



Thierry Breton, Commissioner for Internal Market, European Commission

cc Adina Vălean, Commissioner for Transport
Kristian Schmidt, EU Coordinator for Road Safety
Maroš Šefčovič, Commissioner for Climate Action
Virginijus Sinkevičius, Commissioner for the Environment
Didier Reynders, Commissioner for Justice (including Consumer Protection)

12 October 2023

Dear Commissioner Thierry Breton,

The European Union must end the exploitation of loopholes in the EU vehicle type approval regulation that have enabled thousands of new American-market pickup trucks to enter the EU while avoiding key EU laws on safety and environmental protection.

We are writing to express our concern about the dramatic increase in imports of large pick-up trucks from the North American market into the European Union via the loophole of “Individual Vehicle Approval (IVA)”. The use of IVA for so-called ‘off-road’ vehicles (N1G) has more than doubled since 2019, rising from 2,900 new registrations in that year to 6,800 in 2022, with Dodge Ram pick-up trucks accounting for approx 60% of IVAs in this category over these four years, 2019 to 2022.

Serious safety concerns

These vehicles are unsuited for use in Europe. With front ends often higher than 10-year-old children, they are dangerous and are also compromised by very poor direct vision, i.e. little visibility of other road users around the vehicle, particularly children to the front. Such large pick-ups are more difficult to manoeuvre and are proven to kill and seriously injure other road users at an alarmingly higher rate than regular cars when involved in crashes.

There has been a tragic increase in pedestrian deaths in the United States in recent years, due in part to the huge rise in sales of large pick-up trucks and SUVs.¹

A study published in August by Vias Institute, based on five years of Belgian crash data, showed that for a pedestrian or cyclist struck by a pickup truck, the risk of serious injury increases by 90%; the risk of fatal injuries by almost 200% compared to a car.²

¹ <https://www.iihs.org/news/detail/new-study-suggests-todays-suvs-are-more-lethal-to-pedestrians-than-cars>.

²

<https://www.vias.be/fr/newsroom/des-voitures-plus-lourdes-plus-hautes-et-plus-puissantes-pour-une-securite-routiere-a>

Compared to regular cars, the study also shows that heavier and more powerful vehicles are more likely to kill or seriously injure the occupants of smaller, lighter, less powerful vehicles, as well as pedestrians and cyclists outside the vehicle.



Source: [Consumer Reports](#) (US)

One example is the Dodge Ram, a pickup truck manufactured in North America by the EU-based Stellantis group, with an engine size of up to 6.7 litres. This vehicle weighs 2.5 to 2.9 tonnes and, when its mirrors are extended, is up to 2.6m wide.³ There can be no justification for allowing imports of this vehicle type, when a wide range of EU type-approved commercial vehicles is available, serving all use cases.

European Commission staff are currently preparing an update to the requirements for Individually Approved Vehicles in light of the latest EU environmental and safety standards. Under the draft list of requirements, key safety technologies that are mandatory for EU-type-approved vehicles **will not be required** for Individually Approved Vehicles, including Automated Emergency Braking (with detection of cyclists and pedestrians), Intelligent Speed Assistance, Emergency Lane Keeping, Brake assist, Electronic Stability Control, an interface for alcohol interlock devices, driver drowsiness and distraction warning systems and event data recorders.

Moreover, EU law lets Member States deviate further under the National Individual Vehicle Approval system (permitted under 2018 legislation). Vehicles approved under National IVA can then be sold in other EU Member States, avoiding key safety requirements mandatory under EU type approval.

IVA vehicles excluded from EU CO2 targets

The EU also allows IVA vehicles like the Dodge Ram to avoid climate legislation. The Ram has average CO2 emissions of 330 grams per kilometre (g/km), but this climbs to 470 g/km for some variants and 910 g/km for its most climate-damaging models.⁴ The CO2 emissions of IVA vehicles such as the

[deux-vitesses-](#) In the US, pick-up trucks are the most dangerous vehicles for pedestrians and cyclists, with the Ford F series, Chevrolet Silverado, and Dodge Ram involved in the highest number of pedestrian and cyclist deaths.
<https://tinyurl.com/4hckhedc>

³ IVA registration source: <http://co2cars.apps.eea.europa.eu/> and <http://co2vans.apps.eea.europa.eu/>

⁴ IVA registration source: <http://co2cars.apps.eea.europa.eu/> and <http://co2vans.apps.eea.europa.eu/>

Dodge Ram are not counted toward vehicle-makers' climate targets, despite emissions ranging three to nine times higher than the average new car. There can be no justification for letting any major manufacturer dodge Europe's climate commitments by selling pick-up trucks.

Air quality concerns

Due to the IVA loophole, compliance with European air quality law is uncertain. Vehicles are only subject to a laboratory test, with no verification of real-world performance. This flies in the face of the findings of the European Parliament's Dieselgate inquiry, and the subsequent reform of on-road testing. IVA rules must be changed so that all vehicles approved under this process must undergo on-road testing. Exemptions to this change should be very limited in scope, for example, vehicles converted for citizens with special mobility requirements or for use as ambulances.

There is no limit to the number of vehicles that can be imported under IVA rules

There is no upper limit on the number of vehicles that can be approved under Individual Vehicle Approval, a very significant loophole. For manufacturers of EU vehicles with small production runs a simplified type approval procedure is already available, capped at 1,500 vehicles (and known as Small Series type approval). Above this limit, EU vehicle makers are obliged to seek full type approval.

In the case of Individual Vehicle Approvals, however, the absence of an upper limit is contributing to the clear abuse of the process: the IVA loophole is now being used to import thousands of mass-market vehicles while avoiding the safety and environmental standards that EU lawmakers have placed in type approval. We believe that mass-market vehicles with large sales numbers across global markets (Dodge Ram records annual sales of more than 500,000 in the US⁵) must be required to undergo full type approval and comply with all relevant EU legislation.

One safety and environmental standard for the EU

The EU can be proud of its record on vehicle safety and emissions. We believe there should be one safety and environmental standard for the whole EU market, with no backdoor for unsuitable and unsafe vehicles. Allowing weaker requirements for third-country imports under the IVA system means unfair competition from lethal, high-emission, hyper-resource-intensive vehicles from outside the EU, more pollution, and more dangerous roads for all of us. Now is the time to close the IVA loophole. Special categories of vehicles such as those converted for use by mobility impaired people or for use as ambulances can be partly or fully exempted from the reform.

The EU does not provide import loopholes for North American foods that don't meet EU standards, for example, chlorinated chicken or hormone-laden beef. There can be no justification for allowing vehicles that don't meet EU safety and environmental standards to be imported for use on EU roads.

We strongly urge you to take the necessary measures to ensure that all vehicles entering the EU new vehicle market comply with all relevant legislation through updates to the requirements of Individual Vehicle Approval and the relevant type approval legislation.

Yours sincerely,

⁵ Annual Dodge RAM sales in the US ranged between 500,000 and 634,000 between 2017 and 2020: <https://www.statista.com/statistics/901081/ram-pickup-trucks-vehicle-sales-united-states/>

Dudley Curtis, European Transport Safety Council, dc@etsc.eu
James Nix, Transport & Environment, james.nix@transportenvironment.org
Ceri Woollgrove, European Cyclists' Federation, c.woollgrove@ecf.com
Ivo Cré, POLIS - Cities and Regions for Transport Innovation
Robin Loos, BEUC - The European Consumer Organisation
Thomas Lymes, Eurocities
Geert van Waeg, International Federation of Pedestrians

This letter is sent on behalf of all organisations applying their logos (above). The contact persons are as above.