

Report
Task Force (TF)
Separate Technical Unit
(STU)

for
37th VRU-Proxi IWG meeting
8th - 9th July 2025



Agenda

- TF Team – Status and Meetings
- Context and Goals
- Challenges and Conclusions
- Process of Documents, Review and Feedback
- Support Request for other Ongoing Changes
- Request for ToR Changes – Scope and Timeline
- Thank You / Questions / Thoughts / Feedback

TF Team – Status and Meetings

- **Team** - effective no change
 - TF Lead
 - Contributors – 3 team members
 - Supporters – 4 team members
 - Observers – 24 team members (few leavers balanced by new colleagues joining)
- **Meetings**
 - Weekly Wednesday meetings for approx. 2.5h, mostly maintained subject to core team availability.
 - 17 online sessions so far.
 - Scheduled in-person drafting workshop for 2 days on 14th - 15th July 2025, with remote joining option.
 - Documents and reports are shared within Team or on UNECE server (under VRU-Proxi document area).
- **3 Phases defined** – currently in the begin of phase 2 for R159
 - 1) Agree on proposal how to amend the 4 regulations – focus on efficiencies, ease and matching the UNECE approach.
 - 2) Drafting regulation text amendments between the contributors.
 - 3) Iterative review, first within TF, then within IWG.

Context and Goals

Context

- UNECE has defined Manufacturer, Separate Technical Unit and Component in the latest update of the framework document “Consolidated Resolution on the Construction of Vehicles (R.E.3)”, see [ECE_TRANS_WP.29_78_Rev.7e](#):
 - “...
1.13 “Manufacturer” means the person or body who is **responsible to the Approval Authority** for all aspects covered by the UN Regulations requirements for approval process and for ensuring the conformity of production. It is not essential that the person or body is directly involved in all stages of the construction of the vehicle or component which is the subject of the approval process.
1.14. “Component” means a device intended to be part of a vehicle, which may be **approved independently of a vehicle** where relevant UN Regulation(s) provide express provisions for so doing.
1.15. “Separate technical unit” means a device intended to be part of a vehicle, which may be **approved separately, but only in relation to one or more specified types of vehicle** where relevant UN regulation(s) provide express provisions for so doing.
...”
- Reviewing various regulations on UNECE and EU levels containing STU or Component approach – all dealing with a specific system, having at the outset a basic specific universal structure, which is picked up in the framework of the regulation.
- STU TF is dealing with regulations which are mostly pure functional and technology independent (especially R151 and R159).
- Consulted within the TF team and a few external people – it was suggested such will become a more common matter for regulations with e. g. ADAS functions or self-driving vehicles.

Goals

- All changes should not make the regulation less or more stringent however adding wider scope.
- Current scheme for full vehicle approval will be maintained and ensures possible extension of current approvals.
- Therefore, allowing to follow the UNECE process of an “Amendment as a Supplement” (not a new series).
- A “blueprint” to be developed as recommended for general future use and for the reuse of the TF reuse as dealing with 4 regulations.

Challenges and Conclusions

Challenges

Efficiency	Avoid or limit the same testing on STU or Component level vs. integration of STU or Component on vehicle level.
Dependency	Taking in account vehicle features which significantly influence the performance of a STU or Component when integrated on vehicle level.
Stringency	Ensure fulfilment for all requirements and testing demands after the integration of STU or Component on vehicle level.
Simplicity	Guidance for the approval requester providing the information for Component, STU or integration of STU or Component on vehicle level. Ensuring the Technical Service and approval authority can fulfil their responsibilities.

Conclusions

- For each regulation 4 types for approval:
 - 1) Full vehicle (like currently will be maintained / unchanged for such content)
 - 2) STU
 - 3) Component
 - 4) Integration of STU or Component on vehicle level
- Key work focus
 - Framework – how different chapters and paragraphs are linking up (“blueprint”).
 - Breakdown of the requirements and testing sections between STU or Component with the integration of STU or Component on vehicle level.
 - Additions to Annex 1 with new Appendixes for information documents or deliverables for new types.

