Brussels, 25 September 2019

**MEETING DOCUMENT**

<table>
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<th>From:</th>
<th>Swedish Delegation</th>
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<td>To:</td>
<td>Working Party on Technical Harmonisation (Motor vehicles)</td>
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Memorandum

24 September 2019
M2019/01350/KI

Ministry of the Environment


As a general remark, Sweden supports a speedy adoption of the proposal in order to ensure legal certainty for the car industry in Europe.

At the last Working party, on 19 September, the issue whether a delegated act or the ordinary legislative procedure (through a review clause, as proposed by the Czech delegation) should be used to adapt the conformity factors was discussed (Article 14 of the original act, Regulation (EC) No 715/2007).

Sweden’s position is that the Commission should be empowered, by delegated acts, to regularly revise and amend the uncertainty margin of the conformity factors. The margin should only reflect the technical uncertainty of the measurement that really exists.

Besides, Sweden reaffirms its position that we believe that the temporary conformity factor is not necessary for vehicles of categories M and N1 Class I and that the last line of table 2a should be amended accordingly.