
Proposal to Streamlining the regulatory activities at WP.29

1. Background

a. History

Over the past 30 years, motor vehicle performance has been subject to an enormous change and improvement, with significantly reduced pollutant emissions and enhanced safety. Technological advancements, such as advanced after-treatment systems, electrification of powertrains and advanced driver-assistance systems (ADAS), have played a crucial role in this improvement. Regulations have also been pivotal, with stringent emission requirements and test methods, and safety protocols enforced globally. The UNECE World Forum for Harmonization of Vehicle Regulations (WP.29) has been instrumental in this progress, fostering international collaboration to develop and implement these regulations. This synergy between technology and regulation has led to cleaner, safer vehicles on our roads. In this regard, WP.29 can be proud of its work, and the International Organization of Motor Vehicle Manufacturers (OICA) never failed to contribute to this effort.

b. Current situation

With the technological advancements, increased access to data to highlight vehicle issues, and the increase in the number and size of regulations that require maintenance, the workload at WP.29 has grown substantially. Decisions to establish new working groups, task forces or special interest groups sometimes have not been based on rational criteria. At times, this has led to experts focusing on low-benefit regulatory measures, diverting their efforts from more critical aspects. In some cases, this misallocation of resources hampers the ability to address truly important regulatory issues effectively.

2. Possible solutions

WP 29 and the GRs should prioritize and become more selective in their activities. Such a shift could help ensuring that resources are allocated to the most impactful areas, balancing the need for progress with practical constraints. During the 194th session of WP.29 in November 2024, OICA engaged in informal discussions with experts from various Contracting Parties to share opinions on streamlining regulatory activities. All participants acknowledged that resources to follow activities in Geneva are limited, and the increasing number of groups (IWGs, TFs, SIGs, Subgroups) is becoming overwhelming. Each Contracting Party has its own political priorities, making it difficult to reach a consensus on which items are the most important. Many Contracting Parties, especially those in AC.2, have already discussed the issues of overload, poor prioritization, and lack of transparency or visibility of the groups' structure. A proposed improvement is to include all groups, not just IWGs, in the updates of the "List of IWGs" informal document at every WP.29 session.

Other initial suggestions that OICA collected from the Contracting Parties (in no particular order):

- 1) Perform a Cost/Benefit Analysis before proposing a new item of work;
- 2) Perform a Gap Analysis before proposing a new item of work;
- 3) Set a minimum number of Contracting Parties being needed as sponsors before starting a new activity;
- 4) Improve the PoW document with real weighting of the different priorities;
- 5) Adopt metrics to assess priority (National examples: Canada; Japan). See in particular the document GRSP-76-49 (CAN);
- 6) Share good practices between the 58 Agreement and the 98 Agreement;
- 7) Focus WP.29 efforts on Management Systems at OEM level (examples: CSMS, SUMS, SMS, Audit pillar of the NATM for ADS) in a view to let the 58 Agreement and the 98 Agreement converge and be future-proof;

- 8) Combine different Regulations (and new Series of Amendments) with the same EiF dates in a single package every e.g. [3]-years.

It was also pointed out that Contracting Parties and NGOs may, in particular cases, have the urgency to submit proposals which are not included in the programme of work. In such a case those contracting parties or NGOs should be encouraged to collect as much information as possible in advance to improve the quality of the discussion at GR level in an effort to prevent, if the conditions will allow it, the establishment of a dedicated new group of experts.

Overall, there was a general positive feeling from the experts as they felt this initiative by OICA is a good starting point to improve the actual practice within WP.29 and the GRs. All the Contracting Parties' delegates approached in this informal exercise declared that they would be willing to receive a first baseline document from OICA and that they would be happy to provide their own suggestions and feedback.

3. OICA initiative

OICA has internally taken the initiative of scrutinizing the way to address the approach to regulatory work within WP.29. Experts from OICA have been working to identify the proper criteria that justify new rulemaking. These criteria vary depending on the nature of the World Forum participants; for example, for Contracting Parties, most of the times the focus is on user safety and environmental protection. Meanwhile, while this is also a priority for the industry, it might also wish to emphasize harmonization of safety requirements allowing economies of scale. An approach of identifying the proper criteria may ensure that regulatory efforts are directed towards the most impactful and necessary areas, optimizing the use of resources and expertise.

To enhance the efficiency of regulatory activities within WP.29, OICA proposes to identify several criteria for a "good regulatory activity." These may include:

- **Improvements in safety, emissions, security:** Prioritizing regulations that significantly and demonstrably enhance vehicle safety, reduce emissions, or increase security.
- **Harmonization of the provisions:** Ensuring consistency and compatibility of regulations across different regions to streamline compliance activity.
- **Regulatory stability:** Maintaining stable and predictable regulatory environments to support long-term planning and investment.

By focusing on these criteria, OICA aims to ensure that regulatory efforts are both impactful and efficient, while delivering the diverse needs of Contracting Parties and the industry.

4. Conclusion

OICA's informal initiative to propose streamlining regulatory activities within WP.29 has been positively received by the experts approached in the margins of the 194th session of WP.29. The discussions highlighted the need for better prioritization and transparency, given the limited resources and increasing number of working groups. Proposed solutions include performing cost/benefit and gap analyses, setting minimum sponsor requirements, and improving the objective prioritization of work items. The general consensus is that OICA's efforts are a promising starting point for enhancing the efficiency and effectiveness of WP.29's regulatory processes, with Contracting Parties willing to provide further feedback and suggestions.

5. Next Steps

OICA is willing to undertake further actions in this regard, in collaboration with the Contracting Parties to help all stakeholders allocate the existing resources to the most impactful areas, balancing the need for progress with practical constraints.