GRE IWG "Simplification of the UN Lighting and Light-Signalling Regulations" (SLR)

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GRE Informal Working Group on Simplification of the UN Lighting and Light Signalling Regulations (SLR)

14th meeting

5 December 2016, 10:00 – 17:30 6 December 2016, 9:00 – 17:30 7 December 2016, 9:00 – 12:30

CLEPA Headquarters 87/B1 Boulevard Brand Whitlock, Brussels

REPORT

		Working Documents
1.	Welcome and opening remarks Mr. Lazarevic, Vice Chairman of the Informal Working Group, opened the meeting in substitution of Mr. Loccufier who could not attend the session for medical reasons.	
2.	Introduction of participants and organisations A list of all participants is available in Annex 1 to this Report.	
3.	 Adoption of the agenda The agenda was adopted with the following modifications: Addition of document SLR-14-02 "DETA feedback to GTB understanding of the application of the UI" under item 5. Addition of document SLR-14-03 "E-mail from DETA-IWG Secretary concerning use of the UI" under item 5. Insertion of document SLR-14-04 under item 6 "GTB ideas for the Stage 2 Simplification". Insertion of document SLR-14-05 under item 7 "Light Source issue identified by the IWVTA informal group at the 170th WP.29 session". The updated agenda was circulated as document SLR-14-01/Rev.1. 	SLR-14-01/Rev.1
4.	Approval of the reports of the previous sessions The approval of the Reports was postponed to the next session.	SLR-12-07 SLR-13-06

Use of the Unique Identifier to replace the approval markings

- DETA feedback to GTB understanding of the application of the UI
- E-mail from DETA-IWG Secretary concerning use of the UI

SLR-14-02 SLR-14-03

Mr. Draper reported that, according to the feedback received from the DETA-IWG (see SLR-14-02 and SLR-14-03), it is uncertain when DETA will become available or when it can deliver a Unique Identifier. Moreover the DETA group expressed concerns whether it shall be allowed to obligate the UI marking. This specific subject will be addressed at the IWVTA Sub-Group on 1958 Agreement (*SG58*) session on 10 March 2017.

Mr. Draper observed that, while the best solution would be to remove all type approval markings and replace them with the Unique Identifier, it could still be possible to use the existing markings as shown in Annex 7 of the draft new UN Regulation on Light Signalling Devices.

Mr. Grigorescu pointed out that for small lighting units with little area available the Unique Identifier would be extremely useful as the markings affect the quality of the beam.

The SLR considered informal document GRSP-60-02 where the Netherlands proposed GRSP not to replace the approval mark in R-44 and R-129 by the UI due to the key importance for the parents to get the right information about child restraint systems. The participants recognised that in the case of lighting devices the situation would be very different and indeed the Unique Identifier would be extremely useful.

Mr. Lazarevic recommended the SLR to provide DETA with a good justification in support of the Unique Identifier.

The SLR agreed, for the time being, to still consider the existing markings in addition to the Unique Identifier.

Mr. Draper, with the assistance of Mr. Rovers and Mr. Grigorescu, volunteered to produce for the 15th SLR session a presentation (including some practical examples) to justify that for GRE the UI is a priority due to the growing complexity of the markings.

GTB ideas for the Stage 2 Simplification

Mr. Draper introduced the GTB ideas for the Stage 2 Simplification, on the basis of document SLR-14-04, pointing out the great opportunity for ECE to synchronize with the Chinese Simplification of GB standards. He explained that the last slide summarises the "Regulatory Hierarchy" approach discussed at the recent GTB session in Taiwan.

Mr. Lazarevic commented that the proposed plan is very ambitious and will require considerable workload without guarantee of success.

Mr. Draper clarified that a specific session between GTB delegates and Chinese experts is planned at the end of March 2017 with the aim of better understanding how China intends to simplify its GB standards and the main target dates.

