

# INDIVIDUAL VEHICLE APPROVAL IN EUROPE



A Presentation to the Motor Vehicle Working Group



**HIVA**-The **Problem** And A **Proportionate Solution**



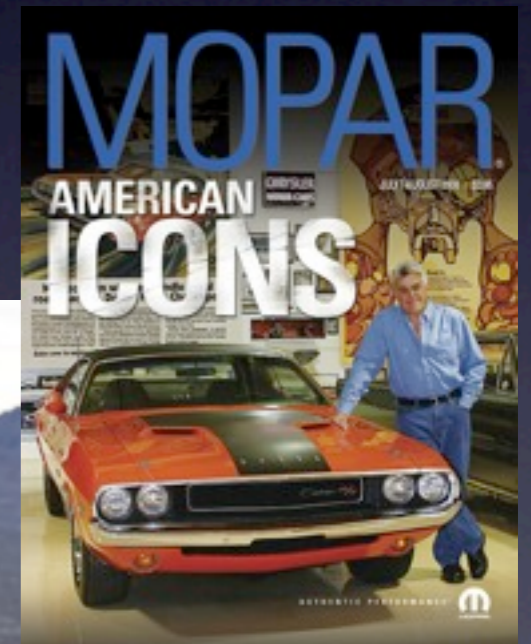
Presented by Anthony Cohen  
Chairman - American Import Agents Association





American cars, not marketed by the Manufacturers in Europe, improve consumer choice and are generally sold to enthusiasts.

Only imported by SME's and Individuals in very low volume, American cars are arguably the best American ICON in Europe.





Classic Chevy Club



Motorvatin USA Club



Ford Club UK



Classic Camaro Club



Buick Club UK





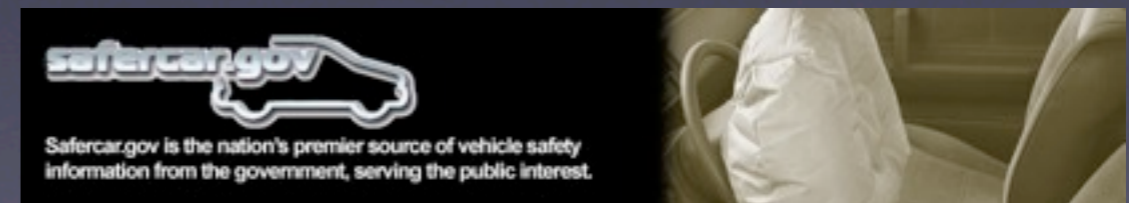
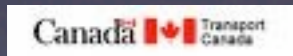
# New American Vehicles in Europe



- Mainly bought by **enthusiasts & collectors**
- Imported for over **65 years**
- Business conducted by **1000 micro-SME's** in Europe
- **Service/parts/warranties/finance/insurance**
- **Very low Volumes** (UK circa 500/year)
- UK-Ultra low volumes as **LHD in RHD** market
- No **official Manufacturer** support
- **>250,000** FMVSS/CMVSS vehicles on EU roads
- **No Safety and Environmental** problems
- **Hundreds** of potential models
- **300** American Car Clubs in Europe

# North American Automotive Safety

“American cars are manufactured to the same high standards as Europe and low volume imports should be excluded. **This was never the intention of the legislation.**” *Malcolm Harbour* MEP



For National reasons, some Member States accept equivalencies with North American standards more than others

# 2007/46/EC

29th April 2009

Large  
Manufacturer  
**ECWVTA**

EC Small Series

Nat. Small Series

Manufacturer

**NIVA**

SME

EC Citizen

Proportionate  
for Micro-SME's  
& Individuals

Article 24  
"Equivalence  
to the  
greatest  
extent  
practicable"

# Draft proposal 5.3 for HIVA

Large  
Manufacturer

ECWVTA

EC Small Series

Nat. Sm. Series

High Volume  
Importer

HIVA

**Problem:**  
Technical bar raised  
beyond capability  
of genuine IVA  
for Citizen or SME

Only  
Manufacturer  
can comply



# POTENTIAL COSTS & IMPLICATIONS OF HIVA for SME's/Individuals

- > 1,000 long-standing SME's fail in domino effect
- Circa 5000 people unemployed directly
- Additional unemployment in multiplier effect
- Maintenance Problems for 250,000 FMVSS vehicles on EU roads
- Significant effect on personal freedom of choice
- Effect on Transatlantic ties
- Encourages import of older vehicle technologies



# Possible Approaches



- Numerical Limits X  
very **difficult** to administer
- Amend Article 24 ✓  
Disallow manufacturers from using **National IVA** for vehicles manufactured in large series  
-eg Landwind
- Give MS discretion to ✓  
define **low Volume** for NIVA

# Amendments

- Continue to permit Member States, for genuine low volume imports, to offer an approval on a National basis under the current regime of Article 24.
- **Respects differing views** held by Member States
- Mutual Recognition applies as explained in Article 24 of the Directive.

# SUMMARY - AIAA's Preferred SOLUTION

- Permit Member States to maintain Low Volume National IVA only for SME/Individual Imports - **respects national differences** (mostly for North American Imports)
- **High Safety and Environmental** standards maintained
- Low Risk of Abuse-SME's/Individuals only import in **very low volume**
- Subsidiarity Respected- **Regulations are targeted** at correct level
- **CONSISTENT** approach for all low volume imports <10 years old
- Proportionality-**No unintended consequences**
- Single Market rules respected - **NIVA=MR**
- Small Business Act of Europe- **"Think Small First"**
- **Competition** and **Consumer Choice** maintained
- Follows principles of **Better Regulation** and **Simplification**



**With sincere thanks to the  
Motor Vehicle Working Group**

