



7th ACEM Annual Conference

The Views of the Industry on COM (2010) 542

Jacques Compagne
Secretary General of ACEM
The Motorcycle Industry in Europe



ACEM Created in 1994:

- 12 PTW manufacturers (including extra-EU)
- The main Tricycle and Quadricycle manufacturers
- More than 30 brands
- 16 national industry associations representing smaller manufacturers (including SMEs)
- 14 countries





A new regulation for the next decades

- Good cooperation with EC and within MCWG
- ACEM welcomes the long awaited regulation
- Among the positive aspects:
 - The intention of “simplification”
 - Some of the industry proposals have been incorporated for the short and medium term
 - Level playing field and higher emphasis on market surveillance
- But much remains to be improved/defined with the co-legislators



ACEM further proposals in the same spirit of constructive cooperation for:

1. Scope
2. Environmental measures
3. Safety measures
4. Administrative requirements
5. Calendar



1. Scope

The Scope of the Regulation Needs Stability

- Enduro and trial MCs always part of EU legislation
- The proposed regulation explicitly excludes them





1. Scope

The Scope of the Regulation Needs Stability and Certainty

- The interpretation of the definition
“vehicles primarily intended for off-road use and designed to travel on unpaved surfaces”
in Article 2 § 2 letter (g) is left at the discretion of
type-approval authorities



1. Scope

One Fair Proposal

- The scope of the regulation should cover all L1 and L3 vehicles fulfilling the safety, environmental and construction requirements
- ACEM proposal: to simply exclude L1 and L3 from the exclusion (g) of Article 2 § 2.



2. Environment

Next Euro Stages 3/4 and 4/5 are Welcome

- ACEM appreciates the integration in the regulation of most of its proposals on emissions reduction
- It leads to a -50% reduction by 2017

Other Provisions Need Further Attention

- Hybrid propulsion is penalised
- Euro stage numbering requires consistency
- Euro 3 for L6B limit values do not reflect progressive reduction



2. Environment

Encourage Hybrid Propulsion

- A valuable contribution in reducing pollutant and noise emissions.
- The proposed regulation aligns the emissions limit values of hybrid propulsion to the ones of the diesel propulsion.
- An unfair penalty to a technology, already disadvantaged by its intrinsic manufacturing and component costs.



2. Environment

In Fairness of Hybrid Propulsion

- ACEM proposal: the emissions limit values of hybrid L-category vehicles to be logically defined according to the technology of their thermal engine.



2. Environment

Euro Stage Number Consistency

- Why same limit values, but different Euro stage numbers?
- ACEM proposal: to apply consistent Euro stage number, to the benefit of industry, authorities and consumers
(equal access to potential incentives, application of traffic management/restriction measures in cities,...)



2. Environment

Euro 3 and Euro 4 stages for L6B diesel No Progressivity in CO emissions reduction

- L6B diesel subject to a 3.5 times reduction of CO emissions by 2014!!
- Proposal: to follow ACEM's proposed values before reaching the 2020 target
 - Euro 3: 3500 g/km
 - Euro 4: 1900 g/km



3. Safety

Some Safety Provisions are Welcome

- Deletion of power limit option for L3 in coherence with EU internal market objectives
- Legislative approach to AHO ensures level playing field

Some Need Further Attention

- Legislative approach to braking systems for L3
 - ensures level playing field
 - offers acceptable flexibility
 - but requires obvious exemptions for off-road vehicles.
- Max mass for L6 and L7 needs adaptation/clarification

