

Informal document WP.29-164-18
(164th WP.29 session, 11-14 November 2014,
Agenda item 3.6.4.)

Simplification of Regulations

Light Sources Regulations

Nos. 37, 99, 128

analysis and way forward

GRE IWG SLR

Informal **W**orking **G**roup **S**implification of **L**ighting **R**egulations

EXECUTIVE SUMMARY

for presentation

Full version
for reference
included

Scope of this presentation

Analysis and way forward

for approved (replaceable) light sources
complying with

the major objectives of the informal group

- Reduce the administrative burden
- Reduce burden on governments
- Reduce regulatory burden for industry

Similar structure

Light source regulations

Scope

Administrative provisions

Technical requirements

Conformity of production

Names and addresses of Technical Services ...

Transitional provisions

Annexes

Sheets for light source categories

Communication

Example of the arrangement of the approval mark

Prescriptions for technical testing

Prescriptions for conformity of production

Administrative
Technical
Category Sheets

Analysis

amendments
Statistics

Bubbles

Size

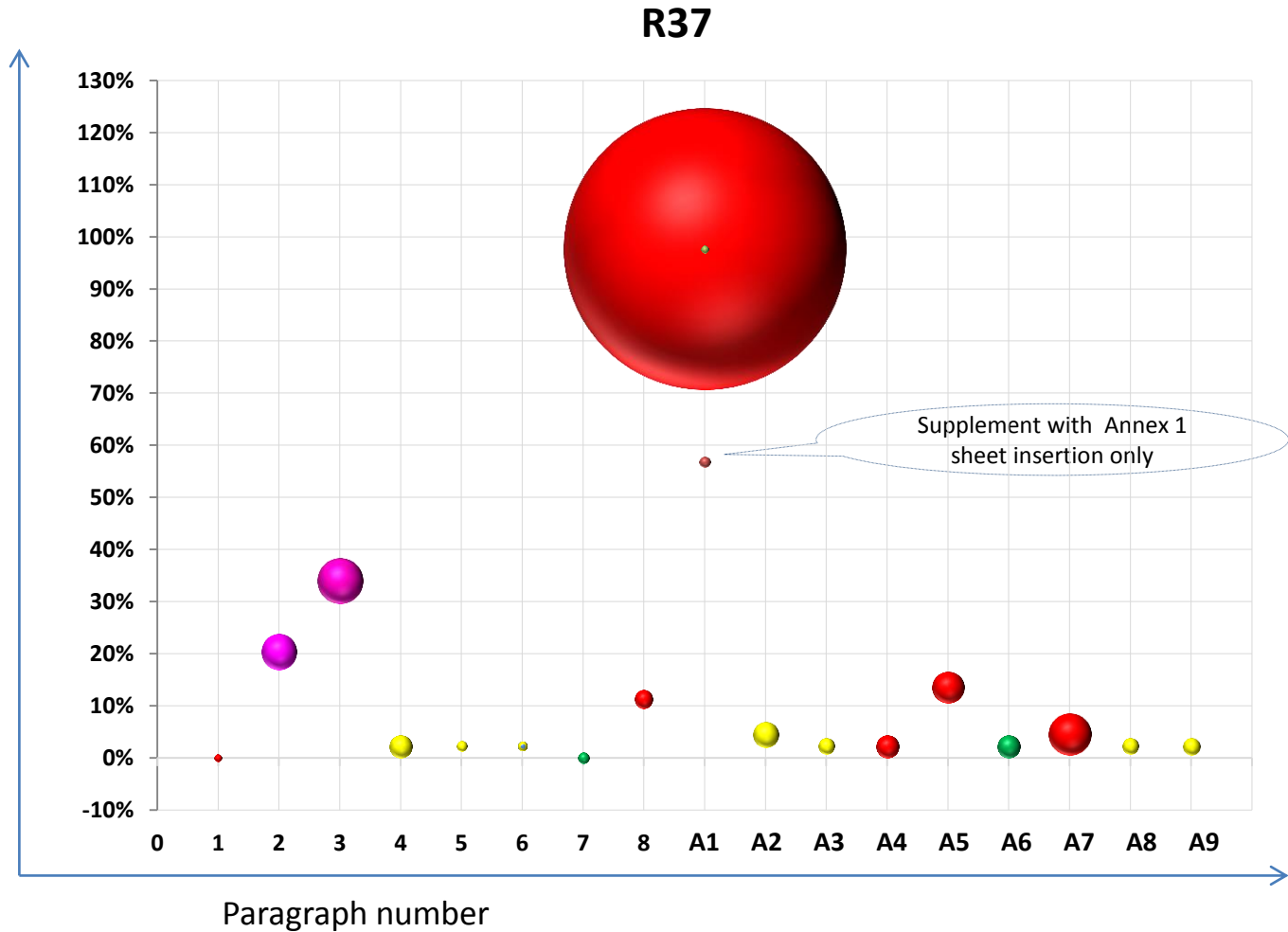
Reflects number
of pages per
paragraph/
annex

