



Brussels, 20 November 2017

FIA Region I input on vehicle type approval and market surveillance Trilogue negotiations

Dear Representatives of Members States, the European Parliament and the European Commission,

I am writing on behalf of FIA Region I on the matter of the reform to EU legislation on type approval and market surveillance of motor vehicles. Now that we are heading into the final phase of the Trilogue negotiations, we call on the EU to urgently adopt a final package that includes the following key elements:

- 1) **Transparency in testing** – It is essential that the type approval and market surveillance process is fully transparent. This must ensure that independent service providers such as FIA Region I mobility clubs can have a role in testing vehicles and in turn have access to key data (e.g. coast down data/vehicle dynamometer operation mode) that will allow them to verify type approval and market surveillance tests. It must also mean allowing mobility clubs to have a role in the proposed Forum, in order to share information with Members States and the Commission. A fully transparent system should work both from a top down and bottom up approach, and where by third party tests results and complaints reach all European authorities via an available online tool.
- 2) **Market surveillance** – FIA Region I strongly supports the need for sufficient market surveillance testing to be carried out by Member States and the European Commission. An agreed target level must ensure that all Member States take responsibility for testing cars on a yearly basis. Markets surveillance authorities must also have sufficient resources to efficiently and effectively conduct market surveillance. Activities should be based on state of the art tests, such as real driving emissions, in order to ensure compliance of vehicles on the road.
- 3) **Repair and Maintenance Information (RMI)** –Third party service providers, including the mobility clubs of FIA Region I, must have access to RMI information. This means ensuring that information continues to be made available via the physical, harmonised Onboard Diagnostics connector. Furthermore, information should be easily accessible in machine readable and electronically processible formats. Ensuring that such measures are taken is essential to our Mobility Clubs in order to provide state of the art services to motorists¹.
- 4) **Financial relations** –The financial relations between vehicle manufacturers, technical services and type approval authorities should be decoupled. By doing so this will remove a possible conflict of interest between the different stakeholders and mean for a more impartial approach to testing vehicles. Ultimately, this should mean that more emphasis is put on testing cars for the purpose of achieving representativeness of real world performance rather than for the sake of achieving impressive laboratory results.

This is a once in a generation opportunity to fix the way that cars are approved and tested in the real world. We call on the Council, the Parliament and the Commission to follow our proposals above and

¹ Please note: concerning wider issues on access to vehicle data and to ensure consumer privacy, competition and innovation in the sector, it is essential that the EU adopts a dedicated legal instrument



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to find compromises in such a way that makes the system fit for purpose in the 21st Century and restores consumer trust in the automotive sector.

Yours sincerely,

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