

Issues on UN Regulations on light sources in Annex 4 of UN Regulation No.0 (UN Regulations applicable to IWVTA)

Background

- UN Regulation No.0 requires submission of approval certificates for all UN Regulations listed in Annex 4 of the Regulation. In case of lighting this includes the installation of lighting systems, lamp units as well as light sources to be used in these lamp units.
- Among the approval certificates required, those for lamp units and bulbs are obtained by suppliers, and therefore it is difficult for motor vehicle manufacturers to submit such certificates.
- It was therefore agreed that those type approvals need not be provided which are contained in the approval for installation, i.e. in this case the approval to UN-R48.
- This resolves the problem for approvals of light units which are routinely listed in R48 approvals, but not for light sources because approvals according to R37, R99 and R128 are not listed in R-48 approvals.

Proposed solution for this issue

- If (for the case of replaceable light sources) every lamp unit is required to be equipped with bulbs which are type-approved in accordance with the applicable UN Regulations, UN Regulations for light sources (R37, R99 and R128) can be deleted from Annex 4 of UN-R0.
- **Current status**: Individual UN Regulations on lighting and light-signaling devices do not systematically require the light sources to be type-approved pursuant to the respective UN Regulations.
- **Request to GRE**: amend individual UN Regulations on lighting and light-signaling devices to require that **their** light sources, **when they are covered by other UN Regulations (e.g. UN R37, R99, R128)**, shall be type-approved pursuant to **these** respective UN Regulations **whenever possible**. (WP.29 at its 170th session mandated GRE on this issue.)

For info, the 170th WP29 report will state:

70. The World Forum noted the request by IWG on IWVTA to clarify the individual Regulations on lighting and light-signaling devices with a requirement that light sources in these devices should be type approved pursuant to UN Regulations Nos. 37, 99 or 128. WP.29 invited GRE, in cooperation with IWG on IWVTA, to consider how to better address this issue, taking into account the IWVTA objectives, the ongoing process of the simplification of lighting and light-signaling Regulations and the fact that not all light sources were covered by UN Regulations Nos. 37, 99 and 128.