



AAAM

African Association of
Automotive Manufacturers

Managing Director
Kenya Bureau of Standards
P.O. Box 54974 – 00200
Nairobi
Kenya

19 May 2022

Dear Lt. Col. Njiraini,

KEBS PUBLIC NOTICE ON IMPLEMENTATION OF KS 1515:2019 – CODE OF PRACTICE FOR INSPECTION OF ROAD VEHICLES

Following the declaration of KS 1515: 2019 - Road Vehicles - Inspection of Road Vehicles – Code of Practice as mandatory Kenya Standard approved by the Cabinet Secretary for Industrialization, Trade, and Enterprise, KEBS has informed all stakeholders and the public of the planned implementation of KS 1515:2019 on 1 July 2022.

This Kenya Standard specifies general, safety and environmental requirements for road vehicles and includes the inspection schedule for road vehicles.

As the African Association of Automotive Manufacturers (AAAM) we welcome the move to improve vehicle safety and inspection standards and support the initiative by the Kenyan Government and the role that KEBS plays in improving safety on the roads in your country.

AAAM is an automotive association focused on the development and growth of the automotive industry in Africa. Our members include global automotive companies & Original Equipment Manufacturers (OEMs). Our mission is to work with African governments to refine, develop and implement automotive policies and ecosystems that will unlock the economic potential of the country and the continent. We see ourselves as an authoritative body that provides automotive knowledge, insights, and advice considering the full automotive value chain.

AAAM would like to bring to your attention two areas of concern that have been highlighted by our members.

The first is the pull-forward of the date from 1 January 2023 to 1 July 2022 for the implementation of EURO IV/4 emissions standards for all newly imported diesel and petrol (gasoline) powered vehicles.

By way of background, the REVISION OF EMISSIONS REQUIREMENTS FOR ROAD VEHICLES letter dated 20th July 2018 from the National Transport and Safety Authority informed members that all imported vehicles would need to meet Euro IV/4 as from 1st January 2024.

+27 (0)72 323 4916

ceo@aaamafrica.com

www.aaamafrica.com

Dave Coffey (CEO) | Mike Whitfield (President) | Andrew Kirby (Vice-President) |

Dr Markus Thill (Vice-President) | Dr Ahmed Fikry (Vice-President)

This date was carried forward into the DRAFT KENYA STANDARD (DKS 1515:2019) in section 6.1.1 (as 1st January 2024) but removed from the final published standard.

A subsequent letter dated 20th December 2019 highlighted the concerns of the Kenya Vehicle Manufacturers Association (KVMA) in meeting the 1st of December 2019 implementation date and permitted an exemption to all licensed motor vehicle assemblers until 1st January 2023.

This communication resulted in our members planning for the introduction of all their products to meet the Euro IV/4 emission standards (both imported and locally assembled) by 1st January 2023.

AAAM would like to point out to the Kenya Bureau of Standards, that this pull forward by 6 months is extremely difficult to meet and will result in reduced availability and sale of vehicles between 1 July 2022 and 1 January 2023. The planning for the introduction of new models in a market begins many years in advance. The development and release process itself can take up to 2-3 years, this is followed by production scheduling, adjusting manufacturing lead times, planning the logistics of intercontinental delivery and port clearance times, all before the final delivery to dealers can commence.

Our members have carefully scheduled these lead times around the introduction date for 1 January 2023 and thus will not have all vehicles ready for sale in the Kenyan market, in time for the 6 months earlier introduction of the KS 1515:2019 standard.

AAAM respectfully requests that KEBS reconsiders the introduction date of 1 July 2022 as published and implements the new standard from 1st January 2023, as previously communicated; this will allow our members to meet the originally planned and scheduled lead times, so as not to negatively affect product availability, and ultimately new vehicle sales in Kenya and in turn employment.

The second concern relates to clarification and confirmation. The KEBS 1515:2019 standard in Annex E stipulates the vehicle emissions limits of Euro IV/4 for various vehicle classes. The understanding of our members is, that the certified results from the relevant tests to which these limits are applicable, is all that is required to prove conformity to the standard. We request confirmation from KEBS in this regard.

The AAAM would appreciate KEBS reconsidering the introduction date of 1 July 2022 for KS 1515:2019 with a view to reverting to the original Euro IV/4 implementation date of 1 January 2023 as well as receiving confirmation that the certified results for the required emissions testing is all that is required to meet conformity.

Yours sincerely



Dave Coffey

CEO AAAM

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