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Market Access System for Motor Vehicle Products in Morocco

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Abstract: Morocco is a major automotive producer and consumer market in Africa and a key gateway for Chinese automakers seeking to enter Northwest Africa. Drawing on Moroccan legislation, regulatory publications and industry data, this paper employs legal-text analysis and institutional comparison to examine the market access system for motor vehicle products across four dimensions: the industrial base, the legal framework, the competent authorities and the approval procedures. The analysis shows that Morocco has developed a three-layer structure: a technical core aligned with UNECE regulations and the EU technical framework; a procedural spine built on the dual track of type approval and individual approval; and market thresholds shaped by the requirement for a local authorised representative and by tax policy. Since 2024, passenger cars have had to comply in full with Euro 6b, whereas the application of Euro 6b to M2, M3, N1, N2 and N3 vehicles has been deferred to 2027-2028. On the basis of the performance of Chinese brands in Morocco, the paper recommends appointing an authorised representative at an early stage, pursuing type approval on a vehicle-family basis, localising technical documentation, differentiating through electrification and building an after-sales system.

Keywords: Morocco, motor vehicles, market access, type approval, technical regulations, Chinese automakers.

1. Introduction

Morocco lies at the north-western tip of Africa, bordering the Atlantic Ocean to the west and the Mediterranean Sea to the north, and serves as a hub linking Europe and West Africa. In 2024 it produced 559,600 vehicles, making it Africa's largest producer of passenger cars; new vehicle sales stood at about 174,000 units and rose to 235,400 in 2025, with Chinese brands accounting for around 10% [2-4, 8]. Industrial expansion and market opening have proceeded in parallel, making Morocco an important springboard for Chinese automakers entering Africa. Existing Chinese-language studies tend to focus on the investment climate, tariffs or individual certification requirements and provide little systematic analysis of the hierarchy of market access rules, the division of responsibilities among regulators or the sequencing of procedures; some practitioner guides even mistake IMANOR for the body responsible for whole-vehicle type approval. Drawing on legislation and industry statistics published in the Official Bulletin and by the Ministry of Transport and Logistics, NARSA and ADII, this paper addresses three questions: what levels of regulation make up the access regime, how responsibilities are divided among the competent authorities, and what procedures a vehicle must pass through from approval to registration. It concludes with recommendations for Chinese automakers.

The paper is organised in five sections: Section 1 introduces the regional and industrial context; Section 2 reviews the legal framework; Section 3 analyses the mandates of the competent authorities; Section 4 reconstructs the approval process; and Section 5 concludes with recommendations.

2. Regional Context and Automotive Industrial Base

2.1. Location and Market Characteristics

Morocco borders the Atlantic to the west and faces Spain across the Strait of Gibraltar to the north. Tangier Med port is within short sailing distance of major European ports, making the country a logistics hub for vehicle and component trade. The September 2024 census recorded a population of 36,828,330 and an urbanisation rate of 62.8%, with population concentrated in Casablanca-Settat and Rabat-Sale-Kenitra [1]. Morocco drives on the right and uses left-hand-drive vehicles, as do China and the EU, so steering systems require no modification, which lowers the adaptation cost for Chinese models.

New vehicle sales recovered to about 174,000 units in 2024, up 7% year on year; electrified vehicles, including hybrid, plug-in hybrid and battery-electric models, grew by 53% and accounted for around 7% of sales [2]. In 2025 sales reached 235,372 units, up 33.43%, with 208,848 passenger cars registered and Casablanca accounting for 40.4% of passenger-car sales [3]. The market is modest in size but fast-growing and geographically concentrated, making it suitable for entry with a high-volume model and a strong value-for-money proposition.

2.2. Vehicle Manufacturing and the Supplier Landscape

Vehicle production reached 559,645 units in 2024, comprising 524,467 passenger cars and 35,178 commercial vehicles, compared with 535,825 units in 2023 and 464,864 in 2022 [4]. Morocco accounts for roughly half of African output excluding South Africa and is the continent's largest passenger-car producer [4].

