

GRE Informal Working Group on Simplification of the UN Lighting and Light Signalling Regulations (SLR)

1st meeting

11 September 2014, 10:00 – 16:30

CLEPA Headquarters, Meeting room 3
87/B1 Boulevard Brand Whitlock, Brussels

REPORT

		Working Documents
1.	Welcome and opening remarks Mr. Loccuffier, Chairman of the Informal Working Group, opened the session welcoming all the participants. A special thanks was addressed to CLEPA for making this meeting possible by offering a meeting room in its headquarters.	
2.	Introduction of participants and organisations All participants, in person and via telephone, introduced themselves. A list of all participants is available in Annex 1 to this Report.	
3.	Adoption of the agenda Dr. Manz announced to have prepared a new document showing, as a possible option, how to have all into one Regulation. This document will be added to the agenda as SLR-01-08. Mr. Plathner informed that IEC made an analysis for Light Sources and, if time allows, he will present it to the meeting. The agenda was adopted with the above modifications.	SLR-01-01-Rev.1
4.	Adoption of the report of the 2nd SIG session The Report on the 2 nd SIG session was adopted without modifications.	SLR-01-02
5.	Draft ToR IEC comments on SLR-01-03 Since all the comments made by IEC to document SLR-01-03 were clearly indicated on document SLR-01-06, the meeting agreed to address the draft ToR on the basis of document SLR-01-06.	SLR-01-03 SLR-01-06

Mr. de Visser pointed out that, as a result of this activity, the total number of regulations may actually increase and therefore he suggested to clarify that only the number of active/non-frozen regulations will be reduced. This was agreed by the meeting.

With regards to the exclusion of Light Sources from this activity, the following observations were made:

- Mr. de Visser pointed out that LS should be excluded from item 3 due to their technology specific requirements.
- Mr. Frost observed that item 2 a) is the core piece of work of this group. The outcome of the IWG might be to exclude LS but this should not be the initial starting point.
- Mr. de Visser agreed with Mr. Frost and clarified that IEC does not want to exclude LS. The real problem is to treat LS in the same way of the other lighting regulations.

Conclusion: the meeting agreed not to exclude Light Sources from the ToR. Item 3 will be amended to read: "*Based upon the conclusion of Item 2 and/or additional analysis, the other regulations (relating to forward lighting, retro-reflective devices, light sources and installation) shall be addressed.*"

With regards to the proposed approach from IEC to list the pending proposals to the ToR, the following observations were made:

- The Chairman commented that adding the list of documents as an annex to the ToR is correct in order not to forget them.
- Mr. Frost was concerned to move part of the GRE agenda into the IWG. He pointed out that the ToR should not include the list of outstanding proposals from GRE and recommended GRE to deal with such proposals without relying on the IWG. The principle of listing the documents is correct but not to include it in the ToR.
- Mr. Gorzkowski agreed with Mr. Frost that the documents shall not be moved from the GRE agenda since this IWG shall not work instead of GRE.
- Mr. de Visser reported that IEC has no objections to remove the list from the ToR, nevertheless a way to move it back to GRE shall be found.
- The Secretary suggested to extract the list of documents and convert it in a separate file to be placed in the IWG website in order not to be forgotten.
- Mr. Frost suggested Mr. Gorzkowski to consult the GRE Secretariat for advice and added that the GRE-71 minutes do not mention to remove those items from the GRE agenda. He also pointed out that documents accepted by WP.29 and referred back to GRE should be treated differently from those accepted by GRE and then "frozen", awaiting the results of the IWG.

Conclusion: the meeting agreed to remove the Annex and to delete the proposed text in page 1 because the listed documents will be brought back to GRE.

