Transmitted by IWG SLR

Informal document GRE-73-23 (73rd GRE, 14-17 April 2015, agenda item 4)

Simplification of Regulations Light Sources Regulations Nos. 37, 99, 128

Clarification 13 April 2015

GRE IWG SLR Informal Working Group Simplification of Lighting Regulations

GRE-IWG-SLR

2nd Meeting 23 October 2014

• Analysis and proposed strategy SLR-02-02

Similar structure

Light source regulations

Scope

Administrative provisions

Technical requirements

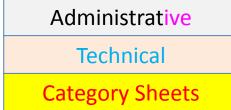
Conformity of production

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



Analysis amendments Statistics

Bubbles

Extract from WP29-164-18

Size	Colour	
Reflects number	Green	Common text shared between light source regulations
of pages per	Yellow	Common text with minor technology related lines
paragraph/	Purple	Common text with frequent technology related lines
annex	Red	Totally different paragraphs

R37

130% 120% 110% 100% 90% 80% 70% Supplement with Annex 1 60% sheet insertion only 50% 40% 30% 20% 10% 0% -10% A7 A8 A9 A2 A3 A4 A5 A6 A1 0 1 2 3 4 5 6 7 8

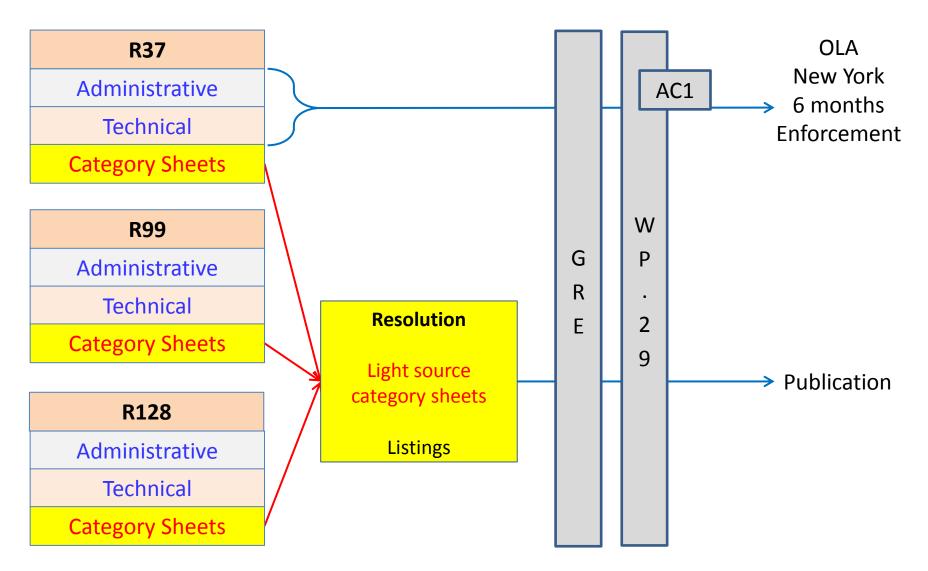
Percentage of supplements amending a paragraph/annex

R37 03 series In effect for 28 years 44 Supplements

Paragraph number

 \geq

Concept for simplification



GRE-IWG-SLR

2nd Meeting 23 October 2014

• Report SLR-02-08, item 5

"Conclusion: the meeting agreed that the separation of the datasheet is acceptable and the preference of the group is to develop a separate resolution. A presentation to WP.29 in November 2014 will be prepared by IEC and made by the IWG Chairman with the aim to get some feedback."