Renault's Tangier plant began production in 2012. In 2024 Renault produced 413,614 vehicles in Morocco, of which 312,381 were built at Tangier and 101,233 at Casablanca; about 90% were exported. Morocco has become Renault's second-largest production base worldwide, accounting for 17% of the group's global sales [5]. Stellantis has invested more than EUR 300 million in its Kenitra plant, raising capacity from 300,000 to 450,000 units and producing models such as the Fiat Multipla and Fastback [2]. The supplier base

comprises about 270 firms clustered around Tangier, Kenitra and Casablanca, including Valeo, Aptiv, Yazaki, Denso, Leoni and Sumitomo; the sector employs more than 250,000 people directly, generates turnover of about MAD 196 billion and exports more than USD 14 billion [5-6].

2.3. Market Structure and the Institutional Significance of Access

Moroccan output is roughly three times domestic sales, reflecting a strong export orientation, while domestic supply combines local assembly with imports. Before a vehicle may be driven on the road, it must obtain either RPT or RTI approval and use the approval document to clear customs and register; market access is therefore a continuous chain running from technical compliance to approval, customs clearance and registration. Table 1 summarises the main industry and market indicators.

Table 1. Key indicators of Morocco's automotive industry and market, 2022-2025

Indicator	2022	2023	2024	2025
Total vehicle production/units	464,864	535,825	559,645	—
Passenger car production/units	—	—	524,467	—
Commercial vehicle production/units	—	—	35,178	—
New vehicle sales/units	—	—	174,000	235,372
Passenger car registrations/units	—	—	—	208,848
Electrified vehicle share/%	—	—	7	—
Chinese brand share/%	—	—	—	approx. 10

Source: compiled from references [2-4] and [7-8].

3. Legal And Regulatory Framework for Motor Vehicle Access

3.1. Hierarchy of Rules and the Road Traffic Code

Moroccan motor vehicle access rules follow a hierarchy of law, decree, ministerial order and technical annexes. Law No. 52-05 of 2005 on the Road Traffic Code establishes the regime for vehicle use, registration and technical inspection [9]. Decree No. 2-10-421 lays down technical requirements, approval procedures and the competences of the authorities; Article 89 distinguishes type approval (RPT) from individual approval (RTI), and Article 96 lists the cases in which RTI applies [10]. Ministerial orders and their annexes refer item by item to UNECE regulations or EU directives, combining procedural stability with technical updating.

3.2. Technical Regulations for Type Approval

Ministerial Order No. 2730-10, issued on 25 December 2010 and published in Official Bulletin No. 5910 on 20 January 2011, is the basic instrument for the type approval of vehicles, components and accessories [11]. Annex II lists 102 technical orders: 84 on safety, 11 on the environment and 7 on accessories, corresponding respectively to regulations annexed to the 1958 UNECE Agreement or to the relevant provisions of EU directives and regulations [11-12]. Ministerial Order No. 711-13 of 2013 further recognises UNECE, EU, US FMVSS, Canadian CMVSS and GCC standards as technical bases [12].

This recognition operates at the level of technical standards and does not amount to automatic mutual recognition of approval certificates: approval must still be issued by the Moroccan authorities. ECE or EU reports can reduce duplicate testing but cannot replace the local procedure. Technical requirements apply by vehicle category (M, N, O and L). Passenger cars are typically subject to requirements on braking, lighting, occupant restraint systems, glazing, tyres, electromagnetic compatibility, emissions and noise, while commercial vehicles are also subject to axle loads, braking consistency and protective devices. Manufacturers should build a matrix linking each regulatory item to its test report and annex.

3.3. Emission, Noise and Environmental Regulations

Ministerial Order No. 2835-10 sets the emission approval conditions by fuel type [13]. M1 vehicles have had to comply with Euro 6b at the approval stage since January 2023 and all newly registered M1 vehicles since January 2024 [12]. For M2, M3, N1, N2 and N3 vehicles, Joint Ministerial Order No. 2094.24, signed on 11 December 2024 and published in Official Bulletin No. 7361 on 16 December 2024, postpones application to approval in 2027 and registration in 2028 [14]. Morocco has not yet introduced mandatory CO2 standards, fuel-economy labelling or zero-emission vehicle credits, and regulation continues to focus on pollutants and noise; diesel sulphur content is 10 ppm, which can support Euro 6 after-treatment [12]. For Chinese manufacturers, environmental compliance should focus on after-treatment matching, OBD diagnostics, real-driving emissions consistency and noise.

