

Proposal for a framework towards prioritizing possible future gtrs

In the joint CLEPA/MEMA/JAPIA comments on priorities for future global technical regulations (GTRs), we emphasized the importance of signalling regulatory goals and objectives to the automotive manufacturing industry as early as possible. *Informal Document WP.29-152-18*

Automotive suppliers can better contribute towards meeting public policy objectives when they can integrate such future needs into their product and technology planning horizons. Given the time and other resources involved in developing and commercializing new technologies, manufacturers need to have a clear understanding of eventual objectives and the procedures envisioned for measuring progress towards meeting those objectives well before their implementation within regulatory directives. Indeed, access to such forward-looking information can act as a catalyst towards encouraging manufacturers to invest in applicable technologies and support regulatory efforts.

Therefore, we would like to propose a framework for establishing and maintaining a list of potential gtr projects that can serve as an indicator of future regulatory directions. We believe that such a list would provide a quick means for all stakeholders to stay abreast of global rulemaking interests while helping to focus AC.3 discussions on high-value targets for future gtr efforts.

To date, many of Forum participants, including several Contracting Parties, have submitted information concerning their respective regulatory priorities.

In our submission, we defined criteria that describe what we believe are attributes that enhance the probability of success in establishing gtrs that can be readily transposed into local legislation worldwide.

This combination of specific priorities with a set of “success criteria,” we believe, offers a framework for prioritizing potential gtr projects. In short, we propose a process with three components:

1. Establish a list of safety and environmental regulatory objectives worldwide
2. Establish a list of attributes conducive to successful regulatory harmonization
3. Prioritize the regulatory objectives according to the success criteria

We submit that such an approach would permit AC.3 to maintain a future-oriented list of potential areas for gtrs that would clearly signal its areas of interest to manufacturers and other stakeholders. At the same time, we suspect that such a list might also encourage Contracting Parties to pursue certain rulemaking efforts primarily through the World Forum, where resources can be shared and resulting standards can be transposed efficiently into local legislations.

Framework Process

To illustrate the approach we envision, we propose the following framework that might be pursued during 2011.

- First, we suggest an effort to agree on the basic principle(s) of this proposal at the March 2011 Forum session (AC.3-31). The desired outcome would be a consensus agreement to pursue this approach with a voluntary commitment among participants to contribute guidance on their respective regulatory priorities and/or on criteria that facilitate the development of regulations that can be readily adopted at the national/regional level.
- At the June 2011 session (AC.3-32), we propose a review of the collected lists of issue interests and criteria. Presumably, this review would permit recognition of any items of greater interest across participants. The desired outcome would be consensus on a list of possible priorities and the criteria by which they should be evaluated. In principle, this consensus would involve removing any contentious items from either list.
- Finally, at the November 2011 session (AC.3-33), we propose a review of the draft prioritized list. Essentially, we suggest that this list would line up each issue of interest against the criteria the issue appears to satisfy. Presumably, certain issues would satisfy more criteria more readily than others, thus permitting a first cut at prioritization. The desired outcome would be a consensus on the suitability and value of the prioritized document and underlying methodology such that the prioritized list might be submitted as a formal document for the March 2012 session (AC.3-34) with a view towards its adoption.

Ultimately, our proposal envisions the maintenance of this document as an integral part of AC.3 deliberations whereby participants can continuously contribute items, signal changes in their respective priorities, and review the status and attractiveness of potential rule areas at each session.

As expressed above, our intent is to establish a simple, easily accessible tool that enables stakeholders to focus on high-potential areas for coordinated future action. In this regard, we note that manufacturers often have difficulty evaluating the likely impact of gtrs on national and regional standards.

We submit, therefore, that it is imperative for the future of the 1998 Agreement to undertake rulemaking in areas where the transposition into local legislation/regulation is direct, transparent, and predictable. The support of automotive suppliers for this process depends heavily upon fulfilling the expectation that resources invested in the establishment of a gtr will result in the harmonization of local standards worldwide. We believe that our proposal would enhance this dynamic of identifying, establishing, and enacting such harmonized regulations.