

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

4th meeting
13 April 2015, 9:30 – 17:00

Palais des Nations in Geneva (CH)
Room V (1st floor)

REPORT

| | | Working Documents |
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| 1. | Welcome and opening remarks Mr. Loccufier, Chairman of the Informal Working Group, opened the session welcoming all the participants. | |
| 2. | Introduction of participants and organisations A list of all participants is available in Annex 1 to this Report. | |
| 3. | Adoption of the agenda The agenda was adopted with the insertion of document SLR-04-12 under item 6. | SLR-04-04-Rev.1 |
| 4. | Adoption of the report of the previous session The Report was adopted without modifications. | SLR-03-14 |
| 5. | Final review of the documents submitted to GRE-73 - Analysis and concept for simplification of lighting and light-signalling Regulations Dr. Manz presented the document GRE-73-05 highlighting the most important points. Mr. Hubert thanked Dr. Manz for the comprehensive presentation of the activity and commented that now the simplification concept is clear. He observed that some CPs apply only some device regulations therefore this matter should be addressed at WP.29, where a larger audience of CPs is present, nevertheless he did not see major problems. | GRE-73-05 (SLR-04-03/Rev.1) |

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| | <p>Mr. Hubert also commented that the link to IWVTA has to be checked as they are working on the existing philosophy and therefore they shall be informed to make sure there is no problem.</p> <p>Mr. Rovers pointed out that there should be no problem because even today in the devices regulations there are references to R-48 (e.g. definitions) so if the problem exists it should have appeared time before.</p> <p>Mr. Frost shared the same opinion that there should be no problem but recommended to add one slide to the presentation to clarify that nothing changes except a reference to technical requirements.</p> <p>Mr. Frost also questioned if having paragraphs starting with A and B could be a problem. Mr. Hubert replied that it should not represent a problem as R-51 already uses this system for Annexes.</p> <p>Conclusion #1: in order to avoid questions at GRE-73, the presentation (GRE-73-05) will be amended to spell out that nothing will change except a reference to technical requirement. It will also be clarified that the IWG SLR does not expect to make new series of amendments when changing Part B.</p> <p><i>Note: the amended presentation as presented at GRE-73 is available as document GRE-73-05/Rev.1 (the SLR reference for such a document is SLR-04-03/Rev.2).</i></p> <p>- Draft text of UN Regulation No. 7 applying the common provisions indicated in Part II of R-48</p> <p>- Draft text of the new UN Regulation No. 48 which includes, in Part II, the common provisions for lighting, light-signalling and retro-reflecting devices</p> <p>The meeting did not discuss in details the proposals for R-7 and R-48 (respectively GRE-73-04 and GRE-73-03) already submitted to GRE-73.</p> | <p>GRE-73-04 (SLR-04-02/Rev.2)</p> <p>GRE-73-03 (SLR-04-01/Rev.2)</p> |
| <p>6.</p> | <p>Draft proposals to demonstrate the application of the common provisions indicated in Part II of R-48</p> <ul style="list-style-type: none"> - UN Regulation No. 3 - UN Regulation No. 4 - UN Regulation No. 6 - UN Regulation No. 7 - UN Regulation No. 23 - UN Regulation No. 38 - UN Regulation No. 50 - UN Regulation No. 77 - UN Regulation No. 87 - UN Regulation No. 91 - UN Regulation No. 112 - UN Regulation No. 119 | <p>SLR-04-11</p> <p>SLR-03-03</p> <p>SLR-03-04</p> <p>SLR-03-05</p> <p>SLR-03-06</p> <p>SLR-03-07</p> <p>SLR-03-08</p> <p>SLR-03-09</p> <p>SLR-03-10</p> <p>SLR-03-11</p> <p>SLR-04-12</p> <p>SLR-03-12</p> |

Following an introduction of Dr. Manz, the meeting examined in details the draft proposal for a "simplified" version of Reg. 3 (doc. SLR-04-11).

Mr. Goldbach reported that Dr. Manz has made a good job and observed how the frequent references to R-48 in this document clearly show the increased importance of the R-48.

Mr. Genone brought the attention to the way the final set of documents will have to be treated either as supplements or series of amendments and added that, in his opinion, new series of amendments would be better to avoid application problems.

