Engineering Development Board Ministry of Industries & Production Government of Pakistan

> No. EDB/AIDEC-IV/2023 December 28, 2023

Subject: 4th Meeting of Auto Industry Development and Export Committee

Dear Sir,

I am directed to refer to the 4th meeting of the Auto Industry Development and Export Committee held on Tuesday, December 12, 2023 at the Committee Room, Engineering Development Board, Islamabad.

02. The draft minutes of the subject meeting are enclosed for submission of comments before 12-01-2024.

Best regards,

Usman (Usman Ali), Manager (Policy), Ph: 051-9210285, usman@edb.gov.pk

Distribution:-

All AIDEC Members/Special Invitees.

Copy to:

- 1. ES to Secretary, Ministry of Industries and Production.
- 2. ES to CEO EDB (for information).

EDB

ENGINEERING DEVELOPMENT BOARD

Ministry of Industries & Production

Government of Pakistan

4thMeeting of Auto Industry Development Committee

MINUTES OF THEMEETING

The 4th meeting of the Auto Industry Development and Export Committee (AIDEC) was held on Tuesday, December12, 2023 at Engineering Development Board (EDB), Islamabad. The meeting was chaired by CEO, EDB. List of participants is enclosed at <u>Annex-A</u>.

The meeting started with recitation from the holy Quran. CEO, EDB welcomed the participants and requested all participants for their introduction. After the introduction, following agenda items were presented by the GM (Policy)/Secretary AIDEC with the permission of chair.

S.#	Agenda Item
1.	ConfirmationoftheMinutesof3 nd MeetingofAIDEC held on March21, 2023.
2.	Submission of ExportPlansbyallOEMSasstipulatedunderAIDEP2021-26andSRO-656
3.	DiscussiononproposedlistofpartstobeaddedinSRO693–Dec2023.
4.	 Discussion on Budget Proposals/Finance Bill and recommendations Tariff Proposals for Electric Vehicles (4wheelers) for penetration of EVs in the local market in view of National Electric Vehicle Policy. Discussion on export requirements for HCVs in the light of AIDEP. Discussion of applicability of export requirements by new companies under Tariff Based System (TBS).
5.	Discussion on import of old and used auto parts as scrap imported under SRO 499 and exclusion from Appendix C, in the light of meeting held in FBR on 15 th November 2023.SubmissionofrecommendationstoMinistryof Commerce &FBR.
6.	DiscussiononWP-29regulations, localization of auto parts and exports.
7.	Request to device import policy to allow commercial import of used vehicles (All Pakistan Car Dealers & Importers Association)
8.	 Individual Requests Discussion on request of M/s Universal Motors Pvt Ltd, a New Entrant for relaxation of 9 months/till date to launch their vehicles and avail concessionary rate of duty under ADP 2016-21/AIDEP 2021-26. Discussion on request by M/s AI-Haj Automotive (Pvt) Ltd, Karachi, a New Entrant For approval of time extension on import of SAGA1332CC CKD Units-Force Majeure Circumstances.

AGENDA ITEM NO. 1: CONFIRMATION OF THE MINUTES OF 3RD MEETING OF AIDEC HELD ON MARCH21, 2023.

GM (Policy)/Secretary AIDEC informed that minutes of 3rd meeting were circulated among members of AIDEC, and that no comments/observations have been received. There being no observations on the minutes, the house unanimously adopted the minutes of 3rd AIDEC meeting.

Decision: <u>AIDEC unanimously approved minutes of the 3rd AIDEC meeting.</u>



AGENDA ITEM NO. 2: <u>SUBMISSION OF EXPORT PLANS BY ALL OEMS AS</u> <u>STIPULATED UNDER AIDEP 2021-26 AND SRO-656</u>

GM (Policy)/Secretary AIDEC briefed that the OEMs (Car/LCV) assemblers were required to meet certain export targets in compliance to the S.R.O. 2069 (1)2022 dated 1-12-2022, which they were unable to do. Ministry of Industries & Production has allowed temporary import quotas to all OEMS till 31stDecember 2023 with the condition that firm export plans will be presented by end of December 2023.

