

**From:** NEIRA Pablo (TRADE)  
**Sent:** Wednesday, September 12, 2012 5:13 PM  
**To:** PERREAU DE PINNINCK Fernando (TRADE)  
**Cc:** GARCIA BERCERO Ignacio (TRADE); EMBERGER Geraldine (TRADE); ROELAND Christophe (ENTR); BONVISSUTO Barbara (ENTR)  
**Subject:** Report - Meeting GM - US-EU HLWG

General Motors: [ 4.1.6  
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Commission: Fernando Perreau de Pinninck, Geraldine Emberger and Pablo Neira (TRADE); Barbara Bonvissuto and Christophe Roeland (ENTR).

- GM representatives , particularly GM Europe, welcome the initiative, [

NOT RELEASABLE

- ..... ]
- In concrete terms, GM suggests that previous efforts did not bring much benefit to industry and they would welcome that regulators first find a way to cooperate between each other and then

request the input from industry. They note that in the past industry harmonising initiatives failed because[

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- Although Mutual Recognition would be desirable, the main objective would be to agree on common regulation, for that it would be necessary to previously agree on better rulemaking procedures, in particular regarding common impact assessment and cost benefits analysis. It is important to avoid that common regulations become an addition of both existing regulations: it only increases costs. The main benefits are to be expected from a harmonisation of technical specifications, not harmonisation of the underlying procedures (i.e. SDOC and third party certification can co-exist as can self- certification and type approval) as long as the underlying requirements are the same.

- Divergent rulemaking procedures (NHTSA vs EU legislative procedure) and the US liability/litigation system are seen as main obstacles[

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- They also suggest working on in existing frameworks, such as the 98 Agreement, making sure that there are not different versions of the GTRs. They also see room for improvement in working together on horizontal issues related to rule-making, such as in particular impact assessment, and cooperation on pre-normative research feeding into standardisation.

- They note that the mayor beneficiaries of the initiative would be [ *N.R.* ] US market is so large that adapting to US regulations has a low impact on the final price of the car. On their side they see more benefits arising from the impact that a common US-EU regulation would have on third countries. As regards economic benefits they warn against "overdoing" the real impact of harmonisation of devices like the plugs for EVs – although a good 'leitmotiv' more substantial outcomes need to be delivered to keep industry engaged.
- Follow-up: GM will submit more detailed information in writing giving concrete examples of the issues, which will arise and have in the past arisen in cooperation EU-US including past work on GTRs in the framework of the UNECE 1998 Agreement. GM will also further investigate the situation as to legal issues (liability of regulators and producers in the US). GM will communicate contact persons at AAC whom TRADE and ENTR could meet when in Washington beginning of October.