

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

2<sup>nd</sup> meeting  
23 October 2014, 9:00 – 16:30

Palais des Nations in Geneva (CH)  
Room XV (door 11, 2<sup>nd</sup> floor)

**REPORT**

		<b>Working Documents</b>
<b>1.</b>	<b>Welcome and opening remarks</b> Mr. Loccuffier, Chairman of the Informal Working Group, opened the session welcoming all the participants.	
<b>2.</b>	<b>Introduction of participants and organisations</b> All participants introduced themselves. A list of all participants is available in Annex 1 to this Report.	
<b>3.</b>	<b>Adoption of the agenda</b> The agenda was adopted without modifications.	<b>SLR-02-01-Rev.1</b>
<b>4.</b>	<b>Adoption of the report of the previous session</b> The Report was adopted without modifications.	<b>SLR-01-10</b>
<b>5.</b>	<b>IEC analysis and proposed simplification strategy for light source regulations Nos. 37, 99 and 128</b> Mr. de Visser introduced the document pointing out that the proposed approach is based upon a lot of data. He explained that, as the common text never changes, there would be no real benefit in merging together the light source regulations. On the contrary, the proposal to move all the category sheets from the light source regulations to a depository “docket file” like in NHTSA could be beneficial, as long as such a document/resolution is placed in an easily accessible area of the UNECE website.  Mr. de Visser reported that the approval of the idea for the time being is the main task while the work for the rewrite is more marginal as most of it will be done in the background.	<b>SLR-02-02</b>

Mr. Frost observed that it is an interesting proposal as it will reduce the burden of the secretariat, nevertheless he added that it does not seem to be an insignificant piece of work. He also recommended to restrict to a Resolution for the 1958 Agreement only and suggested to provide an initial draft document to WP.29 in November 2014 in order to get some feedbacks.

Mr. Gorzkowski did not agree to restrict to 1958 Agreement only. He commented that light sources are mirrored in the USA and the IWG should not dismiss right away the idea of a Resolution for the 1998 Agreement.

Mr. de Visser clarified that NHTSA Part 564 is only for High-Low beam lamps and does not cover all Light Sources. He also reported that a separate resolution would be the best solution.

Mr. Goldbach suggested to postpone the discussion about the type of resolution until the group will know how the document will look like and what its contents will be.

Mr. Rovers reported that the IEC proposal seems a good idea and it would be worth checking with the secretariat if it is feasible.

Mr. Guichard informed that there should be no administrative difficulty to establish a resolution. With regards to which Agreement the resolution should refer to, he pointed out that the Contracting Parties have the responsibility to decide and this is not a matter of this group.

Mr. Guichard also clarified that, for the ECE Secretariat, there would be the same workload but instead, for the EC, there would be a clear improvement of the process as this would no longer be part of the "mega decision".

Mr. de Visser confirmed the comment of Mr. Guichard pointing out that the main changes are to datasheets, therefore removing them from the body of the Regulations (i.e. extracting Annex 1) would immediately reduce the workload for the EC.

Mr. Genone commented that the list of lamps shall remain in the body of the Regulations otherwise WP.29 will totally lose control and that would not be acceptable. Mr. Goldbach agreed that the list shall be maintained.

Mr. Frost informed that anything which goes into a Resolution shall go through the GR and WP.29 process. The Regulation is the legal basis for the approval and if reference is made to a Resolution, instead of an internal Annex 1, it is fine as it reduces the administrative workload.

