**SGR0 – Pre-test Task Force – Issue Report**

**Type Approval Authority:** JAPAN MLIT

**Subject:** Treatment of approval certificates for bulbs at the time of application relating to lamp units

**Draft Regulation 0 (version):** [**SGR0-18-03.doc**](https://www2.unece.org/wiki/download/attachments/25887943/SGR0-17-04.doc?api=v2)

**Reference to Legislation:**

Paragraph Number(s):

Annex 4 List of requirements for the purpose of IWVTA

Part A: Requirements for vehicles of category M

Section I: List of requirements for U-IWVTA

Number 1.2.3.4.10,12,16,17,25,28,31,32,34,36,38,41

**Issue Detected:**

R0 requires submission of approval certificates for lamp units as well as approval certificates for bulbs to be used in these lamp units. However, when a lamp unit is approved, it is required to be equipped with bulbs that comply with the applicable requirements. For this reason, it should be no problem to omit the approval certificates for bulbs.

**Discussion**

Among the approval certificates required in Annex 4, those for lamp units and bulbs are obtained by suppliers, and therefore it is difficult for motor vehicle manufacturers to submit such certificates.

**Suggested Solution(s)**

To add a footnote to Part III of Annex 5 stating that if the approval certificates for lamp units are provided, the certificates for bulbs may be omitted.