3.4. Product Safety, Standardisation and Import Regulation

Law No. 24-09 on Product and Service Safety requires imported industrial products subject to technical regulations to demonstrate conformity and bear the 'Cم' mark. Since 2020, import inspection has been entrusted to bodies such as SGS and Intertek, with tyres, batteries, brake pads, glazing, filters and cables among the priority items at the border [15-16]. Aftermarket parts are therefore subject to the same access requirements.

Law No. 12-06 of 2010 on Standardization, Certification and Accreditation establishes the standardisation and certification system [17]. IMANOR develops NM standards, operates product and system certification and represents Morocco in bodies such as ISO and CEN [22]. NM standards cover components, materials and test methods and underpin technical regulations, but IMANOR does not issue whole-vehicle type approvals. On imports, Law No. 13-89 on Foreign Trade establishes general freedom of import, with a limited number of goods subject to licence or prior declaration; vehicles require an import commitment, a licence

or a prior import declaration (DPI), and the customs declaration (DUM) is processed through PORTNET [18].

3.5. Taxation and Customs Regime

Import duty depends on the powertrain: 17.5% for internal-combustion vehicles and 2.5% for battery-electric and hybrid vehicles [12, 19]; import VAT is levied at the standard rate of 20%, with a 10% rate for economy cars since January 2024 [12]; and an import surcharge of 0.25% applies [12]. Vehicles with a customs value, excluding VAT, of MAD 400,000 or more are subject to the luxury registration duty at rates ranging from 5% to 20% depending on the value band; battery-electric and hybrid vehicles are exempt, and vehicles exceeding 3,000 kg, except four-wheel-drive vehicles, are excluded [19-20]. The annual special tax is based on taxable horsepower and energy type, with battery-electric and hybrid vehicles exempt [12].

Importantly, customs assesses duty on an estimated value in new condition rather than the transaction price, then applies an age-related reduction of 0%, 10%, 20% or 25% [23]. A low transaction price therefore does not necessarily reduce the tax burden. Table 2 summarises the main taxes.

Table 2. Main taxes on imported motor vehicles in Morocco, 2025

Tax	Tax base	Rate/standard	Main remarks
Import duty	Customs value	ICE 17.5%; BEV and hybrid 2.5%	Rate varies with origin agreements
Import VAT	Customs value + duty + surcharge	Standard 20%; economy cars 10%	Economy-car rate raised from 7% to 10% in January 2024
Import surcharge	Customs value	0.25%	Finances export promotion and inspection services
Luxury registration duty	Customs value excluding VAT	MAD 400,000-600,000: 5%; 600,000-800,000: 10%; 800,000-1,000,000: 15%; above 1,000,000: 20%	BEV and hybrid exempt; vehicles above 3,000 kg (except 4WD) excluded
Annual special tax	Taxable horsepower/energy type	Graduated by displacement and energy type	BEV and hybrid exempt

Source: compiled from references [12], [19-20] and [22].

3.6. Structural Features of the Regulatory Framework

Overall, the Moroccan regime displays EU-oriented technical rules, French-style procedures and differentiated taxation: the 102 technical orders bring the technical threshold close to European levels, the procedures emphasise prior approval, written documentation and on-site inspection, and the tax regime steers the powertrain mix. Together they form an access environment in which technical, procedural and fiscal instruments interact.

4. Competent Authorities for Motor Vehicle Access

4.1. Ministry of Transport and Logistics

The Ministry of Transport and Logistics (MTL) is responsible for vehicle safety and environmental policy, signs the technical ministerial orders and supervises NARSA; both Order No. 2730-10 and Order No. 2835-10 were signed by the Ministry [11, 13]. It does not, however, receive applications directly, as implementation is entrusted to NARSA and CNEH.

4.2. National Road Safety Agency (NARSA) and National Testing and Approval Centre (CNEH)

NARSA was established by Law No. 103-14 as a public establishment with legal personality and financial autonomy. It has operated since 2020 and has its headquarters in Rabat. Its responsibilities include driver licensing, vehicle registration and registration certificates, oversight of technical inspection, vehicle approval management and road-safety statistics [21]. CNEH carries out the technical work of type approval: it registers manufacturers or authorised representatives, reviews technical documentation, organises identification inspections of sample vehicles and issues certificates. RTI applications for vehicles exceeding 3,500 kg are handled by CNEH, while those for vehicles of 3,500 kg or less are handled by the NARSA centre in the owner's place of residence [12, 22].

