

## Request for Guidance

How to treat the GTB proposals submitted to GRE-76 and deferred to GRE-77 for final decision, in the context of the drafting of the new regulations?

### INTRODUCTION

At its 76<sup>th</sup> session, GRE considered proposals from GTB concerning:

- a. LED Light Sources for Road Illumination Devices (RID)
- b. LED Substitutes for Light Signalling Devices (LSD)
- c. Simplification of the COP requirements for AFS

These proposals were not adopted and decisions were deferred to GRE-77 where they will be addressed under agenda items 5 and 7(e) respectively, in the context of revised proposals from GTB.

### QUESTIONS FOR GRE

Assuming that GRE decides to adopt the revised proposals from GTB the question arises in respect to how they shall be introduced into the respective regulations in view of the “freezing” of the existing regulations and the creation of the new simplified regulations. With regard to the amendments to Regulation No. 128, the Special Resolution for light sources and Regulation No. 48 the situation is clear because they are not part of the “frozen” regulations. However there is an issue concerning the associated provisions to be eventually introduced into the new RID and LSD Regulations.

GTB understands, and was party to, the decision to freeze the existing regulations as part of the simplification activity. This means that the introduction of provisions, that are part of the package of amendments to introduce the LED light sources and the simplified COP requirements for AFS, shall be postponed until the new Regulations have entered into force in January 2019. This will create a situation where the industrialisation of the LED light sources and the simplified COP testing for AFS will be delayed until January 2020, at the earliest, because it will be necessary to introduce an amendment to the new regulations.

To avoid this delay GTB would like to suggest options that GRE may wish to consider, in order to avoid a delay to the introduction of the new LED light sources and the simplified COP provisions for AFS. These options, that would also avoid the need to work on amendments to the new regulations immediately after they have entered into force, are:

1. Introduce the proposals, if adopted by GRE-77, into the drafts of the new RID and LSD Regulations so that the whole package is formally submitted to GRE-78 according to the IWG-SLR timetable.

This approach would be the most efficient because it will not involve additional administrative steps for WP29 and the Contracting Parties. However, it does infringe the agreed plan to freeze the existing regulations and then transform their content into the new regulations without any material change to the requirements.

2. Draft the first amendments to the new regulations and submit them for adoption at GRE-78 so that they can be processed through WP29 and enter into force at the same time as the drafts of the new regulations. This would not infringe the agreed plan but it would create extra work for the secretariat and for the contracting parties.

During the presentation of the revised proposals GTB will demonstrate that the necessary changes are minor in the context of the RID and LSD Draft regulations.

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