EUROMOT POSITION

30 January 2015

Potential amendment to COM(2014) 581 to remove the requirement for a Certificate of Conformity for stage V engines

Article 30 of COM(2014) 581 proposes to introduce for the first time at stage V a requirement for the engine manufacturer to provide a Certificate of Conformity (CoC) to accompany every engine. The CoC is intended remain with the engine throughout the shipping and installation process and subsequently accompany every machine. Furthermore, manufacturers will be required to include special measures to prevent forgery of the certificate, and supply replacement certificates for a period of ten years after the engine has been produced.

Simultaneously with this requirement, the following means of demonstrating compliance are additionally required:

- Articles 21 & 22 require that member state approval authorities issue type approval certificates for approved engine families, inclusive of an information package identifying all types of approved engine included in the type approval.

- Article 31 requires all engines to be fitted with labels or other method of marking, indicating mandatory essential information regarding the engine, in order to enable confirmation that the engine was produced in accordance with the associated type approval.

- Article 42 establishes a Union central administrative platform and database for the ‘exchange of data and information related to EU type-approvals in electronic format.’ This is intended to not only include provision for sharing data between approval authorities, but additionally to make certain type approval information available to the public.
EUROMOT fully supports measures to ensure effective market surveillance. However EUROMOT believes that the requirement to provide a CoC for every engine, and for this CoC to be retained with every machine, is an unnecessary and duplicative burden, given that the requirements contained in articles 21, 22, 31 & 42 are also intended to demonstrate compliance of an engine with COM(2014) 581.

EUROMOT consequently calls for the deletion of Article 30 of COM(2014) 581.

For more information please contact:

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