

CEMA position on document SLR52-10 EC proposals on transitional provisions



- Proposal for additional point in the transitional provisions of installation Regulation R48:

12.6.X → As from 1 September [202X], Contracting Parties applying this Regulation shall not be obliged to accept the installation of devices, which have not been approved according to 01 series of amendments to UN Regulations Nos. 148, 149 and 150.¶

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Concerns with the EC proposal



- The addition of such paragraph could generate diverging approach depending on the authority
- As a consequence, what would happen if, for example, authorities of Ireland do accept an installation with original series of amendment and Spain does not? May this impact the free circulation within EU?
- For vehicles produced in low volumes – for example some vehicles of categories R or S (trailers / towed equipment) –:
 - additional administrative burden for the vehicle manufacturer
 - additional cost to have the update done by the suppliers
 - additional time required to get a vehicle type-approval, which has an impact on the sales considering the seasonality of the equipment

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Questions on the proposal



In practice, we would like to better understand:

- the reasons of this request
- the added value in terms of safety: the original intent of such regulations is to improve the road safety of the user / customer

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Present (EU) Regulations



- For agricultural vehicles, Regulation (EU) 167/2013 provides the requirements for the type-approvals and Regulation (EU) 2015/208, the technical requirements on “functional safety”, i.e. road requirements
- In Regulation 2015/208, specific Annex listing the UN Regulations necessary to ensure a technical compliance. It specifies the series of amendment / supplement to comply with, and an additional statement is provided to allow the use of subsequent versions.

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ANNEX I

List of applicable UNECE regulations

Regulation Number	Subject	Series of amendments	OJ Reference	Applicability	
▼ <u>M1</u>	1	Lighting installation	Incorporating all valid text up to 02 series of amendments	OJ L 177, 10.7.2010, p. 1	T and C
▼ <u>B</u>	3	Lighting, light-signalling devices and their light sources	Supplement 12 to the 02 series of amendments	OJ L 323, 6.12.2011, p. 1	T, C, R and S
	4	Lighting, light-signalling devices and their light	Supplement 14 to the original version of the Regulation	OJ L 31, 31.1.2009, p. 35	T, C, R and S

▼ M2

The transitional provisions of the UNECE regulations listed in this table apply, except where specific alternative dates are provided for in this Regulation. Compliance with prescriptions in accordance with subsequent amendments to those listed in this table shall also be accepted.

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CEMA proposal



- Addition of the point in the list of topics to consider (doc. SLR52-03-Rev.1 refers) for Stage II, step 2
- For discussions during the Stage II, step 2:
 - Applicable only to new types of vehicles
 - Covered in the requirements, not the transitional provisions
 - To be considered function by function, to reflect the technical modifications – improvement of safety – brought by the 01 series of amendments of the lighting regulations