

The logo for EUROMOT, featuring the word "EUROMOT" in white, bold, uppercase letters on a dark green rectangular background.

The European Association of Internal
Combustion Engine Manufacturers

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EUROMOT comments on the stakeholder consultation on EU-US regulatory cooperation activities

EUROMOT, the European Association of Internal Combustion Engine Manufacturers, welcomes the European Commission's initiative to consult stakeholders in the process of evaluating possible EU-US regulatory cooperation activities.

In particular, we would like to highlight some regulatory issues related to non-road engine exhaust emission regulations.

EUROMOT believes that full mutual recognition of US EPA certificates in the EU and of EU type approvals in the US is not a realistic option yet for the time being: EU and US non-road exhaust emission limits, test protocols, certification systems and compliance enforcement are currently so divergent that prioritising full mutual recognition in the context of EU-US trade talks does not currently seem to be a solid policy option.

For the time being, we believe that improved **EU-US regulatory cooperation** should rather be the option to prioritise: concerning our sector in particular, this would mean more alignment on requirements, on limits and – most importantly – on test protocols, thus removing (or significantly reducing) technical barriers to commerce.

As an example, harmonization in the next rounds of Non-Road Mobile Machinery regulation development following future planned reviews of Regulation (EU) 2016/1628 could be an option to consider.

In conclusion, we would like to stress once again the fact that regulatory cooperation and harmonization should be, in our opinion, prioritised at this stage. On this basis, we remain available to provide additional and more detailed proposals.



EUROMOT aisbl

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 UN International Maritime Organisation (IMO)

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EUROMOT would like to thank the European Commission and reiterate its willingness to further contribute to the stakeholder consultation process.

Yours sincerely,

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

Dr Peter Scherm
General Manager