



FEMA position statement on the European Commission's proposal for a European regulation on the type-approval and market surveillance of two- and three-wheeled vehicles

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On October 4th, 2010 the European Commission published its proposal for a new regulation on type-approval of motorcycles, scooters and mopeds in Europe¹. Applying both to vehicles sold and imported in the European Union, the proposed regulation aims at clearing up the existing rules while introducing additional requirements in several fields, notably safety and environmental impact.

The initiative of the European Commission is based on an array of concerns.

Complexity of current regulations – Centralizing the relevant information currently spread over a hundred of regulations and directives in one document is expected to reduce the administrative burden of current type-approval legislation

Emissions – The regulation aims at continuing the introduction of Euro emissions regulation for mopeds and motorcycles.

Safety – Though powered two-wheeler casualties in traffic accidents have been decreasing steadily over the past decade, albeit at a lower rate than other road users, the European Commission believes that some technical solutions could have an added safety benefit.

New technologies – The new regulation intends to include provisions for new technologies, trying to balance the needs of the common market and industrial innovation.

Non-compliant products – New rules are drafted for setting up market surveillance, in order to make sure imported products from outside the EU and displaying comply with type-approval regulations.

Regarding safety aspects, the Federation of European Motorcyclists' Association (FEMA) reminds that human behaviour remains the most important safety element. To that effect, **training of all road users should be improved and preferred over vehicle regulations which restrict consumers' choice and motorcycling culture**. While regarding environmental aspects and the reduction of harmful emissions, FEMA members underline that two-wheelers only account for a tiny minority of road transport emissions and warn that efforts at reducing them, while commendable, should not lead to unrealistic expectations leading to unfair competition between transport means and ban of cultural specificities of motorcycling.

Hence, while FEMA wholly agrees that the main objectives of the European Commission should be pursued, it points out the flaws in the text and calls for better and more adapted measures regarding safety and environmental requirements.

The Federation of European Motorcyclists' Federation (FEMA) therefore:

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52010PC0542:en:NOT>

- is worried that the proposed delegation of power (delegated acts/ UN references) could eventually lead to key measures being decided without Parliament's control, threatening the democratic legitimacy of decided measures, especially when dealing with key issues directly linked to consumer choices or cultural elements of motorcycling;
- calls for vehicles primarily intended for off-road use to be covered by the regulation, while being excluded from the mandatory fitting of advanced brake systems;
- supports the progressive introduction of affordable advanced braking systems on all new motorcycles and scooters through voluntary commitment only;
- shares the view of the Commission that engine power and safety are unrelated, and welcomes the lifting of engine power limits;
- supports the principle of consumer choice for automatic headlamps and calls for a simple technical solution to off-switch headlamps for repair and maintenance operations as well as for engine starts at cold temperatures.
- FEMA supports the introduction of more severe emission limits and strongly welcomes the proposed durability requirements for emissions. However, FEMA deplores that manufacturers are not allowed to offer Euro-compliant vehicles before the scheduled implementation dates and calls for the possibility for manufacturers to set out compliance with Euro 4, Euro 5 and Euro 6 as soon as possible.
- FEMA supports the introduction of a better emissions testing procedure but calls for the application of a conversion factor as long as more accurate test cycles are not introduced for all categories of vehicles;
- opposes the change in the currently applicable limit for small series type-approval;
- calls for the possibility for Member States to interpret in a wide sense the exemptions for individual approvals;
- suggests the adoption of notification [2010/9011/N](#)² in order to provide a safe and efficient process for the type-approval of trailers;
- calls for free availability of repair and maintenance information, with specific mention in the text of guaranteed access for consumers;
- believes that the matter of powertrain modifications should be left to the discretion of Member States, while mutual recognition of legal modifications between Member States should be encouraged;
- welcomes efforts at removing unsafe and inferior products through market surveillance;
- suggests that the adaptation to new technologies should be extended to include braking systems.

²http://ec.europa.eu/enterprise/tris/pisa/app/search/index.cfm?fuseaction=pisa_notif_overview&sNlang=EN&iyear=2010&inum=9011&lang=EN&iBack=2

LEGAL STRUCTURE OF THE REGULATION

The proposed regulation includes:

- a co-decision act, approved by the Parliament and the Council of Ministers
- 3 delegated acts:
 - o environmental & propulsion performance requirements
 - o vehicle functional safety requirements
 - o vehicle construction requirements
- an implementing act.

