A New Approach to UN Lighting and Light-Signalling Regulation

In response to the intervention of the representative of the European Union at the 156th session of WP.29 relating to the need to find a new approach to lighting and light-signalling regulations and, following a meeting of the GTB executive with the representative of the European Union and the chair of GRE, it was suggested that GTB might develop some ideas as a basis for further discussion. GTB considered this topic during its recent meeting and would like to share its initial reaction. This will, of course, be presented in more detail to GRE during its next session.

The report of the 156th session states that "the representative of the EU proposed changing from the current prescriptive UN Regulations to more performance based requirements. Therefore, he invited delegates to reflect on a new approach to lighting regulations which would make them less design restrictive. In his opinion, such an approach would also reduce the number of amendments and corrigenda to lighting Regulations".

In response, GTB believes that it is time to review the approach to the lighting and light signalling regulations in the context of modern requirements related to traffic safety, advanced technology and commercial pressures. There are currently 41 regulations that have to be maintained and regularly amended to keep them in line with technical progress and this is creating a massive workload for all parties in terms of:

- Technical review and update (largely done by GTB)
- Drafting of new proposals (by GRE experts and GTB)
- Consideration of the proposals at GRE (including translation) (done by GRE experts and the UN secretariat)
- Preparation and transmission of proposals (including translation) to WP29 for adoption (done by the UN secretariat)
- Detailed analysis (Including translation into all working languages) in preparation for voting at WP29 (done by Contracting Parties)
- Submission to the UN processes for final adoption and entry into force (done by the UN secretariat)
- Preparation of revisions (consolidated versions of the regulations) (done by the UN secretariat)
- Maintenance of the official and unofficial consolidations (done independently by the UN secretariat, by GTB, and by industry to keep track of proposals for amendment passing through the system)
- Actions required to include the regulations and their amendments into national legislation (done by Contracting Parties)
- Actions required by administrations not signatories to the 1958 agreement but who
 are adopting the text of the regulations into their national requirements.

Although there are numerous regulations in force, each dedicated to a specific device, there is much duplication of requirements. This means that a simple change to a common test requirement, for example, results in a collective amendment that generates many individual documents for voting at WP29. Moreover, some requirements related to lighting and light-

signalling devices are very technology restrictive, forcing many amendments with no impact on the performance of the device in question yet necessitating prolonged discussions and creating many documents. To address these issues, with a view to the simplification of the lighting and light-signalling regulations, GTB has initiated a feasibility study based upon the following approach:

- 1. The creation of three new Regulations (with a greater emphasis on performance requirements)
 - Forward lighting devices
 - Light Signalling devices
 - Retro reflective and luminescent devices

The greater emphasis upon performance requirements would have the objective of producing less prescriptive regulations that could facilitate the earlier exploitation of new technologies and remove existing barriers to free competition sometimes resulting from the current "prescriptive" regulations.

- 2. Taking advantage of the expected introduction of the Horizontal Reference Document, under discussion in GRE, and the Database for the Exchange of Type Approvals being developed by the DETA informal group.
- 3. Certain regulations would remain unchanged:
 - Light sources according to Regulations 37, 99 and the new Standardised replaceable LED's
 - Adaptive Front Lighting Systems (Regulation 123) with the exception of the removal of provisions that can be transferred into the HRD
 - The installation regulations 48, 53, 74, 86. (However GRE is already working on a rationalisation of Regulation 48)

However, restructuring and redrafting of the regulations will certainly be a major challenge that will require a high level of coordination and resource, both technical and editorial. In principle, GTB is ready to support an activity to investigate the feasibility of such an approach, within the framework of GRE.