Simplification of Regulations
Light Sources Regulations
Nos. 37, 99, 128

analysis and way forward

GRE IWG SLR
Informal Working Group Simplification of Lighting Regulations
EXECUTIVE SUMMARY
for presentation

Full version for reference included
Scope of this presentation

Analysis and way forward for approved (replaceable) light sources complying with the major objectives of the informal group

- Reduce the administrative burden
- Reduce burden on governments
- Reduce regulatory burden for industry
Similar structure
Light source regulations

Scope
Administrative provisions
Technical requirements
Conformity of production
Names and addresses of Technical Services ...
 Transitional provisions

Annexes
Sheets for light source categories
Communication
Example of the arrangement of the approval mark
Prescriptions for technical testing
Prescriptions for conformity of production
Analysis
amendments
Statistics

Percentage of supplements amending a paragraph/annex

R37 03 series
In effect for 28 years
44 Supplements

R37
Concept for simplification

• Move Annex 1 with all light source category sheets from the light source regulations Nos. 37, 99 and 128 into a depository ("Docket file")

• Insert a reference from these regulations to this depository

➢ The regulations are not amended when only light source categories are inserted
Concept for simplification

- R37
  - Administrative
  - Technical
  - Category Sheets

- R99
  - Administrative
  - Technical
  - Category Sheets

- R128
  - Administrative
  - Technical
  - Category Sheets

Depository
  - Light source category sheets
  - Listings
  - Administered by WP.29/ GRE
Concept for simplification

The depository

• Docket file, no database
• Entry point should contain a contents list with the date of introduction/phase out, amendment/correction
• It may be a separate or AC.1 controlled resolution

Aspects for consideration:

• It should be easily accessible in daily use
• Large number of pages (>200)
• Though intended for use under the 58 agreement, it should not to be limited for use to the 58 agreement (world wide harmonisation)
Consequences

Percentage of supplements amending a paragraph/annex

R37 03 series
In effect for 28 years
44 Supplements
/~2

amendments
Statistics
Consequences

• Significantly less amendments of the light source regulations
• The processing of light source category sheets is complete after GRE and WP.29 adoption and posting in the depository
• No further submission to OLA, NY, etc. is needed
• Elimination of 6 month period for category sheets (only)
• **BUT**: nature of depository (resolution) should be considered carefully also in relation to voting
GRE IWG SLR

Evaluation *simplification concept vs.* major objectives

- Reduce the administrative burden
- Reduce burden on governments
  Number of supplements reduction
  Process completed after WP.29 and posting in the docket
- Reduce regulatory burden for industry
  Approvals earlier due to elimination of 6 month period
  Sufficient innovation within a category
END of presentation
THANK YOU
Q/A

Question
1. Concept of depository acceptable for WP.29?
2. IWG SLR continue working on this concept?

Guidance
3. OLA confirmation?
4. Nature of the depository?
5. Voting procedure?
FULL VERSION
for reference
Scope
GRE IWG SLR

Terms of Reference summary

• Minimize the number of parallel amendments
• Reduce the number of non-frozen regulations
• Define essential requirements in performance (technology neutral) terms
• Reduce the administrative burden
• Reduce regulatory burden for industry
Scope
Light sources regulations

Approved light sources for use in approved lamps

Regulations

No. 37 (Halogen) filament lamps 1977
No. 99 Gas-discharge light sources 1996
No. 128 LED light sources 2012

In force >
Content

• Analysis
  • Structure of light source regulations
  • Statistics of amendments
• Concept for simplification
• Consequences
• Questions for follow-up
Structure
Light source regulations

Scope
Administrative provisions
Technical requirements
Conformity of production
Names and addresses of Technical Services ...
Transitional provisions

Annexes
Sheets for filament lamps
Communication
Example of the arrangement of the approval mark
Prescriptions for technical testing
Prescriptions for conformity of production
Structure
Light source regulations

• Structure is more or less the same
• Deviating from other lighting regulations

➢ This is due to the specific characteristics of light source categories
  – Necessary for universal replacement, which is
  – Resulting in standardized specifications
    ➢ Annex 1: sheets for light source categories
Catalogue or selected list? 
Light source regulations

Is Regulation No. 37 a reference book for filament light source categories complying with minimum requirements necessary for traffic safety or a list of selected light source categories complying with the highest standards/state-of-the-art technology?

**GRE-66-01** - (GTB) GTB Internal Process for introduction and evaluation of new light source categories

**GRE-61-02** - GTB internal process for introduction and evaluation of new light source categories
Analysis
amendments
Statistics

Percentage of supplements amending a paragraph/annex

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44 Supplements

Supplement with Annex 1 sheet insertion only

R37

**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

**Analysis amendments**

**Statistics**

Supplement with Annex 1 sheet insertion only
Axes

Vertical: Percentage of supplements amending a paragraph
Horizontal: Number of paragraph; Annex numbers are following paragraph numbering

Bubbles

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

Supplement on Annex 1 only
Summary of analysis
Light source regulations

1. Parallel amendments rarely occur (only 3 in 20 years)

2. The major part of the regulations is technical specifications and category sheets, which are necessarily technology specific and therefore quite different

3. The common text is very minor and was never changed

4. Some text could be made common but
   a. Most parts never change
   b. Quite some parts are necessarily (very) technology dependent

5. By far the biggest number of amendments concern annex 1: the category sheets plus some house keeping
Conclusion
Analysis

The approach for simplification of the lighting regulations to move common text to a common place holder is not effective for light source regulations

BUT

Moving light source category sheets is
Concept for simplification

- Move Annex 1 with all light source category sheets from the light source regulations Nos. 37, 99 and 128 to a depository ("docket file")
- Insert a reference from these regulations to this depository

➢ The regulations are not amended when only light source categories are inserted (or amended/ corrected/ phased out)
Concept for simplification

- **Central reference**
  - R48
  - Par. 2.29
  - Colour definitions (already in R48)

- **Depository**
  - Light source category sheets
  - Listings
  - Administered by WP.29/ GRE

- **R37**
  - Administrative
  - Technical
  - Category Sheets

- **R99**
  - Administrative
  - Technical
  - Category Sheets

- **R128**
  - Administrative
  - Technical
  - Category Sheets
Concept for simplification

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Aspects for consideration:

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amendments
Statistics

Consequences

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R37
Consequences

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• No further submission to OLA, NY, etc. is needed
• Elimination of 6 month period for category sheets (only)
• **BUT:** nature of depository (resolution) should be considered carefully also in relation to voting
GRE IWG SLR

Evaluation of this concept vs. Terms of Reference

• Minimize the number of parallel amendments
  N/A
• Reduce the number of non-frozen regulations
  N/A
• Define essential requirements in performance (technology neutral) terms
  N/A
• Reduce the administrative burden
• Reduce the burden on governments
  Number of supplements reduction
  ✔
  Process completed after WP.29 and posting in the docket
• Reduce regulatory burden for industry
  ✔
  Approvals earlier due to elimination of 6 month period
  Sufficient innovation within a category
Follow-up

General question
1. Is the concept of depository for light source category sheets acceptable for WP.29?
2. Can WP.29 confirm that GRE and its IWG SLR may continue working on this concept for light source regulations?

Specific questions
where WP.29 may have the preference or guidance to the IWG on SLR
3. Is OLA confirmation needed?
4. The nature of the depository?
5. The voting procedure for amendments to the depository?
END