



Vice President Günter Verheugen
European Commission
Rue de la lois 200
B-1049 Brussels

Sweden, 14 October, 2008

Regarding Individual Vehicle Approval, Directive 2007/46/EC

Dear Commissioner Verheugen,

The Swedish Association of Vehicle Importers (BIRF) represents a cluster of small enterprises who offer directly imported motor vehicles, mainly from USA and Canada, on the European market.

These vehicles have often special design and construction that fulfill certain needs such as big environmentally friendly hybrid cars, vehicles for the disabled, the police forces and the public rescue services.

In a globalized world it is natural that consumers is given reasonable opportunities to choose vehicles that fit precisely their needs, no matter where the vehicle has been manufactured.

It is our strong belief that these vehicles contribute to a more constructive and innovative competition in the motor vehicle field.

Even if the legal framework of the USA and Canada is different from the corresponding European legislation there is no doubt that new vehicles manufactured for the American and the Canadian market meet very high standards of road safety and environmental protection. Any reason to deny registration based on road safety or environmental protection does not exist.

The original intention behind the proposal for an Individual Vehicle Approval (recast framework directive 2007/46/EC), which is strongly supported by our organization, has unfortunately been distorted by proposed amendments to insert alternative requirements from the manufacturer. This will jeopardize the approval of new cars and only give possibility to used cars who are excluded from the requirements. This is not in line with the goal to get clean and safe vehicles on the road.

We need a purposeful political action on high level to restore the proposal for Individual Vehicle Approval to its original intention.

Our organization is at your service for any questions regarding these matters.

Yours sincerely

Lars K Rodeblad

President of the Swedish Association of Vehicle Importers

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