

Industry comments to GRRF-2017-08

Industry welcomes the willingness of the EC to bring clarifications on the way the CEL Annex should be implemented, using current best practices of different technical services and vehicle manufacturers, and can support the general principles of the proposal. However, Industry has some concerns and comments about the proposal, which could not be raised during September session of GRRF due to lack of time to discuss the document:

- The examples given in paragraphs 3.2 and 3.4.4 are in a way setting a level for the ‘state of the art’ and promoting these examples as references, while they are not necessarily directly applicable and will evolve over time: ISO 26262 today applies mainly to light vehicles, while not all parts of ISO 26262 are usually applied by VMs. HAZOP is a method for industrial risk analysis used mainly in petrochemicals industries. Our suggestion is to delete references to particular standards. Industry favours an approach where the need is specified rather than providing a list of tools.
- What is the intention with the “assessment report established by a competent authority”: is the intention to involve a third party who should be different from the TS conducting the CEL assessment? This may generate extra-costs and increase risks of confidentiality issues. One of the principles of CEL annex is the protection of confidential knowledge against 3rd parties. OICA would rather promote the idea that the Technical Service conducting the approval is the competent authority.
- Regarding the two items above, Industry would rather suggest a wording as below:
3.2 ...
A description should be provided of the methodology applied for the design of “The System”, which includes the processes and standards followed during the development phase. The application of the methodology shall be demonstrated by an assessment report established by the technical services, and included as a part of the Annex 6 assessment.
- The aim of splitting the *concept (vehicle) level* from the *system level* in paragraph 3.4.4 should be clarified. It drives no specific requirement, and the examples given are not fully relevant to Industry (e.g. a Fault Tree Analysis applies as well to the *concept (vehicle) level*).
- The question of harmonizing the template is relevant, however it questions the principle of that an audit should audit what the VM is actually doing, and not request the VM to do things in a specified way. Furthermore, the example given reflects only one way of doing, which may be different for every TS / VM. Reaching a consensus may take time.
- It should be checked that “the safety concept is understandable and logical and that validation plans are suitable and have been completed”. This makes sense but looks not relevant for a regulation text.

More work is needed to clarify the proposal and improve it. Industry is willing to work with the EC until the next GRRF session.

Furthermore, the proposal from the EC is related to R79, which brings up the question of alignment with other regulations using the CEL Annex.

Some further comments:

- The “Involvement of the technical service at an early stage in the design process” is a recommendation which is difficult to assess. What does “early stage” mean?
- In paragraph 3.2, it is unclear which paragraph of current text of the CEL Annex is deleted.