



# Framework Regulation on European Type Approval

## The Position of FEMA concerning the new Framework Regulation on Type Approval

**FEMA**

Federation of European Motorcyclists' Associations





# Framework Regulation on European Type Approval

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## Critical Issues

1. Advanced braking systems
2. Periodical Technical Inspection/Road Worthiness Testing
3. RMI & Modifications ('tampering')
4. Modifications and Emissions
5. On-Board-Diagnostics
6. In-Use Compliance
7. CO2-labelling & Emission limits
8. Power-Limit



## Advanced Braking Systems

- ABS is useful but should be further improved
- Producers of small batch series cannot afford own testing
- Mandatory introduction blocks innovation of better and cheaper braking systems



## **FEMA suggested:**

Introduction of ABS through voluntary commitment

## Periodical Technical Inspection/Road Worthiness Testing

- High administrative burden for users, especially in sparsely populated areas
- Safety benefit of the measure lacks statistical evidence
- Countries\* without RWT do not have worse accident statistics

### **FEMA suggested:**

No justification for including PTWs into RWT



\*Belgium, Denmark, Finland, France, Greece, Malta, Netherlands and Portugal

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## Repair and Maintenance Information (RMI) & Modifications ('tampering')

- Modifying is equal to improvement and adaptation to personal needs
- Long lasting traditions of self-maintenance and modification
- Experienced users and well established after market component parts market
- Responsibility to ensure he is using a machine that is appropriate to his licence status



## RMI & Modifications

- Culture and Creativity
- No statistics indicating relationship between modifications and accident probability



## FEMA suggested:

Preventing or controlling the freedom to make modifications will disadvantage many qualified riders

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## Modifications ('tampering') & emissions

- Low share of modified bikes
- Negligible share of emission-related modifications

### FEMA suggested:

The costs of ensuring that modifications do not negatively effect emissions far outweigh the benefits



## On-Board Diagnostics

- Effect on motorcycle safety negligible
- Additional user costs
- Periodical technical inspections required



## FEMA suggested:

voluntary introduction of OBD under the condition that whatever information provided or recorded by an OBD device is freely accessible (see RMI).

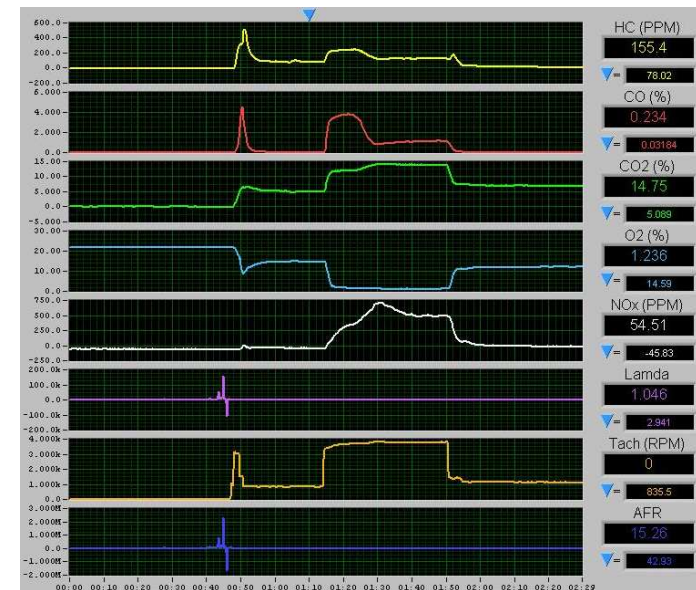




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## In-Use Compliance for emissions

- Adequate instrument to control whether a product is functioning correctly
- Non-compliance should lead to product recalls
- Emission warranty for 50.000km or 10 years
- Equal responsibility for producers of component parts



**FEMA strongly supports IUC**

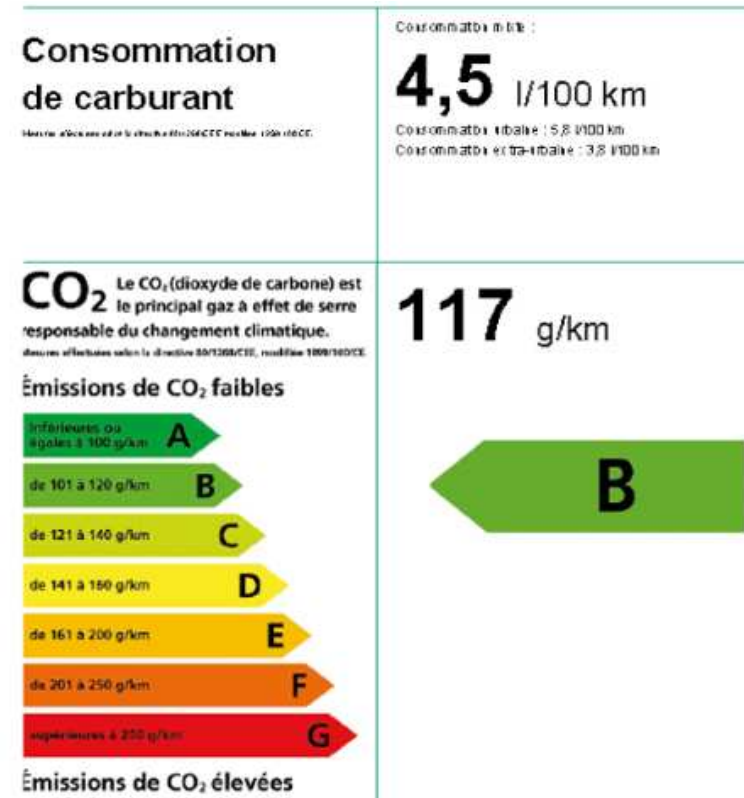


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## CO2-Labeling

- Important information for users
- Inexpensive measure

**FEMA favours the introduction of mandatory CO2-labelling**



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## Power Limit

- No causal relation between engine power and accident rates
- PTWs represent low danger for other road users
- Today type approved cars have up to 1001 hp. FEMA considers the power limit discussion for motorcycles as discriminatory



**FEMA strongly opposes a power limit for PTWs**



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**Thank you for your attention**

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