

## **Simplification of Lighting Regulations** Special Interest Group of Experts Meeting

As agreed under agenda item 6 of the 70<sup>th</sup> session of GRE, an inaugural meeting of the Special Interest Group of Experts, chaired by Mr Kakizis of the EC, took place in Brussels on 12 February 2014. There was a participation of 20 experts representing Belgium, France, Germany, Italy, Japan, The Netherlands, Poland, UK, the GRE Chairman, CLEPA, GTB, IEC, LTIK, OICA, SAE.

A full report of the meeting is appended but the main points may be summarised as follows:

### **The Main Issues Identified**

- a) *The heavy administrative burden, for the UNECE and for the EU, associated with the continuous amendments to the regulations developed by GRE.*
- b) *The management of the complex legal implications created by the decisions of the EU and Japan to fully integrate the content of the UN regulations into their legal systems.*

The implication is that GRE is presenting proposals to WP.29 that the legal systems, particularly of the EU, are allegedly unable to manage in a timely manner. In some cases these proposals seemed to be incompatible with the legal framework of the EU. However, although many opinions are being expressed about the so called “conflict” between the EU system and the UNECE process, it has not been possible to clarify whether this is actually the case because no lawyers participated in this first meeting of the Special Interest Group of Experts.

- c) *The adaptation of the lighting and light signalling regulations to technical progress in a highly competitive market that is innovation driven.*

It is argued that the regulations are device specific instead of being based upon performance requirements but there is no clear understanding of how the regulations can be reformulated to overcome this alleged problem.

### **Proposal for a First Approach**

- a) The first priority should be given to reducing the administrative burden presented by the numerous collective amendments.  
  
To achieve this, the GRE Horizontal Reference Document (HRD) Informal group should be reactivated and its terms of reference updated. The officers, including the addition of a vice chairperson ideally from the European Commission, will be proposed at the GRE 71<sup>st</sup> session.
- b) The European Commission is allocating resources and contractors to support the HRD Informal Group, and will seek advice from its lawyers to investigate the legal implications of placing the common requirements into a reference document, such as the R.E.3 managed by WP29.
- c) This Special Interest Group should continue to meet until the HRD informal group is operational.

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# Simplification of Lighting Regulations

## Special Interest Group of Experts Meeting

Draft Report of the Inaugural Meeting - February 12<sup>th</sup> 2014  
DG Enterprise & Industry, Brussels, Belgium

This inaugural meeting of the Special Interest Group was focussed upon a free exchange of opinions having the objective of developing a roadmap to simplify the UN regulations under the responsibility of GRE. This report aims to provide a comprehensive record of the discussion and is presented in three parts. The first part attempts to define the motivation for the activity and identifies the main issues to be addressed. The second and third parts provide a detailed record of the discussion during the meeting for future reference.

### **Part A - Summary**

#### **1. Motivation**

At the March 2012 session of WP.29 the representatives of the EU and Japan identified problems of managing the lighting and light signalling regulations and their continuous amendments. Specific reference was made to the new LED light sources regulation UN R128. In addition the EU explained that there seemed to be a conflict between the UN lighting regulations and the legal procedures in the EU and, as the EU has adopted the UN regulations in their entirety as a substitute for its own provisions, it is of major importance to take urgent action to simplify and clarify the UN lighting and signalling regulations. Similarly, as Japan has amended its national legislation to accede to the UN lighting regulations it has problems with inconsistencies and the continuous amendments of the UN regulations.

The UNECE secretariat has identified problems associated with the impact upon resources to carry out the preparation of the proposed amendments for GRE and WP.29 and to then process the adopted amendments in the three languages. The EU has the challenge of administering the status of the 42 UN regulations in its 26 working languages. GTB has already signalled in its initial document to WP29 that it is experiencing problems of finding resources to support the process of having to check all versions, as due diligence for preparing amendments.