Mr. Goldbach recommended to first check carefully the body and the actual contents of the final document and then focus on the administrative aspects such as deciding if they should become supplements or series of amendments.

Mr. Goldbach also informed that, at a certain point, the GRE production will have to be frozen and agreed; this will constitute the baseline from which starting the future amendments. In order to reduce the burden on Dr. Manz, he recommended to find extra people to help him in this task.

Mr. Frost congratulated Dr. Manz on the huge work done so far but observed that, for producing the documents, some changes to the original texts have been introduced in the following cases:

- 1) for efficiency some part have been moved
- 2) some editorial changes have been made because necessary for making the text flow
- 3) in some areas there are parts where the text has been modified.

Mr. Frost explained that when such changes will be presented to GRE, it will be necessary to point out if and where some real changes have been introduced (for instance to fix errors).

Dr. Manz reported that he has done his best to highlight such modifications and added that for Regs. 3, 7 and 112 the changes are mostly editorial.

Mr. de Visser suggested to make a listing of where the changes have been made like he did for the Light Source Regulations.

Mr. Puglisi proposed to produce for R-48 a document divided in two columns in order to show the clean proposed text on one side and, on the other side, where it comes from. This would simplify the job for who will produce the final document and also for GRE representatives to understand the document and vote.

Mr. de Visser agreed with the proposal to provide separately a two column file showing the proposed text and the originating text but, in addition to that, a clean copy of the document shall be provided as a reference file to be used also for translations.

Dr. Manz agreed that at least a list of changes will be necessary to make sure that nothing is forgotten. Moreover he pointed out that it is fundamental to have a clear idea of how to handle Part II of R-48.

Mr. Goldbach recommended to modify R-48 as little as possible and added that the definitions should be at the beginning and not mixed with component regulations. They should be in alphabetic order and not divided by device.

Dr. Manz informed that today new definitions are sometimes not grouped together in a logic way and for this reason he has now grouped the definitions in this mode. He explained that this is a philosophic question and the proposed alphabetic order is another option but a clear final decision shall be taken as soon as possible.

Mr. Gorzkowski pointed out that the alphabetic order would not work because of the three different languages in force at the UN in Geneva (i.e. English, French and Russian).

Mr. Frost commented that it is not so fundamental to ask the secretariat for guidance while it would be important to take the outcome of the group, once agreed by GRE, to WP.29 and seek their guidance and approval.

Mr. Loccufier observed that the outcome of the next GRE sessions should be frozen until the SLR work will be completed.

Mr. Gorzkowski warned about freezing the Regulations because it would block the progress of work. He recommended instead to the submitters of new proposals to prepare two versions: one for the existing text and another one for the "simplified text".

Mr. Goldbach recommended to be very careful to avoid confusion and suggested to consider the current text and to freeze it. In this way if new amendments will be made and approved by GRE, they will be taken into account at the end of the SLR work and not from time to time.

Mr. Frost, recalling the strong statement made by the EU representative at the 165th WP.29 session in March 2015, recommended to seriously consider what on the GRE agenda is so urgent to be moved forward to WP.29 and what can be put in a package and considered by the SLR.

Mr. Prigent shared the same opinion and recommended to identify a priority for each proposal.

Mr. Frost furthermore observed that the SLR will not be able to meet the schedule adopted by GRE; this will have to be reported to WP.29 in June (166th session) and a new timetable shall be agreed.

Mr. Frost explained that GRE-73 will not be able to adopt any proposal from SLR and, consequently, it will not be in a position to send final proposals to the 167th WP.29 session in November. He added that GRE-73 should agree to have the final package ready for its October session (GRE-74) with the target to send it to the 168th WP.29 session in March 2016 (i.e. 14-15 weeks delay).

GRE-73 shall be asked if any of the proposals cannot wait such an additional time and be implemented into the SLR document.