Colour

- Green Common text shared between light source regulations
- Yellow Common text with minor technology related lines
- Purple Common text with frequent technology related lines
- Red Totally different paragraphs

Percentage of
supplements
amending a
paragraph/annex

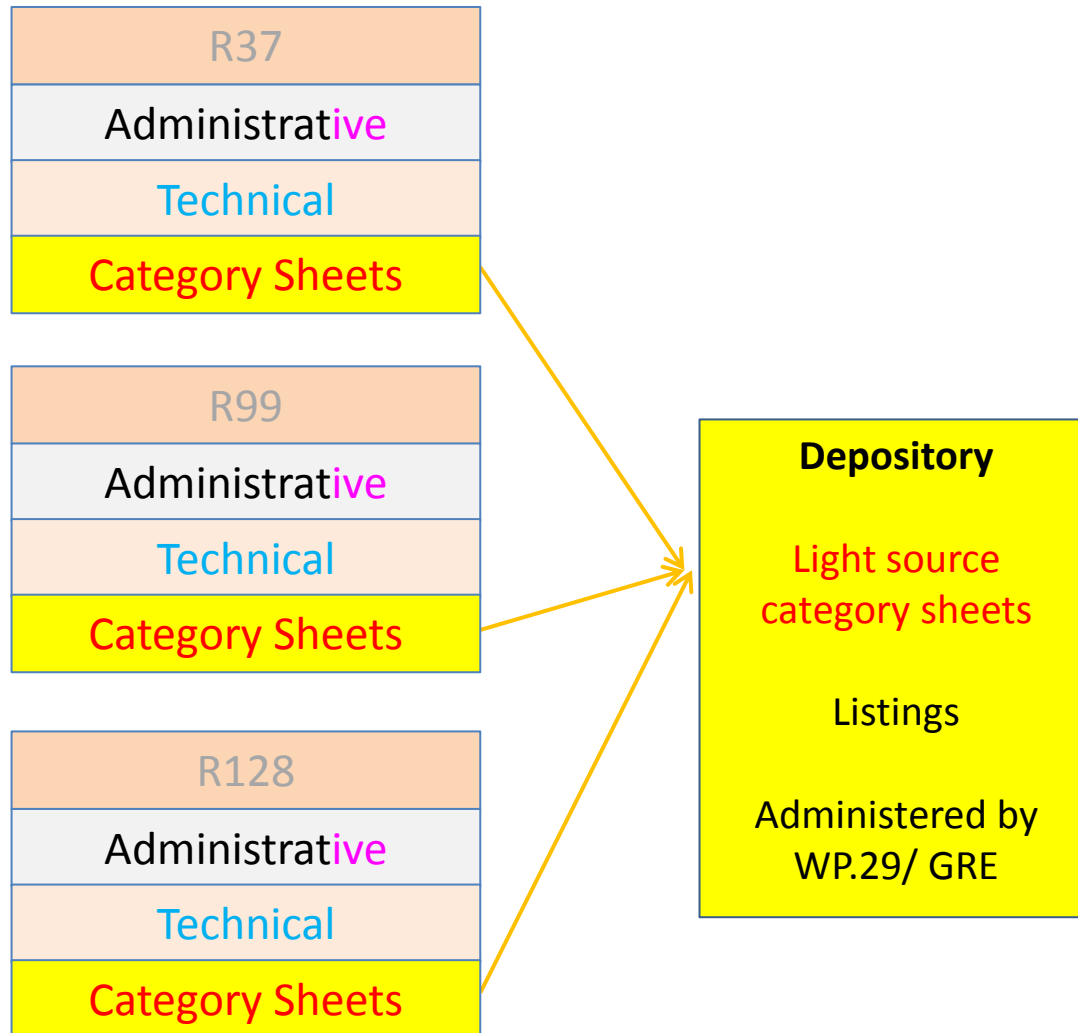
R37 03 series
In effect for 28 years
44 Supplements



