Justification of proposed amendments to transitional provisions in ECE/TRANS/WP.29/2021/86

 During the 84th session of GRE in April 2021, documents ECE/TRANS/WP.29/GRE/2021/4 and GRE-84-22 introducing the 08 series of UN R48 were agreed directly at the beginning of the session. In addition a further amendment of UN R.48, document ECE/TRANS/WP.29/GRE/2020/8/Rev.2 with the outcome of the discussions regarding visibility and glare was also on the agenda. This document was discussed at the end of GRE-84. It was expected that the proposal may be combined with the agreed part for the 08 series. However, during the discussion of the proposed amendments Contracting Parties came to the conclusion that further investigation was necessary. The consequence of this decision was that no further discussion on the Transitional Provisions took place. The representative of OICA raised a concern that the date for vehicles of a New Type (NT) will be too close to the enforcement of the 08 series of UN R.48. An assessment of the Transitional Provisions would have meant that the whole proposal on the 08 series would have been up for discussion again. As this was no longer possible for reasons of time, it was decided to include OICA's objection in the report of GRE-84. This would allow for a final discussion on the adaptation of TPs during the WP.29 meeting in November 2021.

The proposal currently includes the date of 1 September 2023 for New Types. If adopted in November during the WP.29 session, the proposal would enter into force in June/July 2022. This would only be a good year between enforcement and the date for New Types.

 In the agreed proposal, the basic requirement that dipped-beam headlamps can be switched OFF manually was deleted, amongst other things. To ensure that national User-Regulations do not contradict the technical specifications of UN R.48, paragraph 6.2.7.5.1. specifies the possibilities under which manual switching OFF of the Dipped-beam Headlamps is still permitted. In addition, it will be required that Daytime Running Lamps be switched ON at least together with the Rear Position Lamps.

It is simply not possible for vehicle manufacturers to comply with these changes to the legal requirements for vehicles already under development within one year after the entry into force of the new series of UN R.48. For this reason, OICA proposes a postponement of the New Type Date by one year to September 1, 2024, as already proposed in document ECE/TRANS/WP.29/GRE/2020/8/Rev.2.