Moreover Mr. Frost recalled the differences between Consolidated Resolution (R.E.3), Special Resolution (S.R.1) and Mutual Resolution (M.R.1) and pointed out to be very careful to choose the right one. He explained that a separate Resolution, not incorporated into another one, would be the best solution. Nevertheless, among the existing Resolutions, Mr. Frost recommended to start with a consolidated Resolution, i.e. only applicable to 1958 Agreement,

	<p>because there is no justification to have a special Resolutions as there is no lighting GTR.</p> <p>Mr. Plathner explained that the contents of this Resolution will be much more dynamic than the existing ones (e.g. vehicle categories) and pointed out that it shall still be legally binding as it is now Annex 1, being part of the Regulations. Mr. Guichard clarified that the importance is where the reference is made and, for instance, an ISO standard or even a newspaper article could become legally binding if referenced in a Regulation.</p> <p>Mr. Frost clarified that nothing will change from today's practice until WP.29; the changes will be after WP.29, i.e. no submissions to UN in New York and no EC processing. The key is to get the right reference.</p> <p>Mr. Rovers and Mr. Frost explained that, because of the entry into force of the Lisbon treaty, all proposals to modify the UN Regulations (and their annexes) are subject to the "mega decision", but this does not apply to the Resolutions. Resolutions are voted in WP.29 and do not go through AC.1.</p> <p>Mr. Pichon commented that the subject is interesting but it is not the major one. He informed that WP.29 might not be interested in this discussion as the work on datasheet is not of great interest since it could be done by GTB or IEC.</p> <p>At the request of Japan to make sure that the decision will be taken at WP.29 and not by TCMV, Mr. Guichard clarified that the UN system works on consensus and that all CPs present at WP.29 decide, by simple majority vote, on resolutions.</p> <p>Mr. Pernkopf pointed out that dynamic reference shall be made otherwise it will still be necessary to continuously amend the regulations.</p> <p><u>Conclusion:</u> the meeting agreed that the separation of the datasheet is acceptable and the preference of the group is to develop a separate resolution. A presentation to WP.29 in November 2014 will be prepared by IEC and made by the IWG Chairman with the aim to get some feedback.</p>	
6.	<p><b>Draft proposal for common administrative provisions</b></p> <p>Dr. Manz introduced the proposal pointing out that it is based on the Informal document GRE-66-14 submitted by Canada. He reported that references shall be as general as possible to avoid continuous update and informed that, if the group agrees with the proposed approach, a detailed check of the whole document shall be done.</p> <p>The Secretary recalled the outcome of the last meeting on the basis of SLR-01-10 Annex 2.</p> <p>During the extensive discussion which took place about this agenda item, the following general observations were made:</p> <ul style="list-style-type: none"> <li>➤ Mr. Gorzkowski clarified that this proposal contains only common parts and added that the HRD cannot be a regulation.</li> </ul>	SLR-02-03

- Mr. Goldbach pointed out that the proposal seems to be applicable also to motorcycles therefore this group shall be very careful.
- Mr. Genone commented that having all the common requirements (both administrative and technical) in the same regulation is the best solution.
- Dr. Manz reported that the idea expressed at the previous meeting to use R-2 as a placeholder for this document was to avoid any modification to the Regulations currently in use. He reminded that it will only be a reference document since the approvals will be made according to the specific Regulations.
- Mr. Goldbach expressed concerns on the need to get new approvals and Mr. Gorzkowski explained that this reflects today's situation where, for instance, in case of important modifications to the colour requirements in R-48, all device Regulations will have to get new approvals.
- Mr. Choda pointed out that the group shall agree on the principle and structure of this document. Furthermore he stated to be in favour of moving common requirements if they apply to several Regulations.
- Mr. Langhammer observed that, from a user point of view, it would not be very handy to have the information divided in different documents and Dr. Manz agreed that the best solution would be to have only two documents: one containing general requirements and one for specific provisions.
- Mr. Goldbach stressed that this activity shall not add any extra burden to the carmakers' industry (e.g. changing the labelling) and Mr. Frost clarified that any regulatory burden which is not strictly necessary is intended to be removed, therefore there should be no problem for the carmakers' industry.
- Mr. Guichard informed that, like in the case of references to ISO standards, a CP adopting a device Regulation is not obliged to completely adopt another Regulation which is referenced, but only to fulfil the parts which are referenced.
- Mr. Genone, in his double position as Italian representative and as carmaker, pointed out that there is no risk of increasing the burden for the carmakers. He explained that this group shall agree upon the best structure and not on all the details as this task will take a lot of time.