Following the rules brought by the Lisbon Treaty, delegated acts cover the more technical elements, drafted by the Commission under a delegation of power from the Council and the Parliament.

Though both institutions can challenge these acts after they are published, and request changes or cancellation, FEMA is worried that an increased recourse to delegation of power (being through delegated acts or through global cooperation agreements such as UNECE/WP29 provisions) could eventually take key measures out of the Parliament's hands, threatening the democratic legitimacy of decided measures, especially when dealing with key issues directly linked to consumer choices or cultural elements of motorcycling.

SCOPE OF THE PROPOSAL

The proposed regulation covers a wide range of vehicles, each having their own characteristics, use and market. However, explicitly excluded from the regulation are "*vehicles primarily intended for off-road use and designed to travel on unpaved surfaces*".

But where is the line drawn? Many motorcycles are dual-use. Often, the distinction between an on-road and off-road bike will lie with the additional equipment or options, such as tires or exhausts; there is no single characteristic that identifies off-road motorcycles. In practice, a wide range of motorcycles, called trial or enduro, are designed for use on public roads as well as on unpaved dirt or gravel roads and off-roads. Even motorcycles designed with off-road use in mind need to access public roads, especially urban streets and secondary roads that allow access from the owner's residence to rough terrain, forest tracks and other unpaved roads. These vehicles have never been excluded from type-approval regulations, and doing so would exclude them from the current regulation's requirements, and therefore from registration and access to public roads.

FEMA regrets this choice, and instead calls for vehicles primarily intended for off-road use to be included in the regulation, while being excluded from the mandatory fitting of advanced brake systems³.

³ anti-lock brake systems and combined brake systems do not operate properly on a soft surface such as dirt or sand, losing their effect and potentially lead to a loss of control from the rider

SAFETY MEASURES

Advanced Braking Systems

The Commission suggests the mandatory introduction of anti-lock braking systems for powered two-wheelers over 125cm³, and either anti-lock or combined brake systems for the 50 cm³-125 cm³ range. All new vehicles would have to be equipped with the required systems by January 2013.

FEMA does not share Commission's hope that mandatory ABS will have a tremendous impact on motorcycle safety. Instead FEMA believes, while increasing vehicle cost, the measure is reducing consumer choice, giving the wrong impression that motorcycle safety will be tackled with technical improvement of the vehicle.

Road safety is a common endeavour which should include efforts from all stakeholders. FEMA believes that many avenues for improving safety for riders are not sufficiently explored and the focus of attention should not only be the mechanical aspects of motorcycles. In particular, the introduction of mandatory ABS should not be presented nor understood as a silver bullet for road safety issues, be used as a justification for reducing efforts in other critical areas of road safety, or refusing to tackle identified challenges. FEMA supports the progressive introduction of affordable advanced braking systems on all new motorcycles and scooters through voluntary commitment only.

74KW engine power limit

Current type-approval rules allow Member States to impose a blanket ban on all motorcycles with an engine power exceeding 74KW or 100 horsepower. This provision traces its roots back to the inception of European type-approval in the 1990's, allowing France to maintain a similar ban enforced at national level since 1986.

This provision, based on a perceived link between engine power and accident risk, infringes the principle of free movement of goods. In view of the consistent absence of any link between engine power and traffic accidents, the European Commission concluded that the 100 horsepower ban should no longer be allowed.

FEMA shares the view of the Commission that engine power and safety are unrelated, and welcomes the lifting of engine power limits. This proposal shows the willingness of the European Commission to base its regulations on objective data, casting aside policies arising from irrational fears and misunderstandings about powered two-wheelers and their users. It is also a step towards a better, more efficient single market which should reduce the cost of manufacturers and distributors, benefiting the users in turn.

Automatic headlamp on

The proposed regulation introduces permanently switched on headlamps for all powered two-wheelers. For mopeds and small scooters under 50cm³, headlamps on; for other powered two-wheelers, either headlamps or dedicated run-time lights, at the manufacturer's choice.

As a matter of principle, FEMA opposes measures that increase the purchasing and maintenance cost of powered two-wheelers without consumer choice. Besides, repair and maintenance works as well as engine starts at low temperatures require the possibility to turn on the ignition without switching on lighting in order to not drain on battery power. FEMA calls for a simple technical solution to be offered to alleviate this problem.

