

ADS IWG Working Document
Change Proposal Form
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Document Reference

ADS-08-10

Date

08 April 2025

Agenda item

Proposed by (affiliation only—no personal information)

United Kingdom

Summary of Change (25 words or less)

Harmonisation of the term ‘manufacturer’. This proposal links to open item number 11 for ‘Purpose, scope and definitions’ in document ADS-08-05

Reason for Change (Justification)

In the consolidated draft common provisions (ADS-08-04r1) several terms are used inconsistently to refer to the entity responsible for ensuring compliance with the requirements (‘manufacturer’, ‘ADS manufacturer’, ‘manufacture’). At the 7th meeting of the informal working group on automated driving systems, the group discussed using the term ‘manufacturer’ for consistency in the draft common provisions for both the GTR and UNR. The term ‘manufacturer’ is commonly used throughout both UN regulations and GTRs. Under type approval, the term ‘manufacturer’ has specific meaning under resolution R.E.3 and under national type approval frameworks.

The table below proposes changes to ADS-08-04r1 to implement the term ‘manufacturer’ based on the following searches:

1. 'manufacturer' = 291 instances (correct term - no action required)
2. 'ADS manufacturer' = 8 instances
3. 'manufacture' = 6 instances
4. 'manufacturers' = 6 instances
5. 'vehicle manufacturer' = 0 instances

Note – the workshop may need to consider use of the term ‘vehicle manufacturer’ (and similar) in ‘application for approval’ and other sections. This consideration is out of scope of this proposal.

Location

Throughout ADS-08-04r1

| Term searched and number of instances in ADS-08-04r1 | Proposal to amend ADS-08-04r1 |
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| <p>'ADS manufacturer' = 8 instances</p> | <p>Replace the term 'ADS manufacturer' in the following seven instances:</p> <p>6.1.2.1.1 The SMS ADS manufacturer shall then be able to show the link between the overall risk management process, the mitigations, and the resulting operational risks.</p> <p>6.1.4.2 The manufacturer shall establish and document their distributed production processes and activities in the SMS. The processes and activities shall include:</p> <p>a) Liaison between the vehicle and/or ADS manufacturer and all other manufacturers organisations (e.g. suppliers, partners or subcontractors) involved in the supply chain.</p> <p>6.3.1.7.1 Any operational risk identified in the ADS shall, where appropriate, have mitigations implemented. The ADS manufacturer manufacturer shall then be able to show the link between the overall risk management process, the mitigations, and the resulting operational risks.</p> <p>6.3.1.14 The safety case provided by the ADS manufacturer manufacturer shall include a description of each ADS feature configuration including ADS functions applicable to that specific feature, the intended uses and limitations on the use of the feature which gives a simple explanation of its operational characteristics.</p> <p>7.4.2 (UNR) The Type Approval Authority or its Technical Service shall review the information provided by the manufacturer on the ADS operations (e.g. Notification, short term and periodic reports):</p> <p>(a) to receive confirmatory evidence on the ADS manufacturer's safety case and on the Safety Management System,</p> <p>7.4.2 (GTR) The Assessor shall review the information provided by the manufacturer on the ADS operations (e.g. Notification, short term and periodic reports):</p> <p>(a) to receive confirmatory evidence on the ADS manufacturer's safety case and on the Safety Management System,</p> |

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| | <p>Annex [] In-Service Reporting Templates periodic reporting table under 'ADS identification' - line item on 'ADS manufacturer' - replace 'ADS manufacturer' with 'Make and type of ADS'</p> <p>Justification - the term 'manufacturer', as defined under resolution R.E.3, is generally the correct term to use under type approval. Where reference is being made to an entity other than 'the manufacturer', it is better to use alternative wording such as 'organisations', 'suppliers' etc.</p> <p>In the following instance, no amendment is needed:</p> <p>Footnote 23</p> <p>Justification - no need to amend the term 'ADS manufacturer' given the footnote is a direct quote from another ADS IWG document and will be deleted for the final GTR/UNR anyway.</p> <p>(checksum: 7+1 = 8)</p> |
| 'manufacture' = 6 instances | <p>Replace the term 'manufacture' with 'manufacturer' in the following four instances:</p> <p>6.1.4.1 (b) 6.3.1.25 7.2.3.4.2 7.3.2.3.2</p> <p>Justification - manufacture is a verb. 'Manufacturer' is the noun.</p> <p>In the following two instances, no amendment needed:</p> <p>Footnote 10 Footnote 20</p> <p>Justification - For footnotes 10 and 20, no need to amend the term 'manufacture' given the footnotes are direct quotes from two other ADS IWG documents and will be deleted for the final GTR/UNR anyway.</p> <p>(checksum: 4+2 = 6)</p> |
| 'manufacturers' = 6 instances | <p>Replace the term 'manufacturers' in the following three instances:</p> <p>4.2.4.1 The In-Service Monitoring and Reporting (ISMR) of the manufacturer Manufacturers shall ensure the ADS's safety throughout the lifetime of the ADS.</p> |

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| | <p>6.4.4 The reporting shall be carried out according to the laws applicable in each contracting party and according to the information available to the manufacturer manufacturers</p> <p>Annex [] In-Service Reporting Templates - The data elements marked with an asterisk (*) represent information immediately available to the manufacturer manufacturers and that shall be reported as part of the mandatory reporting requirements in 6.4.</p> <p>Justification - where a requirement applies, it should be clearly indicate the subject through use of the definite article (e.g. 'the manufacturer').</p> <p>Retain the term 'manufacturers' in the following three instances:</p> <p>6.1.4.2 The manufacturer shall establish and document their distributed production processes and activities in the SMS. The processes and activities shall include:</p> <p>(a) Liaison between the vehicle and/or ADS manufacturer and all other <u>manufacturers</u> (partners or subcontractors) involved.</p> <p>6.1.6.2 The manufacturer shall put in place suitable arrangements (e.g., contractual arrangements, clear interfaces, quality management system) with any organization involved in the development, manufacturing, or in-use deployment of its vehicles (e.g., contracted suppliers, service providers, or <u>manufacturers'</u> sub-organizations) The manufacturer shall document its processes and activities, including the following aspects:</p> <p>Annex [] ODD-based Behavioural competences and Scenario Identification approach - Different approaches may exist to perform such an activity; therefore, the approach herein presented should be considered as a guideline for both <u>manufacturers</u> and authorities.</p> <p>Justification - the use of the term manufacturers (plural) is correct in these three instances.</p> <p>(Checksum: 3+3 = 6)</p> |
| 'vehicle manufacturer' = 0 instances | No use of the term 'vehicle manufacturer' so no amendments necessary. |