

**CLEPA Position Paper on the revision of Directive 97/68/EC
on emissions from non-road mobile machinery engines**

Background

The European Commission, DG Enterprise & Industry is currently preparing a revision of the emission standards for non-road mobile machinery engines. A legislative proposal is expected to be published mid-2014.

Ambitious yet realistic emission reductions

CLEPA supports the ongoing revision process, as technologies for reducing emissions are mature. For the revision to achieve ambitious yet realistic results, CLEPA suggests to follow the guiding principles outlined below.

A) Cover additional engine classes

The future regulation should include engine classes not yet covered, i.e. compression ignited engines below 19kW and above 560kW. For ensuring both a level playing field for industry and environmental benefits, spark ignited engines between 19 and 37kW should also be included.

B) Promote international alignment

In order to allow industry to benefit from economies of scale and avoid duplication of development work, the alignment with US EPA standard Tier 4 final should be pursued for engine classes below 56kW and above 560kW.

C) More ambitious regulation for the main segment

For the main engine segment of 56 to 560kW, a more ambitious regulation is appropriate given the similarity of non-road mobile machinery engines technologies with on-road heavy-duty ones to meet e.g. Euro VI requirements. Therefore, CLEPA supports the EU Commission scenario "road ambition" for this segment. Common hardware platforms lower costs through economies of scale and avoid duplication of work

D) General considerations

Given the long development cycles in the non-road field, substantial lead-time is appropriate. The mandatory introduction of new emission limit values should start three years after the adoption at the earliest. For example, a phase-in stretching over five years could give manufacturers and suppliers enough lead-time to adapt. For credible emission reductions in the use phase, CLEPA supports in-service conformity tests, as long as boundary conditions are well established for the large variety of non-road mobile machinery applications. In order

to ensure a smooth transition between emission stages for manufactures and suppliers, the transition scheme should apply to all engines produced before the entry into force of a new stage. A limitation to engines produced in the sixth months before a new stage might result in hardly predictable peak demand.

Generally, over-complex regulation should be avoided and the principles of community law such as proportionality and technology neutrality should be respected. In order to ensure a uniform implementation across the EU, CLEPA favors a Regulation compared to the existing Directive.

* * *