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PERIODIC TECHNICAL INSPECTIONS (PTI) FOR MOTOR VEHICLES AND THEIR TRAILERS

- EC Internet consultation -

UETR comments

This document presents a number of separate comments to the Internet consultation on Periodic Technical Inspections (PTI) for motor vehicles and their trailers launched by the European Commission.

UETR is the umbrella organization representing more than 200.000 European freight transport SMEs from Western and Eastern EU Member States associations, with a total capacity of more than 430.000 commercial vehicles ¹.

UETR is registered in the European Commission's Register of Interest Representatives.

UETR document focuses on road haulage sector. Other aspects of transport sector with important consequences on road carriers will be tackled as well.

PTI'S MAIN CRITICAL ISSUES- OVERVIEW

Waiting time at testing stations

For heavy goods vehicles PTI is very often a time-consuming procedure. As a matter of fact, apart from the time needed for the inspection itself, many PTI stations across the

¹ Within the European Union, 95% of the road haulage companies are micro-enterprises with less than 10 employees (small firms or one-man operations).



European Union suffer congestion. Waiting times in line of more than 2 hours are quite common. Exceptional situations let aside, these waiting times are examples of inefficiency that need to be tackled. A maximum waiting time could be imposed in order to encourage PTI stations' operators to enhance inspection efficiency and hence reduce waiting time for their clients.

Value for Money

Some Member States have determined the fixed price of the inspections and all of its aspects in their national legislation: it means that a certain amount of money has to be paid, for instance for the inspection of the tachograph and speed limiter. In practice, inspectors tend to go very fast when checking such aspects of the vehicle. Police controls or roadside technical controls by other public authorities, very shortly after the PTI visit, quite often point out problems not emerged during PTI.

When a vehicle gets a general approval, it should imply the issue of a quality label.

Vehicles: agricultural tractors and trailers for agricultural purpose

Agricultural vehicles are generating more and more a situation of unfair competition at European level. Being exempted from large part of EU provisions, they are used for local road haulage out of any licence/access to profession/access to market framework, as for freight transport companies on third account. The main aim of PTI is and has always been enhancing road safety, one the key elements of European transport Policy. For instance, today's agricultural tractors and combinations speed is much higher than in the past: UETR support a legislative initiative at EU level to bring in new requirements concerning safety measure and social provisions for tractors.

Frequency of inspections

The current frequency is correct, but the first date of inspection for brand new vehicles and trailers of less than 3,5 tons should be delayed, compared to that one for older vehicles.

Cost of PTI

The improvement of clean technologies for heavy goods vehicles has been dramatic over the past 20 years and will evolve in the same way in the coming years thanks to the introduction of new Euro-standards legislation, with Euro 6 coming up. There is no added value in imposing more tests concerning CO2 emissions on every single vehicle.

Roadside inspection

These roadside inspections have been put in place in order to invite vehicle operators to ensure that their vehicles are in constantly up-to-date good conditions, not just at the occasion of the PTI. Given this approach, the roadside inspection should consequently be extended to all motor vehicles.



Items verified in roadside inspections

The items currently verified in roadside inspections should not be extended to the ones foreseen in PTI, as roadside inspections would cause too much loss of time and hence inefficiency to companies. Heavy trucks operate very often in a just-in-time scheme. Roadside inspections that would take too much time, would consequently lead to claims for delay in delivering.

Introduction of a standardized European system

The introduction of standardized European systems for PTI will reduce costs. It should come together with fully free competition in the EU internal market. Currently existing monopolies or oligopolies in some member states (like in Belgium) could be abolished. In the scenario of free settlement of PTI operators, fair competition should be made possible. Furthermore the owners of heavy goods vehicles and service stations should have the possibility to become testing centres or certified workshops and hence operate the PTI at a lower cost (e.g. the Netherlands, France, etc.).

A standardized European system should ideally lead to freedom of vehicle testing: permitting a PTI in another member state, than the one of the registration of the vehicle, but being valid in that member state.

Taking into account the options set out above, the introduction of a standardized European system can create an important increase of flexibility for transport companies.

A standard EU-wide system for PTI- medium quality seems the best option to tackle such target.

