UN/ECE Regulatory Process
CLEPA comments on Document TRANS/WP29/2004/45

CLEPA supports the need to clarify, where necessary, the UN/ECE regulatory procedures for the modification processes of Regulations under the Revised 1958 Agreements, and welcomes the OICA proposal in TRANS/WP29/2004/45.

However, CLEPA would like to highlight an issue which does not seem to be covered by that document, items II b), II c), III (partly) and IV b): the situation when installation requirements are added to a Regulation relating initially to components type approval only, without modifying the requirements on these components.

When reading TRANS/WP29/2004/45, CLEPA understands that it should be a new series of amendments. But CLEPA does not see the need to change the approval mark, as the components under the scope of that Regulation are not affected by the addition of installation requirements. The transitional provisions should make it clear that the approval mark must not be changed, and the usual clause on the approval marks for components must be altered accordingly (i.e. the first two digits will not indicate that series of amendments, but the previous ones).

One other solution is that this addition is made through a Supplement, with transitional provisions for the part relating to installation requirements.
This was made for Regulations n°16 and n°43 for example.
CLEPA prefers this solution. The principle of a supplement with transitional provisions should be formally recognised in that case.

The last solution is to make a new ECE Regulation for the installation requirements, but CLEPA thinks it should be avoided as far as possible.

On the other hand, CLEPA has no suggestion on the right place to lay down these clarifications in the UN/ECE documentation.
We leave it to the Contracting Parties and WP29 Secretariat. When the right place and the solution to our concern have been chosen, CLEPA is ready to help in drafting the clarifications.