IMMA position on the draft Horizontal Regulation

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New moped definition

IMMA considers the proposal to set the maximum speed of mopeds at 45 km/h inappropriate for the following reasons:

• The <50cc + < 50 km/h moped is a basic part of the ECE structure and includes all other definitions
• The proposal will reclassify 1.5 million production mopeds as motorcycles (EU = 0.4 million)
• No technical justification given for this change
• It would conflict with legislation in at least Brazil, Russia, China, Indonesia and Vietnam.
L6 and L7 category vehicles

(Quadricycles and ATVs)
History – the “voiturettes”

The origins of the “Quadricycle” are in Europe
Quadricycles - standard

These vehicles only exist in the EU (and some in Russia), nowhere else
Quadricycles – body?

A wide variety of vehicles cannot be defined easily
Quadricycles - leisure

Unclear border between registration and off-highway use
Quadricycles - utility

Commercial vehicles are/will be difficult to define
Golf carts

**Neighborhoud Electric Vehicles (NEV)**

- Are not considered L6-L7 in the EU (but some could be if “tweaked”?)
- Are “registered” for use in enclosed community areas (USA)
Concepts: all European developments

Narrow car company

Piaggio P104  GG Quad  Bertone
Concepts/Near Fits

- ITRE eCooter
- Peugeot Quark FCV

- How far will industry/authorities want to stretch the definitions?
The ATV is not unique to Europe, but its homologation/registration is. This is an example of how the L6-L7 category has been “extended” beyond the original concept.
ATV – side-effects
Considerations

- L6-L7 were developed in and for Europe
- If further developed in ECE, these categories will be used (abused?) to bring all kind of vehicles onto the road.
- Better for the ECE to be for vehicles that are used everywhere (Cars, PTWs, Trucks)
- Vehicles outside these criteria are better regulated at regional level, this includes L6-L7.
- Some Contracting Parties will not accept ECE Regulations which include L6 and L7 vehicles.
Conclusions

- Quadricycles and ATVs are not motorcycles.
- There is no industrial interest in trying to harmonise at the ECE level.
- ATVs are not intended for road use.
- If quadricycles and ATVs come to the ECE, they should be separated from the existing L-category vehicles.