



European  
Automobile  
Manufacturers  
Association

# Type Approval Framework Regulation

## ACEA's views

IMCO COMMITTEE

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Tuesday, 31 May 2016





# ACEA MEMBERS

**BMW Group**



**DAIMLER**



FIAT CHRYSLER AUTOMOBILES



**IVECO**



**HYUNDAI**



PSA PEUGEOT CITROËN

**GROUPE  
RENAULT**

**TOYOTA**

**VOLVO**

**VOLKSWAGEN**

AKTIENGESELLSCHAFT





# ACEA COMMERCIAL VEHICLE MEMBERS



DAIMLER

**IVECO**



**VOLVO**

**VOLKSWAGEN**

AKTIENGESELLSCHAFT



# KEY FIGURES ABOUT THE INDUSTRY

**12.1 million** direct and indirect jobs

**€41.5 billion** in R&D spending, largest private investor

**€95.1 billion** positive net trade contribution

**€396 billion** in tax revenues (EU14)



# ACEA POSITION

- ACEA shares the assessment of the Commission and welcomes the objectives of the proposal to solve the issues which have been experienced with the current system for homologation of vehicles in Europe.
- Key for our industry is that any new proposal remains cost effective and efficient without creating unnecessary additional bureaucracy.
- The proposal is also an opportunity to reduce some of the existing complexity in the current system while strengthening the internal market for homologation of vehicles in the European Union.

# CRITICAL ITEMS

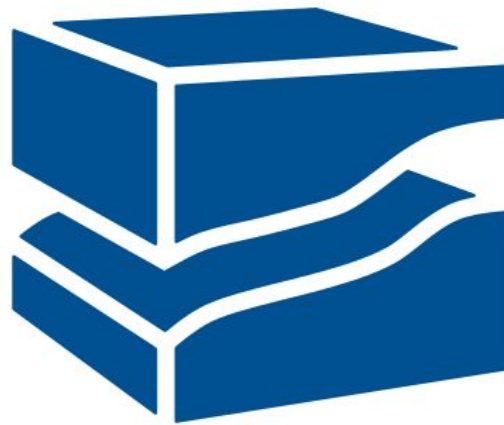
See also ACEA position paper, April 2016:

[https://www.acea.be/uploads/publications/ACEA\\_Position\\_Paper\\_on\\_2016\\_Type\\_Approval\\_Framework\\_Regulation.pdf](https://www.acea.be/uploads/publications/ACEA_Position_Paper_on_2016_Type_Approval_Framework_Regulation.pdf)

- **5-years-limited validity of certificates**
  - Could become an enormous burden for industry - **efficient administrative procedures for renewal – both for OEM and authorities – are needed**
  - **Systems, components and separate technical should be excluded**, to avoid conflict with the provisions of the 1958 Agreement to which the EU is a member
- **Financing TA and Market Surveillance via combined national fee**
  - **Member States with small type approval business cannot finance from these fees also market surveillance without raising them to prohibitive levels.**  
Financing of TA and market surveillance should be separated
- **Disruptive measures – eg sales stop - should be limited to ‘non-critical’ non-conformities**

# CONCLUSION

- **ACEA members do not want to be part of the problem, but part of the solution.**
  
- **We are ready to discuss and support with constructive proposals:**
  - How to prevent that the continuation of existing types of vehicles circumvents implementation of new requirements
  - How to finance TA and market surveillance without creating financial dependencies spoiling the level playing field
  - Any other critical issues raised by the EP and other stakeholders



ACEA

THANK YOU  
FOR YOUR  
ATTENTION

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