Transmitted by the Informal Working Group Simplification of Lighting Regulations

Informal document WP.29-167-19
(167th WP.29 session, 10-13 November 2015, Agenda item 3.5.4)

Simplification of Regulations

Light Sources Regulations
Nos. 37, 99, 128

Request for guidance

GRE IWG SLR
Informal Working Group Simplification of Lighting Regulations
Introduction

164\textsuperscript{th} WP.29 Session, 11-14 November 2014

• Main objectives of the informal group
  – Reduce the administrative burden
  – Reduce burden on governments
  – Reduce regulatory burden for industry

• \textit{Analysis and way forward} for light sources
  – Document WP29-164-18
Analysis amendments Statistics

Percentage of supplements amending a paragraph/annex

R37 03 series
In effect for 28 years
44 Supplements

Supplement with Annex 1 sheet insertion only

“The catalogue”

R37

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

From WP29-164-18
Concept for L.S. simplification

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

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

- **R128**
  - Administrative
  - Technical
  - Category Sheets

**Resolution**

"The catalogue" of Category Sheets

**Dynamic references**
(under control of GRE and WP.29)

**Publication**

**OLA**
New York
6 months
Enforcement

From WP29-164-18
“.......For the purposes of simplification and in line with the ideas of SLR, the expert from IEC proposed to separate data sheets for various light sources from Annex 1 to UN Regulations Nos. 37, 99 and 128 and to place them in a repository document administered by WP.29 (WP.29-164-18). WP.29 endorsed the proposed approach. “
Status October 2015

GRE-74

First reading of the draft proposals
• To amend the Regulations Nos. 37, 99 and 128
• To introduce a New Resolution on the Common Specification of Light Source Categories

Comments
• Editorials
• Open items
  – Most can be resolved by GRE-75
  – Guidance from WP.29 is requested, possibly advice from OLA needed
Legal aspects

Simplification of Lamp (Device) regulations
Consultations of OLA to identify any legal issues

“...under the 1958 Agreement, Regulations can only be amended in accordance with the procedure set out in Article 12 of the Agreement. It follows that a Resolution cannot be employed to amend a Regulation.”
Legal aspects

Simplification of **Light Source** Regulations

**Evaluation**

- All requirements: still in the Regulations
- The light source categories specification: moved to the Resolution ("the catalogue")
- The "**list of light source categories allowed for use in lamps**": also moved (from the Light Source Regulations to the Resolution)
- No references from the Resolution to Regulations (except for 3 to indicate in which lamps some light source categories are not allowed; no alternative, appropriate generic wording was found so far)
Legal aspects

Simplification of light source regulations

Conclusion

• (Amendment of) the Resolution does not amend a Regulation
• Amendment of one Regulation does not amend another Regulation

➢ There seems no contradiction to the response from OLA that this Resolution is employed to amend a Regulation

However, some CP’s in GRE seek confirmation

   Specifically on the “list of light source categories allowed for use in lamps”
Request for guidance

1. Can WP.29 reconfirm the approach for simplification of light source regulations?

2. Would it be acceptable if the Resolution is in English only?

THANK YOU