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Sent: 13 July 2012 11:07
To: PERREAU DE PINNINCK Fernando (TRADE)
Cc: GARCIA BERCERO Ignacio (TRADE); EMBERGER Geraldine (TRADE); SORENSEN Carsten (TRADE); SZYMANSKI Arkadiusz (TRADE); DE LUSIGNAN Paul (TRADE); DUPUIS Philipp (TRADE); SOURMELIS Petros (TRADE)
Subject: HLWG - Regulatory issues: meeting with CLEPA and ETRMA - report

Meeting took place together with ENTR C. Siebert, C. Roeland and E. Daniel; from CLEPA, Art 4.1b, Art 4.1b and Art 4.1b from ETRMA Art 4.1b and Art 4.1b

COM provided overview of HLWG and requested input from these associations, if possible for September, and eventually a common position with US industry later on. Ideally any action proposed should be demand-driven, based on industry input.

Points raised by CLEPA and ETRMA:

- Positive reply to the initiative, highlighting the great economic importance of the US market, which even being very demanding, is a very interesting one and provides great business opportunities especially for after-market products, where profits are substantial.
- US and EU automotive markets together are approx. 60% of the world automotive market: regulatory convergence could be used to expand the model to other economies.
- Costs attached to regulatory compliance are very high (in particular crash tests and emissions), if those extra costs could be avoided it could bring huge benefits to industry.
- Nowadays most products comply with regulations on both sides of the Atlantic, which substantially increases costs.
- At this stage they do not perceive relevant risks in the initiative; however they will try to identify them when providing their input, assessing all relevant factors. Risks and benefits will largely depend on the type of product.
- They expressed concerns about industry weariness given past experiences, insisting that commitment from the US side should be guaranteed.
- On regulatory issues, they noted that in many areas (assisted driving, e-mobility, emissions) there is a window of opportunity to work in new aligned technical regulations in both sides of the Atlantic. They were more cautious about the possibility of aligning existing technical regulations.
- In particular they showed disappointment about the elaboration of GTRs and underlined the need to work on alignment of conformity assessment procedures.
- On procedure, they showed some concerns about the tight deadlines (ETRMA) and requested clarification on the coexistence of this initiative with the TABD (CLEPA).

Conclusion:

- Initiative warmly welcomed by CLEPA/ETRMA, given the possible economic gains.
- They will provide input by end of September and, if possible, already with the contribution from their US counterparts.