CEO, EDB highlighted that although New Entrants are of the view that SROs have been frozen for them as of date of signing of agreement with MoIP, however the Business Plans/new investment agreement of the new entrants requires provision of export plans. He advised that all OEMs to submit the export plans by end of Dec 2023. He further added that EDB as a regulator can ask for export plans as a mandatory requirement. He added that revalidation will be subject to submission of export plans.

President, Automotive Division, M/s Lucky Motor Company (LMC) said that as such the export plan submission is not part of their agreement and the submission was optional as part of Business Plan. However, he committed to submit export plan before the deadline. Representative from M/s Sazgar Engineering Pvt Ltd said that they are making efforts to export rickshaws and 4 wheel vehicles and they will submit export plans by December 20, 2023. Snr. General Manager, Master Motor Limited said that they submitted their export plan at the time of submission of Business Plan with the investment agreement. However, he highlighted that Government needs to facilitate exports and ensure to do things which are needed to be done to create an environment conducive for exports. CEO, EDB replied that Government will provide assistance after analysis of the Export Plans. GM (Policy)/Secretary, AIDEC highlighted that facilitation to few OEMs to the extent of CKD was provided, however the facilitation mechanism for localized parts is needed to be developed. The mechanism to make the local assembler more competitive for export will be devised based on submission of proposals by the OEMs.

CEO, EDB highlighted that export plan will be submitted to MOIP in two parts, part one which will consist of company specific export plan which are confidential and part two the consolidated proposed measures needed to facilitate the exports from Pakistan. CEO, Indus Motor Company (IMC) said that Government needs to facilitate the export through duty drawback/rebate and FTAs. Vice President, Honda Atlas Cars Pakistan said that they are submitting proposals for facilitation of export i.e. FTAs and rebate etc. which should be reviewed.

Joint Secretary (LED), MoIP said that Government will analyze the proposals for export facilitation and where the FTAs are needed, the government will play its due role. CEO, IMC said that they are ready to send their first export consignment in next three months and they already sent one export consignment to Egypt. Joint Secretary (LED), MoIP appreciated the efforts of M/s IMC and ensured Government of Pakistan support.

Decision: <u>It was decided that OEMs (4 Wheel Vehicle Assemblers) will submit</u> their Export Plans to EDB by end-Dec 2023.



AGENDA ITEM NO. 3:

DISCUSSION ON PROPOSED LIST OF PARTS TO BE ADDED IN SRO 693-DEC2023.

GM (Policy)/Secretary AIDEC highlighted that the SRO 693 committee has finalized the list which was circulated to the AIDEC members but a separate meeting will be required to discuss the proposed list based on detailed specifications. CEO, EDB highlighted that the Board Meeting of EDB is to be convened shortly and EDB has to submit the list by end of the December. Therefore, he suggested finalizing the list at the earliest to ensure submission to MoIP in time after consultation with Board of Management of EDB.

Vice President, Honda Atlas Cars Pakistan said that his company is in favor of localization, however in case of patent parts i.e. radiators or headlights need approval from OEMs/ principle. The patent parts are not available in Pakistan as technological assistance agreements are not signed with international manufacturers and local vendors. He added that the local parts where only one vendor is available should not be included in the SRO 693 as it will create monopoly and industry will stop if that one vendor has manufacturing difficulties. CEO, IMC said that pricing is a factor as well, which is needed to considered. He added that inclusion in SRO 693(I)2006 results in unjustified profits by the vendors. He added that include any localized item in SRO 693(I)2006 and give time period of two years for development. Representative from M/s LMC said that Government needs to come up with governance mechanism. Protection of 30% is there if a firm is not competitive at 30%, it is unjustified to make it to 46%. He added that localization should be reviewed in view of competing objectives. LVA condition i.e. 50% may be considered for inclusion in the 693(I)2006. M/s LMC referred to the letter forwarded to MoIP in this regard.

CEO, EDB said that bi-annual submission by December 31, and June 30 is binding as per amendment in SRO 656(I)2006 vide S.R.O 841(I)/2021. He requested the AIDEC members to be specific. Representative from M/s LMC said that, SOPs should be finalized that may include pre-requisites i.e. two vendors requirement for a localized part, LVA-50%, technology capability via technical professionals, conflict of interest, deletion mechanism etc. CEO, IMC said that impediments are there in localization of few parts, but there are many parts which are localized at 30%, they should be included in the SRO 693(I)2006. He added that vendor industry is creating jobs; The OEMs are creating small proportion of the jobs. He endorsed the SOPs for inclusion in the SRO 693(I)2006. Director, Atlas Honda Pvt Ltd said that before inclusion capacity of the vendor should be reviewed.

