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Item 12 of the provisional agenda

Revision 3 to the 1958 Agreement

Proposal for amendments to Schedule 2 of the Agreement concerning the Adoption of Harmonized Technical United Nations Regulations for Wheeled Vehicles, Equipment and Parts which can be Fitted and/or be Used on Wheeled Vehicles and the Conditions for Reciprocal Recognition of Approvals Granted on the Basis of these United Nations Regulations

Submitted by experts from France and Ireland*

The text reproduced below was prepared by the experts from France and Ireland. It is based on working document ECE/TRANS/WP.29/GRVA/2025/37.

* In accordance with the programme of work of the Inland Transport Committee for 2025 as outlined in proposed programme budget for 2025 (A/79/6 (Sect. 20), table 20.6), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

I. Proposal

Schedule 2, part 2, amend to read:

Schedule 2

...

Part two: Standards which the technical services, referred to in Part one of this Schedule, shall comply with

1. Activities in testing for UN type approval, to be carried out in accordance with UN Regulations

1.1. Category A (tests performed in own facilities):

- ISO/IEC 17025:2017, on the general requirements for the competence of testing and calibration laboratories.

And additionally, for UN Regulations that include provisions for the audit of management systems:

- **Paragraphs 7.1.1., 7.1.2., 7.2.4., 7.2.5., 7.2.8., 7.2.10., sections 9.1. to 9.4. and section 9.6. of ISO/IEC 17021-1:2015, on the requirements for bodies providing audit and certification of management systems.**

A technical service designated for category A activities may carry out or supervise the tests according to UN Regulations for which it has been designated, in the facilities of the manufacturer or of its representative.

1.2. Category B (supervising tests performed in the manufacturer's facilities or in the facilities of its representative):

- [ISO/IEC 17020:2012 / **ISO/IEC DIS 17020:2025**], on the general criteria for the operation of various types of bodies performing inspection.

And additionally, for UN Regulations that include provisions for the audit of management systems:

- **Paragraphs 7.1.1., 7.1.2., 7.2.4., 7.2.5., 7.2.8., 7.2.10., sections 9.1. to 9.4. and section 9.6. of ISO/IEC 17021-1:2015, on the requirements for bodies providing audit and certification of management systems.**

Before performing or supervising any test in the facilities of a manufacturer or of its representative, the technical service shall verify that the test facilities and measurement devices comply with the appropriate requirements of paragraph 1.1.

2. Activities related to Conformity of Production

2.1. Category C (procedure for the initial assessment and surveillance audits of the manufacturer's quality management system):

ISO/IEC 17021-1:2015, on the requirements for bodies providing audit and certification of management systems.

2.2. Category D (inspection or testing of production samples or supervision thereof):

[ISO/IEC 17020:2012 / **ISO/IEC DIS 17020:2025**], on the general criteria for the operation of various types of bodies performing inspection.

II. Justification

1. In recent years, GRVA has developed several UN Regulations that contain not only testing provisions for technical services, but also auditing provisions for technical services to evaluate management systems of manufacturers: this is the case for UN Regulations Nos. 155 on cybersecurity, 156 on software updates, and 157 on Automated Lane Keeping Systems, among other Regulations from other WP.29 subsidiary bodies (e.g. UN Regulation No. 133 on recyclability, etc.).
 2. The experts from France and Ireland understand Schedule 2 of the 1958 Agreement to mean that technical services may only be designated for category A or category B activities for these UN Regulations if they can perform a full evaluation of manufacturers according to these Regulations. The experts believe that most Contracting Parties interpret Schedule 2 to mean that technical services must comply not only with ISO/IEC 17025, but also with ISO/IEC 17021, as ISO/IEC 17021 contains important provisions on the audit and certification of management systems.
 3. However, it has come to the attention of the experts from France and Ireland that this compliance with ISO/IEC 17021 does not seem to be systematically requested by all Contracting Parties to the 1958 Agreement that apply UN Regulations with auditing provisions. This seems to be caused by a lack of clarity in the Schedule 2 of the 1958 Agreement, where compliance with ISO/IEC 17021 is not explicitly mentioned as a prerequisite for the designation of technical services.
 4. The experts from France and Ireland therefore propose the above amendment to the Schedule 2 to ensure a harmonised designation process for technical services for existing and future UN Regulations, including the future UN Regulation on ADS.
 5. Compared to the previous working document ECE/TRANS/WP.29/GRVA/2025/37, which this document is based on, the experts propose to only require compliance with the relevant sections of ISO/IEC 17021, as some sections related to certification should only apply to approval authorities and not to technical services. References to specific versions of the standards have been updated to refer to the most current versions of each standard (a new revision to ISO/IEC 17020 is expected to be published in 2025). Additionally, due to the importance of complying with the provisions ISO/IEC 17021 when conducting audits, the experts propose that the amendments apply as soon as they are published.
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