



ENGLISH REPORT

EU Memorandum

Retrofitting, manufacturer warranty, CE and ECE R10

Concise documentation memorandum for Zenride Optimizer

7 August 2026

ZENRIDE OPTIMIZER

Regulatory documentation • EU and Serbia

1. Retrofitting and manufacturer warranty

The European Commission's supplementary guidelines for the motor vehicle sector address "misuse of warranties". The guidelines state that concerns may arise where a statutory or extended manufacturer warranty is made conditional on repair and maintenance work not covered by the warranty being performed exclusively within the authorised network, or on use of the manufacturer's own brand of spare parts for replacements outside the warranty.

At the same time, the guidelines recognise that a supplier may legitimately reject a specific warranty claim where the event giving rise to the claim is causally linked to incorrectly performed repair or maintenance work, or to the use of a poor-quality part.

Practical consequence for Zenride: Retrofitting third-party equipment should not, in itself, be described as automatically voiding the entire manufacturer warranty. A specific dispute may nevertheless arise if the manufacturer can demonstrate a relevant causal link to the damage. EU competition law is not a product-approval certificate and does not replace a technical compliance assessment.

2. Technical scope of the Zenride Optimizer

Zenride's Technical Statement describes the Optimizer as a passive mechanical device installed in the fuel line, with no electrical or digital connection to the ECU, no modification of engine software, and no interaction with emissions or safety sensors. This is a relevant technical factor when assessing warranty and type approval, but the final assessment depends on the specific installation and the applicable rules.

3. CE marking

CE marking is not a general product or quality approval. Official EU guidance states that CE marking is mandatory only for products covered by harmonised EU rules that specifically require it. A product not covered by such legislation must not be CE-marked solely to create documentation.

Recommendation: Obtain a concise written compliance assessment identifying precisely which EU rules apply to the Zenride Optimizer and concluding whether CE marking is required or not applicable.

4. ECE R10

UN Regulation No. 10 concerns electromagnetic compatibility for vehicles and for components or separate electrical or electronic technical units intended for installation in vehicles. As the Zenride Optimizer is described as passive and mechanical, with no electrical or electronic connection, ECE R10 does not appear to be the natural approval framework for the Optimizer unit itself.

Recommendation: Ask a qualified automotive compliance specialist to confirm applicability in writing. If R10 does not apply, the distributor should receive a concise "not applicable" rationale rather than an irrelevant certificate.

5. Official sources

1. European Commission / EUR-Lex - Supplementary guidelines for the motor vehicle sector, consolidated 17 April 2023, paragraph 69

<https://eur-lex.europa.eu/legal-content/DA/TXT/PDF/?uri=CELEX%3A02010XC0528%2801%29-20230417>

2. EU - Your Europe - CE marking

<https://europa.eu/youreurope/business/product-requirements/labels-markings/ce-marking/>

3. UNECE - UN Regulation No. 10 - Electromagnetic compatibility

<https://unece.org/transport/vehicle-regulations-wp29/standards/addenda-1958-agreement-regulations-0-20>

This memorandum is a practical negotiation and documentation note, not a binding legal opinion. The product's specific regulatory status should be confirmed by a competent professional in the EU and, before sale, in Serbia.