

**IMMA position on Document WP.29/2008/46,
Draft regulation on country codes, vehicle categories and definitions.**

1. General

In general, IMMA supports the principle behind the draft Horizontal Regulation to be annexed to the 1958 Agreement. However, there are two points with which IMMA does not agree; the moped definition and the introduction of quadricycles.

2. Moped definition

The definition of a moped as <50cc and < 50 km/h is a basic part of the ECE structure. No technical justification was provided for this change during GRSG. The proposed change from 50 to 45 km/h will reclassify 1.5 million production mopeds as motorcycles each year. The new definition will conflict with legislation in at least Brazil, Russia, China, Indonesia and Vietnam. IMMA considers the proposal inappropriate.

3. Quadricycles (L6 and L7)

The proposal will cover all kinds of 4-wheelers, including ATVs, for which there are conflicting national/regional definitions and specifications worldwide. (IMMA will make a presentation of examples of these vehicles at WP.29, but basic examples are shown in the Annex)

Quadricycles bear no relationship to motorcycles or mopeds for their essential construction characteristics, and the technical requirements and technologies for quadricycles are substantially different.

Discussions with quadricycle manufacturers have confirmed that there is no interest in the industry for having harmonised international regulations for quadricycles at the ECE level. IMMA's position is therefore that these vehicles should continue to be regulated at regional level.

ATVs are only type-approved as road vehicles in Europe because almost all unpaved roads (on which they mostly travel) are public highways. WP.29 should not regulate these vehicles worldwide because of this specific European problem, particularly as these vehicles are not intended for general road use.

If however quadricycles are to be added to the ECE categories, IMMA strongly believes that they should all be put in separate classes and not be made part of the L-category. Some administrations have informed IMMA that they would be unable to accept ECE Regulations for the L-category that included quadricycles. Therefore, if quadricycles are to be included in ECE categories, IMMA wishes to see these vehicles treated separately from the existing L-category vehicles.

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Annex: Basic differences

There are two types of vehicle involved in the discussion; road quadricycles and ATVs.



Quadricycle



ATVs