NARSA manages approval, registration and in-service supervision as an integrated cycle. This centralises data, but the vehicle identification information and technical parameters submitted at the approval stage must match those used at registration; otherwise registration will be rejected.

4.3. Ministry of Industry and Trade

The Ministry of Industry and Trade (MCINET) does not issue whole-vehicle approval certificates. It is responsible for industrial policy and cluster coordination, and under Law No. 24-09 it carries out market surveillance on product safety and import conformity inspection [16], and supervises IMANOR and SEMAC [23]. Components, markings and manuals, as well as complete vehicles, fall within its remit; focusing only on vehicle approval while neglecting component compliance exposes manufacturers to failing market inspections after launch.

4.4. Moroccan Institute for Standardization (IMANOR)

IMANOR was established in 2010 under Law No. 12-06, replacing the former Industrial Standardization Service (SNIMA). It develops NM standards, operates product and system certification and represents Morocco in international standardisation [17, 22]. It provides the standards basis for components, materials and test methods but does not issue whole-vehicle type approvals. Some Chinese-language sources mistakenly describe it as the approving authority, which can lead companies to the wrong office.

4.5. Customs and Tax Authorities

The Administration of Customs and Indirect Taxes (ADII), under the Ministry of Economy and Finance, is responsible for customs declaration, valuation, taxation and release, and provides tax simulations through the ADIL/MCV system [19,

22]. The General Tax Directorate (DGI) administers VAT, registration duty and the annual special tax [20]. Neither is involved in technical approval, but both directly affect landed cost and pricing. Access is thus divided between transport for technical matters, industry for market matters, and customs and tax for fiscal matters, requiring companies to deal with several bodies; inconsistency at any stage delays the whole process.

Table 3. Competent authorities and their responsibilities in motor vehicle market access

Institution	Nature	Main responsibilities in market access	Industry interface
Ministry of Transport and Logistics (MTL)	Government ministry	Formulates vehicle safety and environmental policy; signs technical ministerial orders	Track regulatory amendments and application dates
NARSA/CNEH	Public establishment/technical body	Approval management, registration and oversight of technical inspection; registration of representatives, document review, sample-vehicle inspection and certificate issuance	Submit RPT/RTI applications, send sample vehicles for inspection, register vehicles
Ministry of Industry and Trade (MCINET)	Government ministry	Industrial policy, product-safety market surveillance, import conformity inspection	Component compliance, preparation for market inspections
IMANOR	Public standardisation body	Develops NM standards, product and system certification	Adopt NM standards, obtain voluntary certification
ADII/DGI	Ministry of Economy and Finance	Customs declaration, valuation, taxation and release; VAT, registration duty and annual tax administration	Import declaration, tax calculation and payment

Source: compiled from references [9], [11], [15-16], [19], [21] and [23].

5. Market Access Procedures

5.1. The Dual Track: Type Approval and Individual Approval

RPT applies to newly manufactured vehicles and chassis of the same type, including locally manufactured or assembled vehicles, and is applied for by the manufacturer or its NARSA-recognised representative. RTI applies to newly imported vehicles without an authorised representative, new vehicles that have not obtained RPT, used vehicles not more than five years old, small-series vehicles, vehicles modified after chassis approval, auction vehicles, vehicles adapted for persons with disabilities, driving-school vehicles, and vehicles that have undergone major modification or post-accident repair before returning to the road [10, 12]. A single RPT approval covers all vehicles of the same type and is suited to volume exports, whereas RTI involves vehicle-by-vehicle review and suits small series and special-purpose vehicles. Chinese automakers exporting complete vehicles to Morocco should obtain RPT rather than leaving dealers to process RTI for each unit.