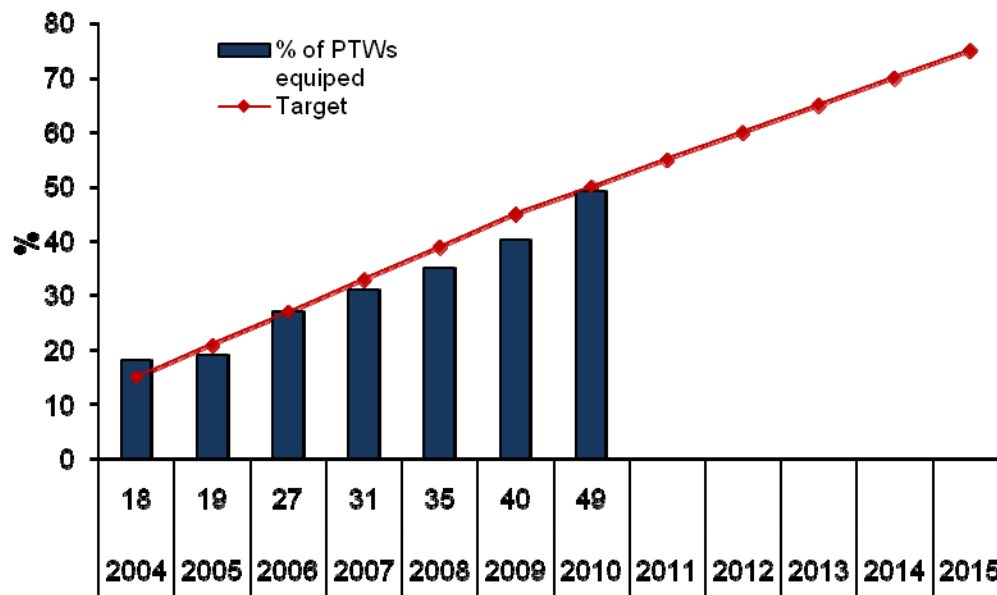


3. Safety



Reminder: ACEM Commitment on Advanced Braking Systems

European Road Safety Charter
% of MCs equipped with Advanced Braking Systems



Today's situation

- 2010 Industry commitment is achieved for MCs
- 2015 commitment is on track
- 2009 penetration rate: 35% of registration

Commitment provides a useful “bridge” towards legislation in 2017/2018



3. Safety

EC Proposal on Braking for L3 cat. A Real Bottom Line for Industry

- Provided that industrial lead time is respected
 - Through the constructive industry proposals on distinguishing new and existing TAs
- Provided that minimum flexibility
 - Is kept for the L3-A1 category vehicles (choice between CBS and ABS takes into account cost/benefit of solutions)
 - Is introduced by exempting Trial and Enduro (off-road use requires actuating single brake)
- Then ACEM can accept the EC proposal



3. Safety

L6 and L7 Quadricycles Subject to Contradictory Requirements

- New environmental requirements
- New safety requirements with unknown specs so far
 - Front and rear protective structures
 - Vehicle occupant protection
 - Vehicle structure integrity
- Both set under stringent maximum mass
- Proposal: define the maximum mass once visibility on specs will be provided



4. Admin. Requirements

Administrative Requirements Cause Deep Concerns

- With the exception of Market Surveillance provisions: a step towards level playing field
- Limits for small series and end of series are unjustified
- Article on systems, components or separate technical units is not applicable
- RMI provisions appear as a Pandora's box



4. Admin. Requirements

Market Surveillance > Level Playing Field

- Crucial in particular in the current economic situation.
- ACEM welcomes market surveillance provisions and the definitions of the different operators intervening in the supply chain.
- Need for
 - Effective coordination and monitoring measures at EU and National level to ensure new measures are applied in a fair way,
 - Clarification of the market operators' roles



4. Admin. Requirements

Limits for Small Series are Too Low

- From 200 down to 20 (L1) or 50 (L3, L5)!!
- ACEM proposal: to keep existing provision of 200 units per year for all L-category vehicles.
- **Relevant to SMEs**



4. Admin. Requirements

Limits for End of Series are Too Low

- From 100 down to 10!!... (in one of the proposed alternatives)
- ACEM proposal: to keep existing provision of 100 units per Member State for all L-category vehicles.
- **Relevant to SME**
- **Relevant to the scheduling of obligations**



4. Admin. Requirements

System, Components or Technical Separate Units

- Initial objective: to prevent the use of parts that pose significant safety or environmental risks
- BUT the foreseen provisions are not applicable
- They would prevent
 - The sale of duly type-approved spare parts, if used in racing activities
 - The sale of racing parts to individuals
- Proposal: to achieve the intended goal through other legislation than TA



4. Admin. Requirements

Disproportionate RMI provisions

- ACEM supports in principle sharing RMI
- Two prerequisites: clarification of the obligations and feasible lead time
- Most of foreseen provisions seem not reflecting the specificities and possibilities of the sector
- Open issues: fraud, privacy, safety (integrity of anti-tampering provision) and cost of a complex system
- **Relevant to SME**



6. Calendar

The Current Calendar Needs Rationalisation

- A complex and burdensome amount of dates
- Delegated acts available in 2012 only
- End of validity of the Euro 3 at the end of 2012
- Optional dates offer a very limited time window



