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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.