

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

Document Reference

ADS-19-06/Rev.1

Date

3 February 2026

Agenda item

Item 15.

Proposed by (affiliation only—no personal information)

Japan

Summary of Change (25 words or less)

The definition of “manufacturer”

Reason for Change (Justification)

Align the definition of “manufacturer” with that of RE3.

Location

- A. Section [3.1 (UNR)] – Application for Approval
- 1. Paragraph E.1.47 etc (GTR) / 3.1. etc (UNR)

Original text

None

Revised text

As defined in R.E.3, "Manufacturer" means the person or body who is responsible to the Approval Authority for all aspects covered by the UN Regulation's requirements for the 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 which is the subject of the approval process.