

Motor & Equipment Manufacturers Association

1030 15th Street, NW Suite 500 East Washington, DC 20005
Tel 202.393.6362 Fax 202.737.3742 www.mema.org



February 12, 2018

The Honorable Elaine L. Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Ms. Heidi R. King
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: WP. 29 Vote on Electric Vehicle Safety GTR

Dear Secretary Chao and Ms. King,

The Motor & Equipment Manufacturers Association (MEMA) recommends that the National Highway Traffic Safety Administration (NHTSA), representing the United States, vote “affirmative” to adopt the Electric Vehicle Safety (EVS) Global Technical Regulation (GTR) Phase 1 during the March meeting of the UNECE World Forum for Harmonization of Vehicle Regulations (WP.29).

MEMA is the leading international trade association in the fast-changing mobility industry and represents more than 1,000 vehicle suppliers¹ that directly employ over 871,000 Americans in all 50 states – the largest sector of U.S. manufacturing jobs. Together with indirect and employment-induced jobs, the total U.S. employment impact of the supplier industry is 4.26 million jobs and contributes nearly \$435 billion to the U.S. GDP.²

Many of our Tier 1 supplier members develop and manufacture the batteries and related components that are installed in electric and hybrid electric vehicles. Demand for these critical components will increase over time as more EVs enter the marketplace. According to a July 2017 study by Bloomberg New Energy Finance shows that the long-term forecast for electric vehicle deployment is quite significant.³ It is for these reasons MEMA supports the adoption of the EVS GTR Phase 1 because it provides important safety and performance specifications.

Worldwide, vehicle suppliers lead the way in developing advanced, transformative technologies that enable safer, smarter, and more efficient vehicles, all within a rapidly growing global marketplace. The vehicle industry depends on an integrated worldwide network of suppliers and customers for continued viability and growth. As such, MEMA – along with our counterpart supplier associations in Europe and Japan⁴ – have long supported the goals of the WP.29 1998 Agreement and the efforts to develop GTRs. The endeavors of the 1998 Agreement are important because harmonized standards increase efficiencies, provide regulatory certainty, and reduce costs for government and industry.

Aligning vehicle regulations and test procedures reduces regulatory burdens on vehicle manufacturers and their suppliers and enhances the ability of manufacturers to be more efficient.

¹ MEMA represents vehicle suppliers through the following four divisions: Automotive Aftermarket Suppliers Association (AASA), Heavy Duty Manufacturers Association (HDMA), Motor & Equipment Remanufacturers Association (MERA) and Original Equipment Suppliers Association (OESA).

² “Driving the Future: The Employment and Economic Impact of the Vehicle Supplier Industry in the U.S.” Available here: https://www.mema.org/sites/default/files/MEMA_ImpactBook.pdf, released by MEMA in January 2017.

³ “Electric Vehicle Outlook 2017” Highlights available here: <https://about.bnef.com/electric-vehicle-outlook/>, released by Bloomberg New Energy Finance in July 2017.

⁴ CLEPA (European Association of Automotive Suppliers) and JAPIA (Japan Auto Parts Industry Association).



Multiple, divergent regulations risk increasing costs for manufacturers and creating technical barriers to market access. Lack of participation in the world market limits both the domestic and global competitiveness of all suppliers.

In a white paper entitled "Improvement in the Implementation of the 1998 Global Agreement,"⁵ MEMA supported recent recommendations made by the U.S. and other contracting parties (CPs) of the 1998 Agreement to improve the GTR process. MEMA will continue to support the GTR process and provide inputs, as appropriate, on how it can continue to improve for the CPs and for industry stakeholders.

MEMA appreciates the opportunity to weigh in on this important issue and reiterates its support for the United States, via NHTSA, to vote "affirmative" to adopt the EVS GTR Phase 1 as well as for continued engagement and active participation in the 1998 Agreement.

If you have any questions, please contact me or Leigh Merino, senior director of regulatory affairs, at lmerino@mema.org.

Regards,



Ann Wilson
Senior Vice President, Government Affairs

cc: Julie Abraham, USDOT
Ryan Posten, NHTSA
Jane Doherty, NHTSA
Ezana Wondimneh, NHTSA
Nha Nguyen, NHTSA

⁵ Informal document WP.29-168-08 (WP.29 168th session, 8-11 March 2016)