

Comments from Japan, sent by e-mail on June 6

Japan supports to submit the current draft working document to UN Secretariat by 6 June, since it is most important to reach official agreement at 60th GRB in September.

However, we still have some comments as follows, which we would like to discuss at the forthcoming IWG meeting on 18 June. Then we propose to re-submit the revised document reflecting the outcome of the meeting on 18 June.

In addition, I would like to add that Japan is now preparing for comments on the Transitional Provisions aiming at final IWG's discussion on 18th June in Brussels. I think we will be able to send it within this week or next week.

1. Regarding the “Transitional Provisions”:

“Transitional Provisions” states the requirements for issue, acceptance per series and the deadline for the acceptance of certificate for preceding series of amendments of a Regulation. It is rather skeptical whether the case of different phases of requirements could be stated as Transitional Provisions. We suggest that we consult UN Secretariat if such case would be acceptable from the legal point of view.

If the above case could be allowed, the type approval of any phases shall be obtained and the CP applying R51 can issue and accept any phases of type approval as well after the R51-03 series enters into force. In that case, it is necessary to take measures so that the type approval authority can easily confirm (ex. on the certificate document) which phase of 03 series the type approval meets. (Ex. By means of mentioning “phase 1”, “phase 2” or “phase 3” on the certificate.)

2. Regarding the ISO issues:

The final documents shall include the test procedure from the ISO discussion. This could be reflected after the GRB session in September.

3. Other issues:

Regarding the Chinese proposal, questions were raised by several CPs at the last IWG meeting. It is necessary to discuss at next IWG how to deal with these issues on the working document to GRB.