

## **Comments on the Proposed Wording for Vehicle Categorisation in SR1 and RE3**

Both proposals use the exact same wording for the definition of Category 3-1A in SR1 and L1-A in RE3 as in Regulation No168/2013, despite the fact that it has been proved through Regulation No 168/2013 and the implementing Regulations that such categorisation may result in the obstruction of the placing on the market of certain types of electric bicycles.

In other words, the proposed wording for the L1e-A category in SR1 and RE3 exclusively allows for bicycles of which the pedalling assists the motor, not for bicycles on which pedalling and motor assistance are not linked together. There are no reasons to prevent such vehicles to come on the market by not allowing for their type-approval or by subjecting them to a type-approval which has been designed for traditional mopeds.

Therefore, AVERE insists to amend the proposed wording in such a way that it will allow for different types of electric bicycles of which the motor is cut off at a vehicle speed of  $\leq 25$  km/h. This will contribute to the clarity of the text and may, in a later stage, be used as a basis for improving Regulation No 168/2013.

Therefore, AVERE proposes the following wording:

"Category 3-1A vehicle/Category L1-A: powered cycle" means a cycle designed to pedal equipped with an auxiliary propulsion unit of which the output is cut off at a vehicle speed of  $\leq 25$  km/h and with a maximum continuous rated or net power of  $\leq 1000$  W."

Also, AVERE sincerely regrets that this opportunity is not being used to adapt to technical progress and to the development of new types of vehicles that result from this progress. The proposed wording is still very much restricted to the traditional types of mopeds and motorcycles. AVERE believes that this is a prime opportunity to introduce a new category of light electric vehicles with adapted technical specifications. Also, we would appreciate a bit more time to study the wording for the other categories in view of defining possible improvements for the benefit of electric vehicles.