Although the above mentioned statements of the EU and Japan were presented to WP.29 their significance was not understood by many stakeholders. However, the open debate during this Special Interest Group meeting clarified the situation as summarised by Mr. Kakizis, during the meeting, as follows:

There is a need to define a road map focussed on issues where a satisfactory result for both the EU and UNECE can be achieved. GRE is accused of a lack of transparency and an inflexible attitude toward modernisation of the regulations that have been in force for more than 50 years. The EU Lisbon treaty and the EU General Safety Directive are in force and the EU is totally committed to apply the UN regulations. However, the current structure of the UN lighting regulations seems to be incompatible with the legal process of the EU and this is the main reason for the initiative of the EC to simplify the regulations. The Article 20 of the Framework Directive dealing with exemptions for new technologies or new concepts is usually focussed on legislative issues in the pipeline at the EC. A decision to grant an EU approval under the terms of this article depends upon having a basis of some legislation being developed (e.g. a proposal at GRE). At the EU level there is need to encourage a high level of competitiveness and this may require the development of new provisions. Some issues seem to not be type approval compatible and may be more suited to a self certification approach.

## 2. The Main Issues

- a) *The heavy administrative burden, for the UNECE and for the EU, associated with the continuous amendments to the regulations developed by GRE.*
- b) *The management of the complex legal implications created by the decisions of the EU and Japan to fully integrate the content of the UN regulations into their legal systems.*

The implication is that GRE is presenting proposals to WP.29 that the legal systems, particularly of the EU, are allegedly unable to manage in a timely manner. In some cases these proposals seemed to be incompatible with the legal framework of the EU. However, although many opinions are being expressed about the so called “conflict” between the EU system and the UNECE process, it has not been possible to clarify whether this is actually the case because no lawyers participated in this first meeting of the Special Interest Group of Experts.

- c) *The adaptation of the lighting and light signalling regulations to technical progress in a highly competitive market that is innovation driven.*

It is argued that the regulations are device specific instead of being based upon performance requirements but there is no clear understanding of how the regulations can be reformulated to overcome this alleged problem.

## 3. Conclusion and Agreement for a First Approach

- a) The first priority is to reduce the administrative burden presented by the numerous collective amendments.  
To achieve this, the GRE Horizontal Reference Document (HRD) Informal group should be reactivated and its terms of reference should be updated.
- b) A presentation of the initial conclusions of this Special Interest Group, with the plans of the European Commission to allocate resources and contractors, will be prepared for GRE-71 along with a short-term action plan and an overview of the legal implications.
- c) It will be necessary to re-confirm the officers of the reactivated HRD informal group including a vice chairperson, ideally, from the European Commission.
- d) This Special Interest Group should continue to meet until GRE decides how the activity should proceed.

## 4. Agreed Actions

1	Consult the legal officers of the European Commission to have their advice whether R.E.3. is the appropriate place for common contents of the existing lighting regulations while regulations would refer to it.	N Kakizis	21 March 2014
2	Re-confirm the officers of the reactivated HRD informal group including a vice chairperson, ideally, from the European Commission	C Pichon / N Kakizis / G Draper	
3	Prepare a presentation of the initial conclusions of this Special Interest Group, with the plans of the European Commission to allocate resources and contractors, will be prepared for GRE-71 along with a short-term action plan and an overview of the legal implications.  This should also include references to the documents previously developed by the GRE –HRD Informal Group and the original proposal from France.	N Kakizis / G Draper	
4	The expert from the UK is invited to provide a copy of the spreadsheet being developed to identify the common parts of the regulations that could be transferred to the HRD	C Rees	

## Part B - Agenda

1. 10:30 hrs - Welcome and opening remarks
  - Opening remarks by host (EC)
  - Logistical information
2. Introduction of participants and organizations
  - Adoption of the agenda
  - User Requirements & Expectations
  - Stakeholder Associations
  - Member States/Contracting Parties/ EU Commission
5. Identifying the problem
  - Proposals & Approach Methodologies
  - Discussion and brainstorming among the participants
6. Elaborating on the EU Commission proposals
  - Multi-Phase Approach and Resources available (Document GRE-69-14 as the basis for discussion)
  - Other tools and means of making progress
  - Discussion & Feedback
7. Future Steps & Interaction with GRE required
  - Preparation of an Informal document for the 71st Session of GRE
  - Other necessary actions
8. A Special Interest Group or an Informal Working Group
  - Setting-up the framework of cooperation
  - Drafting of Terms of Reference (optional)
9. Election of Officials and appointment of working teams
10. A.O.B.
11. Preparation of next meeting and allocation of drafting resources
12. 16:30 hrs – Adjourn

