

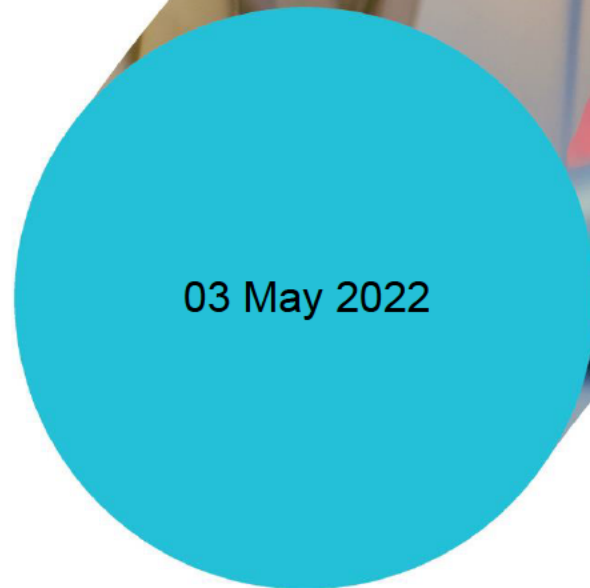
# DG GROW-ACEA MEETING

EU SMALL SERIES, AUTOMATED  
VEHICLES, UKRAINE CRISIS, EU-UK,  
ETC.

Brussels

03 May 2022

acea



# WHO WE REPRESENT



DAIMLER  
TRUCK

**Ferrari**



**HONDA**  
The Power of Dreams



I V E C O • G R O U P



**GROUPE  
RENAULT**

STELLANTIS

**TOYOTA**

**VOLKSWAGEN**  
AKTIENGESELLSCHAFT



# ABOUT THE EU AUTO INDUSTRY

- 12.7 million Europeans work in the automotive sector
- 11.5% of all manufacturing jobs in the EU
- €398.4 billion in tax revenue for European governments
- €76.3 billion trade surplus for the European Union
- 8.2% of EU GDP generated by the auto industry
- €58.8 billion in R&D spending annually, 32% of EU total

# AGENDA

01

Small Series Volume for Scheme I and Automated Vehicles

02

Ukraine Crisis

Spare parts supply interruptions, Hardware and Software dependencies,  
Impact of interruptions towards GSR requirements fulfilment, End of Series,  
etc.

03

Any feedback on Steel Safeguard?

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Opinion of DG GROW on EU/UK TCA battery rules of origin?

05

Position of EU on EU-US Trade and Tech Council in May'2022 (Paris)?



# AGENDA 1

## SMALL SERIES VOLUME FOR SCHEME I AND ADDV

# INTRODUCTION- SMALL SERIES "SCHEME I"

ACEA welcomes the Draft Delegated Regulation from the Commission specifying the technical requirements for vehicle produced in unlimited series, small series, special purpose vehicles and fully automated vehicles.

EU COM has been very pragmatic and laid a strong base for approval and market surveillance of motor vehicles and their trailers for vehicles produced in small series, special purpose vehicles and driverless vehicles.

ACEA has submitted EU Automotive Industry position with regard to the Commission proposed scheme for vehicle produced in small series "Scheme I".

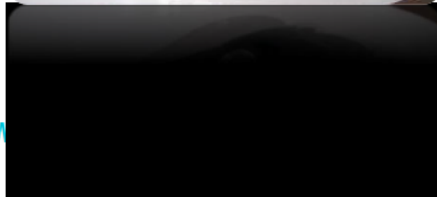
# SMALL SERIES SCHEME INCL. ADDV

## NON AUTOMATED VEHICLES

### SCHEME I

the manufacturer's  
**combined number of  
units** does not exceed  
1 500 annually

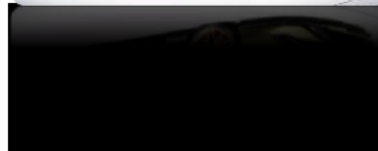
**M1 & N1**



### SCHEME II

the manufacturer's  
**number of units per  
type** does not exceed  
1 500 / annually