6. Calendar

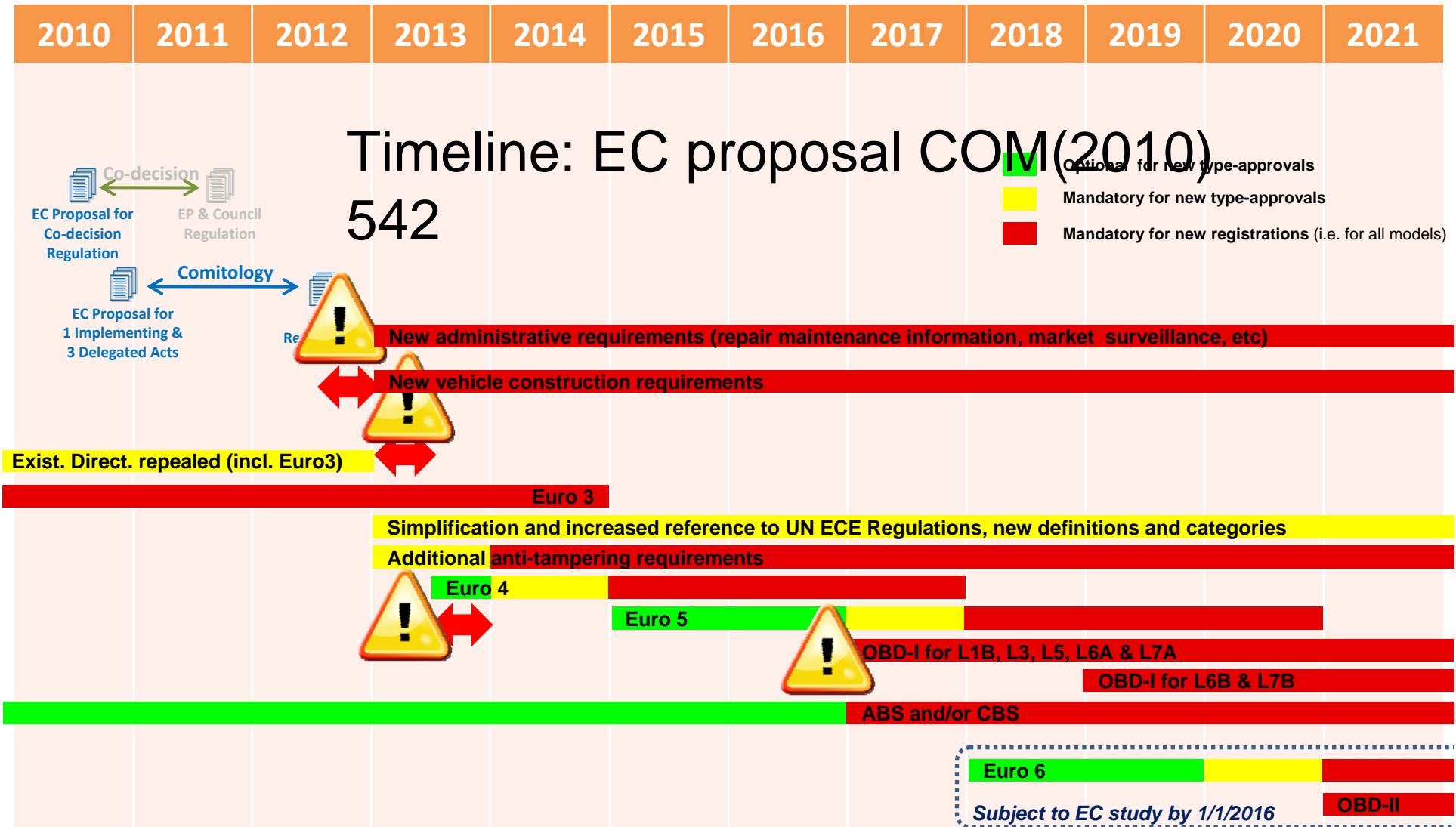
A Clouding of Obligations

- 2013: several new requirements for new TA, incl. shift to ECE
- 2014: Euro 3/4 for new TA
- 2015: Euro 3/4 for all new registrations
- 2017: Euro 4/5 for new TA
- 2017: OBD-I and ABS/CBS for all new registrations (means: TA prior to 2017)
- 2018: Euro 4/5 for all new registrations
- 2019: OBD-I for all new registrations (L6B and L7B only)
- 2020: Euro 5/6 for new TA
- 2021: Euro 5/6 and OBD-II for all new registrations



