

ADS IWG Working Document
Change Proposal Form
One major comment per form
(Shaded blocks for use by the IWG Secretariat)

Document Reference

ADS-19-05r1

Date

11 February 2026

Agenda item

Item 9.

Proposed by (affiliation only—no personal information)

UK and EC

Summary of Change (25 words or less)

Revised Purpose section

Reason for Change (Justification)

Original wording based on the reg 155 interpretation document uses the term “clarify the requirements” this implies the current text is not complete. We propose using the term “facilitate the interpretation of the requirements” Since the power to actually interpret the requirements lies with the authority, this document is to aid them in doing so in a harmonised manner and help the manufacturer to understand what sort of evidence is expected.

In order to remain agreement neutral, it is suggested the text use “authorities” rather than Type Approval Authorities.

The rev.1 intends to streamline the text by merging the content of the Ch1 and Ch4 and remove duplications.

Location 1.1 and 1.2, 4.1,4.2,4.3

Original text

1: Preamble

1.1.[The purpose of this document is to help clarify the requirements within UN Global Technical Regulation No. [XXX] and UN Regulation No. [YYY] on Automated Driving Systems and provide information on what may be used to evidence those requirements.

1.2.[The target audience for this document are vehicle manufacturers submitting systems for test and the Technical Services / Approval Authorities assessing those systems. The outcome should be that this document is able to help harmonise evaluations between different Technical Services/ Approval Authorities.]

4. Introduction

4.1. [The present document provides information to support the interpretation and guidance on the requirements established in the GTR and UN Regulations on ADS on laying down rules for the self-certification of the Automated Driving System (ADS) of automated vehicles (“Regulation(s)” hereinafter). The document also provides information and guidance on possibilities to comply with those requirements, and how to provide evidence of such compliance.

4.2. The target audience are manufacturers aiming at a self-certification of an ADS or submitting systems for type-approval, other organizations involved in the ADS lifecycle, and the Competent Authorities/Technical Services (TS) / Type Approval Authorities (TAAs) assessing those systems. The purpose is to facilitate a harmonized interpretation and implementation of the Regulation(s).

4.3. The document strictly provides information to support the interpretation and guidance on the Regulation(s); it does in no form introduce new requirements. Whenever conflicting, the contents of the Regulation(s) are legally binding.

Revised text

1. Introduction

1.1 The purpose of this document is to facilitate the interpretation of the requirements within UN Global Technical Regulation No. [XXX] and UN Regulation No. [YYY] on Automated Driving Systems when applying them to a particular ADS vehicle, to provide guidance on what may be used to evidence those requirements, and to help harmonise application across different manufacturers, authorities and inspection bodies.

1.2 The document strictly provides information to support the interpretation and guidance on the Regulation(s); it does in no form introduce new requirements. Whenever conflicting, the contents of the Regulation(s) are legally binding.

Preamble

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