EUROMOT POSITION

BREXIT -

RECOMMENDATIONS ON AVOIDING TECHNICAL BARRIERS TO TRADE (TBT) IN THE FIELD OF NON-ROAD MOBILE MACHINERY AND RECREATIONAL CRAFT ENGINES

22 May 2020

EUROMOT is the European Association of Internal Combustion Engine Manufacturers. It represents manufacturers of engines used in non-road mobile machinery such as construction equipment, agricultural equipment, mobile power generation, railway vehicles and inland waterway vessels, and in recreational craft.

EUROMOT members have research, development, and production facilities in locations across Europe. A common aspect for these engines is the application of product legislation to determine the necessary emissions performance of the engines, implemented by the process of type-approval, or in the case of recreational craft engines, conformity assessment, by an organisation independent of the manufacturer.

EUROMOT recognises the independent sovereign rights of both the EU and the UK to establish product regulation and perform corresponding assessments on those products. Nevertheless, in the context of avoiding Technical Barriers to Trade (TBT) between EU and UK in the field of non-road mobile machinery and recreational craft engines, EUROMOT would like to highlight the importance of establishing concrete bi-lateral arrangements on the following points:

- A framework for consulting on development of future regulation, to avoid diverging requirements where both parties are nevertheless seeking a similar level of environmental protection; and
The mutual recognition of technical services and notified bodies to enable manufacturers to continue to work with the bodies in their own countries and avoid duplicative assessments.

EUROMOT believes that this would be facilitated by including sector-specific provisions in the future trade agreement between EU and UK, building upon precedents set by the EU-Japan and EU-Canada trade agreements.

EUROMOT consequently urges all parties to remain open to discussion of such sector-specific solutions during the ongoing trade discussions.
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 25 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. Taken together, the EUROMOT member companies employ about 200,000 highly skilled and motivated workers. The European market turnover for the business represented exceeds 25 bn euros.

Our EU Transparency Register identification number is 6284937371-73.