

# Tractors Emission Directive –

## T2 – C2-T4.1-C4.1 delay

### The Challenge

Narrow tractors and high clearance tractors (categories T2/C2 and T4.1/C4.1 according to Directive 2003/37/EC) are dedicated machines that are specifically developed for fruit and vine cultivations requiring the capacity of the tractors to operate in extremely restricted spaces maintaining high manoeuvrability.

These high value crops, limited to selected regions, are optimised for quality and yield, the European Union subsidised their restructuring and defined the present layout and, implicitly, the tractors requirements. These tractors are totally dedicated machines, unsuitable to operate in other areas and almost exclusively used in the EU.

Directive 2000/25/EC defines the emission requirements for agricultural and forestry tractors equivalent to Directive 2004/26/EC for non-road mobile machinery. Starting from stage IIIB the limits on gaseous and particulate emissions will require the installation of exhaust after-treatment systems and much larger cooling systems. The installation of such devices would impose an increase in dimensions and a loss of manoeuvrability incompatible with the cultivations.

### The CEMA position

The engine packaging is already a very challenging task for the 'Compact Tractor' manufacturer going from phase II to phase IIIA, due to the increase in required performance of the cooling system including charge air cooling. After-treatment systems (particulate filters and NOX selective catalysts) have dimensions totally incompatible with the engine compartments, their remote installation would make them ineffective. An increase of the current dimensions to accommodate these devices would be totally incompatible with the functionality of these tractors.

The European Joint Research Centre and ARCADIS, operating on behalf of DG Enterprise and industry, confirmed with their studies the findings of CEMA:

- The overall dimensions of these tractors are dictated by the cultivations. Adopting any after-treatment system would make the size of these tractors increase in a way not compatible with their functionality, thus leaving a

**“Specialized tractors and implements are the key factor to allow farmers to improve their cultivation and get best quality with an acceptable income. European legislative system shall correct the shortcomings of its decisions that would put products out of the market well beyond its original intentions.”**



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significant part of the European agriculture without a fundamental tool;

- The environmental impact of these tractors is negligible.
- The economical impact on the manufacturing industry and agriculture far outweigh the environmental benefits.
- The lack of suitable tractors would extend the life of the existing ones, specifically pre-regulation tractors, thus leading to a substantial stop in the improvement of exhaust emissions in this particular sector.

CEMA requests an exemption for T2, C2 and T4.1 tractors as no technical solution is available



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