## **Part C - Report**

### **1. Welcome and opening remarks**

Mrs. Barbara Bonvissuto (Deputy Head of Unit, Sustainable Mobility and Automotive Industry, European Commission, DG Enterprise and Industry) opened the meeting and welcomed the participants. She explained the need to make the UN regulations more attractive to emerging countries and also stressed the importance of approaching harmonization with the USA in a different way in the context of the trade agreements between the EU and the USA. This work includes the urgent need to review how regulations of lighting and light signalling should be addressed in the future.

Mr Kakizis (European Commission - Chairman of the Special Interest Group) explained that the output of GRE is not adequately aligned to the procedures and objectives of the EU. The EU has already made it clear at WP.29 that it is time to review the activities of GRE and its approach to lighting and light-signalling regulation. A proposal from the EU was presented to GRE at its April 2013 session. This was not intended to be a binding proposal but presented a long term vision as a first approach to provoke a discussion. The Special Interest Group has been launched and this first meeting was planned to be a brainstorm and an opportunity for the EC to explain initiatives it is launching.

## 2. Participants and Organizations

The list of participants is appended

## 3. Adoption of the agenda

The agenda was adopted without amendment but as the discussion progressed it became evident that items 4 and 5 could not easily be separated.

## 4. Statements, Requirements & Expectations

Mrs. Rees (UK) explained that the UK Department for Transport is the champion of better regulation. Currently the lighting regulations create much work for lawyers because GRE produces many more amendments than other GR's. The UK has ideas on how to progress, such as making a small group of regulations where much harmonization of the requirements is possible. Type Approval markings may present issues. The UK is prepared to share these ideas.

Mr Kakizis explained that the EU Commission has identified the same problems already described by the UK. For the EU they become a burden for the Technical Committee and the Working groups that have to be consulted prior to going to the European Council for the Mega Decision. This EU process results in an established position very close to the WP.29 session and there is no time for taking action if concerns emerge.

Mr Draper (GTB) commented that GTB submitted an informal document to WP.29 in June 2012 in response to the initiative of the EU and Japan at the March 2012 session of WP.29. This document attempted to identify some of the factors contributing to the complexity of the regulations, and to the associated administrative burden. At the same time GTB declared that it had initiated a feasibility study to evaluate ideas for simplifying the regulations by combining them, placing the common parts into a reference document and introducing a performance based approach. The outcome of the GTB feasibility study has been published as a "position paper". The conclusion is that the collective amendments, mainly introducing clarifications to the text, revisions to test procedures, and resolving interpretation issues are creating the main problem. With regard to merging/grouping regulations, as was GTB's initial suggestion in WP.29, GTB now believes this should be addressed later, as this is a lot of work and requires a deep-dive into detailed technical provisions.

Mr Gorzkowski (GRE Chair) agreed with the GTB opinion that concentrating on the collective amendments would be a good start. He urged the NGO's at GRE to take a more radical approach and to "think outside of the box". The transfer of common provisions to an "R.E.3 type document" could be a good approach.

Mr De Visser (IEC) stated that the IEC is involved in light source regulations; these are technology dependent, and it makes no sense to attempt to merge them. On this point Mr. Gorzkowski agreed that light sources are important and would be the only devices that should not be performance oriented. There are complaints at WP.29 level that it is not acceptable to have a regulation that resembles a catalogue but well-defined light sources are important to allow safe interchangeability.

Mr De Visser continued by pointing out that the IEC does not object to simplification, but it does not see the benefit of creating a new regulation when the old regulations remain in force. The process of having to check all versions, as due diligence for preparing an amendment, is also a lot of work for submitters of proposals for amendment. The IEC supports the GTB position. As a short-term measure to reduce the workload perhaps it would be reasonable to define a period prior to the meeting where no documents, even if informal, can be submitted. In summary, the IEC is of the opinion that a regulatory system should not be redesigned because of problems in "the way of working". It is very concerned about changing the UN regulatory system at a time when the UN is trying to make it more attractive for new CP's while in most areas of the world countries have already adopted, de facto, the regulations by adopting the UN technical requirements. Any such change in the UN system would cause confusion and discourage increased harmonisation.

