

Mr. Thierry Breton  
Commissioner for Internal Market  
European Commission  
Rue de la Loi 200  
B-1049 Brussels

Daimler Truck

Stuttgart, May 21, 2021

Dear Commissioner,

*Cher Mr. Breton*

It was a great pleasure to have met on Wednesday and I would really like to thank you for the fruitful and constructive exchange.

As for EURO 7/VII, we would like to follow up on this by proposing an open platform to you and involving your services with our industry experts to find a workable and pragmatic solution that could be enacted **relatively quickly to give industry clarity. This will also help facilitate the transition to climate neutrality of Europe and the Automotive Industry.**

When it comes to the shortage of semiconductors, we understand that the current situation is not only extremely important for the automotive industry, but for many other industries too, and as you rightly analyzed, it is crucial for Europe's Industry and competitiveness.

We agree with you, we urgently need a common action to address the semiconductor shortage, if we want to avoid jeopardizing Europe's green transition and digitalization agenda. We therefore welcome your plans to make Europe more resilient by investing in future production plants in Europe. We hope we can be a close partner on this issue and are happy provide you with input on the specific needs of our industry.

The shortage of semiconductors shows how important electronics are for our industry, not only when it comes to automation but also as regards safety and many other features.

This brings me to an issue, which we unfortunately did not have time to discuss, and that is the General Safety Regulation (GSR) as agreed in 2019.

Currently, the technical details and type approval procedures are being discussed on UN-ECE level, European level respectively, and here we are particularly concerned about two issues.

Firstly, we are faced with delays of the delegated acts on key safety features. De facto, this means a breach of the rules and dates set out in the GSR. For obvious reasons, it is impossible for industry to develop a technical system when the content and legal requirements are still under discussion. On the other hand, introduction and implementation dates remain unchanged. This means that the regulatory delays are to the disadvantage of industry. Development, testing and full type approval of safety-related systems in a timeframe far shorter than 15 months is simply not possible.

Secondly, when it comes to Direct Vision requirements for trucks and buses, we see a real risk that the technical proposal currently on the table will lead to a de facto registration ban of a vast majority of heavy-duty vehicles from 2029, while the additional benefits from better direct vision over the mandatory

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fitment of Blind Spot Information Systems and Moving-off Information systems, both as from 07/2024 for all newly registered vehicles, have not even been evaluated yet.

On the other hand, bringing the eye point of the driver down for better direct vision will jeopardize the integration of alternative drivetrains of i.a. fuel-cell vehicles, by taking away much needed design space. Yet, a swift and broad market uptake of those vehicles is the very backbone of the green transition. In addition, as you know, the Franco-German Hydrogen Alliance also brought Hydrogen/Fuel Cells to the European agenda.

Semiconductors, used in a number of assistance systems, could actually easily solve the challenge of reducing blind spots, for example by using the cameras or detection systems that bring at least the same safety benefit compared to improved direct vision without changing the design of the cabin, by simply using the latest technology instead.

Another reason why we fully support your active role in promoting semiconductors in Europe.

Let me finish by thanking you again for our interesting and open discussion. We truly hope that we can mutually support your and our respective efforts for a strong and competitive European industry.

Let me also reiterate my invitation to show you the development and production of Mercedes-Benz trucks at one of the largest truck assembly plants in the world, in Wörth.

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