



**ROYAL NORWEGIAN MINISTRY
OF TRANSPORT AND COMMUNICATIONS**

The Minister

European Parliament
Committee on Transport and Tourism,
Mr. Werner Kuhn
Member of the European Parliament and Rapporteur

Date:
21.03.2013

Subject: Proposal for a Regulation of the European Parliament and of the Council on periodic roadworthiness tests for motor vehicles and their trailers

Dear Mr. Kuhn,

I write to you in your capacity as Member of the European Parliament and appointed Rapporteur on the Commission Proposal on periodic tests of motor vehicles- COM (2012) 380.

Please let me inform you that I welcome the Commission proposal to further harmonize EU standards of periodic roadworthiness tests and thereby to increase road safety, and your engagement to prioritize the work on this proposal.

Norway has implemented Directive 2009/40/EC through the European Economic Area (EEA)- Agreement, and a new Regulation on periodic roadworthiness tests will be relevant for Norway. I therefore take the opportunity to comment upon the suggested Regulation and some of your suggested amendments, as I have concerns related to specific elements of the proposal.

Firstly, I would like to express support for your initiative to modify the frequency of periodic testing in the proposal, as I fear the frequency suggested by the Commission, will lead to disproportionate costs for vehicle owners and capacity problems for the workshops.

I can however, not support the proposal to include new categories of vehicles in the periodic test regime;

As to the suggested incorporation of two wheelers, I believe that the link between accidents and technical failure should be further scrutinized. National statistics concerning accidents involving two-wheelers, indicate that technical failure as a (contributing) cause of accidents is modest. According to these statistics, other risk factors are the main causes of accidents. In addition, two-wheelers are often used on a reasonable basis due to climate conditions. On this basis, the proposal to include two and three-wheelers in the periodic testing regime, seems not to be proportionate.

I also cannot support the inclusion of light trailers in the testing regime. We have little reliable statistic data to support the inclusion of these trailers into the periodic testing regime nationally. Furthermore, the amount of light trailers to be included in the regime, is extensive. I believe targeted roadside checks of these trailers to be a more adequate and proportionate measure in order to achieve increased road safety.

As to the proposed inclusion of tractors with a design speed exceeding 40 km/h, I believe there should be a possibility for member states to exclude such vehicles used for agricultural, horticultural, forestry, farming or fishery purposes only operating on the territory of the Member State, in order to avoid unnecessary costs for owners of tractors.

As to your Draft Report of 11 February, I have concerns about the suggested amendment to enhance independency of inspectors and economic operators involved in roadworthiness testing activities. (Amendment 28, art 12 new paragraph 4 a, and Amendment 5, Recital 13) The suggested amendments exclude the inspector from performing periodic roadworthiness tests on a vehicle he has previously repaired and/or maintained. Furthermore, the suggested amendment in the recital states that economic operators involved in roadworthiness test activities, should keep these activities separate from activities linked to sale, maintenance and repair of vehicles etc .

I believe this will represent major challenges for our workshop industry. In Norway, the majority of roadworthiness testing centres also perform vehicle repair and maintenance. Due to our topography, we have a relatively large number of small workshops/testing centres located in sparsely populated areas. I fear that the suggested amendments will lead to difficulties for vehicle owners to find suitable roadworthiness testing centres in sparsely populated areas across Europe.

In my opinion, the suggested provisions for supervision of testing centres, and training requirements for inspectors as revised by the Council Draft Directive (2012/0184 (COD) are more appropriate measures to achieve quality in periodic tests.

Yours sincerely,



Marit Arnstad