With regards to the possibility to use R-48 as a placeholder, the following observations were made:

- Mr. Rovers, Mr. Genone and Mr. Frost reported that R-48 would be the best candidate because all the devices shall finally be installed and, for this reason, R-48 is already the parent Regulation for several other Regulations. Mr. Frost also pointed out that if R-48 will not be used, then three documents will be necessary: one as HRD, one for installation and one for devices.
- Mr. Goldbach asked whether only the 06 series of amendments should be used or all series and Mr. Gorzkowski replied that all series should be addressed.

- Mr. Pernkopf suggested that, instead of R-48, R-1 could be used as a placeholder. Mr. Goldbach supported this approach and pointed out that, in addition to R-48, also R-53 and R-86 exists. Using a separate Regulation would allow to solve all these aspects without interfering with the Regulations currently in use.
- Mr. Pichon observed that mixing the HRD with R-48 is the problem. For this reason he would support the idea of having all the common parts in R-1 and consequently all the Regulations, including R-48, could refer to it.
- Mr. Gorzkowski proposed to move all the common parts into a Resolution, like for light sources. Mr. Guichard replied that putting definitions in a resolution is not a problem but it might not be the same for requirements because some CPs at WP.29 may consider this as a misuse of the system.
- Mr. Schmidt warned that moving all common parts to a Resolution would entitle WP.29 to decide, including countries not contracting parties to the 1958 Agreement. Mr. Gorzkowski replied that, in practice, CPs who are not involved do not interfere, nevertheless the risk exists. He added that, if it would be possible for AC.1 to vote on a document which is not a regulation, this problem would be solved. Mr. Guichard will verify if this is a possible option.
- Mr. Yamashita reported that R-48 would be the preferred choice since it is recognized already as the "mother" Regulation. He added that working on a new Regulation would not be seen as a good sign for simplification.
- Mr. Gorzkowski warned that R-48 is in the B-list of the IWVTA and this aspect should also be taken into account.
- Mr. Frost pointed out that it would be much easier to start working on R-48 and then, if necessary, replicate the structure in a new regulation such as R-1 or R-2.

Conclusion: the meeting agreed (OICA against) to consider R-48, 06 series of amendments, as the placeholder. The common parts (both technical and administrative) will be kept separate from existing text of R-48 in order not to interfere with the present text. This proposal will be delivered to GRE-73 as an informal document.

Mr. Frost warned that an informal proposal at GRE-73 (April 2015) would hardly be passed to the 167<sup>th</sup> WP.29 session (November 2015) unless it is very well prepared and the secretariat is confident to put the item on the WP.29 agenda for November 2015, on the assumption that at GRE-74 (October 2015) a formal proposal will be adopted.

Mr. Gorzkowski recommended to stick to the plan as indicated in the adopted ToR (see GRE-72-20) but pointed out that, in case of need, the group can change the agreed schedule.

At the request of Mr. Guichard to clarify how to deal with inconsistencies in similar paragraphs, Dr. Manz informed that he will put the different texts as notes or tables to show the differences.

