



Brussels, 27 June 2014

Free Trade Agreement with Japan

ACEM, the Motorcycle Industry in Europe, supports free trade negotiations with Japan in order to improve effective market access for L-Category vehicles manufactured in Europe and is pleased to provide the following comments which supplement its initial submission of 5 July 2013.

Principle position

Japan should adopt all the necessary UNECE Regulations to ensure that L-Category vehicles, accessories, parts and components originating from one EU Member State and covered by an EU whole vehicle type-approval will be accepted in Japan without additional testing, certification, or marking requirements nor modifications, which is not the case today.

Non-tariff barriers in Japan

ACEM welcomes the progress by Japan in acceding to more and more UNECE regulations regarding L-Category vehicles. However some of them are not adopted (yet) and represent an unnecessary burden for ACEM manufacturers who have to retest according to the Japanese standards components already approved under the UNECE regime.

Moreover, Japan type-approves L-Category vehicles according to three main different procedures: full domestic homologation, preferential handling procedure (PHP), and parallel import procedure, among which some requirements differ.

The adoption by Japan of the UNECE regulations listed below in a harmonized way in the three homologation procedures represent therefore a priority for ACEM manufacturers.

Controls & Telltales

1. UNECE R60 - Uniform provisions concerning the approval of two-wheeled motor cycles and mopeds with regard to driver-operated controls including the identification of controls, tell-tales and indicators.

ACEM requests Japan to accede as soon as possible. (ACEM already has indications that Japan is planning to adopt R60).

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Lighting

2. R50 - Uniform provisions concerning the approval of front position lamps, rear position lamps, stop lamps, direction indicators and rear-registration-plate illuminating devices for vehicles of category L.

ACEM requests Japan to accede as soon as possible.

3. R53 - Uniform provisions concerning the approval of category L3 vehicles with regard to the installation of lighting and light-signaling devices.

ACEM requests Japan to accede as soon as possible.

4. R112 - Uniform provisions concerning the approval of motor vehicle headlamps emitting an asymmetrical passing-beam or a driving-beam or both and equipped with filament lamps and/or LED modules.

Japan has acceded to this regulation, but it is not included in the Preferential Handling Procedure for type approval.

ACEM requests this regulation to be included in the PHP procedure.

5. R113 - Uniform provisions concerning the approval of motor vehicle headlamps emitting a symmetrical passing-beam or a driving-beam or both and equipped with filament, gas-discharge light sources or LED modules.

ACEM requests Japan to accede as soon as possible.

Noise emissions

6. UNECE R41 - Uniform provisions concerning the approval of motor cycles with regard to noise.

Japan does now accept ECE R41.04 approvals for noise under full domestic homologation and PHP procedures. This issue represented a huge burden for EU exports until 2012.

However the 94 dB(A) stationary test limit is retained and every single bike is tested at registration either under PHP or full domestic homologation procedures. Japan shall replace the stationary noise limit by the use of the stationary noise measurement result as reference value for enforcement purposes.

Helmets for motorcycles and mopeds

7. Uniform provisions concerning the approval of protective helmets and their visors for drivers and passengers of motor cycles and mopeds.

ACEM requests Japan to accede as soon as possible.

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Recognition of EU type-approvals

For emissions regulations, the previously mentioned Japanese procedures for type-approval have quantitative registrations limits beyond which the vehicles need to be retested (e.g. 50 for the PHP procedure).

However, it is expected that Japan will fully accept EU type-approvals for which conformity of production procedures are foreseen, without any limitation in terms of number of registrations.

ACEM will appreciate to be kept informed on the progress of the negotiations in general, and in particular on the above priorities (adoption of the listed UNECE regulations in a harmonized way in the 3 type-approval procedures, full recognition of EU whole vehicle type-approvals without quantitative limits). ACEM remains of course available for any additional information the EU negotiators may need.

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