Mr Goldbach (OICA) stated that solutions are required to solve the administrative issues but it is important to not forget the users of these regulations who refer to them on a daily basis. The ECE system is able to introduce safety systems quickly into the market. Other regulatory systems are far less flexible and it can be very difficult to adapt to innovation.

Mr Kakizis confirmed that the European Commission endorses the importance of technological progress; it is the reason why the EU has adopted the ECE system. The European Commission wants to encourage GRE to concentrate only upon the technical aspects of Regulation. Sometimes the technical decisions dictate policy. i.e. the technical proposals require a response from the EU but the EU may have policies that are contrary. Mr

Rovers (Netherlands) referred to the “Mega Decision”. He commented that the lack of available time for the EU to develop a position on a proposal for amendment has always been an issue but, in the past, decisions could be taken at TCMV level. With the implementation of the Lisbon Treaty the process time has become much longer but this factor is outside the scope of GRE and the UN. Concerning issues of workload it makes sense to focus on the collective amendments. They create a burden as they have to be distributed in three languages for the UN system whilst, for the EU, they have to be distributed into 26 languages. The NL agrees that common parts can be put into an “R.E.3 type” document but cannot agree that grouping regulations will work because scopes can be mixed etc. Grouping regulations will actually generate more regulations. Regarding the approach to light source standardisation and replacement there is a need to avoid “one-off” solutions by individual manufacturers where replacement would be cumbersome for end-users having to go to dedicated service shops. It should be remembered that tyres are also standardized but there are no complaints about their regulation

Dr Manz (LTIK) fully supported the NL position and pointed out that the number of regulations existing is due to a WP.29 philosophy established long before the establishment of GRE. It should not be forgotten that the “Article 20 procedure” has nothing to do with the ECE system. If the EU has a problem of insufficient time it should be questioned why the EC does not follow the discussions in GRE that are developed over several sessions. Dr Manz stressed that here is no feedback from the EC that is not helpful. He considered that a problem statement should be developed; the UK has identified the need to reduce the workload but the UN system is based upon a very old decision so maybe it is now time to find a way to improve the process.

Mr. Gorzkowski identified an issue where CP’s not attending or contributing to GRE are going directly to the EC and blocking proposals at that level without understanding the background. GRE has to develop the regulations to accommodate emerging technologies and the challenge is to amend the regulations to avoid being design specific. Most of the existing regulations were based upon the technology of the time but now the text does not function in the context of technology that is emerging. Innovation in lighting technology is exploding and there is a need to adapt the text of the regulation accordingly. In the case of headlamps, for example, it may be appropriate to consider a different approach because the requirements in the individual regulations may not be consistent with the requirements on the road. Some consolidation may be required, but this should only be done after careful consideration.

Mr Kakizis summarised that the foregoing discussion indicated the need to define a road map focussed on issues where a satisfactory result for both the EU and UNECE can be achieved. GRE is accused of a lack of transparency and an inflexible attitude toward modernisation of the regulations that have been in force for more than 50 years. The EU Lisbon treaty, the EU General Safety Regulation (No. 661/2009) and the Framework Directive are in force and the EU is totally committed to apply the UN regulations. However, the current structure of the UN lighting regulations seems to be incompatible with the legal process of the EU and this is the main reason for the initiative of the EC to simplify the regulations. The Article 20 of the Framework Directive dealing with exemptions for new technologies or new concepts is usually focussed on legislative issues in the pipeline at the EC. A decision to grant an EU approval under the terms of this article depends upon having a basis of some legislation being developed (e.g. a proposal at GRE). It is important to avoid two different approaches by two different EU states. At the EU level there is need to encourage a high level of competitiveness and this may require the development of new provisions. Some issues seem not to be type approval compatible and are more suited to a self certification approach. Technical persons have difficulty to draft legally acceptable texts and the question associated with the replaceability of light sources is a particular case. The recent proposals submitted to WP.29 by GRE are good examples of provisions that seem to be in conflict with the EU legal process.