ENVIRONMENTAL MEASURES

If conditions remain the same the Commission estimates that mopeds will represent more than 35% of all hydrocarbon emissions from road traffic by 2020, and motorcycles over 20%. This discrepancy between vehicle types is due to the relatively late introduction of Euro emission regulations for two-wheelers.

Reduced emissions

In order to reduce emissions, the European Commission proposes two main measures: **tightening of emission regulations and CO2 measurement**, and **labelling** on new vehicles. The new emissions limits, similar to those implemented for four-wheeled vehicles, will also include **durability requirements** for the declared environmental performance

gradual strengthening of emissions			
	Optional	Mandatory New bikes	Mandatory Existing models
Euro 3 (<50cc) Euro 4 (>50cc)	07/2013	2014	2015
Euro 4 (<50cc) Euro 5 (>50cc)	2015	2017	2018
Euro 5 (<50cc) Euro 6 (>50cc)	2018	2020	2021

FEMA supports the introduction of more severe emission limits and strongly welcomes the proposed durability requirements for emissions. Powered two-wheelers are the most sustainable means of motorized personal transport, not only due to their efficient power-to-weight ratio, but also due to efficient space occupancy on and off the road. In order to keep contributing to the improvement of mobility, especially within urban areas, it is essential that the two-wheelers of the future remain at the forefront of environmental technology. FEMA is convinced that these measures will go toward better acceptance of the role of scooters and motorcycles.

However, FEMA deplores that manufacturers are not allowed to offer Euro-compliant vehicles before the scheduled implementation dates and calls for the possibility for manufacturers to set out compliance with Euro 4, Euro 5 and Euro 6 as soon as possible. The relevant annex must be amended in order to provide incentives for manufacturers to voluntarily offer cleaner vehicles.

Emission measurement

In order to sanction the environmental performance laid out, it is proposed that a single revised version of the currently used **World Motorcycle Test Cycle (WMTC)** be introduced. Unlike tests cycles in use for other categories of vehicles, WMTC is expected to be more accurate and closer to real-life riding conditions. The test cycle, to be used to measure polluting emissions during the type-approval process and the life cycle of the vehicle, will be further defined in delegated acts.

FEMA supports the introduction of a better emissions testing procedure, which is the only way to make sure that actual emissions are well within the theoretical limits. Nonetheless, the introduction of increasingly more accurate test cycles should apply to all categories of vehicles; if not, the continued use of comparatively more lax tests for cars and trucks could lead to a warped

perception by the public and national authorities that powered two-wheelers are more polluting vehicles. In order to maintain a momentum in the push for greener transport, it would be counter-productive to give bad publicity to products that receive a more accurate reading of their environmental performance. FEMA therefore calls for the introduction of a conversion factor as long as test cycles for cars are less precise and therefore suggest lower emission values as compared to real life.

CO2 labelling

For all powered two-wheelers, manufacturers will have to display for the customer the amount of CO2 liberated by the vehicle, in g/km. The display will be similar to the one currently used for personal cars.

FEMA welcomes this initiative, and considers that consumers should have easy access to reliable data about fuel consumption and CO2 emissions of any new two-wheeler offered for sale. This measure is a simple yet effective instrument to encourage customers to purchase products with an improved environmental performance.

Durability requirements

Manufacturers will have to guarantee the continued compliance of the exhaust systems with the stated limits for the mileage described below for each category:

Durability requirements	Euro 3 mileage	Euro 4 mileage	Euro 5 mileage
Mopeds	10,000 km	11,000 km	12,000 km
Bikes and tricycles Max speed <130km/h	18,000 km	20,000 km	30,000 km
Bikes and tricycles Max speed >130km/h	30,000 km	35,000 km	50,000 km

The new durability requirements, in particular, should not be lowered below the proposed levels in order to ensure continued credibility of the environmental efforts of all, as well as a fair sharing of responsibilities and costs between the consumer and the manufacturer.

VEHICLE CONSTRUCTION

On board diagnostics device and repair and maintenance information

The proposal foresees the introduction of mandatory On-Board Diagnostics systems (OBD) for two-wheelers. OBD comprises a diagnostic unit and a standard hardware and software interface, allowing repairers and users to quickly diagnose a list of faults using a standard interfacing computer. The process, expected to reduce the cost of maintenance, is planned in two steps (based on existing legislation applying to cars and trucks):

1. **OBD stage 1**, scheduled for 2017, along with the introduction of Euro 5 emissions regulation for vehicles with an engine size over 50cm³ and Euro 4 for mopeds. It includes basic monitoring of electric circuits of the engine and vehicle management systems.
2. **OBD stage 2**, scheduled for 2021, but only once its cost-effectiveness can be objectively shown and the expected environmental effects studied, and the green light is given by the European Commission. It includes the features of stage 1, as well as monitoring of failure and deterioration of systems, including pollution control devices.

