

**Draft Supplement 4 to the 02 series of amendments and  
draft Supplement 5 to the 01 series of amendments to UN Regulation 100**

**Submitted by the expert from OICA**

The text reproduced below was prepared by the expert from OICA to amend the transitional provisions of UN R100 in both its series of amendments, following the adoption of the new guidelines on regulatory procedures (doc. WP.29/2017/107 + Corr.1 + Add.1)

## **I. Proposal for Supplement 5 to the 01 series of amendments to UN R100**

*Insert a new paragraph 11.5., to read:*

**"11.5 Contracting Parties applying this UN Regulation shall continue to accept UN type-approvals issued according to the preceding series of amendments to this UN Regulation first issued before 4 December 2010."**

*Paragraph 11.5 (old), renumber as paragraph 11.6*

## **II. Proposal for Supplement 4 to the 02 series of amendments to UN R100**

*Insert a new paragraph 12.5., to read:*

**"12.5 Contracting Parties applying this UN Regulation shall continue to accept UN type-approvals issued according to the preceding series of amendments to this UN Regulation first issued before 15 July 2016."**

*Paragraph 12.5 (old), renumber as paragraph 12.6*

## **II. Justification**

When developing the 01 and the 02 series of amendments to UN R100, it had always been understood that the new requirements would only become applicable for new approvals and would not affect previously granted approvals. Consequently, no date was specified as from which Contracting Parties applying UN R100 could refuse previously granted approvals.

The new regulatory procedures adopted by WP.29 in November 2017 however foresee that, in the absence of "Date (c)", i.e. the so-called New Registrations date, and in the absence of any other specification in the transitional provisions, this "Date (c)" would automatically be considered as identical to "Date (b)", i.e. the so-called Type Approval date. As a result, there is now the risk that previously granted approvals could be rejected.

OICA is not aware of any particular issue at this stage, but nevertheless believes that the transitional provisions in UN R100 need to reflect the situation valid at the time of adopting the 01 and the 02 series of amendments, namely that existing approvals should remain acceptable.

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