Process of Documents, Review and Feedback

- Working Version document for each regulation drafting
 - Consolidates all present amendments merged into one document for simplification of work using MS Word comment function referencing changes from which amendment.
 - Text changes from drafting work are logged with MS Word track changes function.
 - Review and discussion supported by MS Word comment function for TF or IWG.
- “Amendment as a Supplement” document
 - For submission as a working document to GRSG for review and approval.
 - Creation based on the final agreed Working Version document complying with UNECE template guide [WP29-157-07-Rev.1e](#).
- Current “Informal” draft of R159 Working Version document – work in progress state
 - Available for review, see document: TF-STU-17-04 R159 & Amendment 1 & 2 combined working version Rev2
 - Any suggestions or feedback?

Support Request for other Ongoing Changes

- Monitoring of upcoming changes for the 4 regulations in concern
 - R158 - **When will these both be published?**
 - 4th Amendment as a Supplement approved at 194th WP.29 session Nov/2024
[ECE/TRANS/WP.29/2024/117 - \(GRSG\) - Proposal for Supplement 4 to the Original Version to UN Regulation No. 158 \(Reversing motion\)](#)
 - 5th Amendment as a Supplement approved at 195th WP.29 session Mar/2025
[ECE/TRANS/WP.29/2025/24 - \(GRSG\) - Proposal for Supplement 4 to the original version of UN Regulation No. 158 \(Reversing motion\)](#)
 - R166 - **When will these both be published?**

New Series 01 and Amendment approved by 194th WP.29 session Nov/2024

 - [ECE/TRANS/WP.29/2024/98 - \(GRSG\) - Proposal for 01 Series of Amendments to UN Regulation No. 166 \(Vulnerable Road Users in Front and Side Close Proximity\)](#)
 - [ECE/TRANS/WP.29/2024/168 - \(GRSG\) - Proposal for Supplement 1 to the original version of UN Regulation No. 166 \(Vulnerable Road Users in Front and Side Close Proximity\)](#)
 - Removing Unique Identifier (UI) marking provisions in line with direction from 129th GRSG session in Apr/2025 for R151 and R159
 - Report: [ECE/TRANS/WP.29/GRSG/108 - Report of the Working Party on General Safety Provisions on its 129th session \(7–11 April 2025\)](#)
 - Informal Document: [“GRSG-129-01 - \(NL\) Collective amendments to UN Regulations Nos. 151, 159, 160 and 167”](#)
- Formal feedback is still requested for awareness of Secretary of GRSG for ongoing changes or possible plans for the 4 regulations in concern.
- Does anyone have other awareness of any ongoing changes or plans for the 4 regulations R151 / R158 / R159 / R166 ?

Request for ToR Change – TF Scope

- Proposed change of the ToR

“
...
Completing draft regulatory proposals for Separate Technical Units (STU) and **Component** approvals for the following regulations (if applicable):

- UN Regulation No. 151;
- UN Regulation No. 158;
- UN Regulation No. 159;
- UN Regulation No. 166.

(Separate Technical Units and Component as defined in UNECE framework document “Consolidated Resolution on the Construction of Vehicles (R.E.3)”, see [ECE TRANS WP.29 78 Rev.7e](#))

