

Input received by email by Mr Van Der Straaten – OICA, on April 10th, 2021

I also want to stress a few points, some of which I mentioned at the first meeting of the subgroup on PTI, and I hope that they will be considered/reflected one way or another in the draft revision of the framework document:

1. Basically the goal of any PTI is and should be to check that vehicles are still OK in terms of roadworthiness (as clean and as safe as possible, considering the age and wear) after X years, not to check that they still meet the type approval requirements (which, obviously, cover NEW vehicles) nor to repeat a type approval procedure or a conformity of production check. A PTI is therefore especially geared towards the user and is intended to verify the maintenance of the vehicles, to check there is no tampering, etc. I had the impression that these points were generally well received, but still I think it would be useful to stress them.
2. The 97 Agreement is therefore clearly separate from the 58 Agreement and it makes no sense to mix them
3. Notwithstanding point 2 above, possibly UN Regulations could (and some already do), contain requirements that older vehicles must fulfil, or at least provide some guidance as to the test procedure, potential deterioration etc. This path should be pursued. In some cases also, there can be requirements in the UN Regulations to make the PTI possible (e.g. standard connectors, inspection holes, ...). We however need to ensure that these type approval requirements are developed with the full collaboration of the respective GR groups and remain reasonable and feasible from a technical and economical point of view.
4. Where needed, PTI can of course develop own rules and procedures, but these may not contradict the requirements for new vehicles, i.e. the approval requirements. This is typically the role of the various rules under the 97 Agreement: define the items to be checked during a PTI and the requirements that the vehicle must still fulfil in order to continue to be allowed on the road. I also believe that it would be perfectly normal to regularly review and update these rules, as is done for any regulation. Also, as new technologies appear on the market, I would find quite normal to develop new rules or to amend existing ones in order to take into account these new technologies to ensure that their performance remains satisfactory (again, this does not mean that their performance must be identical as when new!) and to indicate when possibly a repair/replacement/update is necessary. An obvious example could be that during a PTI, a verification is made that any safety or environment relevant software in the vehicle is still in line with the manufacturer recommendations.
5. Many data in the vehicle belong to the vehicle owner and/or to the vehicle manufacturer and there is absolutely no justification for a PTI to have access to all the data of the vehicle. PTI is not a police control, but must be limited to a verification of what is strictly necessary, e.g. is the installed software still OK (see above)?
6. I am not sure to understand why the IWG should become a permanent group. Once the job is done, then the IWG can stop its activities, at least until such time that there is a need to start some new work, in order to amend existing rules, develop new ones, etc.
7. Market surveillance is clearly not in the remit of the IWG, as was also stated at the March WP29 session. MS is intended to check that vehicles indeed are in line with the approval requirements and to chase down "defeat devices"; this is totally different from a PTI! Of course, each and every country/region is perfectly allowed to introduce MS, but this must remain a possibility, not an obligation. It clearly would be useful that in any case,

the MS procedures are harmonised, e.g. possibly a recommendation in the UNECE framework (Resolution?) such that countries wishing to introduce MS are recommended to follow certain guidelines. However this should be discussed at WP29, on the basis of a proposal by a CP, but is not a discussion item for the IWG. In other words, I cannot agree at this stage with statements on market surveillance in the framework