Mr. Naono expressed support for the global harmonization nevertheless he recommended to discuss with China and USA in order to understand their point of view before defining the details. **SLR-14-04**

Mr. Pernkopf recommended to start harmonising UN Regulations with Chinese GB Standards. GTRs and harmonisation with US should be a further step for the future.

Mr. Draper explained that the GTR discipline is very good for writing Regulations however, the first step is to work within the 1958 Agreement.

In order to seek some initial feedback from the US, Mr. Draper will present this proposed approach at the next DVN workshop in Rochester, MI, in January 2017 where some NHTSA representatives will be present.

Mr. Draper informed that GTB intends to present its initial ideas for Stage 2 during the GTB reporting session at GRE-77. The GTB target is to define a proposal as a possible basis for the SLR to start work on Stage 2 simplification in September 2017.

Light Source issue identified by the IWVTA informal group at the 170^{th} WP.29 session

Mr. Puglisi informed that the IWVTA informal group reported at the 170th WP.29 session that individual UN Regulations on lighting and light-signaling devices do not systematically require the light sources to be type-approved to the respective UN Regulations (WP.29-170-10/Rev.1).

Mr. de Visser acknowledged that the text used in the various UN Regulations is not always consistent and in certain cases it may generate some interpretation problems. He added that the main problem is how to fix this issue without delaying the whole Stage 1 approach of the simplification process.

Mr. Lazarevic commented that a legal interpretation of the text may be needed and added that SLR is the right group to address this issue. A solution could be to amend only the new UN Regulations or address this issue during the Stage 2.

Mr. Puglisi pointed out that unfortunately this is not possible since Annex 4 of UN Regulation No. 0 (i.e. the list of existing UN Regulations applicable to IWVTA) is planned to be finalised at the March 2017 session of WP.29. The whole UN Regulation No. 0 is expected to be submitted as a formal proposal to WP.29 in June 2017 for formal adoption in November 2017.

Mr. Draper explained that, since an amendment to the new UN Regulations is not possible (the Regulations are not yet available and IWVTA needs an urgent solution), a collective amendment to the existing UN Regulations would be the only solution to resolve the problem. The main concern is timing since GRE will not be able to endorse it (GRE-77 will be held in April 2017 while WP.29 in March).

The participants concluded that only a Contracting Party would be able to submit an informal document directly to WP.29. Due to the urgency of IWVTA, WP.29 may decide to adopt the collective amendment (although submitted as informal documents) so that the "stabilised" regulations will include the modifications requested by the IWVTA and the new simplified UN Regulations will also reflect the new wording.

WP.29-170-10/Rev.1 SLR-14-05 Mr. Lazarevic informed that the EU may be able to submit such an informal document to WP.29 but only if supported by IEC and GTB and only if the text is provided in due time before TCMV.

The SLR agreed to proceed as follows:

- I. GTB/IEC to prepare a proposal for collective amendment and share it with IWVTA for a quick review.
- II. GTB/IEC to send the proposal to Mr. Lazarevic in early January 2017 in order to include it on the TCMV agenda and be part of the "mega decision".
- III. If adopted by TCMV, EU will send the proposal for collective amendment to WP.29 in March 2017 as an informal document to be addressed under the IWVTA section of the WP.29 agenda.

Draft introduction before the scope of the 3 new UN Regulations

Mr. Puglisi recalled that this item for the time being is still a placeholder in order not to forget to insert the introduction in each of the new UN Regulations.

In view of the discussion about the use of the Unique Identifier to replace the approval markings (see item 5 above) and the decision to still consider, for the time being, the existing markings in addition to the Unique Identifier, the SLR discussed about how this will affect the introductory text of the new UN Regulations.

Mr. Draper volunteered to amend the introduction of the draft new UN Regulation on Light Signalling Devices to explain that both approval markings and the Unique Identifier have been included to future-proof the new UN Regulations.

Draft text of the new UN Regulations

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- Draft New UN Regulation on Road Illumination Devices

The participants resumed the examination line-by-line of document SLR-12-04/Rev.1 starting from Par. 4.3.4. Several comments and improvements have been made to the text but, for lack of time, it was not possible to complete the review of the whole document.

