

## DRAFT REPORT OF THE 43<sup>rd</sup> SESSION OF THE IWG ON DETA

Date: Thursday 3 March 2022  
Venue: abbreviated virtual meeting  
Chairperson: Sven Paeslack, KBA, Germany (sven.paeslack@kba.de)  
Secretariat: Tim Guiting, RDW, The Netherlands (tguiting@rdw.nl)

### Agenda

1. Adoption of the provisional agenda.
2. Approval of the draft minutes of the IWG on DETA 42nd session.
3. State of play.
4. Widening of the scope of DETA.
5. State of play on the UI presentations to the GRs.
6. Proposal for a Q&A on UI.
7. Follow-up ETRTO's proposal for partitioning of documents and file names in DETA.
8. Report to WP.29.
9. AOB.
10. Next meetings.

During his opening statement, the Chair welcomed new delegates to the IWG.

#### 1. Adoption of the provisional agenda.

Document DETA-43-01e rev2. The agenda was adopted.

#### 2. Approval of the draft minutes of the IWG on DETA 42nd session.

Document DETA-43-02e rev2. The Secretary explained the amendments incorporated in revision 2 of the draft minutes. The draft minutes were approved.

#### 3. State of play.

The Chair laid out the current state of play, noting that fifteen authorities uploaded in total 17,300 approvals and thirty-four contracting parties notified a focal point to access the system. About 5,600 manufacturers are uploaded and thirteen manufacturers have access to their own approvals in DETA. The Chair then informed the IWG that WP.29 at its November session was informed about the state of play. He added that WP.29 discussed the potential extensions of DETA, including storing of the scenarios catalogue for automated vehicles, and explained the various opinions that had been shared.

He indicated that WP.29 will consider the proposal (DETA-42-04e/WP.29-184-13) for amending the 'specifications and application guideline for the Unique Identifier (UI) module' with an official symbol at its March session. The Secretary added that no working document had been submitted yet as there was still discussion about the wording. The IWG then reviewed the proposed amendments from the UNECE secretariat and provisionally agreed to: *"For the purpose of Unique Identifier, a product is a physical object, or a group of physical objects consisting of one or more approved systems, components, equipment or parts and is identified by a unique combination of Section 1, Section 3 and the UN Regulation number contained in Section 2 of the type approval number(s) (as defined in Schedule 4 of the 1958 Agreement) as is typically for lamp units."* This is pending objections from IWG delegates received by mail mid next day. As this proposal would affect the software development of the UI tool, the IWG sensed some urgency in getting it endorsed by WP.29 in March and the representative of the UNECE secretariat explained he would take the necessary steps in order to have it considered in time.

Concerning the UI, the Chair updated the IWG that the German KBA discussed the draft contract with the sponsors and the contract is currently under review within KBA. Once signed (expected in March or April), the functionality will be ordered at the software house.

The Chair then informed the IWG on the technical developments as regards:

- mass upload-functionality: the implementation and testing could start later this month. After successful implementation, the type approval authorities will be invited to adapt their electronic data processing

systems to implement this functionality, which will help the automated uploading of all the granted type approvals;

- system security: the request for a quotation for a free-OTP type two-factor authentication is currently under review at the KBA. KBA will contact the software house about an offer soon.

On financing of the DETA system itself by UNECE, no new information was available.

#### **4. Widening of the scope of DETA.**

The Chair recalled the discussions at the previous IWG session regarding broadening of the scope. He explained that the intention is to make DETA more attractive to also the CPs to the 1998 and 1997 Agreements. At the same time, not much input had been received from those CPs.

The representative from the Russian Federation suggested considering to share information on Cyber Security (CS) with also 1998 Agreement CPs, as requested by China in GRVA. The representative of the UNECE secretariat, Secretary to GRVA, explained that “GRVA workshop on the implementation of UN Regulation No. 155” co-organized by NTSEL and the secretariat, was reflecting on the implementation of UN Regulation No. 155 (para. 5.3.). It also briefly discussed separately that a confidential exchange of information on vulnerabilities may be desirable (possibly based on information collected as per para. 7.4 of UN Regulation No. 155).

The representative from China explained following GRVAs activities and that China deals with CS matters in line with UN R155. Not being part of the 1958 Agreement, China has currently no access to the CS assessment information. He requested to open up this information to also 1998 Agreement CPs. The representative from the Russian Federation added that it does not concern access to type-approval information but to the general CS information.

The representative of the UNECE secretariat clarified that under the current rules, the CPs of the 1998 Agreement, the CPs of the 1958 Agreement, non-signatory to UN Regulation No. 155, the technical services and the manufactures had no access to the CS information either.

The expert from OICA pointed to the confidentiality constraints.

The Chair concluded that more discussion is necessary. He added that the IWG is discussing potential extensions to DETA to make it attractive to non-58 Agreement CPs for reasons of obtaining financing for DETA but at the same time, it is unclear who will pay for these potential extensions. More guidance by WP.29 and AC.2 is necessary.

#### **5. State of play on the UI presentations to the GRs.**

The Secretary informed the IWG that experts from the IWG on DETA presented the proposal (doc. DETA-41-06e Rev.1) for introducing ‘UI summary documents’ to several GRs. These GRs were invited to consider to which UN Regulations under their responsibility the UI summary documents should apply and what information it should contain. The Chair asked the concerned experts to report on this.

