The Proposal for a Regulation of the European Parliament and of the Council “concerning type-approval requirements for the general safety of motor vehicles” (COMM(2008) 316) attempts to harmonize rules on motor vehicle construction. The main goals of this harmonization are vehicle safety, environmental protection, and ensuring the functioning of the internal market. By standardizing safety and environmental requirements, the proposal will allow for increased competitiveness in the auto industry by simplifying the existing legislation on vehicle safety, “improving transparency,” and “easing administrative burden.”[[1]](#footnote-1) Fifty of the existing directives on vehicle safety would be replaced. Existing safety requirements at the Community level would be updated in light of more advanced safety and eco-friendly technology, including Electronic Stability Control Systems and low-rolling resistance tires. In order to enhance vehicle safety across Member States, reduce emissions, and prevent market fragmentation from uneven product standards, the Commission seeks to increase vehicle construction regulations.

Among the proposed regulations is the mandatory fitting of Electronic Stability Control Systems, tire pressure monitoring systems, and Advanced Emergency Braking Systems and Lane Departure Warning Systems (for heavy-duty vehicles) on all new vehicles. The proposal also seeks to tighten limitations on noise emission and set new requirements on the wet grip and rolling resistance of tires.[[2]](#footnote-2) Electronic Stability Control Systems have proven to reduce automobile fatalities, while low-rolling resistance tires have contributed to the reduction of CO2 emissions. The Commission called on stakeholders to voice their opinions on the new regulation. The documents submitted subsequently can be most efficiently divided into three clusters according to the focus of the discussion. In general, the documents in all three clusters show support for at least some provisions of the new regulation, and none reflect outright opposition to any part of the Commission’s proposal.

The documents in the first cluster strongly advocated for the mandatory implementation of the Electronic Stability Control System because of its significant contribution to road safety. Even in documents that only briefly mentioned the ESC, there was a definitive consumer protection argument and a dedication to updating vehicle construction regulations. The top ten frequently used words in this cluster included “safety,” “mandatory,” and “ESC,” suggesting a clear trend across all of the documents.

The second cluster was heavily focused on tire regulations for safety purposes as well as for the promotion of environmental sustainability. Some documents discussed tire regulations as a way of reducing toxic and nontoxic (such as CO2) emissions, and some expressed support for tightening tire noise to the extent that they did not compromise the safety goals of other regulations. A few documents showed concern about the cost-effectiveness of tire regulations but did not argue within an explicit loss frame. The top ten words in cluster two included “rolling,” “resistance,” and “pressure,” which is coherent with the general trends of the cluster.

The final cluster of documents supports the proposed tire noise and rolling resistance regulations on the basis that they would improve efficiency by decreasing traffic noise and public noise exposure. This trend is illustrated by words most often used in this cluster, such as “noise,” “tires,” and “limits.” Some documents in this cluster cited safety and emissions reduction as alternate reasons for tire regulation.

Across the three clusters, a handful of the documents discussed the proposal purely in terms of economic gain or loss and were coded “1” accordingly. Alternatively, some documents supported the regulations purely from an environmental standpoint and thus were coded with a “2” for an environmental frame. Overall, however, the documents relied heavily on using a consumer protection frame. The vast majority of these documents, regardless of cluster, were coded “8” for consumer protection because they expressed interest in either safety or noise exposure.

1. European Commission, COM (2008) 316: Proposal for a Regulation of the European Parliament and of the Council concerning type-approval requirements for the general safety of motor vehicles. 23 May 2008. < http://www.europarl.europa.eu/registre/docs\_autres\_institutions/commission\_europeenne/com/2008/0316/COM\_COM(2008)0316\_EN.pdf>. [↑](#footnote-ref-1)
2. European Commission, “Summary for Legislative Proposal: COMM(2008)0316.” 23 May2008. < http://www.europarl.europa.eu/oeil/popups/summary.do?id=1037795&t=e&l=en>. [↑](#footnote-ref-2)