

Brussels, 8th of March 2011

Re: COM(2010)0542 : Revision of the European type-approval Directive 2002/24/EC.

Dear Member of the European Parliament,

ECF is the European federation of bicycle user associations and associated members, based in Brussels, representing more than 65 organizations in almost 40 countries.

Regarding the Directive 2002/24/EC and the Commission proposal for a new Regulation that deals with the approval and market surveillance of two- or three-wheel vehicles and quadricycles and exempts EPACs (Electric Power-Assisted Cycles), we support the current specifications on cycles.

Our support applies in particular to the exemption mentioned both in the Directive 2002/24/EC and the new Commission proposal (Art 2, 2h: "cycles with pedal assistance which are equipped with an auxiliary electric motor having a maximum continuous rated power of 0.25 kW, where the output of the motor is cut off when the cyclist stops pedalling and is otherwise progressively reduced and finally cut off as the vehicle reaches a speed of 25 km/h;".

We need a clear border line between what a bicycle is and what does exceed the definition of 'bicycle'. This is important for clear decisions on the use of infrastructure and facilities for bicycles and cyclists that authorities have to make on national, regional and local level.

Besides this, we are concerned about the safety aspects. Increasing the power of the auxiliary electric motor or even deleting the technical specifications as laid down in the Directive 2002/24/EC and proposed Regulation, could mean that the European market would be flooded with unsafe electric two-wheelers and a growing pressure on authorities to allow them on cycling infrastructure. There is clear evidence that the shared use of cycling infrastructure by ever more powerful electric vehicles and "normal" bicycles (i.e. without electric support) will worsen the comfort and safety of the latter, especially children and elderly people.

We kindly ask you to consider our position when you discuss the revision of the directive.

Yours sincerely



Dr Bernhard Ensink
Secretary General