Details of the technical requirements are delegated to the European Commission.

As a matter of principle, FEMA opposes measures that lead to a significant increase to the purchasing and maintenance cost of powered two-wheelers. This is particularly worrying in the case of small scooters and mopeds with an engine size under 50cm³, given that the technical requirements involved would incur high and incompressible costs, which would lead to a disproportionate rise in the retail price of these affordable, entry-level vehicles.

Access to repair and maintenance information

On-Board Diagnostics can however help save time and cost for maintenance if standardized information is provided. The regulation guarantees *"the same standardized level of access to repair and maintenance information for all vehicle repairers."*

Furthermore, the regulation proposal introduces access to repair and maintenance information, including *"unrestricted access to vehicle repair and maintenance information to independent operators through websites [...] this access shall be granted this access shall be granted [...] to authorised dealers and repairers."* Manufacturers may charge a *"reasonable and proportionate fees"* for access to this information. This measure is meant to put an end to a rising problem in the motorcycle sector where only brand retailers have access to the manufacturer's diagnostics software, interfacing hardware, wiring diagrams and error codes⁴.

FEMA welcomes the European Commission's initiative to expand this principle to powered two-wheelers, but suggests that the access should be extended to include the consumer.

Many motorcyclists perform their maintenance themselves, which ensures complete confidence in the quality of the work and continued vigilance against possible faults. Strong communities of builders encourage home maintenance, through a culture including specialist publications, websites

⁴ This issue has appeared in the car sector in the last years, leading to an absurd situation where only a brand's dealerships could offer appropriate maintenance throughout the life of a vehicle. Manufacturers thus secured a complete monopoly over the lifetime maintenance of their products, which is often more lucrative than selling vehicles in the first place. Not only does this practice go against the principles of the single market, it contributes to the death of independent shops; not to mention the huge waste incurred by the lines of cars being moved from one shop to another in order to get the right diagnostics equipment. Fortunately, recent legislation put an end to this by offering access to the relevant information to independent and brand repairers.

and meetings. FEMA believes that the freedom to maintain and repair one's own vehicle should not be infringed upon, and the tools required to perform that necessary maintenance should be made available to the consumer. Copyright issues as well as possible misuse of the repair information have been mentioned to support restricting free access to professional repairers only, but FEMA does not believe that these concerns are solid enough to warrant a blackout.

In order to offer fair access to repair and maintenance information the "reasonable fee" for access should not apply to individual consumers. Purchasing a vehicle should warrant free access to the information required to keep using it on an everyday basis.

Since manufacturers will have to build up an information system in any case, including a website and the required databases, FEMA cannot see any additional cost arising from offering vehicle owners free access to the maintenance information they need.

FEMA therefore calls to explicitly expand the guaranteed access to include the consumer; in order to make sure the benefit of this standardization is not only limited to repairers.

4.4.3 Powertrain modification prevention

The proposed regulation introduces specific measures to prevent modifications to the powertrain by the user. These include all modifications or improvements of the engine, engine management systems and control modules, pollution control devices, transmission, chain and differentials. The objective is to prevent unsafe tampering, especially excessive increase in torque or engine power, and damage to the environment through reduced fuel efficiency.

The exact details of the measures to be implemented will be laid down in a delegated act at a later stage.

FEMA aims at protecting the right of users to modify their machines for improved safety, efficiency and comfort.

From a rational point of view, modification is a process that requires an investment of time and money, in order to achieve improvements over the factory standards. They cover a wide array of personal needs: adjusting controls, seating and other elements to better suit personal height, weight, driving style and taste. Within the motorcycle community there is a well-established and long-lasting culture of modification and improvement, along with home maintenance and repairs.

Furthermore, the initial settings as provided by manufacturers can always be optimized further. Manufacturers regularly release better, updated versions of engine management chips, similar to the way computer software is continuously updated. Curtailing the user's ability to safely improve the performance of their products will only harm the thriving aftermarket industry and its workers, deter industrial research and development in designing better products, and shut down Europe's diverse modification culture.