Concept for simplification

- Move Annex 1 with all light source category sheets from the light source regulations Nos. 37, 99 and 128 into a **depository** (“Docket file”)
 - Insert a reference from these regulations to this depository
- The regulations are not amended when *only* light source categories are inserted

Concept for simplification



Concept for simplification

The depository

- Docket file, no database
- Entry point should contain a contents list with the date of introduction/ phase out, amendment/ correction
- It may be a **separate or AC.1 controlled** resolution

Aspects for consideration:

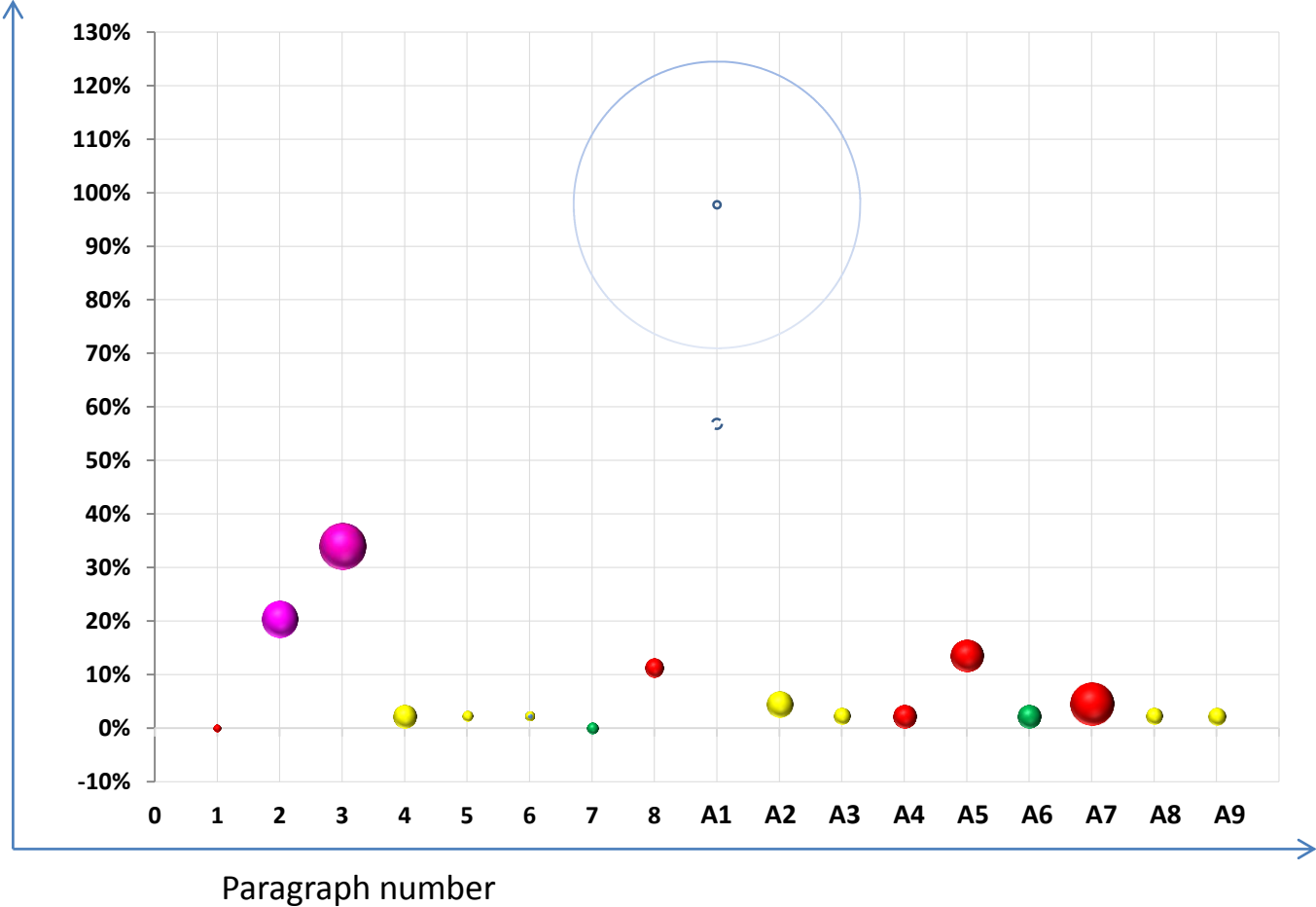
- It should be easily accessible in daily use
- Large number of pages (>200)
- Though intended for use under the 58 agreement, it should not to be limited for use to the 58 agreement (world wide harmonisation)

