

## **Proposal for amendments to informal document GRVA-22-11 Rev.2 (as included in ECE/TRANS/WP.29/2025/147) (Consolidated Resolution R.E.3)**

In the text below the modifications to the document GRVA-22-11 Revision 2 are marked in **bold** and ~~striketrough~~.

### **I. Proposal for a revision to Consolidated Resolution on the Construction of Vehicles (R.E.3)**

*Paragraph 3 of Annex 7. to R.E.3, amend to read:*

#### **"3. Necessary provision for the relevant UN Regulations**

...

*In the relevant section related to specifications and/or tests, insert a new paragraph, to read:*

"x.x. For all vehicles, equipment and parts with which the approval tests are performed, the manufacturer shall provide ~~the Technical Service with the minimum~~ **the necessary** information (e.g. software versions and system parameters) **allowing the Technical Service to uniquely identify the configuration** ~~en~~of all hardware and software that have an influence on performance with regard to this Regulation; this information shall be appended to the test report."

..."

### **II. Justification**

1. The working document GRVA/2025/28 brings considerable progress to the general integration of software updates into the other Regulations of the 1958 Agreement. In particular, it proposes a new series of amendments to UN Regulation No. 156, making the use of RXSWIN mandatory. In parallel, it amends R.E.3 to enable the amendment of all UN Regulations where software might be relevant for type approval, by including RXSWIN in the communication form templates of these Regulations. France welcomes and supports this document prepared by the informal working group CS/OTA.

2. While the traceability of RXSWIN and software updates is important, the need to clearly record the characteristics of each tested vehicle during approval is equally important, and it is already a key component of test reports produced by technical services.

3. **RXSWIN information shall be recorded on the test reports, if RXSWIN is applied for type approval. Additionally** ~~In~~ in the case of vehicle types where software versions (or hardware versions, or other digital parameters such as calibration numbers) are relevant for the ability of the system to comply with the requirements of the Regulation, or are relevant for the definition of the vehicle type, this information should be recorded on test reports in addition to the RXSWIN. **The purpose is to include the information to the test report to identify the installed software which was deployed on the vehicle used for the testing.** Indeed, while many software versions may be part of a given RXSWIN, and while it is expected that the software version tested during type approval will be different from software versions used during production, or from software versions seen on vehicles after registration, it is crucial to keep an official record of the exact characteristics of vehicles tested. It should be noted that various UN Regulations, and in particular emissions Regulations such as UN R83 and UN R154, already mandate a similar transcription of software versions in test reports or information documents.

4. In real-world situations such as the discovery of a non-conformity in the software of a vehicle already registered, market surveillance authorities must be able to determine whether the non-conformity should have been detected during the approval tests, or if the non-conformity appeared on software versions developed after the approval tests, which can only be known if the exact software version as tested during approval was written in the test report.

5. The expert from France has noticed that most — but not all — technical services already provide this information in their test reports. To ensure a consistent level of information for all technical services, the expert from France therefore proposes to clearly indicate in each relevant Regulation that technical services must record the software information of the vehicle(s) tested during approval.