DRAFT REPORT OF THE 36th SESSION OF THE IWG ON DETA

Date: Thursday 7 November 2019
Venue: Federal Ministry of Transport and Digital Infrastructure (BMVI), Bonn Germany
Chairman: Sven Paeslack, KBA, Germany (sven.paeslack@kba.de)
Secretariat: Tim Guiting, RDW, The Netherlands (tguiting@rdw.nl)

Agenda
1. Adoption of the provisional agenda.
2. Approval of the draft minutes.
3. State of play.
4. Contracting DoC and UI.
5. UI and Q&A on UI.
6. Protocol for information exchange by DETA.
7. Exchange of software ID's and software integrity checks.
8. AOB.
9. Report to WP.29.
10. Next meetings.

1.   Adoption of the provisional agenda.
Document DETA-36-01e rev1. The agenda was adopted.

2.   Approval of the draft minutes of the IWG on DETA 35th session.
Document DETA-36-02e. The draft minutes, including amendments to the issue of contracting as proposed by OICA and reflected in DETA-36-02e rev1, were approved.

3.   State of play.
a) Results from IWVTA IWG and WP.29.
The Chairman explained that WP.29 at its 178th session accepted/endorsed all documents as forwarded by the IWG on DETA with regard the specifications for Unique Identifier (UI) and Declaration of Conformance (DoC) and the guidelines on the UI application. WP.29 then invited the GR's to investigate whether the current additional marking provisions are considered part of the approval marking and may be replaced by the UI or that this information could be provided by alternative means. GRE considered this matter in detail. To be discussed at agenda item 5.
The IWVTA IWG forwarded to WP.29, on behalf of the IWG on DETA, a proposal for amendments to Regulation 0. This proposal will be distributed as formal document at the November session of WP.29.
The issue of whether all Contracting Parties to the 1958 Agreement shall get access to the DoC or if this shall be limited to CP's applying R0, will be discussed at the 31st IWVTA IWG session on 8 November.
b) DETA usage by approval authorities.
The Chairman informed the group that 22 CP's notified their DETA Focal Point and about 400 approvals have been uploaded. This is still a modest number and related to the fact that an automated (mass) upload functionality is not yet available. 3 Manufacturer have access to their own approvals in DETA. According to the OICA representative some manufacturers did not succeed in getting the access.
c) Software updates.
The software house explained that no changes had been made to the system since previous DETA session.
d) Mass upload.
The software house explained, by document DETA-36-06e, the developments with regard a functionality for automated upload of approval documents and attributes. With this functionality the authority may sent a zip file containing document parts together with a control file containing attribute values. The DETA Administrator will then feed the zip files into DETA. In that respect this functionality is still to be regarded as an interim solution. Representatives of several approval authorities made clear that only a functionality allowing a fully automated upload process can significantly reduce the burden for authorities and will guarantee full use of the DETA system. The group then decided that a working group need to be

established with IT and approval experts from approval authorities to identify the requirements for this functionality and the infrastructure needed within the authorities. The software house offered to organize and host this meeting (mid-January). Invitations will follow soon. The representative of the EU Commission suggested to also involve Eucaris members.

e) Other.

The GRPE-IWVTA ambassador claimed that the GR's may not be aware about DETA or understand the UI. According to the representative of ETRTO also some approval authorities are not aware about DETA. The IWG on DETA concluded it is necessary to increase the awareness of DETA. Volunteers had been identified who will bring DETA to the attention of the GR's at their next sessions. The group will also report this to WP.29 and will invite the UNECE Secretariat to request all CP's to inform their competent authorities about DETA. In addition, the DETA Secretary will again inform the EU authorities gathered in the 'TAAM' and 'Forum'.

4. **Contracting DoC and UI.**

OICA, as sponsor, informed the IWG on DETA that the new formulation of the contract by the software house still doesn't resolve the issues raised by OICA previously. The current contract is including certain clauses that cannot be fulfilled by the sponsors as they do not host DETA. The representative of OICA reiterated that its role shall be limited to the collection of the contributions coming from the sponsors and settling the invoices. OICA was also not ready to commit to the additional VAT. The OICA representative continued by explaining that in the past sponsors financed the UNECE project WHDC. It could be considered to investigate the solutions from then. CITA, as sponsor for the DoC functionality, confirmed OICA's position with regard to the contract formulations. The VAT although not being an issue for CITA. The leadership of DETA, UNECE Secretariat, OICA, CITA and the software house will further discuss possible solutions, including nominating another party as contractor.