WP.29

Session 164, 11-14 November 2014

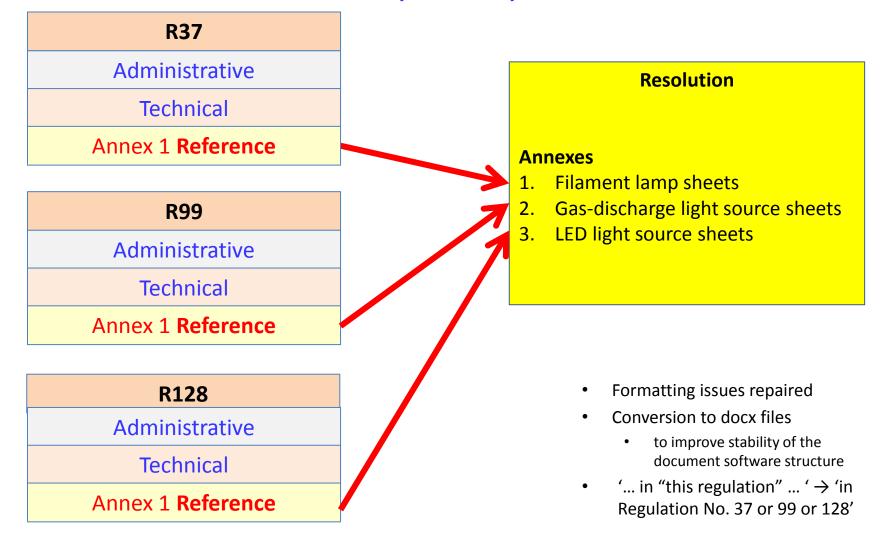
- Agenda item 3.6.4.
- Analysis and way forward WP29-164-18
- Report WP29-2014-1112, par. 42, as part of GRE chair report

".....For the purposes of simplification and in line with the ideas of SLR, the expert from IEC proposed to separate data sheets for various light sources from Annex 1 to UN Regulations Nos. 37, 99 and 128 and to place them in a repository document administered by WP.29 (WP.29-164-18). WP.29 endorsed the proposed approach. "

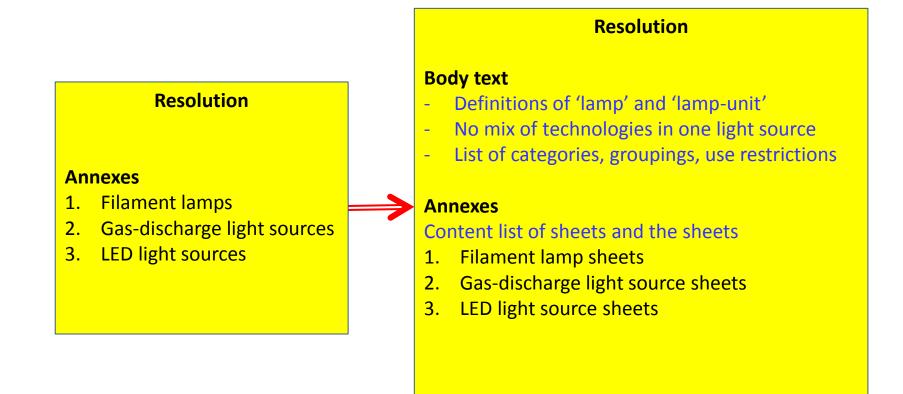
STEP 0 Consolidation

- LS simplification is planned for GRE74 (Oct 2015)
- Suppose all GRE proposals from before pass WP.29
- > The simplification proposal will contain:
 - Proposals already adopted by GRE72
 - Proposals to GRE73 after adoption in April 2015
- GRE74 adopted proposals may arrive in parallel to WP.29
 - Should be part of the simplification proposal
 Can be clarified in the justification
 - Alternatively may be submitted in parallel to WP.29
 Will create more GRE documents to WP.29

STEP 1 Keep it simple



STEP 2 Rationalising



Resolution formatting

Feedback from GRE secretariat

- Title
 - Depending on whether a GTR is foreseen
- Preamble, Introduction, Scope
 - Secretariat provided feedback
- Identification code, numbering
 - ECE/TRANS/WP.29/11XX (/Rev.1, 2 etc.)
- Language
 - GRE and WP.29 should decide on whether translations in French and Russian are necessary since there is not much text

Resolution formatting

Feedback from GRE secretariat

- Versions:
 - Status table in a form similar to the cover page of a revised Regulation containing the history
 - No amendments, only revisions
 - Immediately available from the moment of publication
- Approach with dynamic reference
 - Proposal seems ok
 - To be decided by the contracting parties
 - Proposals for amendments are adopted by more or less the same body (AC.1/WP.29) so static preference might be overruled