Returning to the subject of collective amendments, Mr Rovers recalled that GRE has attempted to introduce common provisions across many device regulations but with time the details in the individual regulations have diverged. Putting the common requirements into a single document is a logical solution and this, in fact, has already been done for the requirements/definitions of colours in the lighting Regulations, which are now centralized in Regulation No. 48 and has proven to have been a successful test case.

Mr Kellermann (Germany) expressed the need to put structure into the discussions. He considered that there is a general agreement to avoid collective amendments by using a “Horizontal Reference Document (HRD) and there is a task for the legal services of the EU to advise how to proceed; should it be in R.E.3 / a separate regulation etc.?

On the subject of the number of lighting regulations, Mr Laurent (CLEPA) compared lighting problems with braking problems. He commented that R13 is a huge book full of annexes but is unmanageable. GRRF has decided to split R13 and create a set of new regulations by extracting sections from R13, e.g. advanced braking, lane departure warning. It is argued that Lighting is the subject of too many regulations whilst more regulations are being created for braking. The problem is at GR level and a decision needs to be taken about whether the GR's should work within the Lisbon treaty or in the ECE system!

Mr Gorzkowski referred to the previous comment from Mr Kellermann and agreed that the HRD approach should be reconsidered. He argued that the HRD approach should be considered in the context of IWVTA and "Regulation 0" where there could be much reluctance to introduce a new regulation with numerous series of amendments.

Mrs. Rees agreed that common parts can be taken out of the individual regulations but was not sure that the R.E.3 has an appropriate legal standing. The UK advocates a radical re-think of the process and is generally against creating new regulations but it may be the only way forward and new regulations may attract new contracting parties. Mrs. Rees commented that currently we are experiencing administrative and technical problems and it is necessary to determine how these can be resolved. It could be that some innovations may not require regulation.

Mr Genone (Italy) supported the proposal to group the technical requirements but questioned who will actually do the work and how would we ensure that the result would match the EU and ECE requirements. He considered that GRE can manage the technical aspects but it is not clear who can manage the legal aspects. Technical innovation is discussed until new technology is acceptable for all and then the regulation is developed to allow use in the market. Currently the system is compromised because a decision to allow use in the market is taken by an administration before the technical discussion has been undertaken; there is clearly a need to follow the correct procedure that is already in place.

Mr Goldbach reiterated that it will be necessary to carefully manage how the HRD can exist alongside a regulation. Collective amendments would be avoided but there would still be requirements to introduce amendments. Lighting is a special subject as it is necessary to regulate and type approve light sources, devices using light sources are regulated and approved and then the installation is approved. The common business of industry is to innovate but there is a lack of agreement between the approval authorities on how this should be managed. Mr Kakizis fully agreed that an approach to avoid restricting innovation is required.

Mr Rovers pointed out that new technologies are always about "working on thin ice" and finding a compromise between the need to innovate for commercial advantage and the need to introduce timely regulatory provisions. The immediate need is to concentrate on collective amendments so we should work on a draft HRD and then test where it stands legally. It will also be necessary to understand what is actually meant by "performance based".

Mr Kakizis returned to the proposal to put the "Horizontal Requirements" in the R.E.3 document and he stated that the EC considers that R.E.3 is not legally binding and therefore legal advice is required. Mr Rovers considered that that the R.E.3 is already de-facto a legal requirement as there is a reference to the R.E.3 in the scope of each regulation.

Mr Pichon remarked that "we are technicians not lawyers" and the recent rejection of 17 documents at WP.29 by the EU means a waste of time for GRE experts. It is necessary to define performance requirements that are not light source specific and to question why minimum luminous flux requirement for LED's are included in the regulations; this is clearly restrictive for industry.

Mr Kellermann considered that our work could be reduced by only having the newest series of amendments in force but currently GRE continues to introduce requirements into the earlier series. Mr Pichon reminded the group that other GR's are also operating with several series of amendments in force without complaints.