Chairman, PAAPAM said that competitiveness in Pakistan is good even at 30%. The basic issues faced by localization, in PAAPAM's view are approval from the principle and willingness. He added that ADP 2016-21 objectives to enhance localization through competition is not yet fulfilled as the New Entrants are enjoying incentivized rate of duty till June 30, 2026. Therefore they have not shown willingness to localize. He said that formula for 30% is needed to be revised to ensure higher localization. He said raw materials are rightly excluded from condition of value addition. He added that simplified parts i.e. aluminum parts can be easily localized. However more effort are need for localization. He said that due to small level of exports, the vendor industry will have no specific advantage. The effort for localization and removal of nontariff barrier is needed. He said that localization or addition in SRO 693(I)2006 should be based on availability of the technology.

President, Automotive Division, M/s LMC said new entrants are in favor of localization. He said that in some cases inefficiency may conceal itself behind localization. The inefficiencies built up in the local parts will also make the export unviable. He added that inefficiencies can be reduced by increasing productivity, automation, local sourcing, consolidating and increasing volume.



GM (Policy)/Secretary AIDEC said that just few basic items are included in the proposed list for SRO 693 additions in compliance of law. CEO, EDB advised the AIDEC members to submit specific comments on the list by 13-12-2023. Snr. General Manager, Master Motor Limited questioned who will do the investment for localization of new parts. If OEM has to invest than it seems illogical at minimum volumes. CEO, IMC said that willingness and investment from vendor is required for localization as well. He said injection molding technology is available but the mold is for millions of dollars. He said that despite low volumes the vendor needs to invest to increase localization. He said that issues impeding localization i.e. technology is needed to be addressed. On query from JS(LED), MoIP, he highlighted the basic bottleneck for localization is low volumes in addition to already highlighted issues. Chairman PAAPAM said that due to low volumes, industry needs to focus on technology as an industry to enhance localization. Head Corporate Affairs, Pak Suzuki Motor Company Limited (PSMCL) said that parts included in the SRO 693(I)2006 must be finalized after the consensus. He suggested making a committee to review the SOPs. CEO, EDB agreed to make a committee of two members each from PAAPAM and PAMA, and one each from EDB and Ministry of Commerce for a complete framework for addition of parts in SRO 693.

General Manager (Policy)/Secretary AIDEC briefed that duty on tyres for various vehicle categories is notified under Table-I of SRO 656(I)2006. He added that, M/s Service Long March (SLM) has approached EDB and requested for inclusion of tyres in the SRO 693(I)2006. DG, PAMA said that tyres are part of CKD and the request of SLM is valid, if they are manufacturing entire range of tyres.

General Manager (Policy)/Secretary AIDEC briefed that tyres for Cars and Motorcycle are not included in the SRO 693(I)2006, however they are still being purchased locally. Since SLM's coming into operations earlier this year, EDB proposed to Tariff Policy Board to increase the duty on HCVs tyres from 3% to 11%, however it was not approved. Representative from SLM said that if tyre is part of the kit, it should be included in the SRO 693(I)2006. He added that they just want Bus and Light Commercial radial tyres to be included in the SRO. He said that they can manufacture all types of radial tyres. Vice President, Pak Suzuki Motor Company suggested visiting industry, if OEMs are satisfied they should be included at appropriate time.

Snr. General Manager, Master Motor Limited informed that SLM is not manufacturing all types of tyres. He was of the view that if SLM is exporting, then what is their justification for inclusion in SRO 693(I)2006. He feared that this will result in increased prices in the local market. DG, PAMA added that their members have placed orders with SLM for testing purpose and that the testing is not verified as yet. He said that 4011.2091 cover a wide range of tyres which are not manufactured by them. Inclusion of 4011.2091 will create an anomaly as high custom duty will be attracted, after market will also be affected, and a monopoly will be created which will hurt the local industry. Therefore, in view of PAMA it is premature to include tyres in SRO 693(I)2006.