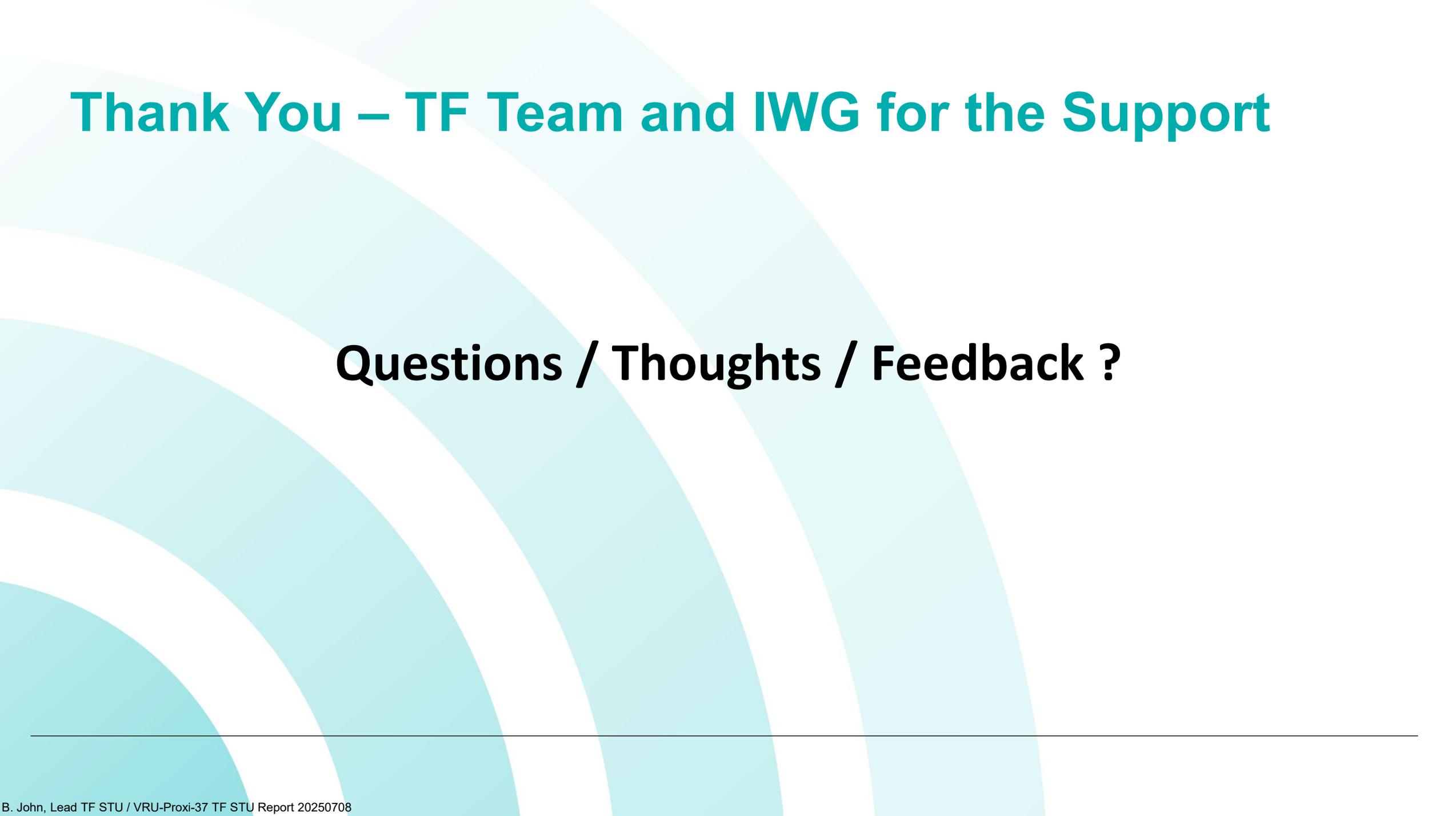
...”

- Proposal considerations and justifications

- The IWG colleagues involved in the definition of the TF scope around 2023 to 2024 unlikely had awareness of the latest updated framework document as stated above.
 - This document defines Components, STU and Manufacturer in UNECE terms.
 - The TF suggest to cover both in the scope to allow Component and STU approach for flexibility and economy benefits for the industry fulfilling the regulation demands, which was the original goal in the initial version of the ToR mentioning “component” at that time.
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Request for ToR Change – Timeline

- Propose extension to GRSG session on 14th - 16th October 2026.
- Proposal considerations and justification
 - Submission deadline to GRSG and preparations within the IWG demands a lead time of at least 3 months.
 - Submission of at least one draft regulation for GRSG session on 13th - 17th April 2026 should be possible.
 - Assuming at least one iteration cycle, means two IWG meetings for review covering each of the 4 draft regulations.
 - Assessment based on current rate of progress for the “blueprint” and R159 work.
 - Expect efficiencies for R151 due to applying the “blueprint” from R159.
 - More time needed for differences in R158 due to its structure and the use of alternative means.
 - Expect efficiencies for R166 due to applying the approach from R158 and its similarities.
 - Alternative – propose extension to GRSG session on 13th - 17th April 2026 and check if sufficed progress is achieved by end of 2025.
If needed propose appropriate extension to GRSG in session 13th - 17th April 2026.



Thank You – TF Team and IWG for the Support

Questions / Thoughts / Feedback ?