It was agreed to resume the consideration of SLR-12-04/Rev.1 at the next meeting from Annex 3 onwards.

Mr. Pernkopf volunteered to check Par. 4.4 to check if all the requirements from UN Regulation No. 113 are included.

Mr. Langhammer volunteered to check Par. 4.3 with regard to the AFS provisions. He also offered to review Annex 1 "Communication Form".

Mr. Bauckhage volunteered to review Par. 2.3 about markings.

- Draft New UN Regulation on Light Signalling Devices (updated clean version, superseding SLR-13-02)

Mr. Grigorescu commented that not all markings would be covered by the Unique Identifier as some markings would still remain. He identified several type of markings: approval marking (e.g. E_1), symbols (e.g. F_3), additional symbols (e.g. \uparrow , \downarrow , PL), additional/other marking (e.g. V, MD).

SLR-12-04/Rev.1

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The SLR agreed to add in the text what markings, regardless of the Unique Identifier, must be on the devices. Mr. Draper and Mr. Rovers volunteered to draft a "clean" consolidated version of the new Light Signalling Devices Regulation, taking into account all the adopted proposals at GRE-76. Mr. Bauckhage offered to check the consistency of the text with the latest WP.29 documents. He also volunteered to check Par. 3.3 and Annex 7 with regard to the marking requirements. A "clean" updated version with a proper SLR-15-xx number will be posted on the SLR website prior to the next meeting. - Draft New UN Regulation on Retro-reflecting Devices (updated version, superseding SLR-13-03) The participants examined line-by-line the latest draft text of the new UN Regulation on Retro-reflecting Devices up to Par. 4.3.2. Several comments and improvements have been made but, for lack of time, it was not possible to complete the review of the whole document. SLR members were invited to provide input to Mr. Ewald and Mr. Manz who will prepare for the next meeting an improved text for consideration. At the next (15th) SLR session the document will be checked again with the objective to have available for the 16th SLR session in March 2017 a final draft text almost ready for GRE submission. The three new UN Regulations will be sent to GRE-77 as informal documents with the purpose of showing how the documents will look like and the concrete reduction of the amount of pages. **Any Other Business** The SLR acknowledged that, if possible, the new UN Regulations should 10. be checked by test houses and users in various setmaker companies in order to identify possible inconsistencies. Next meeting(s) The following meeting schedule was confirmed by the group: > 15th IWG SLR meeting – Brussels on 21-23 February 2017 11. ➤ 16th IWG SLR meeting – Brussels on 22-24 March 2017

> 17th IWG SLR meeting – Tokyo (location TBD) on 16-18 May 2017

The Vice Chairman thanked all the participants for their fruitful

> 18th IWG SLR meeting – Turin (or Brussels) on 13-15 June 2017

Closure

contribution and closed the meeting.

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Annex 1 to SLR-14-06

Participation at 14th SLR meeting 5-7 December 2016

IN PERSON	WEBEX/TELEPHONE
Mr. Aleksander LAZAREVIC (EC, SLR Vice-Chair)	Mr. Lukas SCHWENKSCHUSTER (GTB) – Only 6 Dec
Mr. Davide PUGLISI (GTB, SLR Secretary)	Mr. Ad DE VISSER (IEC) – Only partially
Mr. Derwin ROVERS (NL)	Mr. Michael PERNKOPF (GTB)
Mr. Antoine PAMART (FR)	
Mr. Satoshi TSUKAMOTO (JP)	
Mr. Jürgen EWALD (CLEPA) – Only 5-6 December	
Mr. Geoff DRAPER (GTB) – Only 5-6 December	
Mr. Jean-Marc PRIGENT (CLEPA)	
Mr. Thomas BAUCKHAGE (CLEPA)	
Mr. Gert LANGHAMMER (CLEPA)	
Mr. Walter SCHLAGER (IEC)	
Mr. Takashi NAONO (JP) – Only 6-7 December	
Mr. Beny GRIGORESCU (GTB)	