Mr Gorzkowski proposed to reactivate the HRD informal group in GRE and to concentrate on the performance of the final product. He referred to the UK proposal introduced some years ago at WP.29 to deal with disputes. Mr Pichon, who chaired the HRD informal group until its activity was suspended, commented that there had been no support from the CP's. Mr Draper, who was acting as the HRD group secretary confirmed this but hoped that this time the CP's would actively support the reactivation of the informal group.

Dr Manz strongly supported the reactivation of the HRD informal group but pointed out that if the R.E.3 document is used there would be a need for a "dynamic reference" to this document in each relevant regulation.

Mr Kakizis believed that if the paragraph number remains the same a floating reference is possible in R.E.3 and this should be legally acceptable; this is the approach adopted in ISO standards. Mr Goldbach returned to the need to seek the opinion of the lawyers in the UN and UNECE to confirm the legal status of the R.E.3 and he also emphasised the point made by Mr Genone that resources will have to be found to actually do the work to move the common requirements out of the individual regulations and into the common document.

At this point Mr Kakizis explained that the EC is proposing a multi-step approach that would include the agreement of what to provide a contractor as feedback from this group and the determination of how the HRD should be drafted. Mr Goldbach re-emphasised the importance of asking the lawyers to tell us how we can proceed. We must avoid a result where there would be two pieces of legislation to satisfy. Mr Rovers proposed that the proposal in GRE/2008/32 is used as a guide to the contractor. The NL did not support the initial approach in this proposal (i.e. drafting a new Regulation) because of doubts about the legal standing so it will firstly be important to resolve this issue.

In an attempt to reach some conclusions, Mr Kakizis summarized that it would be necessary to identify common parts of regulations such as administrative provisions, COP provisions, Testing procedures, probably grouped for forward lighting / signalling etc. He reported that the EC is planning to award contracts for a feasibility study and for the detailed drafting work and as input from the lawyers would be a prerequisite he will send letters to request this.

Mr Gorzkowski commented upon the need to harmonise the COP provisions of the EU with the ECE provisions. He pointed out that COP is administrative and not technical and that there are incompatibilities between the UNECE and the EU policies that recently resulted in the rejection of the GRE collective amendment.

Dr Manz emphasised the importance of agreeing the way forward from the beginning and to clearly understand how the HRD and the individual regulations will interact. Mr Rovers considered that the use of dynamic references will be an important aspect.

Mr Gorzkowski was concerned that if we wait for a decision from the EU lawyers and then hope to get acceptance from other contracting parties outside of the EU we will lose much time. He also mentioned that we should take care to avoid conflicts with the IWVTA and Regulation 0 developments at WP.29. Mr Kakizis considered that we should not confuse the objectives of the Regulation 0 with this work to simplify the regulations because the Regulation 0 only contains references to a collection of regulations

Mr de Visser reminded the group that confirmation should be sought from the EU and the UN regarding the acceptability of the HRD approach as GRE is a UN working group. Mr Plathner (IEC) questioned what would be the implications upon an existing type approval if a change is made to provisions in the HRD and he considered that it would be necessary to refer to a particular state of the HRD if there is a dynamic reference with a particular regulation.

Mr Kakizis advised to start slowly and, as a first step, try to develop a test case incorporating requirements that will be applicable to all regulations. The results of this test case could have an influence for the other GR's.

Mr Gorzkowski proposed to start by referring to the previous work of GRE and referred to the original initiative of France (GRE/2008/32) and the informal documents GRE-66-13 and 14.

Mr Goldbach cautioned about the need to take care and to plan the feasibility study bearing in mind the implications of the work upon "big business".

Dr Manz reiterated the importance of confirming the legality of the HRD and Mr Kellermann agreed but pointed out that this was outside the capabilities of this group. Mr Draper expressed his view that the first priority should be to obtain legal advice from the UN as the R.E.3 is referenced in the UN regulations of the 1958 agreement. Mr Kakizis explained that the UNECE Secretariat had agreed to consider a HRD as an annex to R.E.3 or a new RE but agreed that a confirmation of the legality is required. He suggested that the creating of an example R.E.3 annex based upon one of the collective amendments could be considered to provide a test case for consideration of the lawyers but the structure of this annex must be carefully defined. He also expressed concerns that R.E.3 could become too large and it may be preferable to create a new RE(x) document. Mr Gorzkowski remarked that care should also be taken because in the past GRE removed annexes from R.E.3 because they were obsolete in relation to the provisions in the individual regulations and now we are considering the opposite action. In response, Mr Genone observed that GRE decided to remove the



requirements in the R.E.3 because there was duplication but if the HRD is launched the approach will be acceptable.

