

**FIGIEFA contribution to the European Commission public consultation  
on Vehicle safety – revising the EU’s roadworthiness package**

(28/07/2025)

[https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13132-Vehicle-safety-revising-the-EUs-roadworthiness-package\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13132-Vehicle-safety-revising-the-EUs-roadworthiness-package_en)

FIGIEFA, the European Association of independent wholesalers & retailers of automotive parts and components, welcomes the European Commission’s initiative to revise the EU’s roadworthiness package and acknowledge the importance of ensuring that vehicles remain safe, environmentally compliant, and fit for purpose throughout their lifetime.

We take this opportunity to share a number of considerations to help ensure that the revised framework is both coherent and effective for all market participants, including independent operators, and contributes meaningfully to road safety, environmental protection, and fair competition throughout the vehicle lifecycle.

**1. The need for a clear definition of vehicle data**

The current EU legal framework lacks a consistent definition of "data" in the context of roadworthiness testing, diagnostics, condition monitoring, and predictive maintenance. As vehicles become increasingly digital and software-driven, this gap creates uncertainty about which data are relevant for Periodic Technical Inspection (PTI) and for independent repair and maintenance services needed to prepare vehicles for PTI.

We encourage the Commission to define “data” broadly, including not only OBD and fault codes but also dynamic, performance-related, and state-of-health parameters from in-vehicle sensors and ECUs. This is essential for future PTI requirements related to electric vehicles and ADAS.

**2. Access to technical information must be aligned with Regulation (EU) 2018/858**

It is common practice for consumers and businesses to have their vehicles inspected and prepared by workshops prior to undergoing Periodic Technical Inspection (PTI). To support this practice and uphold vehicle safety, independent operators must have access to the relevant technical information—particularly specific PTI data and values, including values related to ADAS systems, which are increasingly subject to PTI requirements. This information should be made available to independent operators on the same terms and scope as it is to testing centres.

In this context, the revised roadworthiness package, once finalised, should feed into the type-approval framework to ensure that independent operators can access the technical information necessary to prepare vehicles for PTI.

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However, coherence is currently lacking. For instance, the state of health (SoH) of high-voltage batteries is relevant for PTI, but is not covered under the Repair and Maintenance Information (RMI) obligations of Regulation 2018/858. This creates a clear imbalance: testing centres may obtain such data via authorities or PTI protocols, while independent operators lack access to prepare vehicles in advance.

This inconsistency undermines both regulations and creates unfair market conditions. It may also lead to vehicles failing PTI unnecessarily due to missing maintenance data, penalising consumers.

### **3. Article 4a(1): combating odometer fraud – odometer recordings**

We support efforts to prevent odometer fraud but are concerned that Article 4a(1) could create an excessive burden, especially for small workshops, by requiring odometer recording for all repairs or maintenance actions.

To avoid disproportionate costs, we suggest excluding minor interventions (e.g. wiper blade replacement, light bulbs, fluid top-ups) from this obligation.

We also encourage linking digital service books to the MOVE Hub to enable automatic odometer data transfer, ease compliance, and ensure consistency across Member States.

### **4. Art 9(4): Clarification of “obvious tampering or manipulation”**

Article 9(4) refers to “obvious tampering or manipulation” of components such as odometers, emission or safety systems. While we support enforcement against tampering, the term “*obvious*” is subjective and risks inconsistent application across Member States.

We recommend clarifying this term by referencing objective indicators (e.g. broken seals, altered wiring, inconsistent mileage) or including examples in implementation guidelines to ensure legal certainty and harmonised enforcement.

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## **Recommendations**

To support road safety, environmental goals, and fair competition, we recommend:

- Introducing a harmonised and up-to-date definition of “vehicle data” that reflects the complexity of modern, connected vehicles.
- Ensuring that any data required or used for PTI are also available to independent operators under Regulation (EU) 2018/858, as part of the RMI information for the preparation of vehicles for PTI
- Updating Annex X of Regulation 2018/858 to include data relevant for PTI, such as battery SoH and ADAS calibration status.
- Clarifying the term “obvious tampering” in Article 9(4) to ensure consistent enforcement.
- Exempting minor repairs from odometer recording obligations under Article 4a(1), and encouraging the connection of digital service books to the MOVE Hub.

These updates will contribute to a future-proof, balanced and coherent regulatory framework across the EU.