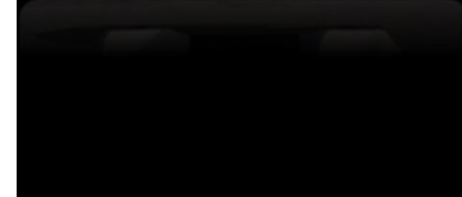
**M1 & N1**



## AUTOMATED VEHICLES (ADDV)

the manufacturer's  
**number of units per  
type** does not exceed  
1 500 / annually

**M1, M2, M3, N1, N2, N3**



# INDUSTRY CONCERNS- SMALL SERIES “SCHEME I”

EU automotive industry accounts for 33% of total R&D spending in Europe, contributing approximately €76.3 billion trade surplus for the European Union and providing 12.7 million Europeans work in the automotive sector. **With ongoing Geopolitical situations**, it is indeed more important to lay policy foundations to **enhance EU Automotive Industry Competitiveness**.

“Scheme I” boundary conditions are **restrictive and unfavorable** for the growth potential of European vehicle manufacturers' offering niche and innovative products to customers in Europe.

Restrictive volume limits in "Scheme I" **heavily discourages, leads to competitiveness issues and blocks the innovations** in EU leading to long term considerable impacts (revenues, R&D investments, etc.).

We therefore request alignment with the EU emissions legislation and call on Commission to support a **10,000 M1 and N1 threshold of EU vehicle registrations per year** for the Small Series Scheme 1.

[https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13291-Vehicle-safety-technical-requirements-for-unlimited-and-small-series-and-special-purpose-and-fully-automated-vehicles/F3242862\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13291-Vehicle-safety-technical-requirements-for-unlimited-and-small-series-and-special-purpose-and-fully-automated-vehicles/F3242862_en)



# ADDV - LIMITATION TO SMALL SERIES APPROVAL NUMBERS

ACEA understands the EU Commissions general reasoning to limit the introduction of Automated Driving Systems for Fully Automated vehicles to 1500 Units /Year /Type, in order to **learn from the limited use-case implementations and number of systems operated on public roads.**

Furthermore, it was acknowledged that for a broad market introduction in unlimited quantities the issue of “**making existing system regulations work for vehicles with Automated Driving Systems**” would have to be resolved first, while derogations could only be applied when limiting the numbers of vehicles in accordance with the Small Series approval scheme, defined in the Regulation EU 2018/858.

However, ACEA proposes the following two approaches to be considered for the implementation of the upcoming Implementing Regulation on “ADS for FAV’s” in next slides:

# PROPOSAL (1)- INCREASE OF VOLUME FOR BUSINESS VIABILITY

## **Increase of volumes for Small Series approval scheme, also in context of Fully Automated Vehicles:**

ACEA explained as early as when the Small Series approach was introduced for the first time for the Implementing Regulation on “ADS for FAV’s” that such limitation will put the economical viability of such technology at serious risk.

This is even more the case given the existing issues related to the COVID-19 pandemic and the crisis in the Ukraine.

# PROPOSAL (2)- NO LIMITATION OF APPROVALS FOR AVP

## No limitation of approvals for the specific use-case of Automated Valet Parking (AVP):

AVP is a technology **close to market introduction and can be commercialized as early as the regulatory environment would allow for it**. A limitation in numbers to the existing small series scheme would clearly be an economic burden for manufacturers and put a successful market introduction at risk. It has to be recognized that **vehicles with AVP will be primarily privately owned vehicles**, unlike autonomous shuttles operated as a TaaS or MaaS.

From a safety perspective it has to be recognized, that vehicles with AVP will be so called “dual mode vehicles”. Such vehicles will be driven manually for the majority of a trip. They will therefore be **compliant with the entire set of Regulations listed in the EU Framework Regulation 2018/858, Annex 2, Part 1**, unlike Small Series approvals. Only for the **limited use-case of AVP the vehicles will be driven in a driverless mode**, making use of the derogations for the non-ADS system regulations defined in the Small Series approach for FAV's.

# PROPOSAL (2)- NO LIMITATION OF APPROVALS FOR AVP

Based on these circumstances, **ACEA is of the opinion that the limited use-case of AVP an application of the Small Series scheme is not appropriate and justifiable.**

Therefore, the restrictions for limited approvals in context of the Small Series approval scheme for fully automated vehicles shall not be applied.



## OTHER AGENDA

RECAP- IMPACT ON AUTOMOTIVE INDUSTRY  
DUE TO UKRAINE SITUATION

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