Proposal for amendments to 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

I. Proposal

Schedule 2

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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 17025:2005 on the general requirements for the competence of testing and calibration laboratories.

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 on the general criteria for the operation of various types of bodies performing inspection.

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.

Insert new paragraph 1.3., to read:

"1.3. For UN Regulations that include provisions for the audit and certification of management systems, a technical service designated for category A or category B activities shall also comply with ISO/IEC 17021:2015 on the requirements for bodies providing audit and certification of management systems."

II. Justification

In recent years, GRVA has introduced 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.

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 with both ISO/IEC 17025:2005 and ISO/IEC 17021:2015.

However, it has come to the attention of the experts from France and Ireland that this compliance with ISO/IEC 17021:2015 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 this compliance is not explicitly mentioned as a prerequisite for the designation of technical services.

The experts from France and Ireland therefore wish to invite the Contracting Parties to the 1958 Agreement to share their interpretation of the prerequisite for the designation of technical services for UN Regulations that contain auditing provisions. Furthermore, if the interpretations of all Parties confirm the need for compliance with ISO/IEC 17021:2015, the experts from France and Ireland 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.