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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”



Isetta



Ligier

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

Neighborhood 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?

ATV



- 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