FEMA is convinced that the "optimum balance between fuel consumption, engine performance (power and torque) and pollutant emission performance" the manufacturer ought to provide, can always be further optimized, similar to the way computer software is continuously updated. Tuners constantly find ways to improve the performance of OEM configurations, including all three pillars: fuel consumption, power, and emissions.

TYPE-APPROVAL PROCESS (ADMINISTRATIVE MEASURES)

In addition to more technical elements on vehicle construction and safety, the regulation also introduces a revision of administrative requirements for type-approval.

Small series exemptions

Receiving type-approval for all elements of a vehicle is a lengthy and complicated procedure, designed to ensure that the products sold in Europe comply with the commonly accepted safety and environmental requirements. The new regulation proposal drastically reduced the upper limit for applying for small series exemptions, from 200 units a year previously, to 20 for mopeds, 50 for motorcycles/scooters, and 100 for motorcycles with a side-car.

Though exemptions can apply to all or part of the requirements of the regulation, under the condition that the national type-approval authority specifies alternative requirements, it only applies to the Member State's territory. Manufacturer then have to send the small-series approval to other Member States and request them to recognize it. Unfortunately, for the small companies on the market, this process can be gruelling, and ultimately too expensive to contemplate.

Small series are at the heart of the motorcycling culture. Either by introducing new concepts, showcasing innovation in propulsion or safety technology, or pushing the limits of vehicle design, they play an essential part in maintaining variety and innovation in Europe. They cater for specific customer needs, offer alternatives to users who are looking for something different, and play a key role in ensuring that cutting-edge racing technology trickles down to road machines. Often made and sold with less than a thousand machines in production, they represent an astounding industrial achievement in a world where the design cycle of an automobile is estimated at 1 billion Euro. The specific needs of small series production have long been recognized, with current regulations offering exceptions to type-approval rules in some cases, for series under 200 units. In these cases, alternative ways of fulfilling the type-approval requirements are offered, giving the manufacturer more flexibility.

FEMA supports policies that ensure the continued availability of a wide variety of products in the sector of powered-two-wheelers and support the existence of healthy small- and medium-sized enterprises (SMEs).

While efforts are made towards mutual recognition of type-approval exemptions between Member States, FEMA regrets a move targeting Europe's small businesses in the manufacturing sector, which could have irreversible consequences on innovation and consumer choice. Furthermore, no rationale is presented to justify this drastic reduction in numbers, and no significant issues with the small series approval have been brought forward.

FEMA therefore opposes the change in the currently applicable limit for small series type-approval.

Individual Type-Approval

In a similar way to small series exemptions, the new regulation offers possibilities for exemptions for individual type-approval. Its provisions are meant for small-scale foreign imports; but also for home-build motorcycles, professional customization work, or engine overhauls.

With regard to individual approvals the Commission proposes to give approval authorities the possibility to "*exempt the vehicle from compliance with requirements laid down in one or more of the acts listed in Annex II*" (Article 42 (1)) as long as alternative requirements "*ensure a level of functional safety and environmental protection which is equivalent as far as possible to that provided for by the relevant act listed in Annex II*" (Article 42 (2)).

Personal customizers and producers of very small series are both a craft and an art form, and contribute to a powerful culture of custom bikes across Europe. Meetings often gather fans and curious onlookers by the thousands, and the sector maintains specialized publications, dedicated workshops, and networks of retailers selling aftermarket and spare parts. In Northern Europe especially, customization is considered an intrinsic part of the motorcycling culture; with its challenging approach on technical innovation, permanent search for excellence, and beautiful displays of craftsmanship. There are as many different needs as there are custom motorcycles, and it is essential that type-approval rules reflect the reality of the building culture.

FEMA recognizes that all vehicles should offer a satisfying level of safety and environmental performance. The type-approval process should be adapted, in a case-by-case basis if needed, to allow single units produced outside of the large-scale industrial chain on the roads.

FEMA calls for the possibility for Member States to interpret in a wide sense the exemptions for individual approvals mentioned above, in order to best adapt to the national specificities and attain the goals of safety and environmental compliance while limiting the administrative burden to a minimum.

