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## **EUROMOT POSITION**

**04 April 2014**



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# **Euromot Position on Introduction dates for new non-road engine emission regulation**

## **Executive Summary**

This document is intended to provide the Euromot position on the introduction dates for new non-road engines that were published by DG Enterprise following the GEME meeting of 13 February 2014. The key points, elaborated in the following pages of this document, are that:

1. Placing on market date for new emission stages should be latched to nearest 01 January (instead of part way through year)
2. The minimum period between publication of both the delegated and implementing acts in the Official Journal and the placing on the market date for the new stage should be 2 years
3. It must be possible for new type approvals to the existing stage to still be issued up to 1 year prior to placing on market of the new stage and for existing type approvals to be updated as necessary until end of engine production
4. The six-month time limit for production of engines to be placed on market after the end of the stage should be removed

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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. Placing on market date for new emission stages should be latched to nearest 01 January (instead of part way through year)**

Euromot supports the need to link the date for the placing on the market of new emission stages with the date of entry into force of the new NRMM regulation. This is important in order to provide sufficient lead-time to make available new engines on the EU market following publication in the Official Journal. However, changing the emission stage part way through the year would result in additional challenges. Consequently Euromot requests that instead of the placing on market date occurring mid-year, that the date is 'latched' to the nearest 01 January.

Example based upon 56 – 130 kW engine category:

If the new NRMM regulation enters into force on 26 February 2016, then the placing on the market date for engines 56 – 130 kW should be 01 January 2020.

If the new NRMM regulation enters into force on 04 July 2016, then the placing on the market date for engines 56 – 130 kW should be 01 January 2021.

A similar principle should apply to other engine categories.

## **2. The minimum period between publication of both the delegated and implementing acts in the Official Journal and the placing on the market date for the new stage should be 2 years**

The placing on the market dates proposed by DG Enterprise are challenging for manufacturers and provide a very short time between the publication of the co-decision regulation and the need to provide type-approved engines of the next stage into the market. The final technical requirements that manufacturers will be required to follow in order to complete their product development and obtain engine type approval will not be known until publication of both delegated and implementing acts. Furthermore, DG Entr has minimised the amount of time available for machine manufacturers to transition their products to use these new engines. This results in additional pressure on engine manufacturers to provide type approved engines to OEMs on-time to meet their product introduction schedule.

Type approval to the new emission stage should be made possible as soon as the delegated and implementing acts are published, as is the case in 167/2013 for agricultural tractors. However, there is concern from engine manufacturers that if the publication of the delegated and implementing acts is delayed it will not be possible to provide type approved engines on-time.

Consequently, Euromot requests that the minimum period between publication of both the delegated and implementing acts in the Official Journal and the placing on the market date for the new stage be no less than 2 years. Euromot is willing to work with Commission Services in order to achieve this objective. However, in order to ensure that this minimum period will be provided, regardless of any unforeseen external influences, Euromot requests that there is a

'safeguard' clause included in the co-decision act that will postpone the placing on the market date if the publication of the delegated and implementing acts is delayed.

**3. It must be possible for new type approvals to the existing stage to still be issued up to 1 year prior to placing on market of the new stage and for existing type approvals to be updated as necessary until end of engine production**

During the life of an engine type approval it will require periodic updating to enable the production of different ratings, including in some cases a new parent engine for the engine family, changes in manufacturing location, and to ensure the list of parts and specifications for the type approved configuration are up-to-date.

Consequently it is essential to ensure that, as for existing practice under 97/68/EC, it is possible for new type approvals to the existing stage to be issued up to 1 year prior to placing on the market of the new stage and for existing type approvals to be updated as necessary until end of engine production.

**4. The six-month time limit for production of engines to be placed on market after the end of the stage should be removed**

The transition scheme proposed by DG Entr foresees the possibility that engine manufacturers can produce engines during the last six months of a stage to enable production of machines using these prior stage engines during the first year of the new stage. Euromot believes that by setting, as already envisaged, end dates for both engine and machine manufacture, it is not necessary to impose a further time limit on how far ahead of the new stage such engines can be manufactured. In fact, restricting the manufacture of engines for this purpose to the last six months of the emission stage appears to merely create distortion between engines that are equally in conformity with the directive purely based upon date of manufacture. This would have a negative impact on engine production scheduling and could result in 'stranded' engines manufactured in conformity with the directive that cannot be used in a machine because they were built too early in the stage.

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**EUROMOT – 2014-04-04**

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