General Manager (Policy)/Secretary AIDEC said that in light category Tyre with 4011.2011, M/s Service Industries Pvt Ltd was not manufacturing various sizes which are used by the local OEMs. The only Tyre size which was manufactured by M/s Service Industries Pvt Ltd was produced half of the quantity of the tyres imported on commercial duties. The industry claimed that in 4011.2011, M/s Service Industries Pvt Ltd is manufacturing one type of tyre and not manufacturing six types of tyres, therefore protection to radial tyres suggestion was given from 3% to 11% in case of buses/trucks. Representative from SLM said they manufacture tyres based on market demand. If a demand for specific size arises they can manufacture all type of tyres. Representative from SLM were of the view that they it should be included in SRO 693(I)2006 based on rule. CEO, EDB suggested to discuss the matter in a separate meeting to finalize the mechanism for inclusion of tyres in the SRO 693(I)2006.



Decision:

- i. Industry will submit specific comments on the circulated list related to SRO 693(I)2006 additions by 13-12-2023
- ii. <u>A committee, with 2 members each from PAMA and PAAPAM, and 1</u> each from EDB and MoC will review SOPs for inclusion in the SRO <u>693(I)2006.</u>
- iii. <u>A separate meeting will be held to discuss inclusion of Tyres in the</u> <u>SRO 693(I)2006</u>

AGENDA ITEM NO. 4:

DISCUSSION ON BUDGET PROPOSALS/FINANCE BILL AND RECOMMENDATIONS

i. Tariff Proposals for Electric Vehicles (4wheelers) for penetration of EVs in the local market in view of National Electric Vehicle Policy.

GM (Policy)/Secretary AIDEC, described that in case of 2-3 Wheelers, EDB has issued 34 licenses, however in case of investment in 4-wheelers is not yet materialized. He elaborated the proposals being considered for EVs penetration. He requested all AIDEC members to submit reply before the budget.

President, Automotive Division, M/s Lucky Motor Company (LMC) and Vice President Honda Atlas Cars Pakistan requested to maintain status quo. Snr. General Manager, Master Motor Limited said that removal of limit of 50KWH is highly desired for the introduction of EVs in Pakistan.

Decision: <u>It was decided that AIDEC members will submit their reply before</u> end-Feb 2023 for inclusion in budget proposals

ii. Discussion on export requirements for HCVs in the light of AIDEP.

GM (Policy)/Secretary AIDEC, briefed that as per AIDEP 2021-26, OEMs were required to consider export of parts and vehicles as per notified targets. However, the applicability of export targets on the Heavy Commercial Vehicles is unclear in the policy document.

Vice President Honda Atlas Cars Pakistan said that export targets on HCVs are not justified. President, Automotive Division, M/s LMC said that export targets for all OEMs should be removed. Snr. General Manager, Master Motor Limited said that due to low volumes, low localization and scattered volumes the export is not justified. Snr. General Manager, Master Motor Limited said the EV policy is not that attractive and if we impose export targets from day one it will discourage the investment. He added that export requirement on an infant company especially in case of EVs is highly unjustified. The House in general opposed that export requirement on infant company. CEO, EDB said that in general the house is of the opinion that no export requirements should be there for the infant company to facilitate investment and M/s LMC is of the view that it should be applied as notified.

Decision: EDB will take up the matter of HCVs with MoIP for amicable solution

EDB

iii. <u>Discussion of applicability of export requirements by new companies</u> <u>under Tariff Based System (TBS).</u>

GM (Policy)/Secretary AIDEC, briefed that in view of the spirit of the policy, an OEM during first year after establishing their plant was required to export 0% during the first financial year and gradually increase export in the upcoming years. However, the notification is notified based on the specific Financial Year. Therefore in this scenario, if an OEM is approved as an assembler under TBS, the question arises that which export requirements will be applicable on the new OEM? Similarly in case of approved OEMs under National Electric Vehicle Policy, the export requirements are unclear in their scenario especially in view of Government of Pakistan's commitment to increase EV penetration in Pakistan.

Representative from M/s LMC said that export targets are implemented for new entrants the same way as in case of existing players. Therefore, the notification based on FY should be implemented. However, Director, Atlas Honda Pvt Ltd objected and said it is against the spirit of policy and requiring exports from day one will hurt the investment.

