



# GRPE-86-31

Concern regarding the Introductory Provision  
in the newly adopted R154.02



# 11. Introductory provisions

- During the development of ECE/TRANS/WP.29/2022/41, it was understood that the same notification procedure would apply as did for the original series. Hence the following text was adopted as the first sentence in paragraph 11.1.:
- *“Contracting Parties applying this Regulation are not entitled to grant type approvals according to the 02 series of amendments to this Regulation until a date eight months following its entry into force.”*
- We are now informed that both new series of amendments (02 and 03) will enter into force on the same day (anticipated in October 2022)
- This presents a frustration to OICA members as it delays the effective usability of R154.02



# 11. Introductory provisions

- However, paragraph 11.1. contains the following second sentence:
- *“Unless exempted in the transitional provisions, Contracting Parties shall accept UN type approvals to the previous version of this Regulation until a date eight months following the entry into force of the 02 series of amendments.”*
- This sentence leads to possible interpretations:
- There is no exemption in “transitional provisions” this text is an “introductory provision”
- If the 02 series refers to “the previous version of this Regulation” but the 03 series is in force, what is “the previous version of this Regulation”?
  - Is it the 01 series (previous to the 02 series)? Or
  - Is it the 02 series (previous to the latest in force)?
- Does GRPE see the need and/or opportunity to bring clarity to this?