Trailers

By increasing the carrying capacity of a motorcycle, a trailer is often used by motorcyclists traveling on long trips. Unfortunately, despite the lack of evidence that trailers create a safety issue, several Member States have taken measures to restrict or ban their use⁵. In a recent case, the Court of Justice confirmed that Italy's ban on the registration of trailers did not infringe on the free movement of goods, and can be justified under the exception of preservation of public safety. Even in countries where trailers are permitted on roads, additional problems linked to type-approval have, in practice, restricted their use⁶. Apart from inserting the definition of a trailer, the new type approval proposal of the Commission makes no further reference to the topic.

FEMA believes that motorcyclists aiming at towing a trailer with their motorcycle on public European roads must be allowed to do so in principle. Without conclusive evidence linking trailers and traffic accidents, citizens should be able to purchase and use these products in their country of residence. The new type-approval regulation should clear up this issue.

FEMA suggests the adoption of Norway's proposal [2010/9011/N](#)⁷ to the Commission as an easy and reliable way to provide a safe and efficient process for the type-approval of trailers⁸.

⁵ Accident figures specific to trailers are not widely available, because standard police report forms for accidents rarely include a section to report the use of a motorcycle trailer. However, data available in Sweden shows that during the time period 2007-2009, no motorcycles with trailers were involved. Furthermore, a survey with insurance companies in Sweden showed that very few accidents were registered, and insurance companies stated that they did not consider trailers an additional safety risk. Despite the lack of specific reporting, the numbers appear to be extremely low across Europe. In any case, no study can show a correlation between the use of trailers and traffic accidents.

⁶ Since April 2009, motorcyclists in Sweden are unable to receive approval for new coupling devices; which are installed on a motorcycle to allow it to tow a trailer. The registration authority requests the production of a certificate of safe weight for towing from the motorcycle's manufacturer – which no motorcycle manufacturer issues.

⁷ Notification 2010/9011/N

http://ec.europa.eu/enterprise/tris/pisa/app/search/index.cfm?fuseaction=pisa_notif_overview&sNlang=EN&iyear=2010&inum=9011&lang=EN&iBack=2

Market surveillance

The regulation includes new rules for setting up market surveillance, in order to make sure vehicles and parts imported from outside the EU comply with type-approval regulations. In practical terms, this will allow national authorities to keep an eye on sub-standard imports, be they vehicles or parts, in order to make sure unsafe products do not reach the consumer. Examples brought to the attention of stakeholders have included vehicles which, when tested, displayed braking distances significantly higher than the allowed maximum.

FEMA welcomes efforts at removing unsafe and inferior products, and making the market more efficient for users while promoting good industrial practices and encouraging manufacturers to make better, safer and cleaner products.

Adaptation to new technologies

In addition to conventionally-propelled vehicles, the proposed regulation aims at protecting research and innovation in alternative fuels by providing options for case-by case exemption. Manufacturers would be able to apply for exemptions to various requirements of Annex II, notably in powertrain requirements but also in other fields.

FEMA believes that this initiative goes toward protecting innovation and research, by avoiding the introduction of technology-specific solutions. Mandating the use of a specific technology against another would only close doors to potential future products, with the effect of harming both the European industry and the consumer.

However, riders regret that this open approach has not been followed with regard to the requirements of Annex VIII, pertaining to braking systems. Current anti-lock and combined braking systems still hold potential for progress, or for a shift to entirely new, different and better performing technologies. Mandating the use of specific elements as the Commission aims to do in this proposal will result in a certain degree of complacency regarding research and development, by discouraging innovation.

FEMA suggests that **the provisions for new technologies also cover braking systems**

The Federation of European Motorcyclists' Associations

The Federation of European Motorcyclists' Associations (FEMA) is the representative federation of motorcycle (comprising all powered two-wheeled vehicles) users throughout Europe. FEMA represents the interests of citizens' national organisations at the European Union and agencies of the United Nations. FEMA's primary objective is to pursue, promote and protect the interests of motorcyclists. FEMA recognises that motorcycles have different characteristics from other vehicles and emphasises the need for motorcyclists' specific requirements to be addressed.

⁸ In its proposal, Norway suggests that trailer coupling devices for motorbikes registered after June 17th 2003 can be approved for use, even if the specifications from the motorcycle manufacturer with regard to the type of coupling device, permissible mass of the trailer and permissible vertical load at point of coupling are missing. In such a case, it is suggested that the maximum laden mass of the trailer should be set according to national procedures as specified for motorbikes registered before June 17th 2003.