Consequences

*~2

R37

Percentage of supplements amending a paragraph/annex






R37 03 series
In effect for 28 years
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/~2

Consequences

- Significantly less amendments of the light source regulations
- The processing of light source category sheets is complete after GRE and WP.29 adoption and posting in the depository
- No further submission to OLA, NY, etc. is needed
- Elimination of 6 month period for category sheets (only)
- **BUT:** nature of depository (resolution) should be considered carefully also in relation to voting

GRE IWG SLR

Evaluation **simplification concept** vs. **major objectives**

- Reduce the administrative burden 
- Reduce burden on governments 
 - Number of supplements reduction
 - Process completed after WP.29 and posting in the docket
- Reduce regulatory burden for industry 
 - Approvals earlier due to elimination of 6 month period
 - Sufficient innovation within a category

END
of presentation
THANK YOU



Q/A

Question

1. Concept of depository acceptable for WP.29?
2. IWG SLR continue working on this concept?

Guidance

3. OLA confirmation?
4. Nature of the depository?
5. Voting procedure?

FULL VERSION
for reference

Scope

GRE IWG SLR

Terms of Reference summary

- Minimize the number of parallel amendments
- Reduce the number of non-frozen regulations
- Define essential requirements in performance (technology neutral) terms
- Reduce the administrative burden
- Reduce regulatory burden for industry

Scope

Light sources regulations

Approved light sources for use in approved lamps

Regulations

		In force >
No. 37	(Halogen) filament lamps	1977
No. 99	Gas-discharge light sources	1996
No. 128	LED light sources	2012

Content

- Analysis
 - Structure of light source regulations
 - Statistics of amendments
- Concept for simplification
- Consequences
- Questions for follow-up

Structure

Light source regulations

Scope

Administrative provisions

Technical requirements

Conformity of production

Names and addresses of Technical Services ...

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Sheets for filament lamps

Communication

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Structure

Light source regulations

- Structure is more or less the same
- Deviating from other lighting regulations
- This is due to the specific characteristics of light source categories
 - Necessary for universal replacement, which is
 - Resulting in standardized specifications
 - **Annex 1: sheets for light source categories**

Catalogue or selected list?

Light source regulations

Is Regulation No. 37 a reference book for filament light source categories complying with minimum requirements necessary for traffic safety or a list of selected light source categories complying with the highest standards/ state-of-the-art technology?