Table 4. Comparison of type approval (RPT) and individual approval (RTI) in Morocco

Item	Type approval (RPT)	Individual approval (RTI)
Scope	Newly manufactured vehicles and chassis of the same type; locally manufactured or assembled vehicles	Newly imported vehicles without an authorised representative; new vehicles without RPT; used vehicles up to five years old; small-series and modified vehicles, etc.
Applicant	Manufacturer or its recognised authorised representative	Vehicle owner or representative
Subject of review	Model technical documentation and sample vehicle	Documentation and technical condition of the individual vehicle
Receiving body	CNEH	3,500 kg or less: provincial or prefectural NARSA centre; above 3,500 kg: CNEH
Validity	Covers all vehicles of the approved type and permits direct sale and registration	Valid only for the vehicle concerned
Main costs	Documentation, sample vehicle, testing and representative registration	Vehicle-by-vehicle inspection, approval fee and time

Source: compiled from references [10], [12] and [23].

5.2. Type Approval Procedure

The first step in RPT is registration of the authorised representative. The manufacturer submits to CNEH an application organised by brand and model, together with evidence that it has an authorised representative in Morocco; the representative may be an importer, dealer or dedicated agent, and the scope of authority, validity period and modification arrangements must be clearly defined. Without registration, a manufacturer cannot apply in its own name [12].

The second step is submission of technical documentation, including three copies of the vehicle description sheet prepared in the format of Annex III to Order No. 2730-10 and covering all characteristics such as powertrain, body, emission control, tyres, weights and dimensions, accompanied by conformity documents and test reports [11-12]. Documents not in French or Arabic must be translated by a certified translator. The third step is identification and inspection of the sample vehicle: CNEH checks the consistency of the vehicle identification number, manufacturer's plate and technical parameters with the description sheet, and either tests the vehicle against the applicable regulatory items or verifies the reports [12].

The fourth step is issuance of the certificate, once the documents, sample vehicle and inspection all comply. The fifth step is sale and registration: vehicles of the approved type may be sold and registered directly without individual re-approval, provided the regulations have not changed [12]. Extensions or amendments are required when major characteristics change. In practice, applications are often made on a vehicle-family basis, grouping variants that share

a platform and powertrain but differ in equipment into a single approval, thereby reducing duplicate testing.

5.3. Individual Approval Procedure

RTI is applied for by the owner or a representative to CNEH or to a provincial or prefectural NARSA centre, with documents on ownership, import, technical parameters and conformity; the vehicle is inspected and, if compliant, the receiving body issues an individual approval report (procès-verbal d'homologation) [12]. Vehicles of 3,500 kg or less are handled by the NARSA centre in the owner's place of residence and those above 3,500 kg by CNEH [23]. Used vehicles must be less than five years old, meet emission requirements and not have been improperly repaired after an accident; exemptions apply to returning nationals, special-purpose vehicles and donated vehicles [12, 23]. Approval fees are modest, but the transport and rectification of the sample vehicle are time-consuming.

5.4. Import Clearance and Registration

With the approval document in hand, the importer submits the DUM through PORTNET, together with the import commitment, licence or DPI, certificate of origin, invoice, packing list, bill of lading, approval certificate and conformity certificate [18]. ADII assesses duty, VAT, surcharge and registration duty on the basis of the estimated new-condition value, age depreciation and powertrain type, then releases the vehicle and issues a customs clearance certificate [19, 23]. The vehicle is then registered with NARSA, with the customs clearance certificate, purchase invoice, approval document, identity document and insurance certificate, and obtains its registration certificate and plates after technical inspection [21]. Registration is permanent, and changes of ownership must be recorded.

The sequence is therefore approval first, customs clearance second and registration third. Shipping before approval is granted may lead to demurrage, re-export or penalties; parallel imports that bypass an authorised representative can only use RTI and cannot obtain the RPT needed for volume sales.

5.5. Principal Bottlenecks

Five bottlenecks recur in practice. First, an authorised representative cannot be dispensed with, and exporting through a trader alone rarely secures volume approval. Second, the sample vehicle must be shipped to Morocco and inspected there by CNEH, and transport, insurance and rectification times are difficult to compress. Third, the vehicle description sheet must follow Annex III and be in French or Arabic, and format errors lead to rejection. Fourth, test reports must come from recognised laboratories and must correspond item by item to the regulatory requirements and vehicle category. Fifth, customs values vehicles in new condition, so undervaluing the invoice does not reduce the tax burden.