	The Chairman invited all IWG experts to study the document on the website and send feedbacks to Dr. Manz.	
7.	<p><b>Draft proposals to demonstrate the application of the HRD</b></p> <ul style="list-style-type: none"> <li>- UN Regulation No. 3</li> <li>- UN Regulation No. 7</li> <li>- UN Regulation No. 87</li> <li>- UN Regulation No. 112</li> </ul> <p>The meeting agreed not to discuss in details these proposals, but only the general structure of the documents.</p> <p>Mr. Gorzkowski, recalling that references shall be as general as possible to avoid continuous updates, pointed out that in the proposal for R-7 (doc. SLR-02-05), Par. 11 reads: "See paragraph 13. of the HDR". He recommended in these cases to mention the title of the relevant section and avoid the re-numbering problem.</p> <p>Mr. Gorzkowski furthermore observed that the initial focus was on signalling and marking devices, nevertheless a proposal for R-112 has been produced (doc. SLR-02-07). The meeting agreed to stick to the original plan and, if possible, to extend the complete package to the rest of the lighting regulations in accordance with the ToR.</p> <p><u>Conclusion:</u> the meeting agreed to continue with the preparation of the other proposals which will constitute the complete package to be sent to WP.29 in November 2015, together with the HRD.</p> <p>The Chairman invited all IWG experts to support Dr. Manz in this task by studying the documents on the website and sending constructive comments to him.</p> <p>Mr. Guichard informed that for the November 2015 WP.29 session the HRD, along with the whole package of device Regulations, should be ready for voting.</p> <p>In order to meet the November 2015 WP.29 deadline, the meeting agreed the following steps:</p> <ol style="list-style-type: none"> <li>1. Brief status report provided to <u>WP.29 in November 2014</u> in order to check the initial reactions</li> <li>2. Further information to be provided to <u>WP.29 in March 2015</u></li> <li>3. Informal document submitted to <u>GRE-73 in April 2015</u></li> <li>4. Announcement to <u>WP.29 in June 2015</u> that in November 2015 the proposal will be delivered</li> <li>5. Formal document adopted by <u>GRE-74 in October 2015</u></li> <li>6. Submit the complete package (i.e. HRD and the package of Regulations for signalling and marking devices) to <u>WP.29 in November 2015</u>.</li> </ol>	<p><b>SLR-02-04</b></p> <p><b>SLR-02-05</b></p> <p><b>SLR-02-06</b></p> <p><b>SLR-02-07</b></p>
8.	<p><b>Proposals for consultant(s) and funding arrangements</b></p> <p>It was agreed to keep this item on the agenda for the next meeting.</p>	
9.	<p><b>Next steps</b></p> <p>See conclusions of items 6 and 7.</p>	

10.	<p><b>Any Other Business</b></p> <p>Mr. Guichard recalled the adopted collective amendments referred back to GRE by WP.29 (see GRE-72-01, item 4 c)) and pointed out that the agreed common text should be part of the HRD.</p> <p>Mr. Frost clarified that only the proposals adopted by WP.29 can be considered in the HRD but not the GRE adopted proposals.</p> <p>Mr. Gorzkowski proposed a supplement, in addition to the HRD, to address the GRE adopted proposals.</p> <p>The Secretary recalled that also GRE-71-23, about the definitions in lighting regulations, shall be taken into account by this group. The meeting agreed that this will be part of the supplement and not included in the HRD because it would introduce changes and the purpose of the HRD is to consolidate the existing text.</p>	
11.	<p><b>Next meeting(s)</b></p> <p>The following meeting schedule was agreed by the group:</p> <ul style="list-style-type: none"> <li>➤ <b>Teleconference on 5 December 2014</b> <ul style="list-style-type: none"> <li>• Main focus on the structure of the document</li> </ul> </li> <li>➤ <b>F2F meeting on 14 January 2015 in Brussels at CLEPA HQ</b> <ul style="list-style-type: none"> <li>• Finalisation of the HRD, i.e. common administrative and technical provisions in R48-06 to constitute a good informal document for GRE-73</li> <li>• Continue the preparation of the rest of the package for signalling and marking devices and, if possible, also or the other Regulations</li> <li>• How to make references without specific numbering of the paragraphs</li> </ul> </li> <li>➤ <b>F2F meeting on 13 April 2015 in Geneva at the UN</b> (day before GRE-73), to be confirmed by Mr .Guichard <ul style="list-style-type: none"> <li>• Final editing of the informal document for GRE-73 and progress with the rest of the package</li> </ul> </li> </ul>	
12.	<p><b>Closure</b></p> <p>The Chairman thanked all the participants for the fruitful contribution and UNECE for the availability of the meeting room.</p>	

## 2<sup>nd</sup> GRE-ING SLR

Geneva, 23 October 2014

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