PM	Indirect benefit to society at large Significant positive effects on environment are expected, due to the measures having an impact on air pollutant emissions and targeted at high emitters of NOx and particulate matter in the vehicle fleet, which should be effectively identified and repaired, with expected cumulative impact on air pollutants reduction 4,119.5 kilo-tonnes of NOx and 206.2 kilo-tonnes of PM over 2026-2050.
Reduction in the external costs of air pollutant emissions relative to the baseline, expressed as present value over 2026-2050	EUR 79.2 billion	Indirect benefit to society at large, due to the reduced air pollutant emissions. The reduction in the external costs of air pollution is estimated at EUR 79.2 billion, expressed as present value over the 2026-2050 horizon (in 2022 prices) relative to the baseline.
Reduction in the external costs of noise emissions relative to the baseline, expressed as present value over 2026-2050	EUR 7.3 billion	Indirect benefit to society at large, due to the reduced noise emissions. The reduction in the external costs of noise pollution is estimated at EUR 7.3 billion, expressed as present value over the 2026-2050 horizon (in 2022 prices) relative to the baseline.

II. Overview of costs – Preferred option (PO2)						
	Citizens/Consumers		Businesses		Administrations	
	One-off	Recurrent	One-off	Recurrent	One-off	Recurrent
Direct adjustment costs (expressed as present value over 2026-2050, relative to the baseline)	-	-	For PTI centres: EUR 2.12 billion	For PTI centres: 3.43 billion	For national public authorities: EUR 29.7 million	For national public authorities: EUR 177.5 million
Direct administrative costs (expressed as present value over 2026-2050, relative to the baseline)	-	For citizens (vehicle owners): EUR 344.2 million	For businesses: EUR 218 million, of which:	For businesses: EUR 2.63 billion, of which:	For national public authorities: EUR 73.6 million	For national public authorities: EUR 2.31 billion

II. Overview of costs – Preferred option (PO2)						
	Citizens/Consumers		Businesses		Administrations	
	One-off	Recurrent	One-off	Recurrent	One-off	Recurrent
			- EUR 48.9 million for PTI centres - EUR 149.2 million for garages, repair stations, etc. - EUR 20 million for vehicle manufacturers	- EUR 87.7 million for PTI centres - EUR 310.8 million for garages, repair stations, etc. - EUR 35.9 million for vehicle manufacturers - EUR 2.20 billion for other businesses (for vehicle owners)		
Direct regulatory fees and charges	-	-	-	-	-	-
Direct enforcement costs (expressed as present value over 2026-2050, relative to the baseline)	-	-	-	-	-	-
Indirect costs	-	-	-	-	-	-

III. Application of the ‘one in, one out’ approach – Preferred option (PO2)			
[M€]	One-off (annualised total net present value over the relevant period)	Recurrent (nominal values per year)	Total
Businesses			
New administrative burdens (INs)	EUR 25.5 million, of which: - EUR 5.7 million for the PTI centres - EUR 2.3 million for vehicle manufacturers - EUR 17.5 million for garages, repair stations	EUR 26.4 million, of which: - EUR 4.9 million for PTI centres - EUR 2 million for vehicle manufacturers - EUR 19.5 million for garages, repair stations, etc.	EUR 51.9 million, of which: -EUR 10.6 million for PTI centres -EUR 4.3 million for vehicle manufacturers -EUR 37 million for garages, repair stations, etc.
Removed administrative burdens (OUTs)	-	-	-
Net administrative burdens	EUR 25.5 million	EUR 26.4 million	EUR 51.9 million
Adjustment costs (expressed as)	For PTI centres: EUR 2.12 billion	For PTI centres: 3.43 billion	

III. Application of the ‘one in, one out’ approach – Preferred option (PO2)			
[M€]	One-off (annualised total net present value over the relevant period)	Recurrent (nominal values per year)	Total
present value over 2026-2050, relative to the baseline)			
Citizens			
New administrative burdens (INs)	-	-	-
Removed administrative burdens (OUTs)	-	-	-
<i>Net administrative burdens</i>	-	-	-
Adjustment costs	-	-	
Total administrative burdens	EUR 25.5 million	EUR 26.4 million	EUR 51.9 million