

EUROMOT · Lyoner Strasse 18 · ZIP 60528 · Frankfurt/M. · Germany

Dr Philipp Troppmann  
Sustainable Mobility & Automotive Industry  
European Commission  
EC DG ENTR - Unit B/4  
1049 Brussels  
BELGIUM

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The European Association of Internal  
Combustion Engine Manufacturers



Tel: (+49 69) 6603-1354  
Fax: (+49 69) 6603-2354  
E-mail: [info@euromot.eu](mailto:info@euromot.eu)  
Web: <http://www.euromot.eu>

General Secretariat  
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## Position on Transitional Provisions for SSI Engines

Dear Dr Troppmann

Within the context of the ongoing review of the nonroad mobile machinery directive 97/68/EC EUROMOT would like to highlight the position of manufacturers of small petrol engines of less than 19 kW on considerations to modify the existing scheme for transitional provisions.

The current directive provides in Art. 2 (definitions of small volume engine family and small volume engine manufacturer) and Art. 10 (3) and (4) (transitional clauses) the framework for a prolonged use of Stage I which has been proven to be essential for a series of our member companies to deliver products for professional use that would otherwise have disappeared from the markets.

Examples are handheld machines in niche markets, i.e. with very low sales volumes and high R&D costs, such as alpine-rope-winches, rescue equipment to cut safety-glass, cork-harvesters, tea-harvesters, etc. A significant number of these niches provide the business models for smaller size companies operating in a highly diversified market with over 500 different applications for small spark ignited engines and equipment.

As a counterpart to the EU schemes, US EPA have introduced more than 10 years ago an Averaging, Banking and Trading program (ABT) as given by 40CFR1054 and 40CFR90. It offers full flexibility for manufacturers and combines an effective mechanism for controlling exhaust emissions from combustion engines with a maximum of cost effectiveness for industry.

Consequently, EUROMOT requests that any future scheme shall:

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**President:**  
Georg Diderich

**General Manager:**  
Dr Peter Scherm

ENGINE IN SOCIETY

A European Interest Representative (EU Transparency Register Id. No. 6284937371-73)

A Non Governmental Organisation in observer status with the UN Economic Commission for Europe (UNECE) and the International Maritime Organisation (IMO)

- EITHER retain the current provisions for small volume engine families and small volume engine manufacturers as defined by Art. 2 and Art 10 (3) and (4) of 97/68/EC,

OR introduce a scheme aligned with US EPA's Averaging, Banking and Trading program, that would allow at minimum the averaging of emissions;

- Facilitate market surveillance measures to ensure a level playing field on the EU market;
- Ensure the provisions are clear and can be uniformly enforced and the chosen approach is simple and transparent.

EUROMOT remains available to provide further explanation and to participate in further discussion on the above points.

Yours sincerely,



Dr Peter Scherm General  
Manager

EUROMOT is the European Association of Internal Combustion Engine Manufacturers. It is committed to promoting the central role of the IC engine in modern society, reflects the importance of advanced technologies to sustain economic growth without endangering the global environment and communicates the assets of IC engine power to regulators worldwide. For more than 20 years we have been supporting our members - the leading manufacturers of internal combustion engines in Europe, USA and Japan - by providing expertise and up-to-date information and by campaigning on their behalf for internationally aligned legislation. The EUROMOT member companies employ all over the world about 200,000 highly skilled and motivated men and women. The European market turnover for the business represented exceeds 25 bn euros. Our **EU Transparency Register** identification number is **6284937371-73**.

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Manufacturers of Nonroad SSI Engines within our membership are:

**BRIGGS & STRATTON**

**DOLMAR**

**EMAK**

**HONDA EUROPE**

**HUSQVARNA GROUP**

**KAWASAKI EUROPE**

**KOHLER GLOBAL POWER GROUP**

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