Decision: <u>EVs and infant industry should submit a export plan at the time of</u> <u>issuance of the Manufacturing Certificate that should be</u> <u>implemented as per given timelines</u>

AGENDA ITEM NO. 5: DISCUSSION ON IMPORT OF OLD AND USED AUTO SCRAP IMPORTED UNDER PARTS AS SRO 499 ANDEXCLUSION FROM APPENDIX C, IN THE LIGHT OF IN 15[™] MEETING HELD FBR ON **NOVEMBER** 2023.SUBMISSIONOFRECOMMENDATIONSTOMINISTRYO F COMMERCE & FBR.

General Manager(Policy)/Secretary AIDC said that, in the light of the Honorable Islamabad High Court's decision a meeting was held on 15-11-2023 in FBR to discuss their medial measures related to Custom Wing, FBR. He added that matter is sent to AIDEC based on the argument that Ministry of Commerce/FBR do not want to hurt the local automotive industry. Therefore, their input is required in this regard.

The representative of the old auto parts importers association briefed that old and used auto parts are being regularly imported and released against redemption fine under the provision of SRO 499(I)2009, therefore, the same may be excluded from the Appendix C of the import policy order in vogue so that the import of old and used auto parts may be made smooth to address market demand of these items, which are otherwise not produced locally. The inclusion in the Appendix C results in fine equal to the price of the old and used auto parts. He said that if they are not removed from Appendix C, it will close the local transport industry.

Group Director, Atlas Honda Pvt Ltd was of the view that matter pertains to Ministry of Commerce and this forum is for localization and export. Chairman, PAAPAM said that the quality of the parts is questionable; the human lives are at stake, if Government wants to allow them the mechanism to ascertain the quality should be in place. He added that misuse requires remedial measures and ITP assessment needs to be reviewed. He added that Pakistan has a big industry and there are many rerolling mills which are exporting as well. The used auto parts can be used by local industry if categorized as serviceable and non serviceable. He suggested making a committee. CEO, EDB was of the opinion that they may refer the matter to Ministry of Commerce.



The representative of the old auto parts importers association said that there is no quality control for new parts as well. Representative of Ministry of Commerce said that their Ministry has a technical wing to discuss such matters. Secretary AIDEC said that since MoIP is regulating auto parts and vehicles therefore the matter placed before AIDEC. However, matter will be referred to Ministry of Commerce with appropriate recommendation.

Decision: <u>The request of old and used parts importers may be referred to Ministry</u> of Commerce

AGENDA ITEM NO. 6: DISCUSSION ON WP-29 REGULATIONS, LOCALIZATION OF AUTO PARTS AND EXPORTS

GM (Policy)/Secretary AIDEC, briefed that to ensure quality standards, Pakistan became a signatory to Working Party-29, which is a UN Forum working for harmonization of vehicle regulations under United Nations Economic Commission for Europe. In the first stage, 17 regulations were implemented from July 01, 2022 which includes those for brakes, steering, tires, lighting, safety belts, seats, collision, safety glazing, mirrors and cameras, antitheft devices etc.

He added that, the implementation mechanism under AIDEP included adoption of basic regulations at the time of manufacturing of the vehicle. He said that Government is in favor of localization of parts and components. He added the brakes, steering, tires, lighting, safety belts, seats, collision, safety glazing, mirrors may be upgrading internationally in line with the latest regulations. However, any rollback of already localized parts is not desirable/acceptable in existing or upcoming vehicle models produced in the country. In case of existing or new models, the local vendors should be given appropriate time period to localize any already localized part. Also, the OEM must support the vendor to acquire technology to produce UNR compliant part in Pakistan to avoid any rollback.

He added that EDB is required to review the implementation of regulations in mid of policy period and is required to create an analysis group within EDB to review the regulations for implementation/further adoption in future. Representative of M/s LMC said that all OEMs should comply to WP-29 regulations. GM (Policy)/Secretary AIDEC said that there should be no roll back of the localization. Group Director, Atlas Honda Pvt Ltd said that implementation is the mandate of EDB and EDB should decide as per law and in the best interest of automotive sector.

AGENDA ITEM NO. 7: REQUEST TO DEVICE IMPORT POLICY TO ALLOW COMMERCIAL IMPORT OF USED VEHICLES (ALLPAKISTANCARDEALERS&IMPORTERSASSOCIATIO N)

GM (Policy)/Secretary AIDEC, briefed that All Pakistan Car Dealers & Importers Association has requested to device import policy to allow import of used vehicles at commercial rate of duty. Representative of All Pakistan Car Dealers & Importers Association said their proposal will increase competition in the market, gives consumer more choice, and increase revenue of the government. He further questioned the quality of local OEMs and stressed that used vehicles will provide a benchmark for them.