GRE-66-01 - (GTB) GTB Internal Process for introduction and evaluation of new light source categories

GRE-61-02 - GTB internal process for introduction and evaluation of new light source categories

Analysis

amendments
Statistics

Bubbles

Size

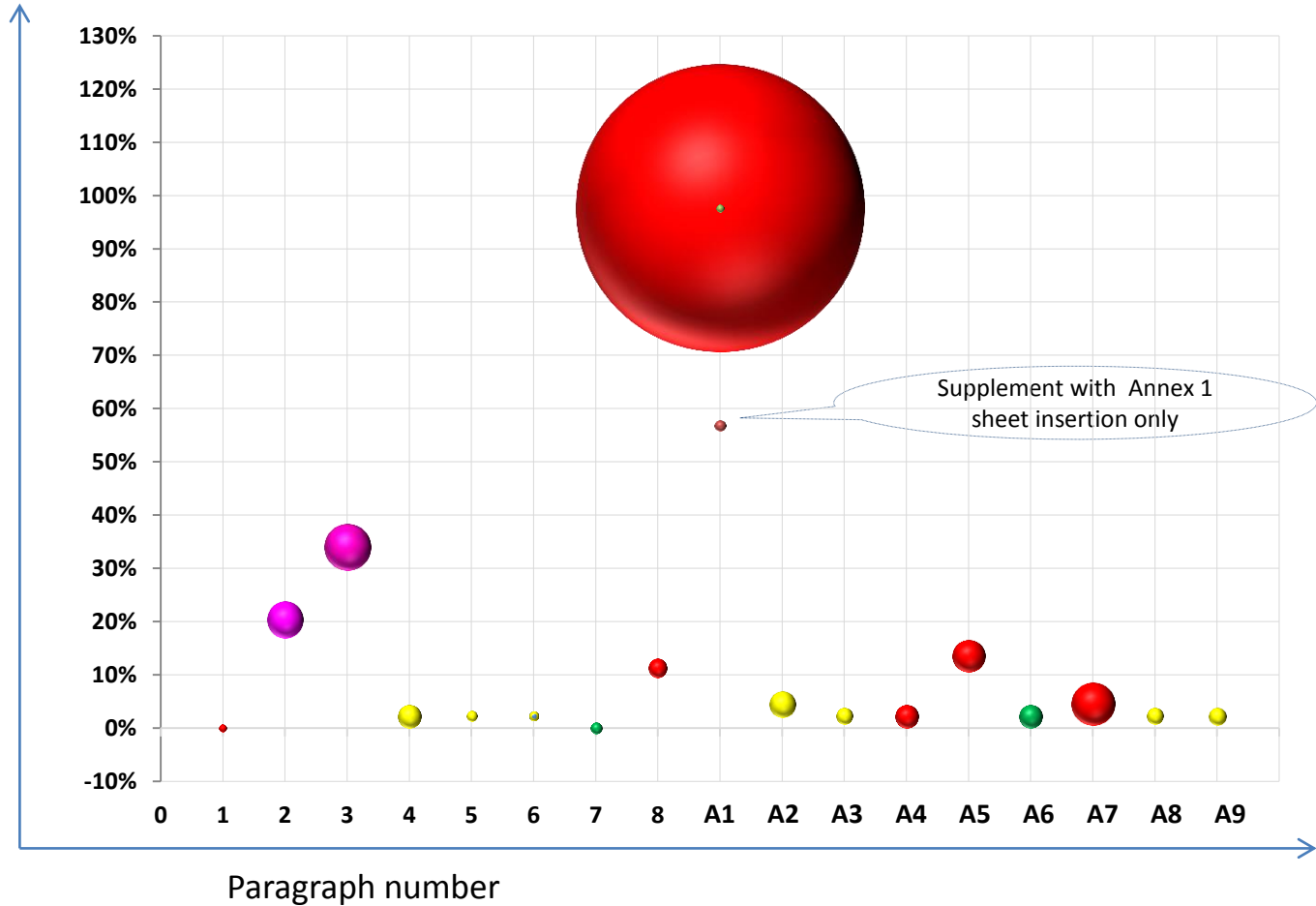
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R37

