



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  
2013-12-23 SchP/Pö

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

---

## **Euromot Position on CI Engine Transitional Provisions**

Dear Dr Troppmann

In view of the current on-going discussions on transitional provisions, Euromot would like to highlight the existing position paper dated 28 November 2011. Euromot believes that the principles and attributes identified in this paper still remain valid as the basis for judging any proposal for revised transitional provisions.

Re-stating the most important aspects identified on the first page of this position paper and adding some additional considerations in the context of the most recent discussions:

From an engine manufacturers perspective it is most important to provide transition provisions that:

1. Enable the placing on the market of engines without also promoting abnormal levels of engine inventory. This minimises peaks and troughs in engine production.
2. Notwithstanding the need to avoid abnormal inventory, set a clear date for end of engine PRODUCTION, followed by sufficient time to place engines on market, regardless of location of engine or machine plants. It is essential that this aspect is adequately taken into consideration, independent of OEM flexibility and additionally taking into account the specific needs of the rail and inland waterway sectors.
3. Ensure that the engine marking requirements do not change subsequent to engine production.
4. Above all, are clear and can be uniformly enforced, ensuring that the chosen approach is simple, transparent and easy to control for market surveillance.

**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)

Whilst recognising the need for flexibility for machine OEMs Euromot believes this must be proportionate.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Scherm', written in a cursive style.

Dr Peter Scherm  
General Manager

**Encl.: EUROMOT Position**

---

## EUROMOT POSITION

28 November 2011



---

### Response to proposals discussed at GEME meeting on 12 October 2011, for revising sell-off and flexibility schemes in Directive 97/68/EC

In considering the proposals that it has so far received, EUROMOT would like to observe that Directive 97/68/EC aims at approximating the laws of the Member States relating to emission standards and type-approval procedures for engines to be installed in non-road mobile machinery. EUROMOT strongly supports keeping the scope of application to engines only and not to enlarge it to machines.

EUROMOT has carefully considered the proposals that it has so far received and is unable to support them as currently proposed. Instead, EUROMOT established a list of general attributes for emission stage change provisions, which they believe to be required by engine manufacturers and their customers (machine manufacturers). This complete list is provided at **Annex 1** to this paper.

From an engine manufacturers perspective it is most important to provide transition provisions that:

1. Enable the placing on the market of engines without also promoting abnormal levels of engine inventory. This minimises peaks and troughs in engine production.
2. Notwithstanding the need to avoid abnormal inventory, set a clear date for end of engine PRODUCTION, followed by sufficient time to place engines on market, regardless of location of engine or machine plants. EUROMOT would support measures such as the addition of the month and year of engine manufacture in the required engine markings to assist market surveillance.
3. Above all, provide provisions that are clear and can be uniformly enforced.

#### EUROMOT

The European Association  
of Internal Combustion  
Engine Manufacturers

President:  
Michael G Hawkins

General Manager:  
Dr Peter Scherm

Lyoner Strasse 18, ZIP 60528  
Frankfurt/M., Germany

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

#### ENGINE IN SOCIETY

EU Transparency Register  
Id.No. 6284937371-73

EUROMOT believes that the two proposals that it has so far reviewed do not provide the necessary attributes to replace the existing provisions in 97/68/EC. EUROMOT would welcome the opportunity to provide further explanation as to how it reached the above conclusion.

EUROMOT will consider alternative proposals if they address the need to avoid abnormal levels of engine inventory, whilst ensuring that there remains sufficient time to place engines on the market, regardless of location of engine or machine plants.

EUROMOT would like to stress the need for great care to be taken in making any such changes. The introduction of change to the way in which placing on the market is permitted at the transition between emission stages could introduce unintended commercial consequences and lead to inequalities between manufacturers based upon manufacturing location if not drafted with utmost care. Consequently, EUROMOT urges the European Commission to work closely with industry and other stakeholders over the coming months in order to ensure any revised regulatory text delivers the intended result.

EUROMOT supports the deletion of the end of series provision (Article 10(2)) as proposed by European Commission at the 12 October GEME meeting.

---

Frankfurt/Main, 28 November 2011

**Dr Peter Scherm**  
General Manager

## Annex 1

General attributes for emission stage change provisions, against which to judge any proposals to change method of regulating the placing on market of non-road engines in the EU

EU emission stage change transition provisions should provide the following attributes:

### **A. For Engine Manufacturers they should:**

1. Set introduction dates that are staggered by power category, since manufacturers are unable to launch all new products simultaneously.
2. Set a clear date for end of engine PRODUCTION, followed by sufficient time to place engines on market, regardless of location of engine or machine plants.
3. Require engine manufacturers to take responsibility for placing on the market of the engine but not for placing into service of the engine.
4. Not drive peaks and troughs in engine production.

### **B. For Machine OEMs they should:**

1. Provide sufficient transitional provisions to cater for needs of machine OEMs who need lead-time to integrate engines into machine designs and who will be likely unable to launch all new products simultaneously.
2. Ensure that such transitional provisions are available to all OEMs regardless of location of manufacturing plant or size of OEM.

### **C. For both Engine Manufacturers & Machine OEMs they should:**

1. Provide provisions that are clear and can be uniformly enforced.
2. Require member states to conduct adequate market surveillance to enforce the provisions as agreed upon.
3. Provide transition provisions that enable the placing on the market of engines without also promoting abnormal levels of engine inventory.

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**.

<http://www.euromot.eu> – your bookmark for IC engine power worldwide

**Our members are:**

### **DIESEL AND GAS ENGINE MANUFACTURERS**

**AGCO POWER**

**CASE NEW HOLLAND INTERNATIONAL**

**CATERPILLAR POWER SYSTEMS GROUP**

**CUMMINS ENGINES**

**DAIMLER**

**DEUTZ**

**DOOSAN**

**GE POWER & TRANSPORTATION**

**HATZ**

**JCB POWER SYSTEMS**

**JOHN DEERE**

**KOMATSU ENGINES**

**LIEBHERR**

**LOMBARDINI**

**MAN GROUP**

**MITSUBISHI TURBOCHARGER & ENGINE EUROPE**

**MOTEURS BAUDOIN**

**SAME DEUTZ-FAHR**

**SCANIA**

**STEYR MOTORS**

**TOGNUM**

**VOLKSWAGEN INDUSTRIAL ENGINES**

**VOLVO CONSTRUCTION EQUIPMENT**

**VOLVO PENTA**

**WÄRTSILÄ**

**YANMAR GROUP**

**ZETOR**

### **SMALL SI ENGINE MANUFACTURERS**

**BRIGGS & STRATTON**

**DOLMAR**

**EMAK**

**HONDA EUROPE**

**HUSQVARNA GROUP**

**KAWASAKI EUROPE**

**KOHLER GLOBAL POWER GROUP**

**SOLO**

**STIHL**

**TORO EUROPE**

**WACKER NEUSON**

**YAMABIKO GROUP**