

Comments on all documents dealing with the simplification process and the “Unique Identifier (UI)”

From our point of view, at first the fundamental questions need to be discussed:

Is it really useful to have the UI without the possibility to use it, because DETA will be not available or only with basic functions (only existing and new type approval numbers and documents **without** UI and International Whole Vehicle Type Approval)?

In principle, there is no necessity to introduce the UI in the new Regulations without the possibility to use it. Still having the UI in the Regulation as an alternative to the type approval number can cause more problems than it solves. This leads directly to the following question:

Each (technical) change in the RRD/RID/LSD-Regulations will cause a supplement or a new Series of Amendments for the Regulation. So, all devices which are covered by the regulation will be affected. Every device affected by a change in series of amendments needs an (additional) new type approval number as long as DETA and the UI are not available. This can't be solved by transitional provisions for the supplement (or the table 3.3.2.4. with the change index in the Regulation LSD), because in that case we will need a reference somewhere to know if that device fulfill the new requirements.

Even in the case of a supplement the proof of fulfillment cannot be done by the communication sheet alone. In fact, this requires the mandatory use of an electronic database (for “lighting devices”) with access for every relevant authority and other involved persons or companies. The change of the system (simplified Regulations) without real advantages of an available electronic database will lead to additional administrative burden for the authorities, industry and all other involved persons or organisations.

The stage 1 documents as they are drafted now are only a summarization of the existing Regulations and do not contain any of the improvements which should be part of the Simplification as it was introduced and requested by WP.29.

Shall we adapt the process of simplification (entering into force of stage 1 documents) and postpone it until we will have a concrete date for the introduction of the UI within the DETA-database and stage 2 in parallel?

The political aspects need to be discussed, because this will influence not only type-approval and Conformity of Production (CoP) but also Periodical Technical Inspection, Technical Roadside Inspection and inspections by other authorities.