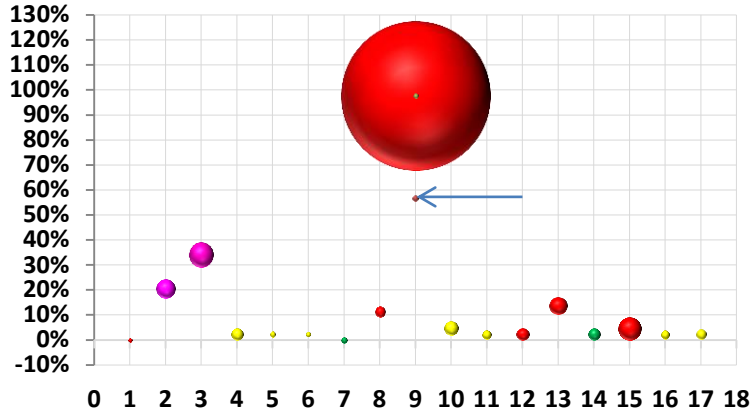
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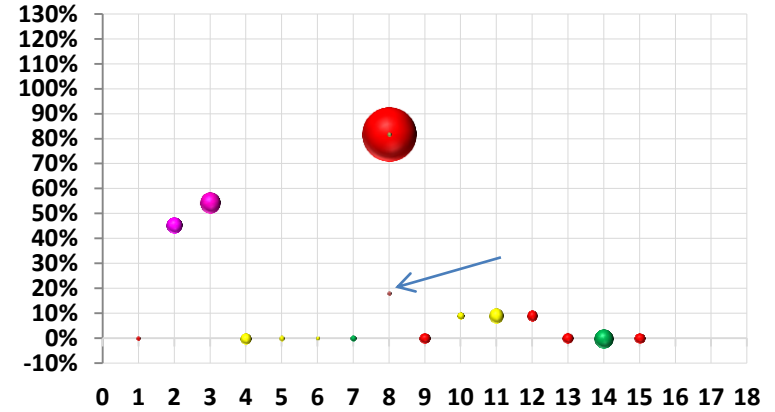
R37

03 series, 28 years



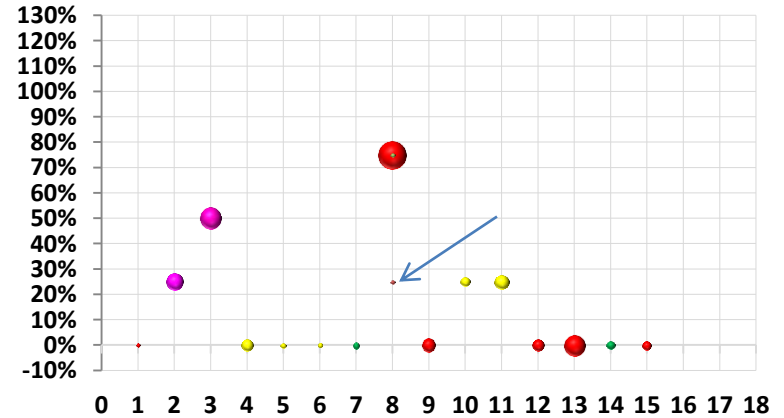
R99

original version, 18 years



R128

original version, 2 years



Axes

Vertical Percentage of supplements amending a paragraph
Horizontal Number of paragraph; Annex numbers are following paragraph numbering

Bubbles

Size is reflecting number of pages

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- ← Supplement on Annex 1 only

Summary of analysis

Light source regulations

1. Parallel amendments rarely occur (only 3 in 20 years)
2. The major part of the regulations is technical specifications and category sheets, which are necessarily technology specific and therefore quite different
3. The common text is very minor and was never changed
4. Some text could be made common but
 - a. Most parts never change
 - b. Quite some parts are necessarily (very) technology dependent
5. By far the biggest number of amendments concern annex 1: the category sheets plus some house keeping

Conclusion

Analysis

The approach for simplification of the lighting regulations to move common text to a **common place holder is not effective** for light source regulations

