
EUROMOT POSITION



14 April 2015

Summary of EUROMOT reaction to proposed stage V non-road engine emission regulation COM(2014) 581

Firstly, **EUROMOT broadly welcomes the legislative proposal**. The Commission has proposed a regulation that recognizes the diversity of the sector, whilst challenging manufacturers to further reduce the impact on the environment.

Secondly, a swift reading in Council & Parliament is essential. If manufacturers are to deliver stage V engines according to the ambitious timeline of this proposed regulation it is necessary to conclude and publish the co-decision regulation by the start of 2016.

Thirdly, EUROMOT members have the following concerns with the proposed regulation:

1. Substantive Issues

1.1. Overly ambitious inland waterway propulsion and auxiliary engine emission limit values

The limits for this niche sector could be detrimental to the viability of inland shipping. Alignment with US limit values would deliver cost-effective emission reduction.

1.2. Lack of a specific provision to permit placing on market of replacement engines

A non-road machine is often a long-term investment in high-value capital equipment. It is essential that the engine can be quickly replaced during the life of the machine.

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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)

1.3. Inclusion of "wintertime engine" in hand-held engine category

This is necessary to allow manufacturers to properly calibrate these spark ignition engines to perform in subzero conditions whilst delivering safe performance and low emission levels.

2. Regulatory Clarity

2.1. Lack of clarity in use of existing exemptions prior to commencement of stage V

In order to avoid a gap in the legislation it is necessary for the existing exemptions in 97/68/EC to continue until stage V commences for the respective engine category.

2.2. Avoid double regulation of emissions from non-road engines

National type approval of non-road machinery should not be refused on grounds related to exhaust emissions where the machine is fitted with an engine in conformity with EU regulation.

3. Administrative Burden: Unnecessary requirement for a Certificate of Conformity (CoC) for each engine

Measures to ensure effective market surveillance are fully supported. However the requirement for a CoC for every engine is an unnecessary and duplicative burden.

Please see additional EUROMOT documents providing explanation and specific proposals on the above items.

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For more information please contact:

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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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