	<p>Dr. Manz commented that a Horizontal Reference Document is the first step while it is premature, for the time being, to discuss the reduction of the regulations.</p> <p>Mr. Frost clarified that ToR and work items are two different things and observed that the current ToR is not restrictive.</p> <p>With regards to the need to have a Vice-Chairman indicated under item C) 2. of the ToR, the following observations were made:</p> <ul style="list-style-type: none"> ➤ Mr. Draper reported the lack of commitment from EC and the extreme difficulties to organise this session due to lack of feedback and poor communication. ➤ The participants shared the same concern raised by Mr. Draper and noted that the EC, after having raised this issue, has shown little interest in working towards a solution. ➤ Mr. Laurent pointed out that a Vice-Chairman is useful and should be kept. In case the Chairman is unable to exercise his functions, the Vice-Chairman can immediately substitute him. ➤ The Chairman took note of the concerns and will verify with the EC if the situation can improve in the future. <p><u>Conclusion:</u> the meeting agreed to leave paragraph C) 2. unchanged, to read: "<i>A Chairman (Belgium), a Vice-Chairman (European Commission) and a Secretary (GTB) will manage the informal group.</i>"</p> <p>In order not to exclude any potential interested party to the discussion, the Secretary asked clarifications about who should be on the distribution list of the IWG. The meeting agreed that only the participants at this meeting shall be part of the mailing list.</p> <p>The Chairman, during his report at the next GRE session, will inform that those wishing to be added to the mailing list shall contact the Secretary of the IWG.</p> <p>The text of the ToR was amended on the screen and finally adopted as shown in document SLR-01-09.</p>	
<p>6.</p>	<p>GTB thoughts concerning the required editorial process</p> <p>Mr. Draper introduced the GTB proposal pointing out that the all GRE regulations should be frozen and be addressed at the same time otherwise it will not be possible to work on "moving targets". He added that it is not wise to work first on Signal Lighting and then on the rest of the regulations. In principle all regulations should be addressed at the same time but he recognized that the task is going to be quite complicated.</p> <p>Mr. Kellermann commented that GRE must take a decision on how to deal with this issue at its 72nd session in October 2014.</p> <p>At the question from the Chairman whether the approach proposed by GTB was according to the adopted ToR, Dr. Manz explained that there is no problem because the ToR tell what has to be achieved and GTB suggested how.</p>	<p>SLR-01-04</p>

	<p>Mr. Draper noted that it would be much easier to work offline and then substitute the whole package but that is not feasible.</p> <p>Mr. Plathner pointed out that the progress and the introduction of new technology shall not be stopped and added that, once the placeholder will be decided, the documents can proceed.</p> <p>Mr. Gorzkowski shared the same view and observed that the GRE work cannot be suspended for 1 or 2 years until the completion of this activity.</p> <p>Mr. Rovers, in order not to block the GRE activity, suggested to follow a step-by-step approach, focussing first on the most critical aspects.</p> <p>Mr. Frost agreed to follow a step-by-step approach, addressing first those regulations that have most created problems. Redefining and/or rewriting the regulations is the long-term goal, with the aim to make the regulations as flexible as possible by allowing technology and innovation without the need to constantly update the texts. He added that one of the main problems today is represented by the technology details and the interpretation problems which cause the urgent need of amendments to legalise vehicles approved according to regulations that would not have allowed it.</p> <p>Mr. Draper pointed out that currently there is not a real buy-in from industry and from Contracting Parties. Moreover, he commented that the IWG does need to have a clear vision of what it wants to achieve.</p> <p>Mr. Genone commented that, in a step-by-step approach, it would be better to correct the administrative parts first and then the technical ones.</p> <p>Mr. Gorzkowski observed that the deadlines are decided and feasible therefore the group should now decide the placeholders and start working on concrete proposals. With regards to the placeholder, he informed to be in favour of using R-48.</p> <p>Mr. Genone reported that the work can start immediately by working on R-48, which is the most logic placeholder. Mr. Rovers also supported the idea of using R-48.</p> <p><i>Note: for the conclusion, see next item.</i></p>	
<p>7.</p>	<p>CLEPA strategy for simplification</p> <p>Mr. Prigent introduced the CLEPA presentation pointing out the justifications to have only two documents instead of three.</p> <p>Mr. Gorzkowski commented that the weak point of the CLEPA proposal is that in case of administrative amendments, these have to be made in three documents. He pointed out that administrative and technical common provisions should go under R-48 and, in that case, only two documents would be necessary.</p>	<p>SLR-01-05 + Annexes 1 and 2</p>

Mr. Rovers reported that moving all the common provisions into R-48 would work only if clearly stating that it does not imply for carmakers to fulfil all such provisions.

Dr. Manz suggested to use R-2 as a placeholder instead of R-48 and R-6. This would avoid overloading the existing in use Regulations. With regards to R-48 he recommended to be very careful since there are 3 series of amendments currently in force in parallel.

Mr. Gorzkowski pointed out that only the administrative parts should be moved together while the technical common parts should be left in each grouping placeholders so that, in case of new series of amendments, these apply to the relevant grouping only.

Mr. Genone informed that he would prefer to have all common provisions, both technical and administrative, in R-48 and explained that new potential Contracting Parties are not really concerned about common vs. separate regulations as they simply copy the contents into their national prescriptions.

Mr. Kellermann commented that he would be in favour of putting all the common parts in each of the three series of amendments to R-48.

In addition to SLR-01-05, Mr. Prigent introduced two excel files which show the CLEPA analysis of signalling regulations in view of the simplification process. Such files will become available on the IWG website as Annexes 1 and 2 to SLR-01-05.

Mr. Rovers observed that the option indicated in Annex 1 (i.e. common administrative provisions separated from common technical requirements) could be seen as a roadmap for the option delineated in Annex 2 (i.e. common administrative and technical provisions in the same document).