The representative of the UNECE secretariat explained that GRBP considered the proposal mainly in relation to the tyre regulations and expressed concerns about the replacement of markings necessary for consumers and enforcement, like the M+S and ‘snowflake’ (3PMSF) symbols (UN Regulation No. 117). GRBP did not finish the discussions. The expert of CITA added that the additional marking information in some cases might also be necessary for PTI purposes.

After discussion, the IWG concluded that not all current markings need to be replaced by the UI marking. The 1958 Agreement stipulates that the ‘approval marking’ may be replaced by the UI marking but the UN regulations often consider additional marking, relevant for e.g. consumers, as part of the approval marking, although a distinction should be made between these. Therefore, the GRs may specify in each UN regulation which part of the markings may be replaced by the UI marking and which part must stay on the product to serve as information to e.g. consumers. A GR may also decide to amend a UN regulation to prohibit the use of the UI marking completely for that regulation, considering that UI applies by default, unless specified otherwise. The representative of the UNECE secretariat confirmed that a ban on the use of a UI marking could be included in a supplement to the UN regulation in question. He invited the group to reflect on the need for a transition phase when the UI will be introduced, until all involved parties understand how the UI works and where information can be accessed.

Furthermore, it was understood that it is of no benefit to replace an ‘E marking’ by a UI marking in case there is no additional marking included in the E mark.

The Chair concluded that it is necessary to explain the situation better to the GRs.

The representative from Finland reported on the presentation to GRSP. Only feedback came from OICA reminding that the UI marking is banned for R22, 44 and 129. No other comments had been received.

The representative from France explained that GRE is well known with the issue for the lighting regulations but the status is unclear as it is currently not possible to generate a UI.

The GRPE Ambassador presented document DETA-43-03e on GRPEs feedback. The feedback showed there are still many questions and much is unclear. The IWG Secretary suggested that the IWG should make clearer what the issue is about and what the IWG on DETA expects from the GRs.

The UNECE representative pointed out that the presentation circulated to GRs might have to be amended if the group considers that the use of UI allows for any flexibility with regards to markings other than the approval number and E mark.

The representative from The Netherlands, chair of the IWG on PTI, explained, by presentation DETA-43-08e, concerns about the use of the UI for carrying out PTI. He referred to the legislation that requires the approval marking to be checked for periodical and roadside inspections and clarified it will be a significant burden when the marking is replaced by the UI marking and the associated information needs to be downloaded via a webportal. He also suggested that the IWG on PTI should be more involved in the related discussions and decisions.

The Chair invited the representative from The Netherlands to join the future sessions of the IWG on DETA. The representative from the Russian Federation suggested that OEMs should deliver, together with the vehicles, an additional paper containing the component marking information. The IWG Chair expressed concerns about this idea since these papers can easily be lost and will be burdensome for OEMs. He wondered if PTI should get full access. The IWG Secretary added that WP.29 previously recognized that PTI is an authoritative task and CPs may decide themselves to forward the credentials for accessing DETA to their PTI enforcers.

The expert from OICA pointed to the confidential nature of certain type approval information, like test reports. He also questioned the need for full access by PTI, as they currently have no access either. However, according to the expert from CITA some countries make this information available for PTI. The IWG Secretary suggested asking WP.29 advice on the access rights to PTI, including observing confidentiality. The expert from OICA felt that this was no matter of the IWG and suggested that CITA should prepare a presentation on the issue.

**6. Proposal for a Q&A on UI.**

As regards the draft Q&A on UI, document DETA-42-03e, the IWG Secretary explained that no suggestions had been received during previous sessions nor by mail. As it is important to make progress on this Q&A, he suggested to establish a task force to discuss it and offered a meeting room in Brussels. The IWG Chair supported this idea. The IWG Secretary said he would provide details by mail soon.

**7. Follow-up ETRTO's proposal for partitioning of documents and file names in DETA.**

Postponed for reasons of time.

**8. Report to WP.29.**

Amendments to the status report DETA-43-05e had been discussed at the meeting. The IWG concluded that WP.29 should be:

- asked to provide guidance on the widening of the scope of DETA and, in relation to this, the access rights to CS information in DETA by 98 Agreement CPs;
- asked to consider the amended guidelines document for the UI module (new working document);
- informed about the progress of the UI discussions in the GRs and that an updated presentation will be prepared to explain the issue better and to make clear what the IWG on DETA expects from the GRs;
- informed that the access rights for PTI are subject of discussion and a presentation on the matter will be prepared;
- informed about the status of the Q&A on UI.

**9. AOB.**

- **Access rights to DETA for technical services.**  
Postponed for reasons of time.
- **Access rights in the course of PTI.**  
Discussed under agenda item 5.
- **Access to CS information on DETA for all 1958 and 1998 Agreement CPs (and amending guidelines doc. on the use of DETA in the context of R155 WP.29-182-07 accordingly).**  
Discussed under agenda item 4.
- **RF proposal for amending the Annex to the UI guidelines .../WP.29/2019/77, document: DETA-43-04e.**  
Postponed for reasons of time.

**10. Next meetings.**

The IWG considered to hold its next session in hybrid format at OICA in Paris on 16 June but to take a final decision after the IWVTA IWG session.