

Simplification of Lightings and Light-Signalling Regulations

Thoughts on a “new approach”

Based upon the discussions in the Special Interest Group of Experts on the Simplification of Lighting Regulations, and upon many exchanges of opinion since the initiation of the activity by Japan and the European Union at WP29 in March 2012, it seems necessary to develop a clear understanding of the ultimate goal this important activity.

The Special Interest Group of Experts has concluded that a GRE informal group should be established to initially concentrate of developing a solution to overcome the administrative impact of collective amendments. The European Commission has undertaken to provide the resources of a consultant to support the drafting of a detailed proposal.

GTB is committed to support this important activity but considers that, before the launch of the GRE informal group, it is necessary, as part of the terms of reference, that GRE provides a clear vision of the desired end result based upon an agreed problem statement. Many comments have been made about the “quality” of the work of GRE and the impact of the continual amendments on the administrative procedures but the stakeholders involved in the work of GRE have difficulties to understand the basic issues that they are being asked to solve.

In order to facilitate the expected discussion during the 71st session of GRE, the attached chart attempts to summarise the problem and to suggest some possible solutions for consideration. The main points are:

- a) The approach to the lighting and light-signalling regulations that has evolved since the 1950’s is a mixture of technical standardisation and regulatory requirements based upon the UNECE 1958 agreement.
- b) Whilst the detailed administrative procedures of the regulations are quite stable, the technical provisions are subject to frequent amendment to remain aligned to the innovation of devices systems or equipment. It seems to be this element that is creating the administrative burden for the UNECE and the contracting parties.
- c) In order to resolve the problem of the administrative burden, that is not only a problem for the contracting parties to the 1958 agreement but also a problem for other countries or regions that are basing their own regulatory systems on the UN technical requirements, it would appear necessary that a clear distinction is made between the regulatory provisions and the associated standardised technical prescriptions.

At this stage, GTB has not reached any definitive conclusion but wishes to engage in an exchange of views based upon the content of the attached chart. It is hoped that this will facilitate the preparation of the “GRE vision” of the desired end result of this important activity.

Thoughts on Simplification of UN Lighting Regulations