5. **UI and Q&A on UI.**

The representative of UTAC, on behalf of the SLR IWG to GRE, introduced document GRE-82-31e. This document clearly explains the challenges of the implementation and usage of the UI as product marking. Although the SLR group welcomes the possibility of replacing a large number of markings by a simple UI marking, the group fears that essential installation information will not be marked on the product anymore, nor being available by other means. The group discussed possible solutions, as suggested by the SLR IWG:

1. replacing only the main approval marking by the UI marking. This means the additional installation information is still available on the product and other information can be found in DETA. No impact to the DETA system necessary.
2. include all marking information in the communication forms (type approvals). This means that all markings can be replaced by the UI marking. The GR's need to identify what information to be added to the communication form models in the regulations under their control. Open access to the communication forms in DETA is then necessary.

The chair added that according to the new EU Framework Regulation in the EU in near future, type approvals, possibly including information documents, must become publicly available.

The expert from ETRTO had no problem with public access to the information on the communication forms but opposed the idea of access to the documents itself. He feared that this will allow ill-intentioned parties to download and tamper with type approvals.

Some participants drew attention to possible threats to, or overload of, the DETA system when opening access to parts of DETA to the public. The chair concluded that first a decision must be taken with regard the open access and then the technical solutions must be found to mitigate possible threats.

The group decided to seek advice from WP.29 with regard this issue and the preferred way forward.

Discussion on the Q&A on DETA was moved to next session for reasons of time.

6. **Protocol for information exchange by DETA.**

The IWG on DETA Secretary introduced document DETA-36-03e. This document aims at promoting DETA as the platform for exchanging information between the CP's with regard to withdrawals, hazardous products, refusals, etc. He claimed CP's are legally required by the 1958 Agreement to exchange this kind of information. The presentation includes a chart detailing the informational topics together with a reference to the relevant articles of the 1958 Agreement.

The IWG Secretary continued to explain that withdrawal certificates are received from approval authorities without information with regard the reason for the withdrawing. If the reason is due to non-compliance with technical requirements or because of hazardous products then the competent authorities need to know to decide on further actions (withdrawing products from the market, recalls, etc.) at national level.

The group decided to already start by using the "news area" in DETA for exchanging this kind of urgent information. The CP's to WP.29 will be requested to draw attention to this decision and to request their

competent authorities to proceed accordingly. The IWG on DETA will work further on improving the process for exchanging information and will update the DETA manual accordingly.

In case of withdrawals it was suggested that the reason for the withdrawal must be included in the "reason for extension" section or at "remarks" on the communication form. Where the "remarks" section is not provided on the communication form model, the UNECE Secretariat is invited to include this with a next amendment of the respective UN Regulation. Also "production definitely discontinued" need to be added to the forms where this is currently lacking. The group understood that the status 'production definitely discontinued' will not impact products already on the market, but invalidates products produced after the applicable date indicated on the 'production definitely discontinued' certificate.

7. **Exchange of software ID's and software integrity checks.**
    CITA submitted document DETA-36-05e on the exchange of software ID's by DETA. The representative from CITA requested clarification on whether the IWG on DETA has the mandate to work on this development. The Chair confirmed this by explaining that WP.29 allowed the IWG to work on "next evolution steps". For reasons of time it was decided not to discuss the CITA contribution and to postpone the agenda item to next session. Liaison of the IWG on DETA with the 'TF CS and OTA issues' is necessary.

8. **AOB.**
    a) Q&A on DETA.
    Document DETA-31-05e. Postponed for reasons of time.
    b) Manual, online help functionality, protocols.
    Documents DETA-34-15e, -16e rev.1, -17e and http://www.unece.org/.../deta-information.html. Postponed for reasons of time.
    c) Other.
    A written contribution from the Russian Federation with regard the administrator process for adding manufacturers into DETA, had been discussed. The group decided not to change the current process and to continue to leave this the responsibility of the DETA Administrator. This decision may be reconsidered in future if necessary.

9. **Report to WP.29.**
    The group drafted document DETA-36-04e rev1 to aid the reporting to WP.29 on the state of play and on requests to WP.29 with regard to decision making for DETA.

10. **Next meetings.**
    - working group, for IT and type approval experts from type approval authorities, on the development of a fully automated upload process: mid-January (t.b.d.), T-Systems, Stuttgart Germany.
    - IWG on DETA 37th session: 5 March 2020, OICA, Paris.
    - IWG on DETA 38th session: 18 June 2020, venue t.b.d.

_____