

## **Comments to Trilateral White Paper on Improvement in the Implementation of the 1998 Global Agreement (Informal Document WP.29-166-17)**

Confirming its continued positive interest in the 1998 Agreement, IMMA is aware of the limitations of national processes that complicate progress of GTR development and implementation. Therefore IMMA welcomes the initiative of 3 Contracting Parties to improve the Implementation of the 1998 Agreement.

The framework of the 1998 Agreement addresses a significant number Powered Two and Three Wheelers issues:

- Motorcycle Gaseous Emissions Test Cycle (GTR2),
- Motorcycle braking (GTR3),
- Motorcycle tell tales and indicators (GTR12).
- Two draft new GTRs for discussion at January 2016 72/GRPE: GTR on Evaporative and Crankcase emissions and GTR on On-Board-Diagnostics.
- Further GTR's planned to be created during the extended mandate of the IWG EPPR 2016-2020.

IMMA endorses the two primary purposes as they are defined inside the Preamble of the Agreement and reminded in the Trilateral White Paper, noting that for IMMA, the items 'tool to develop global regulations for new issues' and 'instrument to harmonise existing regulations' are considered equally important.

IMMA emphasizes the importance of harmonisation between GTRs and UN Regulations. For certain contracting parties, the UN Regulations under the 1958 Agreement allow a quick and efficient implementation of a GTR. For example, IMMA strongly appreciates the approach chosen for the IWG EPPR to ensure alignment of requirements between UN Regulations and GTRs. Further to agreeing on the items already addressed in the Trilateral White paper, IMMA notes that Amending GTRs to reflect technical progress is more complicated than UN Regulations. IMMA hopes that this could be addressed in the future.

Regarding options and/or modules in GTRs, their use should be limited and should not contradict harmonization.

IMMA hopes that once new GTRs are adopted, such as developed by the IWG EPPR, they will be implemented in the national regulation of the Contracting Parties.

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