

**Comments on working document TRANS/WP.29/2004/45,  
“UN/ECE REGULATORY PROCESS”  
(Transmitted by Japan)**

Japan has some comments on working document TRANS/WP.29/2004/45 “UN/ECE REGULATORY PROCESS”, based upon the document (TRANS/WP.29/2003/97) submitted by Japan as follows;

**<Comments>**

1. Document to be amended in order to implement OICA proposal

Japan thinks it is appropriate to amend TRANS/SC.1/WP29/383, which title is “GENERAL GUIDELINES FOR TRANSITIONAL PROVISIONS IN UN/ECE REGULATIONS,” instead of TRANS/WP29/343 and TRANS/WP29/690.

Therefore, Japan thinks that TRANS/SC.1/WP29/383 should be amended in order to add the contents of OICA proposal III. and IV., and the title of document should be revised to “GENERAL GUIDELINES FOR REGULATORY PROCEDURES AND TRANSITIONAL PROVISIONS IN UN/ECE REGULATIONS.”

*[Reason]*

As the US mentioned at the last WP29, Japan believes that it is inappropriate to add the contents of OICA proposal to WP29 Terms of Reference because only basic items such as role of AC.2 and GR should be stipulated in WP29 Terms of Reference.

Japan also thinks that this proposal should be “guideline” for regulatory procedures and be integrated into same kind of document.

2. Transitional provisions for series of amendments

The final paragraph in OICA proposal □. (b) should be amended as followed.

~~Where necessary, Series of Amendments shall also contain a~~ ← Delete

- date as from which national governments may require all new vehicles to comply for the purpose of first national registration (first entry into service).

*[Reason]*

Japanese idea in the document of TRANS/WP29/2003/97 is as follows;

In the case where a safety level (by strengthening of the requirements in particular) has been reviewed,

- a) a transitional provision to refuse the approval, based on the Regulations before the amendment, should be necessary ,
- and
- b) Each contracting party must be able to figure whether the approval was issued under the amended regulation or the previous regulation.

Therefore, such amendment should always adopt the procedure of the Series of Amendment.