

## **OICA comments on Regulation No. 90 proposal (Identical discs/drums and identical linings)**

### Reference documents:

- OICA position GRRF-74-19
- GRRF-75-18: Results from R90 task force, joint CLEPA/OICA/FEMFM document

In spite of its concerns with the philosophy of identical parts, OICA has contributed to the drafting of a proposal within the task force and believes it is now technically far more robust compared to the original one (document GRRF/2013/4). The fact this proposal is a joint one between CLEPA, OICA and FEMFM is positive and reflects the good work performed in the task force.

However, OICA still have concerns regarding the philosophy of identical parts, which were raised during the TF:

- The issue of property rights of UN R13/R13H certificates still exists, and may be creating a competition issue. Indeed, Vehicle Manufacturer (VM) certificates are used for the benefits of a competitor on the replacement market.
  - In spite of the good improvements in the technical proposal, identical parts are adding a risk on the image of VM, with potential liability issues: VM have no control on identical linings; however VM's name is engaged, since the R90 approval of identical parts is based on VM R13/R13H approval tests on the original parts.
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