Mr. Pichon reported that in GRE there can be lengthy discussions about the application of the new Regulations. He was mainly

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| | <p>concerned about the application of the Part B of R-48. In his view it shall be discussed how to manage the new R-48 from an administrative point of view because the technical aspects are not particularly critical.</p> <p>Mr. Pichon also informed about the TCMV application of the WP.29 guidelines for the preparation and submission of documents (ECE/TRANS/WP.29/2010/147/Rev.1) and the consequent TCMV decision to reject all documents.</p> <p>Mr. Rovers presumed that anything changed in Part II will be a supplement and not a series of amendments therefore no Transitional Provision should be necessary. This was agreed by Mr. Pichon who then questioned which series of amendments the supplement shall apply.</p> <p>Dr. Manz replied that the supplement should apply to the latest series of amendments while Mr. Goldbach, recalling that the Part II shall be a reference document, observed that it is not so important if the supplement applies to the 04, 05, 06, etc. series of amendments.</p> <p>Conclusion #2: the meeting agreed to deliver the final package of simplified Regulations for GRE-74 in October 2015 with the target to send it to WP.29 in March 2016. This shall be reported to WP.29 in June 2015.</p> | |
| 7. | <p>Draft proposals for simplification of UN Regulations on light sources (R-37, R-99, R-128) on the basis of WP.29-164-18</p> <ul style="list-style-type: none"> - UN Regulation No. 37 - UN Regulation No. 99 - UN Regulation No. 128 - New draft Resolution on common specification of light source - Amendments to content SLR light sources - SLR light sources clarification <p>Mr. de Visser, introducing the presentation to clarify the simplification of the Light Sources Regulations Nos. 37, 99, 128 (doc. SLR-04-10), explained the status of work and the great progress made. Following the presentation, he introduced and explained the new draft Resolution on common specification of light sources (doc. SLR-04-08). Finally, Mr. de Visser pointed out the amendments to the contents of the simplified light source Regulations (doc. SLR-04-09).</p> <p>Mr. Schmidt asked clarification about the publication of the resolution and Mr. Hubert clarified that, after the WP.29 publication, the resolution will become immediately applicable without any additional voting and notification process.</p> <p>Mr. Genone pointed out that Resolutions are not mandatory requirements but only recommendations. Mr. Hubert confirmed that they are not legal documents but, like ISO standards, they can become mandatory if referenced by a UN Regulation.</p> | <p>SLR-04-05</p> <p>SLR-04-06</p> <p>SLR-04-07</p> <p>SLR-04-08</p> <p>SLR-04-09</p> <p>SLR-04-10</p> |

Mr. Goldbach questioned whether a resolution would be the right place for putting the restrictions as well. Mr. Hubert observed that restrictions should be mentioned in the Regulations.

Mr. de Visser clarified that the restrictions are part of groupings of light source categories. These groupings are lists of light source categories which should be in the resolution. This is to avoid amending the regulations when amendments only concern the light source categories, which is the leading principle for the light source regulations simplification. By means of references the use restrictions are mandatory as just clarified by Mr. Hubert. In addition Mr. de Visser explained that, due to its huge size, it will be a separate resolution, not mixed up with other topics. He added that this was already presented to WP.29 and agreed.

Mr. Frost recommended to have it as a stand-alone resolution applying to only 1958 Agreement, as this is currently the main goal, with the possibility to become a Mutual Resolution in the future.

Mr. Genone asked clarification about which body would be in charge of the Resolution and Mr. Hubert clarified that GRE would be responsible to maintain it up to date, exactly like any other lighting UN Regulation.

At the request of Mr. Pichon to provide clarifications on the possibility for WP.29 to directly modify the resolution without prior agreement of GRE, Mr. Hubert clarified that in such a case the proposal would be referred back to GRE.

Mr. Frost recalled that WP.29 always is allowed to take decisions itself but, for practical reason and due to the very technical subjects dealt with in the different GRs, this would normally be referred back to GRE. In his view, the transparency is sufficient to guarantee that there will be no problems, i.e. availability of the documents 12 weeks in advance of any WP.29 session.

Mr. Langhammer suggested to have at least the list of light sources in a UN Regulation but Mr. de Visser rejected this proposal as in that case the whole simplification would lose significance.

Mr. Pichon questioned why, for light sources, the common parts should go to a resolution while for all the other devices they go to R-48 Part II and recommended to put all common requirements into the resolution. Mr. de Visser replied that moving the common parts for light sources to R-48 Part II would hamper the possible extension of the current resolution to a Mutual Resolution in the future. Nevertheless, he added that if a Resolution for all devices would be separate (new Resolution), then it could be considered as an option for the devices as well.

Dr. Manz informed that there would be no difference in putting the common requirements in a separate resolution or Part II of R-48.

