The lack of links from the online form to supporting documentation has made it difficult to respond fully to this consultation. This lack of transparency raises concerns over any conclusions drawn by the EC.

Specific comments are:

The paper mentions a reduction in bureaucracy in respect of the PTI process. However, the PTI cannot be considered in isolation. Some countries have regimes that impose additional bureaucracy at other stages in a vehicle’s lifecycle, requiring homologation and supporting documentation for any accessories fitted to a vehicle, even where there are no significant safety or pollution considerations. Such processes add to the cost of accessories and limit consumer choice whilst delivering no benefit to the consumer. Harmonizing on such a regime would not be in the best interest of the citizen.

The paper specifically requests comments on extending unannounced roadside inspection to additional classes of vehicle, specifically all goods vehicles and motorcycles. In the UK, all vehicles are subject to annual test; unannounced interim roadside inspections may be carried out where there is reasonable cause to believe that a vehicle is faulty. This seems to strike the correct balance between enforcement and unduly infringing a citizen’s freedom of travel. In the interests of equality of treatment, motorcyclists should not be singled out for a stricter regime of inspections.

The suggested common database of vehicle inspections should be used for the benefit of citizens, such that any vehicle subjected to an unannounced roadside inspection should have the date of the inspection recorded on the system. That information should be used to ensure that vehicle will not be stopped again within a reasonable period (perhaps 30 days).

The consultation offers different options for increases in test costs to cover improved safety and emission issues. The option of a zero cost increase was not offered, which suggests limited vision on the part of policy-makers. The EC should encourage members states to develop more efficient testing regimes, or to harnesses market forces to drive down the cost to the citizen.