In addition, Euro 6b applies to M1 and N categories on different timetables, so passenger and commercial vehicles should not be planned on a single schedule; electric vehicles also require charging infrastructure, high-voltage safety training and battery take-back responsibility.

6. Conclusions and Recommendations

6.1. Main Conclusions

The Moroccan system can be summarised as a three-layer structure. At the technical level, the UNECE and EU frameworks form the core, with 102 orders covering safety, environment and accessories and a threshold close to that of Europe. At the procedural level, the dual RPT/RTI track is central: the MTL sets the rules, NARSA and CNEH administer approval and NARSA handles registration, forming a closed loop from approval to registration and in-service supervision. At the market level, the requirement for a local authorised representative, import trade regulation and differentiated taxation act as thresholds, with battery-electric and hybrid vehicles benefiting from structural advantages in import duty, luxury duty and the annual tax.

Its defining features are EU-oriented technical rules, French-style procedures and localised market access. Technical compliance is not the main obstacle; the real threshold lies in whether a local authorised representative is in place, whether documentation is organised in the Moroccan format, whether the company is willing to localise sample vehicles and testing, and whether component compliance and after-sales are built into the overall plan. In 2025 Chinese brands accounted for about 10% of new vehicle sales, with BYD ranking first among Chinese brands at 3,702 units, up 428% year on year [7-8]. The opportunity is real, but its sustainability depends on access and localisation capabilities.

6.2. Recommendations for Chinese Automakers

First, appoint the authorised representative and manage certificates in advance. Define the authorised models, territory, term, certificate holder and modification mechanism; start representative registration and technical documentation in parallel so as to avoid a situation in which the vehicle arrives before the certificate; and maintain an approval certificate register to track regulatory amendments, extensions and model-year changes.

Second, rely primarily on vehicle-family RPT and use RTI selectively. Group variants sharing a platform and powertrain so that one RPT covers multiple configurations; use RTI for niche models, special-purpose vehicles and used vehicles; and use small-series RTI for initial market testing before converting to RPT.

Third, localise technical documentation and testing. Prepare the vehicle description sheet in French and Arabic in accordance with Annex III and build a regulatory item-test report-annex matrix. Use ECE and EU WVTA reports to cover Moroccan differences, with particular attention to lighting colour and installation, braking, noise, OBD, manufacturer's plates, child restraints and tyres. Complete pre-inspection before shipping the sample vehicle to reduce rectification work in Morocco.

Fourth, use electrification for differentiation without betting solely on battery-electric vehicles. Battery-electric and hybrid vehicles pay only 2.5% import duty and are exempt from the luxury registration duty and the annual special tax, giving them a clear tax advantage; however, the charging network remains underdeveloped. Battery-electric vehicles are better suited to urban commuting and ride-hailing, while plug-in hybrids and strong hybrids are better suited to long-distance travel and first-time family buyers. Companies may adopt a product mix of battery-electric vehicles for brand building and hybrids for volume, and provide for high-voltage safety, battery warranty and recycling.

Fifth, establish channels, parts and after-sales in parallel. Moroccan distribution is concentrated in a small number of

local groups, and the partnerships between BYD and Auto Nejma, Chery and Auto Hall, and GWM and Tractafric Motors demonstrate the value of local channels [7]. At entry, companies should set up a spare-parts centre, technical training, warranty and recall processes, and ensure that tyres, glazing, batteries and brake pads comply with Law No. 24-09 and border inspection requirements.

Sixth, plan for localisation and monitor policy. Morocco offers vehicle, supplier and port advantages, and companies with the necessary conditions should evaluate SKD/CKD assembly in the Tangier or Kenitra free zones, aligning capacity with local-content requirements and investment incentives. They should also monitor the extension of Euro 6b to N categories, CO2 and fuel-economy policy, electric-vehicle incentives and changes to the tax regime.

6.3. Limitations

This paper relies on published legislation and industry statistics and does not include interviews with NARSA, CNEH or major dealers, nor does it obtain actual approval times and rejection rates by model. The applicable list of regulatory items should be confirmed against CNEH's latest requirements. Future research could quantify approval costs and timelines through case tracking and regulator interviews.

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