Mr. Genone recalled that the SLR has already discussed about where to put the common parts and it was agreed to move them to R-48 Part II. He added that using R-48 as a place holder for the

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| | <p>common parts would benefit of being a legally binding document.</p> <p>Mr. Gorzkowski recommended to request the EC to clarify what they mean for new technical requirements. He observed that sometimes the technical changes are only clarifying the text without introducing any change.</p> <p>Mr. Frost informed that the EC is basing its interpretation on document ECE/TRANS/WP.29/1044/Rev.1 "General Guidelines for UN regulatory procedures and transitional provisions in UN Regulations" (an explanation on series of amendments and supplements is given in Par. 22 and 27).</p> <p>Mr. Genone pointed out that deciding between a supplement or a new series of amendments depends on the nature of the changes being introduced in the common part and not about where the common part is placed.</p> <p>Conclusion #3: the meeting agreed that the decision whether an amendment should be a supplement or a new series shall be evaluated on a case by case basis, like today. It was also agreed that there will be no change to the new proposed structure.</p> | |
| 8. | <p>Impact of the simplification of lighting and light-signalling Regulations in the application of the IWVTA and the draft UN Regulation No. 0</p> <p>Mr. Frost informed that Mr. Renders, in his capacity as the IWVTA Co-Chairman, could be the best link for exchanging information between GRE and IWVTA. Mr. Goldbach pointed out that it would be preferable if Dr. Manz could attend the next IWVTA meeting together with Mr. Renders.</p> | |
| 9. | <p>Proposals for consultant(s) and funding arrangements</p> <p>Mr. de Visser pointed out that without volunteers paid for their job, the whole simplification activity soon will be stopped. Dr. Manz recommended to discuss this matter with the EC first.</p> <p>It was agreed to keep this item on the agenda for the next meeting.</p> | |
| 10. | <p>Next steps</p> <p>Mr. Frost recommended to be honest with WP.29 and inform that the delivery date of the simplified Regulations to WP.29 will be postponed. The IWG SLR shall aim at providing the complete package in time for consideration at GRE-74 with the target to send it to WP.29 in March 2016. However, given the special circumstances and taking into account the complexity of the job, he informed that GRE could call a special session of a few hours in March 2016 to adopt the proposals in time for submission to WP.29 in June 2016.</p> <p>Mr. Frost explained that this option, already used in the past by other GRs, implies the agreement of GRE-73 to request WP.29 in June 2015 to hold the Special GRE session in March 2016, and that WP.29 agrees to proceed as proposed by GRE.</p> | |

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| | <p>Dr. Manz informed that the complete package could be delivered by the GRE-74 deadline (i.e. 24 July 2015) but the challenge will be to provide good quality documents and this task will require a lot of reading.</p> <p>Mr. Goldbach suggested not to be too optimistic as the IWG SLR still has to get the feedback from GRE and WP.29.</p> <p>Mr. de Visser confirmed that formal proposals for simplified light source Regulations will be submitted to GRE-74.</p> <p><i>Note: in order to summarize the different scenarios discussed during the meeting and to simplify the IWG SLR status report during GRE-73, Mr. Puglisi prepared a short presentation which has been shown at GRE and then circulated as document SLR-04-14 and GRE-73-22.</i></p> | |
| 11. | <p>Any Other Business</p> <p>No other business to discuss.</p> | |
| 12. | <p>Next meeting(s)</p> <p>The following meeting schedule was proposed by the group:</p> <ul style="list-style-type: none"> ➤ 5th IWG SLR meeting - Teleconference on 28 May 2015 The tentative timeslot will be 12:00 / 15:00 hrs Geneva time. Those who will not be able to participate will have to provide comments in advance. ➤ Teleconference on 4 June 2015 Focussed of the simplification of light source Regulations only. <p><i>Note #1: the 5th IWG SLR meeting scheduled on 28 May has been postponed because not much progress could be made in the preparation of the "package" for GRE-74.</i></p> <p><i>Note #2: the teleconference for the simplification of light source Regulations scheduled on 4 June will be not take place as only few minor comments have been made and Mr. de Visser concluded that a meeting would not be justified. Mr. de Visser will deal with the comments via correspondence (see SLR-05-02).</i></p> | |
| 13. | <p>Closure</p> <p>The Chairman thanked all the participants for their fruitful contribution and closed the meeting.</p> | |

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