

# Simplification of Regulations

## Light Sources Regulations

Nos. 37, 99, 128

**Request for guidance**

# Introduction

164<sup>th</sup> WP.29 Session , 11-14 November 2014

- Main objectives of the informal group
  - Reduce the administrative burden
  - Reduce burden on governments
  - Reduce regulatory burden for industry
- *Analysis and way forward for light sources*
  - Document WP29-164-18

# Analysis

amendments  
Statistics

## Bubbles

### Size

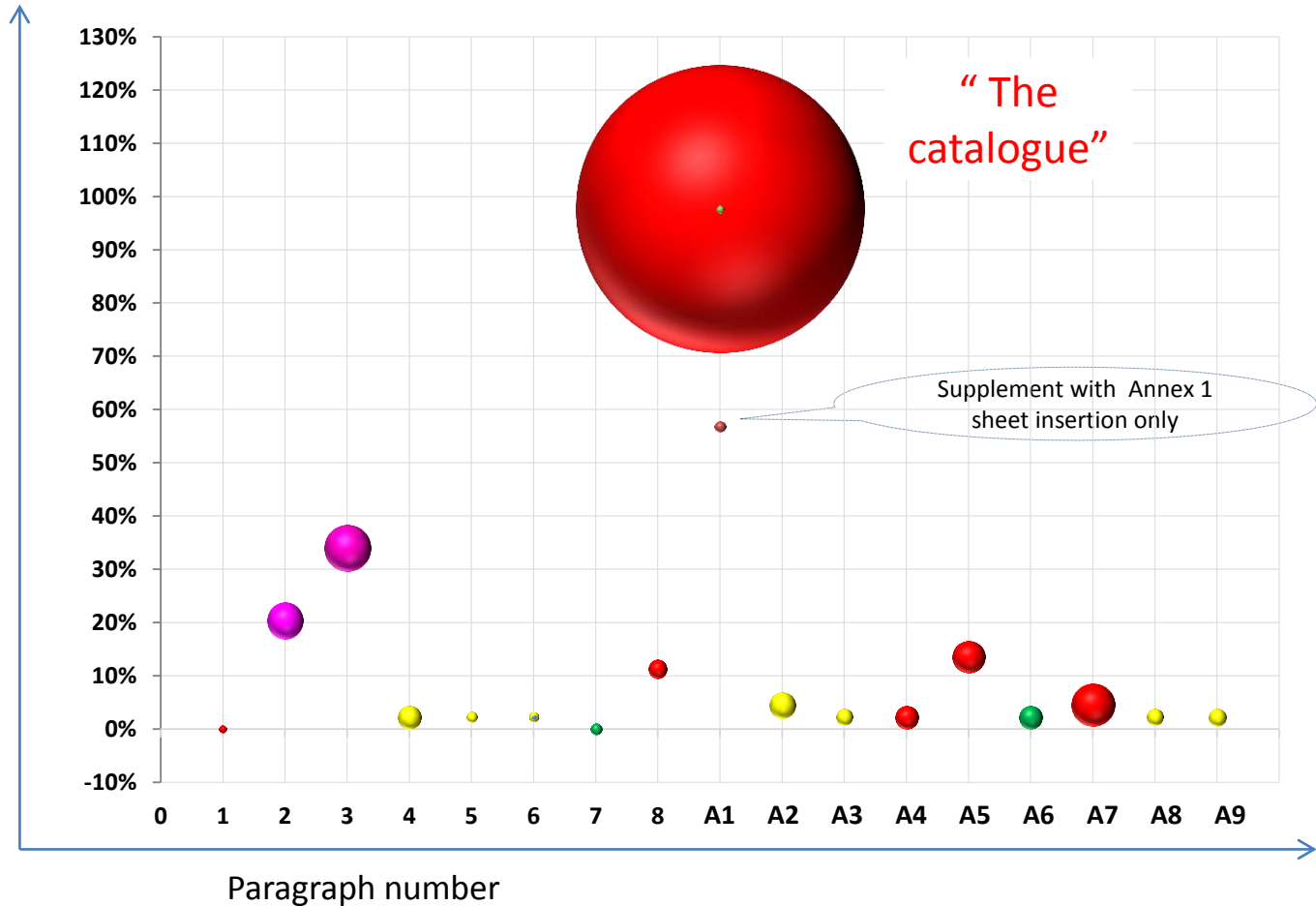
Reflects number of pages per paragraph/annex

### Colour

- Green** Common text shared between light source regulations
- Yellow** Common text with minor technology related lines
- Purple** Common text with frequent technology related lines
- Red** Totally different paragraphs