Resolution formatting

Resolution		Body text
Body text		- Preamble
- Definitions of 'lamp' and 'lamp-unit'		- Introduction
 No mix of technologies in one light source 		- Scope
 List of categories, groupings, use restrictions 		 Definitions and general specifications
		 'Lamp' and 'lamp-unit'
Annexes Content list of sheets and the sheets 1. Filament lamp sheets		 No mix of technologies in one light
		source
		- List of categories, groupings, use restrictions
2. Gas-discharge light source sheets		
3. LED light source sheets		Annexes
		Content list of sheets and the sheets
		1. Filament lamp sheets

2. Gas-discharge light source sheets

Resolution

3. LED light source sheets

Improving consistency

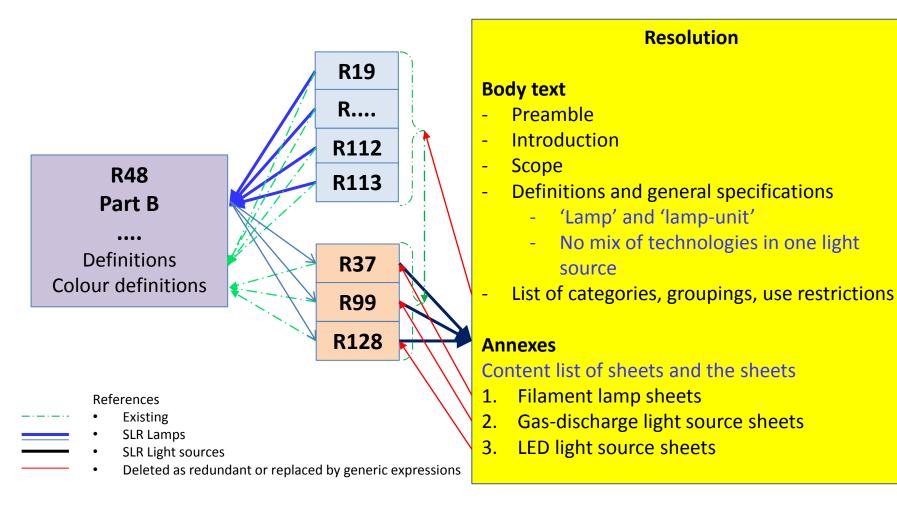
- Title and scope of light source regulations
- Groupings of light source categories

STEP 3.3

Reducing references, removing redundancies

- Simplifying the use
- Maintenance purposes
- Information technology rules
- Keeping the Resolution "neutral" (see steps 4,5)

Reducing references



Applicable for GTR under 98 Agreement

WP.29, AC.1 to decide on a mutual resolution (58 plus 98 agreement)

Light source category sheets do not specify

- "Type approval"*
- "Conformity of production"

* A few " approvals" could be removed

Applicable for GTR under 98 Agreement

Conclusion

- This Resolution can be adapted for reference by a GTR under the 98 agreement, if
 - it is noted that this Resolution contains values for standard (high accuracy) and production light sources
 - references to UN regulations are replaced by equivalent technical provisions

However, a GTR may not be expected soon

Independent from 58 and 98 agreement

There are references already from

- IEC 60809
- SAE J2009, SAE J2560 and SAE J573
- CMVSS108.1

The Resolution might be attractive to e/g USA for reference from their own system and replacing part 564

Done:

- References from the Resolution were replaced
- > Preamble, introduction were rewritten.

Clean-up and review

Outcome was sent to GRE-IWG-SLR 4th meeting:

SLR-04-05e - IEC - R37 SLR-04-06e - IEC - R99 SLR-04-07e - IEC - R128 SLR-04-08e - IEC - Draft new resolution SLR-04-09e - IEC - List of amendments SLR-04-10e - IEC - clarification

Next steps

- Feedback by email
- Teleconference 4th June 2015 (tentative date)
- Formal proposal before the deadline of GRE74

PROCESSING PROPOSALS

Example	Light sourc	e category	Process
Proposals	General requirements	Category specific requirements	
Extension of the approval code	X		Amendment of Regulation
Introduction of a new category		Х	Revision of the Depository
Two independent proposals in the same GRE session	x	x	Separate processes: 1. Amendment of Regulation 2. Revision of the Depository
Introduction of a new family of categories related and test requirements	X	X	Publication of the Revision of Depository should wait until the amendment of the related regulation enters into force

END