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***Proposals and Considerations
for the regulation of Non-Exhaust (Brake) Emissions.***

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Preamble

- European friction industry agrees fully to regulate Non-Exhaust (Brake) Emissions.
- Components emitting Non-Exhaust-Emissions are by definition **sacrificial** parts.
- Components subject to tear & wear are considered parts without intended release of substances, as they **protect** the rest of the system in its safety function.

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What should Non-Exhaust Emissions regulation look like?

- Non-Exhaust Emissions regulation should be a stand-alone regulation
(Only maintaining links to type-approval regulations of affected components.)
- Taking into account all Non-Exhaust Emissions from a **vehicle corner** perspective
- Considering emissions of
 - Brake linings
 - Brake discs or drums
 - Tires
 - Road abrasion
- Emissions shall be measured by relative limits or by a reference system.

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What should Non-Exhaust Emissions regulation take into account?

- Non-Exhaust Emissions regulation shall be assigned to
 - environmental regulatory test parameters,
 - all vehicle categories
- The regulation will **conflict** with all current type-approval regulations as they are designed to be safety, performance and compliance (CoP) oriented.
- Real-driving emissions must first be put in relation to laboratory tests to establish a meaningful baseline for the **development** of Non-Exhaust Emission components.
- The current emission values shall serve as a reference basis.

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What should Non-Exhaust Emissions regulation take into account?

- PM or PN levels shall not be used as the only factors in determining Non-Exhaust Emissions.
- Whether there is a different toxicity level for different components is “not proven” or “not yet fully researched”.

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Thank you very much for your attention