Mr. Frost suggested to start as outlined in Annex 1 and then decide whether to merge or not the administrative and technical requirement into the same document. He pointed out that the key is to define where the concerns are. When a new series of amendments is approved, the transitional provisions shall specify to which device the concerned paragraphs apply and the application dates.

Mr. Frost also recommended to be very careful to assume that if something is good for the EU it will automatically fit under the UN umbrella as it might not always be the case.

Dr. Manz proposed to start the work by developing the following documents:

- 1 document addressing the common administrative provision
- 3 documents addressing the common technical provisions (one for each grouping placeholder)
- 3 documents addressing the technical specific provisions (one example for each grouping)

The scheme drafted by Dr. Manz to illustrate his idea is reproduced in Annex 2. This proposed approach was agreed by the meeting.

	<p><u>Conclusion</u>: the meeting agreed to move the similar technical provisions in the grouping placeholders and the common administrative provisions in a separate placeholder, still to be defined (see SLR-01-05-Annex 1). The final target is to merge the common technical and administrative provisions together, but this will be the next step (see SLR-01-05-Annex 2).</p> <p>The target for the next meeting will be to prepare a document with the common administrative provisions, taking into account all the existing texts and putting the different wording in square brackets. Dr. Manz kindly volunteered to do this job, with the assistance of Mr. Rovers and CLEPA. He will provide this document by Friday 17 October.</p> <p>At the request of the Chairman whether it would be feasible for the group to deliver more for the next meeting, Mr. Frost recommended to stick with the agreed plan and timetable without committing to more than the IWG can deliver. He pointed out that this group shall build confidence with WP.29 that it is able to deliver what it announced.</p> <p>The meeting agreed not to follow the possible approach of having all provisions into one Regulation, as initially suggested as an option by Dr. Manz. This proposal (see SLR-01-08) will stay on the website for reference purposes only.</p>	
<p>8.</p>	<p>GTB analysis of the impact of collective amendments on the work of WP.29</p> <p>Mr. Draper briefly introduced the GTB analysis pointing out that only 41% of the documents at WP.29 result from a collective amendment.</p> <p>Mr. Gorzkowski commented that even 41% of the documents may have led WP.29 to raise the issue.</p> <p>The meeting observed that, as the specific problem of collective amendments has now found a solution, it was agreed that no further study of the GTB analysis is necessary.</p>	<p>SLR-01-07</p>
<p>9.</p>	<p>Proposals for consultant(s) and funding arrangements</p> <p>With regards to the agreed approach for the first step (see above item 7), it was agreed that the funding is no longer a relevant topic.</p> <p>Mr. Gorzkowski recommended not to give up with this idea so that, by the time the technical consolidation will have to be done, the money will be ready and the consultants be found. He added that, due to the time constraint, it will be necessary to keep pressure on the EC.</p> <p>Mr. Draper remarked that, if the EC launched a tender, this group would have no control upon who will be chosen. This task shall be assigned to a/some person/s having a very intimate knowledge of the lighting regulations and the current developments.</p>	

	<p>Mr. Frost recalled that regulations belong to the Contracting Parties. He added that if this group feels to be the only qualified team of people, then we should do this job. If the EC will find the funding, it will have the right to choose its consultant following its own procedure.</p> <p><u>Conclusion</u>: this item will stay on the agenda for the next meeting.</p>	
10.	<p>Next steps See conclusions of item 7.</p>	
11.	<p>Any Other Business No other business.</p>	
12.	<p>Next meeting(s) The next meeting is scheduled on Thursday 23 October 2014, from 9:00 to 17:00 hrs. The meeting will be held in Geneva, at the Palais des Nations, in Room XV (door 11, second floor).</p>	
13.	<p>Closure The Chairman thanked all the participants for the fruitful contribution and CLEPA for the great hospitality.</p>	

Annex 1: List of participants

Name	CP / NGO	Notes
Davide PUGLISI	GTB (Secretary)	
Michel LOCCUFIER	Belgium (Chair)	
Philipp PLATHNER	IEC	
Ad DE VISSER	IEC	<i>Via telephone</i>
Valter GENONE	Italy	
Jean Marc PRIGENT	CLEPA	
Olaf SCHMIDT	CLEPA	
Pierre LAURENT	CLEPA	
Geoffrey DRAPER	GTB	
Derwin ROVERS	Netherlands	
Karl MANZ	Germany	
Gerd KELLERMANN	Germany	
Bernie FROST	UK	
Marcin GORZKOWSKI	GRE Chairman	<i>Via telephone</i>

Annex 2: Agreed approach

General administrative provisions	General technical specifications			Examples		
	Signalling	Front Lighting	Retro-Reflective Devices	Signalling (e.g. R-7)	Front Lighting (e.g. R-112)	Retro-Reflective Devices (e.g. R-3)