

Proposal for amendments to informal document GRVA-20-22

Submitted by the expert from France

The text reproduced below was prepared by the expert from France to clarify the transitional provisions of the informal document GRVA-20-22.

I. Proposal

16. Transitional Provisions

- 16.1. As from the official date of entry into force of the 01 series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept type approvals under this Regulation as amended by the 01 series of amendments.
- 16.2. As from 1 September [2026], Contracting Parties applying this Regulation shall not be obliged to accept type approvals **issued to the original version (00 series of amendments) of this Regulation**, first issued after 1 September [2026].
- 16.3. Until 1 September [2028], Contracting Parties applying this Regulation shall accept type approvals **issued to the original version (00 series of amendments) of this Regulation**, first issued before 1 September [2026].
- 16.4. **As from 1 September [2028], Contracting Parties applying this Regulation shall not be obliged to accept type approvals issued to the original version (00 series of amendments) of this Regulation.**
- 16.5. Notwithstanding the transitional provisions above, Contracting Parties who start to apply this Regulation after the date of entry into force of the most recent series of amendments are not obliged to accept type approvals which were granted in accordance with the original version (00 series of amendments) of this Regulation.
- ~~16.5. Contracting Parties applying this Regulation shall continue to accept type approvals issued according to the original version (00 series of amendments) of this Regulation, for the vehicles/vehicle systems which are not affected by the changes introduced by the 01 series of amendments.~~
- ~~16.6. Contracting Parties applying this Regulation shall continue to accept type approvals issued according to the original version (00 series of amendments) of this Regulation first issued before 1 September [2026].~~
- 16.6. Contracting Parties applying this Regulation may grant type approvals according to the original version (00 series of amendments) of this Regulation.
- 16.7. Contracting Parties applying this Regulation shall continue to grant extensions of existing approvals to the original version (00 series of amendments) of this Regulation.

II. Justification

It is common practice in new series of amendments to UN Regulations, to include a transitional provision allowing Contracting Parties to limit the acceptance of existing type approvals (issued to preceding series of amendments to the Regulation) until a certain date. This usual transitional provision is included in the General Guidelines for United Nations regulatory procedures and transitional provisions in UN Regulations (ECE/TRANS/WP.29/1044/Rev.3), under items V.3. and V.4. of the aide-mémoire. Item V.3. ensures that Contracting Parties must continue to accept these approvals until a pre-determined date, while V.4. allows Contracting Parties to stop accepting these approvals after the given date.

The informal document GRVA-20-22 already includes a transitional provision corresponding to V.3., under paragraph 16.3. However, instead of using the transitional provision V.4., it uses the transitional provision V.8. in paragraph 16.6., which — according to the aide-mémoire — only applies as a replacement to V.3. and V.4.

The opinion of the expert from France is that the use of V.8. in GRVA-20-22 is accidental, and that the correct transitional provision should be V.4. based on common practice and on the fact that V.3. is already used. The expert therefore proposes to add V.4. and to remove V.8.

Additionally, the expert from CLEPA/OICA previously stated that due to some of the new technical requirements introduced by the first series of amendments to UN Regulation No. 171, it is impossible for existing approvals not to be affected by this new series of amendments. Therefore, the expert from France proposes to remove the transitional provision V.7. (paragraph 16.5. of GRVA-20-22), which clarifies the application of the new series of amendments.

This document also clarifies the wording of the paragraphs 16.2. and 16.3.