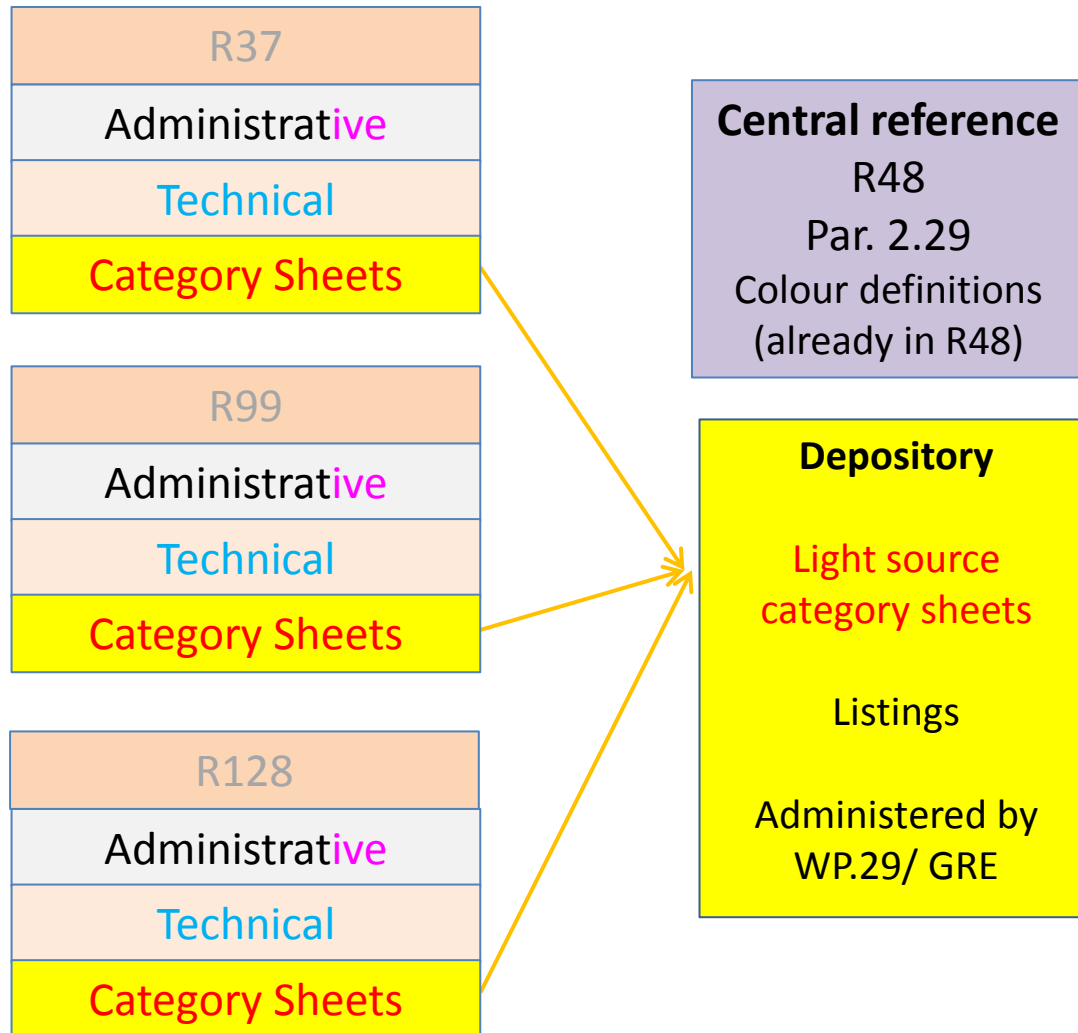
BUT

Moving light source category sheets is

Concept for simplification

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- Insert a reference from these regulations to this depository
- The regulations are not amended when *only* light source categories are inserted (or amended/ corrected/ phased out)