Snr. General Manager, Master Motor Limited said it will reduce the volumes and it will make exports and localization completely unviable. President Automotive Division, M/s LMC said that allowing used cars is against the purpose of exports and localization.



Head Corporate Affairs, M/s PSMCL said that Government of Pakistan has to take a principle decision either to flourish or to close the industry. He added that Australia allowed import of used cars and the assembling and automotive vendor industry closed. He said Government should give OEMs a roadmap. He added that purpose of the industry to create employment through vendor and sub vendors. He added decision for the welfare of manufacturing industry is taken and this matter is referred to the relevant forum and such proposals in view of localization and exports should not be discussed.

Decision: <u>The house was of the view that AIDEC mandate was to look into the</u> <u>auto sector development and exports, hence the instant matter may be</u> <u>referred to Ministry of Industries and Production to review in a holistic</u> <u>manner.</u>

AGENDA ITEM NO. 8

INDIVIDUAL REQUESTS

i. <u>DISCUSSION ON REQUEST OF M/S UNIVERSAL MOTORS PVT LTD, A NEW</u> ENTRANT FOR RELAXATION OF 9 MONTHS/TILL DATE TO LAUNCH THEIR VEHICLES AND AVAIL CONCESSIONARY RATE OF DUTY UNDER ADP 2016-21/AIDEP 2021-26.

GM (Policy)/Secretary AIDEC, briefed that M/s Universal Motors (Pvt) Ltd has been awarded Greenfield Investment Status under Automotive Development Policy (ADP 2016-21). The Agreement was signed between MoIP and the firm on November 11, 2020. The firm was required to complete the manufacturing facilities within two years of signing the agreement. M/s Universal Motors (Pvt) Ltd imported CBUs for Higer Bus on May 17,2021. Therefore, the firm was required to launch HigerBus, KLQ6127(375 HP) by May 16, 2023. M/s Universal approached EDB <u>August 15, 2023</u> to inform that their facilities are complete. The facilities were reported to be complete after a delay of approximately nine months. MoIP referred to the case to EDB as the investment agreement has been signed between MoIP and the investor.

Snr. General Manager, Master Motor Limited said that everything is clearly mentioned in the policy and the investment agreement covers all the details wherein MoIP is the authority to decide in the matter. CEO, EDB said that MoIP may carry out due diligence as it is their prerogative to decide on this matter. JS(LED), MoIP said that the matter will dealt at MoIP as it does not relate to AIDEC. Following decision has been taken.

Decision: <u>AIDEC referred the matter to MoIP for appropriate action.</u>

ii. <u>Discussion on request by M/s Al-Haj Automotive (Pvt) Ltd, Karachi, a New</u> Entrant for approval of time extension on import of SAGA1332CC CKD Units-Force Majeure Circumstances.

CEO EDB declined to take up this agenda item due to serious complaints against the firm regarding deliveries and refunds. Therefore agenda related to the firm will not be taken till submission of data/compliance.



At the conclusion of the meeting, CED EDB thanked the participants, in particular JS-LED for participating in the meeting and providing the participants with the opportunity to interact with the Ministry on this forum. He requested JS LED for her closing remarks to the house.

JS(LED), MoIP in her closing remarks appreciated that industry is on the road toward exports, she said that the need of the hour is localization. She added that efficiency in the local manufacturing needs to be brought in. She said that value addition is the key. The transfer of technology, collective approach as an industry and governance frameworks review is required for industrial growth. She said vendor issues are needed to be addressed. She said duty draw back system needs to be in place and FTAs are needed to be negotiated. She informed that MoIP will work with EDB to resolve the issues highlighted in today's meeting. She added that SOPs are required to be developed for the addition and deletion of SRO 693(I)2006. She advised the OEMs that Business Plan/Export Plan should be presented to EDB. She clarified that export targets are binding, but can be negotiated if there is seriousness on the part of industry. She suggested that Import Policy Order can be reviewed provided it is beneficial to all stakeholders.

The meeting ended with the vote of thanks to and from the chair to all the participants.
