



European Automobile
Manufacturers Association

THE SECRETARY GENERAL

Mr Jean-Luc DEMARTY
Director-General
Directorate-General for Trade
EUROPEAN COMMISSION
B-1049 BRUSSELS

Mr Daniel CALLEJA CRESPO
Director-General
Directorate-General for
Enterprise and Industry
EUROPEAN COMMISSION
B-1049 BRUSSELS

Brussels, 7 December 2012

Subject: AAPC/ACEA Joint Submission to the HLWG

Dear Mr Demarty,
Dear Mr Calleja Crespo,

Please find attached the “AAPC and ACEA Joint Submission in Support of Automotive Regulatory Harmonization in a European Union–United States Trade and Investment Agreement”, as well as the joint AAPC/ACEA letter to the Commission and to USTR.

ACEA welcomed the interim HLWG report, which states that “... a comprehensive transatlantic trade and investment agreement, if achievable, is the option that has the greatest potential for supporting jobs and promoting growth and competitiveness across the Atlantic”. ACEA fully concurs with that assessment and the merits of pursuing a bilateral trade agreement (ETP) between the United States (US) and the European Union (EU).

Our industry expects the initiation by the EU Commission of an impact assessment, the results of which, namely for our industry, should condition the launch of the negotiations of a deep and comprehensive ETP with the US.

An ETP with the US should be ambitious and address tariff and non-tariff measures in the automotive sector. The following key objectives should be achieved in the phase of negotiation: the elimination of tariffs and regulatory convergence as part of the full elimination of non-tariff barriers. Our industry’s position is that tariffs should only be reduced/eliminated following a successful alignment of regulations (maximum in parallel), especially in the fields of safety and the environment.

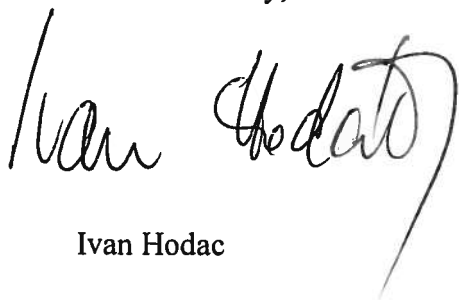
These negotiations should also lead to acceptable results on product liability rules, which remain a major concern and a prerequisite for the automotive industry in EU-US trade. In this regard, the mutual recognition of the US certification and EU homologation processes, along with their respective quality management processes, is fundamental. The procedure regarding mutual recognition of existing regulations and future technical harmonization should draw upon WP 29 UNECE ('58 and '98 agreement).

ACEA would appreciate it if the final HLWG report could include a reference to the AAPC/ACEA joint submission as we expect it to recommend the launch of the ETP negotiations.

It is our understanding that AAPC will send the AAPC/ACEA joint submission to USTR.

We look forward to cooperating with you on this important and challenging topic.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ivan Hodac', with a long, sweeping flourish extending downwards and to the right.

Ivan Hodac

Encl.

cc: Mr Ignacio Garcia Bercero, Director, Directorate-General for Trade, European Commission
Mr Carlo Pettinelli, Director, Directorate-General for Enterprise and Industry, European Commission
Mr Damien Levie, Head of Unit, Directorate-General for Trade, European Commission
Mr Philippe Jean, Head of Unit, Directorate-General for Enterprise and Industry, European Commission