Concept for simplification



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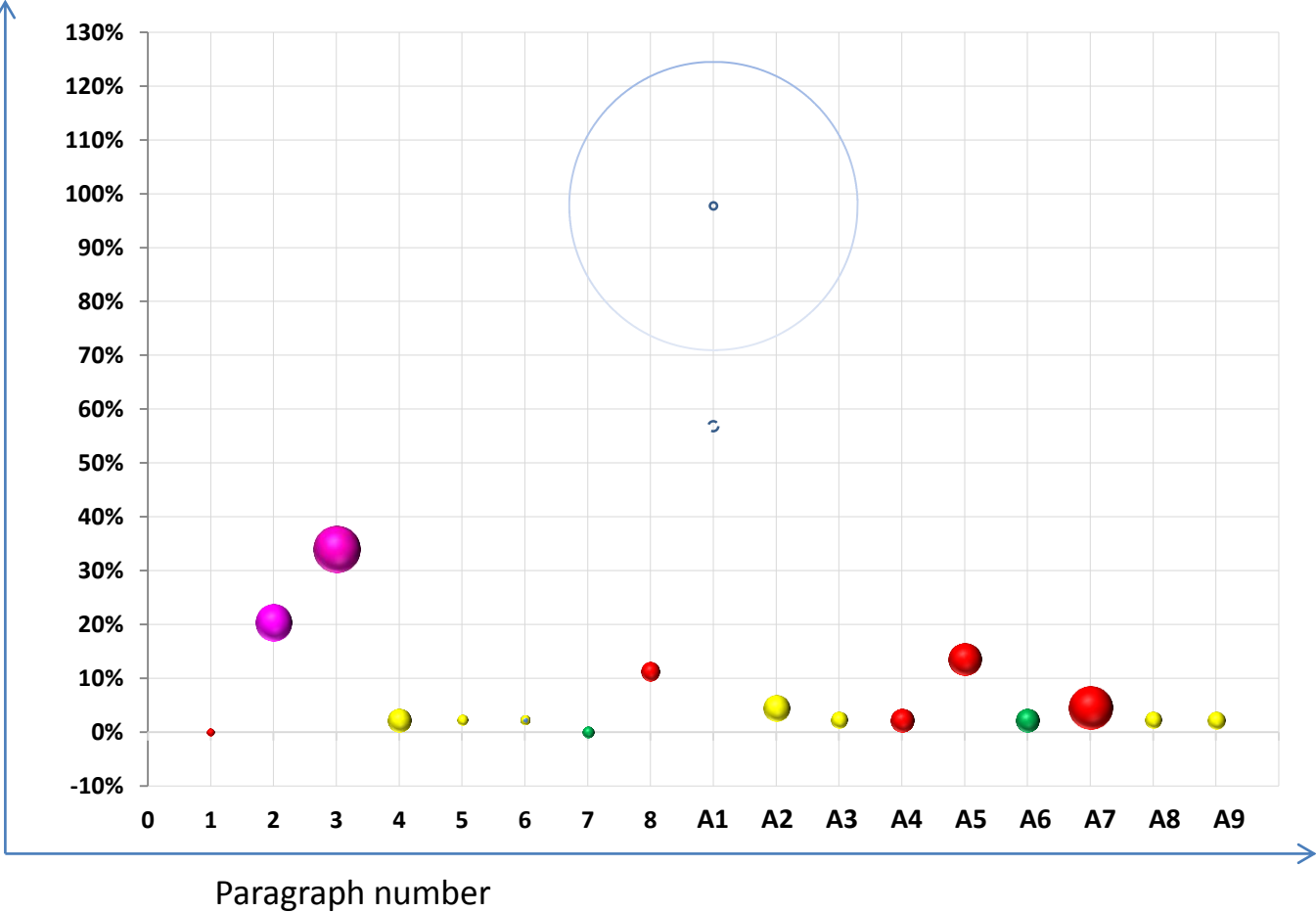
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GRE IWG SLR

Evaluation of this concept vs. Terms of Reference

- Minimize the number of parallel amendments N/A
- Reduce the number of non-frozen regulations N/A
- Define essential requirements in performance (technology neutral) terms N/A
- Reduce the administrative burden
- Reduce the burden on governments
 - Number of supplements reduction ✓
 - Process completed after WP.29 and posting in the docket ✓
- Reduce regulatory burden for industry
 - Approvals earlier due to elimination of 6 month period ✓
 - Sufficient innovation within a category ✓

Follow-up

General question

1. Is the concept of depository for light source category sheets acceptable for WP.29?
2. Can WP.29 confirm that GRE and its IWG SLR may continue working on this concept for light source regulations?

Specific questions

where WP.29 may have the preference or guidance to the IWG on SLR

3. Is OLA confirmation needed?
4. The nature of the depository?
5. The voting procedure for amendments to the depository?

END