

**Comment on
ECE/TRANS/WP.29/GRVA/2020/32 and
ECE/TRANS/WP.29/GRVA/2020/33**

- On the one hand, Japan recognizes that the ongoing discussions at FRAV and VMAD are proceeding in a very positive direction, and it is extremely important to promote international harmonization including the 1998 agreement member countries.

 - On the other hand, Japan understands the aim of proposal from Germany, which wants to proceed with the establishment of specific regulation of ALKS.

 - From this point of view, if ALKS extension is discussed under GRVA, Japan would like to contribute to this activity and propose that the following two conditions should be met in order to ensure consistency with the current FRAV / VMAD and to ensure safety.
 1. The amendment to UN Regulation No. 157 should be consistent with the discussions at FRAV and VMAD, and when the discussion at FRAV and VMAD are concluded, the conclusion should be reflected to UN Regulation No. 157 without delay.

 2. GRVA and relevant party should think sufficient discussion on safety as top priority rather than keeping timeline of discussion.
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