FIVA

Position paper:

We Protect
We Preserve
We Promote

FIVA's Position Paper on the 2025 EU Roadworthiness Proposal

May 2025

Background

On 24 April 2025, the European Commission presented a legislative package to modernise EU rules on roadworthiness testing and vehicle registration. FIVA (*Fédération Internationale des Véhicules Anciens)* welcomes the initiative's overall aim of improving safety and transparency. However, we are concerned that several provisions risk undermining the principles of vehicle preservation, restoration, and the circular economy.

Recommendations

FIVA calls on the European Parliament and the Council to:

- Maintain the current approach to historic vehicles, including the freedom of Member States to define and manage their inspection regimes;
- Introduce a requirement for all Member States to protect vehicles of historical interest, in line with the EU definition;
- Confirm the principle that vehicles must be assessed against the technical and environmental requirements applicable at the time of their first registration or type-approval. A vehicle should not be deregistered or failed at inspection merely because it does not meet standards that did not exist when it was manufactured.
- Provide flexibility for Youngtimers[1] and used vehicles, allowing national authorities to adjust inspection requirements based on actual use and condition;
- Ensure that anti-tampering provisions do not penalise legitimate repairs, tuning, or restorations, particularly where original parts are no longer available. The proposal should clarify that "tampering" refers to deliberate manipulations that defeat safety or environmental controls, not aesthetic or non-critical technical modifications.

[1] FIVA defines Youngtimers as: "A mechanically propelled road vehicle: - which is between 20 and 29 years of age; - which is in good condition and preservation; - which is usually used during leisure time; - and which may become eligible for a FIVA Identity Card upon reaching 30 years of age. The classification of "Youngtimers" is essential to ensure the continuity of the historic vehicle park and of our motoring heritage. Until the vehicle reaches the status of a historic vehicle there is a range of years where protection and preservation are equally important if the vehicle is to survive to become a historic vehicle. This is the "Youngtimer" period.

- Reconsider the mandatory testing of motorcycles, favouring evidence-based and risk-adjusted approaches such as roadside inspections;
- Align the proposal more clearly with the objectives of the Circular Economy, especially regarding durability, repairability, and circularity.

I. Historic Vehicles: Definition is Preserved, but Stronger Safeguards Needed

FIVA welcomes the fact that the proposal to revise Directive 2014/45/EU **preserves the current definition and treatment of historic vehicles**. Under existing law, a "vehicle of historical interest" is defined in Article 3(7) of the Directive as:

"any vehicle which is considered to be historical by the Member State of registration or one of its appointed authorising bodies and which fulfils all the following conditions:

— it was manufactured or registered for the first time at least 30 years ago;

—its specific type, as defined in the relevant Union or national law, is no longer in production;

—it is historically preserved and maintained in its original state and has not undergone substantial changes in the technical characteristics of its main components;"

The Directive allows Member States to exempt these vehicles from periodic roadworthiness testing, recognising their limited use, cultural significance, and unique technical characteristics.

FIVA is pleased that the 2025 proposal does not alter this definition nor remove Member States' discretion to exempt such vehicles. We see this as a clear recognition of the unique nature of historic vehicles and the importance of their continued preservation and circulation.

However, the proposal could introduce a stronger mandate to ensure all Member States provide a baseline level of regulatory protection for historic vehicles. In the absence of such a safeguard, regulatory inconsistency persists, with some Member States lacking a clear administrative category or appropriate exemption framework for historic vehicles. FIVA therefore calls on co-legislators to include in the final text a requirement that all Member States establish a dedicated regime for vehicles of historical interest, in line with the EU definition, ensuring legal clarity and appropriate treatment across the internal market.

II. A Disproportionate Approach to Youngtimers and Used Vehicles

On the other hand, the proposal introduces a significantly stricter regime for Youngtimers (as per FIVA's definition, see p. 1) as well as to any vehicle over ten years old. Youngtimers, owned by enthusiasts who wish to invest in their maintenance and preservation, have the potential of becoming vehicles of historical interest and to become part of our European motoring heritage. Their maintenance and preservation also substantially contribute to employment and economic growth in Europe's diverse vehicle restoration sector, mainly composed of SMEs. These are vehicles that, while not yet old enough to be granted historic status, are increasingly valued for their cultural, design, or technical significance, and are frequently preserved and maintained by private owners.

