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|  |  | GRE IWG “Simplification of the UN Lighting and Light-Signalling Regulations” (SLR) |
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**Guidance from the IWG-SLR Chairman after WP.29-167**

**The IWG-SLR Approach to Simplification**

To provide a clear and stable regulatory status the creation of three new regulations (for Front Lighting, Signalling and Retro-reflective devices), along with the alignment of the collective provisions across the three regulations, is the only solution. With this approach the existing individual regulations will be “frozen” as well as their associated type approvals already granted.

This approach shall be the basis for the work of the next sessions of IWG-SLR. All experts contributing to the drafting activity are invited to focus their efforts on the goal of producing the three new regulations, described above, as a matter of high priority. The outcome will overcome the problem of collective amendments and provide GRE and WP29 with an excellent basis for introduction of new technologies into the regulations with a minimum of administrative burden.

**Rationale**

Having taken into account the results of the work already carried out by the IWG-SLR, the discussions during the 73rd and 74th sessions of GRE and the 167th session of WP29, the following conclusions have been reached:

* **The use of a part “B” in Regulation 48 as the placeholder for a horizontal reference for the common provisions of the individual regulations is not considered to be a feasible solution following the advice of OLA and the experts of GRE.**

*OLA had pointed out that using a new part B of Regulation No. 48 as a horizontal reference document (HRD) would contradict the terms of the 1958 Agreement. There are Contracting Parties applying individual device Regulations, but not applying R48. If so, such Contracting Parties would neither have the opportunity to vote on amendments to part B of R48 nor the possibility to reject their application. In other words, such Contracting Parties would be excluded from the decision-making process for some legal provisions they are bound to. On the other hand, Contracting Parties applying R48, but not device Regulations, would nevertheless be able to vote on or object to amendments to the common provisions of these Regulations contained in part B of R48.*

* **The approach to introduce a resolution as the place-holder for common provisions is not feasible in the content of the device and installation regulations and shall be abandoned.**

*OLA indicated that Regulations can only be amended in accordance with Article 12 of the Agreement and that a Resolution cannot be employed to amend a Regulation. Concerns were also expressed about the regulatory status of establishing a new Resolution as a HRD outside the legal text of the 1958 Agreement. Various experts raised questions on using dynamic or static references to HRD in the individual device Regulations. GRE also wondered about the correlation between amendments to the HRD and supplements or new series of amendments to individual device Regulations, including transitional provisions*

*Finally, the experience of the work in the IWG SLR, especially at the last meeting, shows that it is clear that the approach of a resolution should be abandoned.*

*Note: The introduction of a resolution proposed for the light source data sheets is feasible and is proceeding.*

* **An amendment to the 1958 Agreement may have unwanted implications and is to be avoided.**

*As an alternative solution OLA proposed to amend the 1958 Agreement with a specific procedure applicable in those cases when an amendment to one Regulation would affect the application of other Regulations. However, there are doubts that this alternative solution would bring results, in view of its complexity and the advanced stage of work on Revision 3 of the 1958 Agreement.*

* **The quickest route to deliver a solution for the administrative problem of collective amendments, and to respect the advice of OLA, would be to revert to the GTB proposal (SLR-01-04). However, this solution does not offer any possibilities to reduce the number of “live” regulations.**

The *first priority, detailed in the IWG-SLR terms of reference (GRE-72-20), relates to the development of a solution, for the administrative problem of collective amendments, within a very short timescale. This solution does not offer any possibilities to reduce the number of “live” regulations.*

* **The second priority, to produce groupings of existing regulations, will lead to the creation of three new regulations for Front Lighting, Signalling and Retro-reflective devices. This approach is complicated but will overcome the problem of collective amendments and provide GRE and WP29 with an excellent basis for introduction of new technologies into the regulations with a minimum of administrative burden**

*This approach will be complicated because of approval marking issues and the associated need to “freeze” existing individual regulations and their associated type approvals already granted. Certainly the use of the IWVTA “Common Identifier” in association with the DETA system will have to be considered. GTB presented a proposal for such an approach to the 68th session of GRE (GRE-68-28).*

* **Much of the work to provide the foundation for implementing the GTB proposal (SLR-01-04) is already done to satisfy the first priority requirement. However, assuming that the second priority to reduce the total number of active regulations will subsequently have to be delivered, it would be more logical and efficient, in terms of total effort to be invested, to move directly to develop the three new regulations.**

*The three new regulations mentioned above will provide the basis for the longer-term objective of developing technology independent technical requirements.*

**Background**

There are more than 30 lighting and light-signalling Regulations, addenda to the 1958 Agreement. They deal with light sources, individual devices and installation requirements. Individual device Regulations, being the most numerous group, contain a lot of very similar and even identical provisions on administrative procedures, markings, test procedures, conformity of production, etc. Whenever there is an amendment to such provisions in one device Regulation, it has to be repeated in many (up to 10-15) other device Regulations. These numerous so-called collective amendments have increasingly become a heavy administrative burden for the Contracting Parties, GRE, the World Forum for Harmonization of Vehicle Regulations (WP.29), UNECE secretariat and, eventually, OLA. To improve the situation, WP.29 requested GRE to prepare proposals to simplify lighting and light-signalling Regulations.

Since the start of the discussion several options were investigated. In a general way, for the purposes of simplification, the administrative burden of collective amendments was to be tackled as well as the number of different device Regulations. There was a proposal where the collective amendments should be moved from these Regulations into a single repository (HRD). Taking this approach the individual device Regulations would only contain references to the HRD, thus making its provisions legally binding. Whenever changes to these common provisions would be necessary, this could be done in one single step by amending the HRD, rather than amending the entire individual device Regulations separately and simultaneously.

Concerning the form of the HRD, an option was to establish a new Resolution under the auspices of WP.29 or to introduce a new part B into Regulation No. 48 (R48) and use it as the HRD.

GRE took note of the guidance provided by OLA and WP.29 on different options for the HRD and subsequent discussion and guidance from WP29 has led to the conclusion that the development of an HRD approach is not feasible.