Mr Kellermann questioned who will undertake the EU study and Mr Kakizis confirmed that it will be via a contract with a consultant as part of the framework funding project. This could take 6 months to establish.

Mr Gorzkowski commented that we must not overlook the needs of the CP's to the 1958 agreement that are not part of the EU.

Mr Goldbach emphasised the need to identify resources that have the essential experience and the necessary funding is more important than actually establishing an informal group. The importance is also to clearly separate the problems for the EU, now that it has fully committed to adopt the UN Regulations, and the need to review the approach to the technical issues.

In conclusion Mr Kakizis summarised the outcome of the discussion as follows:

- a) The GRE HRD informal group should be reactivated and its terms of reference should be updated as appropriate.
- b) At the suggestion of Mr Goldbach a presentation of the initial conclusions of this SIG would be prepared for GRE-71 along with a short-term action plan and an overview of the legal implications. Mr Kakizis asked the SIG members to provide their views of the conclusions of this meeting to facilitate the formulation of the presentation to GRE. Mr Goldbach advised that GRE should not be overloaded with too much detail at the first presentation. Mr Kellermann suggested including references to earlier GRE documents and the terms of reference of the HRD informal group on the GRE-71 agenda. Mr Pichon reminded the group that whilst it is a good idea to include the earlier work of France (Mme. Bonneau) it should not be forgotten that this only related to signalling regulations and it will be necessary to develop similar proposals for forward lighting regulations.
- c) Mrs. Rees will provide a copy of the spreadsheet being developed by the UK to identify the common parts of the regulations that could be transferred to the HRD.
- d) The consensus of this SIG was to reactivate the GRE HRD informal group to manage the topic and to engage a consultant provided by the EC to carry out the editorial work. The feasibility of this approach will have to be confirmed. Mr Laurent clearly stated that CLEPA is only prepared to devote time and resource to this issue if there is a commitment from the CP's to actively participate. It was agreed that as a first step the development of the HRD will concentrate on the signalling regulations.
- e) It will be necessary to re-confirm the officers of the restarted HRD informal group. Mr Pichon undertook to discuss his position as Chairman with the French Administration and Mr Draper confirmed his willingness to act as secretary. At the suggestion of Mr Goldbach it was also agreed to consider the nomination of a Vice Chairperson and Mr Kakizis was invited to confirm his availability for the role. Mr Kakizis commented that this should be possible due to the emphasis placed by the EC upon the need to find a solution to the simplification of the lighting regulations.
- f) It is necessary to consult the legal officers of the European Commission to have their advice whether R.E.3. is the appropriate place for common contents of the existing lighting regulations while regulations would refer to it.
- g) It was agreed that this SIG should continue to meet until GRE decides how the activity should proceed.
- h) Mr Kakizis, along with the secretary of the SIG, will prepare the draft presentation to GRE, by 21 March 2014, along with the plans of the EC concerning allocation of resources and contractors.

## Participants

De Visser	Ad	IEC
Draper	Geoffrey	GTB - ( Secretary)
Genone	Valter	Italy
Goldbach	Thomas	OICA
Gorzowski	Marcin	GRE Chairman
Kakizis	Nickolas	EC –(Chairman)
Kellermann	Gerd	Germany
Laurent	Pierre	CLEPA
Leveratto	Daniela	OICA
Loccufier	Michel	Belgium
Manz	Karl	LTIK Germany
Pichon	Christian	France
Plathner	Philipp	IEC
Rees	Claire	United Kingdom
Rovers	Derwin	The Netherlands
Sanchez	Gregory	OICA
Targosiński	Tomasz	Poland
Terburg	Bart	SAE
Tsukada	Yuki	Japan
Vercammen	Thomas	IMMA