

## Discussion paper on the appropriateness and proportionality of the Unique Identifier marking for GRE UN Regulations.

### 1. Background

The 1958 Agreement Revision 3 of 20 October 2017 introduced provisions on circulation of approval documentation by the “secure internet database established by the United Nations Economic Commission for Europe”. WP.29’s IWG on DETA was established to develop this database, called ‘DETA’.

The 1958 Agreement Revision 3 Schedule 5 stipulates that where type approvals are stored on DETA, the approval markings required by UN Regulations may be replaced by a ‘Unique Identifier’ (‘UI’), unless specified otherwise in the UN Regulations.

The IWG on DETA is mandated to work on the implementation of the UI within DETA and is intensively discussing this amongst experts since before 2017.

### 2. Issues with the Unique Identifier

The IWG on DETA concluded:

1. There are serious concerns about incorrectly marked products for reasons of:
  - a) The implementation of the UI concept turned out to be highly complex. One single UI may replace multiple approval markings on a combined product, e.g. a lamp component. And the UI does not include the series of amendments number. As a result, in case of amendments to a UN Regulation and/or modifications to a product, it is very difficult for manufacturers and approval authorities to distinguish when the UI marking must be replaced by a new UI marking.
  - b) It will in many cases be impossible to check during surveillance and enforcement activities whether the correct UI marking is applied to a combined product.
  - c) It will not be possible for all of the cases to assign a UI number to a product automatically. Approval authorities would therefore need to be entrusted with burdensome and error-prone activities for manually generating a UI number within DETA.  
Details about the UI principles and complexity can be found in the draft ‘Proposal for specifications and application guidelines for the Unique Identifier (UI) module’ [DETA-45-05e rev1](#) and the draft Q&A [DETA-45-04 rev1](#).
2. In many UN Regulations, additional markings are part of the product marking, e.g. for lamp components as regards different functions included in the device and possible restrictions in mounting position. With the UI marking, this information may no longer be present on the product. This may cause serious issues in workshops and during surveillance and enforcement activities, including PTI.  
Alternatives which the IWG on DETA explored to deal with this particular situation would introduce new complexities.
3. There is no financing to develop the UI functionality. Potential sponsors from industry announced, after the IWG on DETA discussions, that their previous offer to (co-)sponsor the UI functionality was frozen and they would first need to understand the benefits of the UI concept before deciding on any sponsoring.

For these reasons, the IWG on DETA, as approved by WP.29 during its 188th session in November 2022, forwarded document [WP.29-188-20](#) to all bodies subsidiary to WP.29 to invite them screening the UN Regulations under their purview for the appropriateness of the UI marking.

These bodies considered that additional marking information, useful to consumers, workshops and authorities for e.g. maintenance, surveillance and enforcement activities would potentially not be available on the product anymore. They also expected limited or no benefits from the UI marking for most of the UN Regulations. For that reason, they basically agreed to a general ban of the UI marking for all UN Regulations under their purview.

This was except for GRE that considered that the UI marking would be needed for UNR65, 148, 149 and 150.

The IWG on DETA discussed these results during its 48th session in November 2023 and concluded that this would mean that the full UI concept, with all consequences outlined above, would need to be developed and implemented for only these few GRE UN Regulations.

### **3. Discussion topic for GRE**

On request of the IWG on DETA, WP.29, during its 191st session in November 2023, invited GRE to consider the appropriateness of the UI marking again for UNR65, 148, 149 and 150, especially taking into account all potential consequences including implementation costs and to consider whether alternative marking solutions, like simplified dedicated E-markings, would be more proportionate.

This discussion paper aims at supporting this invitation to the 90th session of GRE and providing additional information on the consequences of the UI marking as outlined at 2 above.

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