

Transmitted by the expert from IMMA

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## THE INCLUSION OF L<sub>6</sub> AND L<sub>7</sub> VEHICLES IN THE ECE REGULATIONS;

Transmitted by the representative of the International Motorcycle Manufacturers Association (IMMA)

### 1. Background

Until November 2004, L<sub>6</sub> (Light quadricycle) and L<sub>7</sub> (quadricycle) were not known in Geneva. These categories of vehicle have been developed as a European regional phenomenon, and the current EU directives reflect the products produced for the European market.

When Russia suggested adding L<sub>6</sub>-L<sub>7</sub> to R.E.3, IMMA's position was that any country wanting to regulate such vehicles only needed to copy the existing EU directives. This would bring instant harmonization and avoid work in the UNECE.

At Russia's insistence, GRSG and WP.29 eventually agreed to add the vehicle categories to R.E.3, where they have remained without being used.

After the EU decision to abolish their vehicle construction directives and to replace them with the ECE regulations, the EU Commission proposed the introduction of a horizontal regulation to replace R.E.3 and the clearer specification of the scopes of all the ECE regulations. IMMA has actively supported this work, as a beneficial clarification of the ECE regulatory structure.

During these discussions it has become very clear that no-one has any clear idea how to treat the L<sub>6</sub> and L<sub>7</sub> categories of vehicle, as these are the only categories of vehicle for which ECE regulations do not exist.

### 2. The general situation relating to quadricycles (and ATVs)

The current parc of true quadricycles with bodywork in the EU is now about 350'000 vehicles (2005) and production is around 30'000 units per year.

Since 2003, some manufacturers of All-Terrain Vehicles (ATVs) have modified part of their production so that the vehicles can be type-approved and registered for road use, as either L<sub>6</sub> or L<sub>7</sub> vehicles.

ATVs were originally developed for off-road use and are generally not considered suitable for road use. However, sales of registered ATVs are growing rapidly (6'200 in 2002, 87'000 in 2004 and the trend continues to rise in 2005/2006).

While some administrations have been willing to approve ATVs for road use, others remain concerned over their safety. These vehicles are basically not designed for use on paved public roads and therefore pose safety risks if used in the same way as other categories of vehicles.

### 3. Discussion of the issues

Although some manufacturers within IMMA's Membership produce quadricycles and ATVs, IMMA does not currently hold a brief to deal with such vehicles.

Until the existing confusion between road quadricycles and type-approved ATVs has been resolved at EU level any further discussion in WP.29 will be at least handicapped, if not pointless.

For quadricycles, IMMA is aware, through its Asian Members and through general research, that vehicles resembling quadricycles are becoming more and more popular in developing economies. Production of these vehicles in Asia, for example, probably largely exceeds that in Europe.

The Contracting Parties concerned with such vehicles, whether new to WP.29 or not, already have different technical specifications for these vehicles in their regulations. It is therefore unlikely that it will be possible for the EU specification to be simply transposed into the ECE Regulations.

### 4. IMMA position

IMMA does not see any advantage in trying to add quadricycles to the ECE Regulations.

The present vehicles are designed to meet national or regional market requirements and to comply with existing local regulations.

Discussions in the ECE context will, in IMMA's opinion, be confused and take up a great deal of time for no substantial benefit. In the present state of the market, harmonization would probably mean that an unhappy compromise would be achieved at best, and at worst there would be a total stalemate.

In addition, IMMA opposes any suggestion that such vehicles should be added to the existing ECE Regulations governing the L<sub>1</sub> to L<sub>5</sub> categories. These Regulations are well established for vehicles produced for a genuinely international market. The frequency with which they are updated would be completely different to any regulations for quadricycles; meaning that there would be administrative problems with every amendment, whether for L<sub>1</sub>-L<sub>5</sub> or for L<sub>6</sub> & L<sub>7</sub>.

IMMA therefore strongly recommends that the L<sub>6</sub> and L<sub>7</sub> categories of vehicle:

- be deleted from ECE R.E.3 and the Draft Horizontal Regulation
- not be included in the scope of any ECE Regulation
- remain categories which are regulated at national and regional level.

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