

**Comments to Trilateral White Paper on Improvement in the Implementation
of the 1998 Global Agreement (Informal Document WP.29-166-17)**

MEMA/JAPIA/CLEPA, representing the global vehicle suppliers have long supported the 1998 Agreement on Global Technical Regulations through the United Nations Economic Commission for Europe World Forum for Harmonization of Vehicle Regulations (WP.29) and have worked with all parties to strengthen the Agreement. We have read with interest the informal document dated 3 June 2015 transmitted by the European Union, Japan, and the United States during the 166th WP.29 session.¹

We have the following comments and suggestions:

- MEMA/JAPIA/CLEPA believe the Contracting Parties (CPs) should focus where there is an absence of regulation or where existing regulations are being rendered obsolete by technological advances. This focus should only include areas where regulations are warranted and only on that portion of regulations that require revision. Primary focus for priorities for harmonization should include:
 - New, emerging unregulated technologies that will significantly enhance vehicle safety and performance;
 - Government vehicle-related policies that are undergoing significant shifts;
 - New testing technologies that promise significant enhancements in regulatory or product effectiveness; and/or,
 - Harmonization of existing regulations should be considered when potential cost savings are significant.
- Encourage all CPs to communicate any concerns or special requirements on timing, research, stringency or other issues minimally on an annual basis.
 - The draft document proposes that CPs identify medium- and long-term priorities on a yearly basis. We would also propose that WP.29 establish basic criteria to define items of priority. This would include addressing potential barriers for transposition/adoption of GTRs.
 - MEMA/JAPIA/CLEPA wish a framework in the context of the WP.29 forum to annually review medium- and long-term priorities, status updates, and domestic regulatory and research planning schedules. This would include annual high-level meetings to assess progress and resolve issues.
- Regularly maintain and update the electronic reporting system available to industry stakeholders and all CPs that provides transparency regarding working group leadership points-of-contact, the operating terms of reference, meeting minutes, discussions, anticipated issues, and other critical information relevant to the GTR development process.

¹ Informal Document WP.29-166-17

- CPs should be encouraged to use domestic regulatory systems to keep all interested parties updated on progress on all discussions and provide sufficient transparency for full public participation.
- GTR working groups should be encouraged to hold a minimum number of sessions with full teleconferencing (audio/visual) connectivity to allow for fuller participation.

The Motor & Equipment Manufacturers Association (MEMA) represents more than 1,000 companies that manufacture and remanufacture motor vehicle parts, components and systems for use in the light- and heavy-duty vehicle original equipment and aftermarket industries. Our members provide over 734,000 direct jobs in the motor vehicle parts manufacturing industry, making this industry the largest creator of manufacturing jobs nationwide. MEMA represents its members through four affiliate associations: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); Motor & Equipment Remanufacturers Association (MERA); and, Original Equipment Suppliers Association (OESA).

CLEPA is the European Association of Automotive Suppliers. One hundred thirteen of the world's most prominent suppliers for car parts, systems and modules and 24 national trade associations and European sector associations are members of CLEPA, representing more than 3,000 companies, employing more than 5 million people and covering all products and services within the automotive supply chain. Based in Brussels, CLEPA is recognised as the natural discussion partner by the European Institutions, United Nations and fellow associations (ACEA, JAMA, MEMA, etc).

Japan Auto Parts Industries Association (JAPIA) was established in August 1969 on the foundations of a predecessor organization created in 1938. Its chief aims are to promote the sound development of the auto parts manufacturing industry and contribute to social and economic welfare. Today, with their annual turnover in auto parts exceeding 13 trillion yen, JAPIA 450 members are helping to support the automobile industry on a global basis. JAPIA is recognised as the natural discussion partner by the MITI, MILT and fellow associations presents its members JAMA, JASIC.