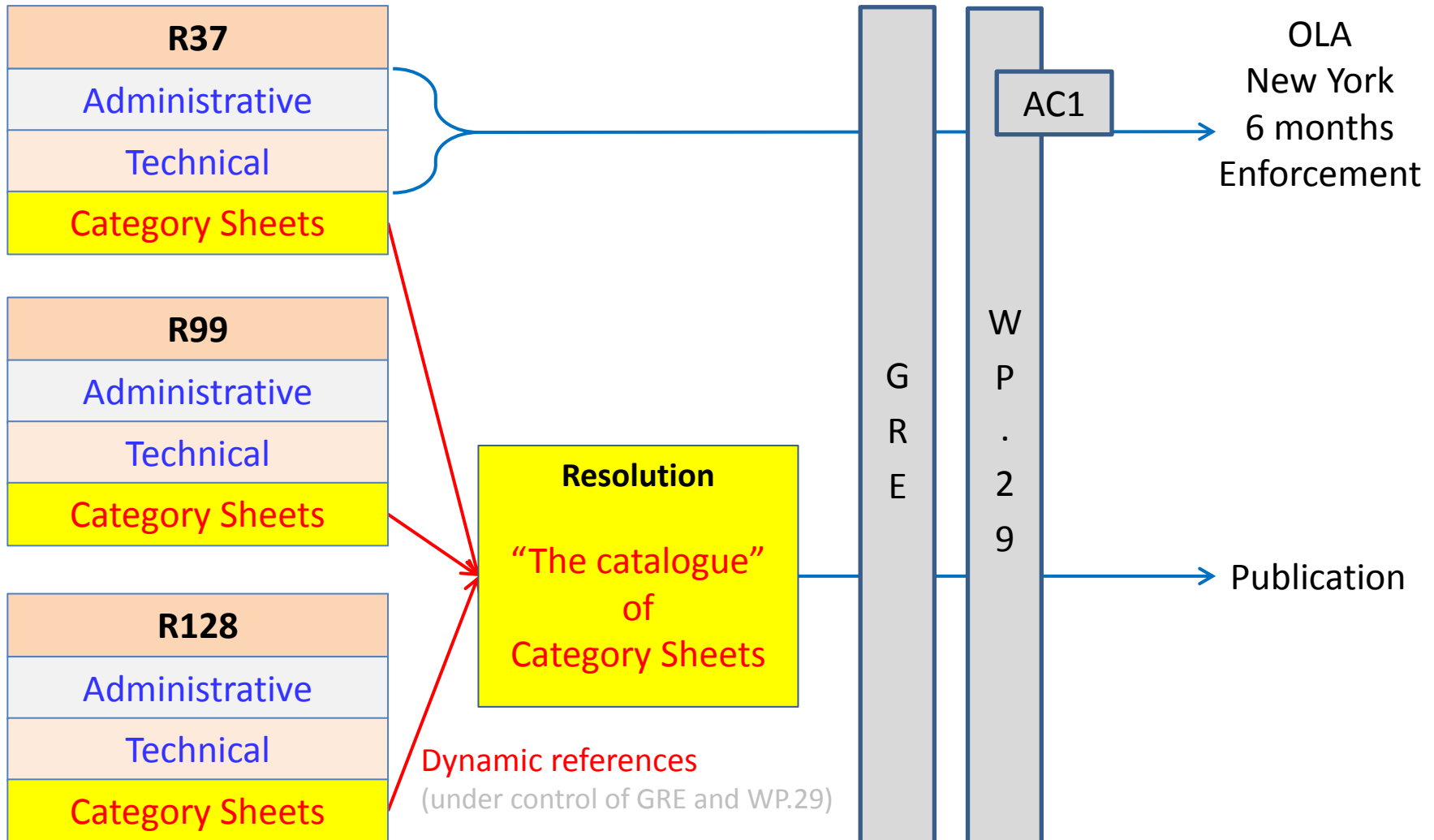
**R37**

Percentage of supplements amending a paragraph/annex



R37 03 series  
In effect for 28 years  
44 Supplements

# Concept for L.S. simplification



# Introduction

## 164<sup>th</sup> WP.29 Session , 11-14 November 2014

– Report WP29-2014-1112, par. 42, GRE chair report

*“.....For the purposes of simplification and in line with the ideas of SLR, the expert from IEC proposed to separate data sheets for various light sources from Annex 1 to UN Regulations Nos. 37, 99 and 128 and to place them in a repository document administered by WP.29 (WP.29-164-18). **WP.29 endorsed the proposed approach.**”*

# Status October 2015

## GRE-74

### First reading of the draft proposals

- To amend the Regulations Nos. 37, 99 and 128
- To introduce a New Resolution on the Common Specification of Light Source Categories

### Comments

- Editorials
- Open items
  - Most can be resolved by GRE-75
  - Guidance from WP.29 is requested, possibly advice from OLA needed

# Legal aspects

## Simplification of **Lamp (Device)** regulations

Consultations of OLA to identify any legal issues

*“...under the 1958 Agreement, Regulations can only be amended in accordance with the procedure set out in Article 12 of the Agreement. It follows that **a Resolution cannot be employed to amend a Regulation.**”*

# Legal aspects

## Simplification of Light Source Regulations

### Evaluation

- All requirements: still in the Regulations
- The light source categories specification: moved to the Resolution  
(“the catalogue”)
- The *“list of light source categories allowed for use in lamps”*: also moved  
(from the Light Source Regulations to the Resolution)
- No references from the Resolution to Regulations  
(except for 3 to indicate in which lamps some light source categories are not allowed;  
no alternative, appropriate generic wording was found so far)



# Legal aspects

## Simplification of **light source** regulations

### Conclusion

- (Amendment of) the Resolution **does not amend** a Regulation
- Amendment of one Regulation **does not amend** another Regulation
- There seems **no contradiction to the response from OLA** that this *Resolution is employed to amend a Regulation*

**However**, some CP's in GRE seek confirmation

Specifically on the *“list of light source categories allowed for use in lamps”*

# Request for guidance

- 1. Can WP.29 reconfirm the approach for simplification of light source regulations?**
- 2. Would it be acceptable if the Resolution is in English only?**

**THANK YOU**