

Japan's comments on the document ECE/TRANS/WP.29/GRE/2019/7 submitted by the experts from Germany

1. In newly introducing the requirements for the sun load impact proposed in ECE/TRANS/WP.29/GRE/2019/7 by Germany, Japan considers it important to explain, in the *Justification* section, etc., the need for introducing them now, expected effects, etc., to ensure a common understanding among stakeholders.
2. It should be made clear how to determine the light emitting surface referred to in paragraph 2.1 of the new Annex 8 and how to measure the mean luminance in the light emitting surface referred to in paragraphs 2.2, 2.3, and 2.4. The reasons are as follows:
 - If the method of determining the light emitting surface is left unclear, different measurement results for the light emitting surface may be obtained depending on the method used.
 - In cases where the luminance distribution of the light emitting surface is not uniform, the light source is smaller than the aperture of the luminance meter, and so on, it may be impossible to accurately measure the mean luminance.
 - The above two factors may lead not only to differences in views between applicants and technical services, but also to differences in judging whether to accept or reject among technical services.

Japan is of the opinion that the voting on ECE/TRANS/WP.29/GRE/2019/7 should be postponed at least until the above points are made clear.

3. If the requirements are to be introduced, a provision should be included that provides for a sufficient transition period allowing technical services to prepare measuring equipment.