**Amendment and comments to the**

**“Framework document on vehicle whole-life compliance” WP.29/2022/145**

 Submitted by the experts from CLEPA the European Association of Automotive Suppliers

 The text reproduced below was prepared by the experts from the European Association of Automotive Suppliers (CLEPA). It proposed an amendment to the “Framework document on vehicle whole-life compliance” WP.29/2022/145 to add a new sub-paragraph clarifying the role of the Contracting Parties. It also contains further guiding principles to be considered along the works of the WP.29 subsidiary bodies (see section III). The modifications to the text are marked in **bold** for new and ~~strikethrough~~ for deleted characters

 I. Proposal

*In paragraph 8 add the following sub-paragraph:*

“ **The evaluation of the level of safety and environmental performance of vehicles, equipment and parts along different stages of their life and also the assessment of the need for new arrangements to demonstrate that vehicles fulfil specific safety or environmental requirements in a given moment of their life shall be conducted by WP.29 and its subsidiary bodies within the context of the 1958 and 1998 Geneva Agreements.** “

 II. Justification

CLEPA welcomes the initiative to further evaluate the level of safety and environmental performance of vehicles, equipment and parts along different stages of their life and to assess if there is the need for new arrangements to demonstrate that vehicles fulfil specific safety or environmental requirements in a given moment of their life, aiming at complementing the existing Type Approval, Conformity of Production, In-Service Conformity, Periodical Technical Inspection and Road-Side Inspection procedures.

Having considered the “Framework document on vehicle whole-life compliance” WP.29/2022/145, CLEPA would like to stress that the proposed project shall be developed considering the following guiding principles:

1. The evaluation of the level of safety and environmental performance of vehicles, equipment and parts along different stages of their life and also the assessment of the need for new arrangements to demonstrate that vehicles fulfil specific safety or environmental requirements in a given moment of their life shall be conducted by WP.29 and its subsidiary bodies within the context of the 1958 and 1998 Geneva Agreements.
2. Following the above assessment, the definition of the specific (new) parameters needed to demonstrate the safety and environmental performances of vehicles shall be conducted by WP.29 its subsidiary bodies within the context of the 1997 Vienna Agreement and the 1958 and 1998 Geneva Agreements.

 III. Further considerations on the “Framework document on vehicle whole-life compliance” WP.29/2022/145

1. It shall be clearly and carefully specified to which party and for which purpose any (new) verification parameter or data need to be disclosed. In any case confidentiality, IP protection and data security shall be granted and the data and information requested shall be limited to the minimum necessary to perform the verification test.
2. Duplication of work across different WP.29 bodies shall be avoided as well as the duplication and proliferation of regulatory requirements relating to the same aspects (e.g. existing regulations may already introduce requirements to be verified throughout the vehicle lifetime). This would reduce unnecessary regulatory efforts to a minimum and would also reduce the risk of inconsistencies.
3. The (new) verification arrangements shall be intended to assess whether the respective parts, components and systems of the vehicle maintains a satisfactory level of safety and environmental characteristics in comparison to those required at the time of approval, without creating new legal obligations that differ from those defined in the scope of vehicles, components and systems type-approval.

It shall also be ensured that the (new) verification arrangements would not induce the implementation of new feature updates in addition to those requested at the date of the vehicle type approval. Therefore, the “repair as produced principle” shall be preserved.

1. Over time a vehicle may need the replacement of some parts or some separate technical units with replacement parts that differ from the original ones. The (new) verification arrangements shall take this into account and allow compliance for any original and non-original replacement part that are legally intended for the fitment on that vehicle and that maintain the safety or environmental performances within a reasonable tolerance from the performance level of the vehicle at the time of its approval.