The proposed measures include:

- Annual testing after 10 years of age, compared to biennial inspections today in many Member States;
- Stricter emissions testing, including for nitrogen oxides (NOx) and particle number (PN), based on new measurement methods;
- Enhanced anti-tampering checks, which could flag necessary repairs using non-original or adapted parts as defects;
- Linkage of test outcomes to vehicle registration, with suspension or withdrawal of registration in case of non-compliance.

While the objective of reducing emissions and ensuring road safety is legitimate, FIVA is concerned that the practical effect of these measures may be the forced removal of countless perfectly functional and roadworthy vehicles — solely because they cannot meet new requirements introduced long after their original approval and manufacture.

This creates a disconnect between the Commission's green ambitions and its treatment of durable, well-maintained older vehicles. The proposal penalises reuse and restoration, discouraging efforts to extend vehicle lifespans, and potentially accelerates scrappage and premature replacement — a clear contradiction of circular economy principles.

FIVA also recalls the importance of **maintaining the long-standing legal principle that vehicles must be assessed against the technical and environmental requirements that were in force at the time of their first registration or type-approval**. This principle is essential to ensure fairness and legal certainty, particularly for older vehicles whose design predates the introduction of many modern standards. For example, braking performance must be judged according to the specifications applicable when the vehicle was first placed on the market — not according to today's electronic or multi-channel systems. Similarly, from the early 1990s onward, Euro emission norms have imposed increasingly strict thresholds, which vary significantly by vehicle generation. For instance, a Euro 2 petrol car from 1995 may not be equipped with a catalytic converter or particulate filter and still be fully compliant with the legal standards applicable at the time. It would be technically incorrect and legally unjustified to penalise or deregister such a vehicle for not meeting later Euro 5 or Euro 6 emission limits that did not exist when it was built.

III. Motorcycles: No Evidence, Yet More Burden

The proposal also makes periodic testing for motorcycles mandatory EU-wide, replacing the current system in which Member States decide based on national risk assessments. The proposal achieves this by deleting Article 2(2)(d) of Directive 2014/45/EU, which currently allows Member States to exempt motorcycles. Going forward, periodic testing will be mandatory EU-wide for motorcycles above 125cc (L3e and L4e categories).

FIVA strongly questions the proportionality of this measure. Available accident statistics do not show a correlation between motorcycle roadworthiness and accident rates, and many Member States already have targeted roadside inspections in place. These are often more effective, less burdensome, and more appropriate for the seasonal and often low-mileage use of many motorcycles.

In this context, mandatory periodic testing imposes administrative and financial burdens on motorcyclists without clear justification — particularly on classic and enthusiast-owned motorcycles, many of which are better maintained than the average vehicle fleet.

IV. Risk to Cultural Heritage and Circular Economy

FIVA believes the current proposal risks eroding Europe's rich and diverse motoring heritage by creating disproportionate compliance barriers for vehicles that have the potential of becoming historic and, in the meantime, serve the cause of vehicle preservation, which is a meaningful activity for countless individuals, clubs and businesses throughout Europe.

If implemented without appropriate safeguards, the proposed regime could lead to the systematic deregistration of vehicles that are technically sound, regularly maintained, and environmentally efficient relative to their lifecycle emissions.

This would undermine:

- The practice of vehicle restoration as a cultural and economic activity;
- The principle of longevity over replacement, central to sustainable consumption;
- The legacy of past engineering and industrial design, increasingly recognised as part of Europe's cultural identity.

About FIVA

The ***Fédération Internationale des Véhicules Anciens*** (FIVA) is a worldwide non-profit organisation dedicated to the protection, preservation and promotion of historic vehicles. Founded in 1966, it is the association uniting owners and collectors of historic vehicles around the world. Historic vehicles are therefore a part of our technical and cultural heritage.

FIVA's national member organisations represent around 1.5 million historic vehicle owners in the EU and around 2 million in over 70 countries worldwide. One of FIVA's core objectives is to ensure that historic vehicles can continue to be preserved and continue to be used on public roads. The cars, motorcycles, vans, trucks, buses, agricultural vehicles and steam engines of yesterday are our motoring and cultural heritage. Historic vehicles are contemporary witnesses of another era and it is essential to protect this heritage today and for the future.

FIVA supports road safety and responsible vehicle maintenance. However, preserving our motoring heritage and promoting sustainable vehicle use require a regulatory approach that is proportionate, flexible, and respectful of automotive culture. We urge legislators to seize this opportunity to modernise roadworthiness rules without undermining the very values they aim to protect.

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