6. Calendar

EC proposal COM(2010) 542





6. Calendar

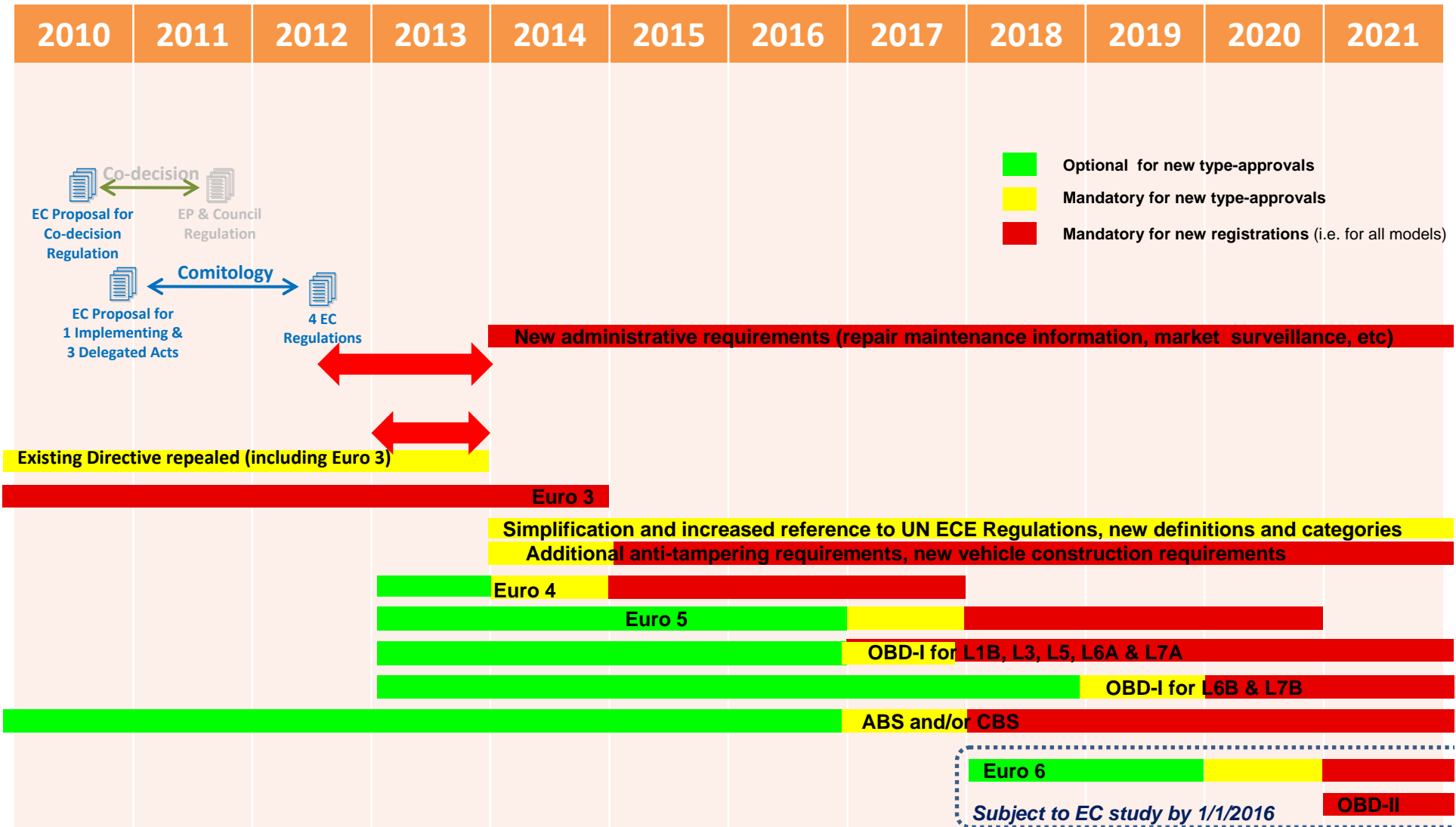
Four Constructive Proposals

1. All new measures not be applicable to new registrations but only to new TAs and subsequently to old TAs
2. One-year postponement of the application date of the regulation ensuring minimum lead time to apply the delegated acts. With no modification of the intermediate deadlines.
3. The repeal as of 01 January 2014 of old Directives
4. The deletion of the optional dates in regards to the emissions stages, a measure better suiting the demands of the society and the consumers as well.



6. Calendar

ACEM proposal COM(2010) 542





Conclusions

- EC regulation proposal good basis for legislative process, BUT much remains to be done:
 - On the calendar: rationalization, feasible lead time
 - On the administrative requirements: RMI, small and end of series
- Fine tuning is necessary on
 - On the scope of the regulation
 - On Safety and environmental measures
- ACEM looks forward to high quality legislation developed in constructive cooperation with the co-legislators



Thank you!