

Proposals for editorial improvements to the texts of GRVA/2026/2 and GRVA/2026/3

Proposals for remaining items and editorial improvements to the working documents GRVA/2026/2 (GTR) and GRVA/2026/3 (UNR). The proposals are based on comments received from ADS IWG experts and items identified by the secretariat, including remaining text in brackets not addressed by other proposals.

	GTR	UNR	Original text	Change proposal	Explanation
1	2.17.	2.17.	2.17. “ <i>User-initiated deactivation of the ADS</i> ” means a procedure by which the user initiates the transfer of performance of the DDT from an ADS feature to the user. ⁶ ⁶ Where an ADSF-2 suggests that a user might optionally take control, this shall be considered a user-initiated deactivation if the user accepts the suggestion.	2.17. “ <i>User-initiated deactivation of the ADS</i> ” means a procedure by which the user initiates the transfer of performance of the DDT from an ADS feature to the user. ⁶ ⁶ Where an ADSF-2 suggests that a user might optionally take control, this shall be considered a user-initiated deactivation if the user accepts the suggestion.	Para. 4/6.2.2.3.2., reads “A suggestion from an ADSF-2 that a user might optionally take control shall be considered a user-initiated deactivation if the user accepts the suggestion.” Therefore, the footnote is unnecessary.
2	2.31.	2.31.	Edge case		
3	4.2.2.1.2.(c)	6.2.2.1.2.(c)	In the case of an ADSF-2, direct view to the outside environment may be reduced or compromised. Direct view shall be restored immediately upon the passenger requesting deactivation.	In the case of an ADSF-2, direct view of the outside environment may be reduced or compromised. Direct view shall be restored immediately upon the user accepting an ADSF-2 suggestion as described in paragraph 4/6.2.2.3.2.	Suggestion from France to align the paragraph with the wording related to user-initiated deactivations.
4	5.1.8.5.3.	7.1.8.5.3.	The data retention strategy shall ensure that: (a) Data related to a detected safety issue is retained..., and (b) The retention of the data for longer-term trend analysis (i.e., subset of the collected data).		Item (b) does not flow from “...shall ensure that:” Perhaps: “a subset of the collected data is retained to enable longer-term trend analysis.”

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5	5.2.1.13.2.	7.2.1.13.2.	The manufacturer shall demonstrate that robust calibration procedures have been adopted for assigning appropriate value(s) to all the simulation parameters while ensuring that special attention is taken for the most critical parameters. This is to ensure that the simulation toolchain can be used to emulate the relevant real-world system.	The manufacturer shall demonstrate that robust calibration procedures have been adopted for assigning appropriate value(s) to all the simulation parameters while ensuring that special attention is taken for the most critical parameters. This is to ensure that the simulation toolchain can be used to emulate the relevant real-world system.	France: “This sentence is not a requirement and could be transformed into a footnote or transferred to the interpretation document.”
6	5.3.1.4.1.4.	7.3.1.4.1.4.	[The table specified in paragraph 5.3.1.4.1.2. of this Regulation shall be kept up to date with software and hardware updates.]		Decision on whether to remove brackets or delete.
7	5.3.1.15.	7.3.1.15.	The safety concept shall include...	The system description shall include...	Section 5/7.3.1. is “System description”. The preceding and following paragraphs both use “system description”.
8	5.3.2.10.	7.3.2.10.	The safety case shall include...	The safety concept shall include...	Section 5/7.3.2. is “Safety concept”. The preceding and following paragraphs both use “safety concept”.
9	5.3.2.16.	7.3.2.16.	The safety case shall describe...	The safety concept shall describe...	

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			<p>(c) Identify test routes that capture predictable aspects of the ODD (e.g., road types and geometries), elements found in the related nominal situations (e.g., other road users, signs, and signals), and typical dynamic conditions (e.g., high/low traffic densities).</p> <p>The test routes enable verification of nominal requirements for the safety of user interactions, including prior to, at the time of, and after entering and exiting the ODD of an ADS feature,</p>		<p>The second paragraph under (c) might be a requirement missing “shall”. If so, it might be out of place here (i.e., belongs under the requirements for test environments?).</p> <p>Alternatively, the paragraph might be an explanation in which case it might be moved to the guidance/interpretation document.</p>
10	5.3.3.7.	7.3.3.7.	Each requirement defined under 7.3.3.2, 7.3.3.4, 7.3.3.6 and as may be defined by the manufacturer shall have at least a claim.		France: “It is not clear what kind of requirements would be defined under 7.3.3.2, 4 and 6. Are they additional requirements to this R defined by the manufacturer as a result of claims/arguments/evidence?”
11	6.1.8.1.	8.1.8.1.	<p>The approval authority or its designated technical service shall verify that the safety-promotion processes cover the following aspects:</p> <p>(a) There is an appropriate level of competence of the personnel to perform their duties,</p> <p>(b) The competence is promoted through training,</p> <p>(c) Means for internal and external safety communications are in place, and</p> <p>(d) Process for continuous improvement.</p>		France: A verb seems to be missing in item (d): ‘A process... is in place’?

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12	6.3.1.1.		[The safety case shall be assessed by an assessor, or team of assessors meeting 6.3.1.6. and 6.3.1.7. in order to determine if the safety case is complete and robust.]		Open item following decision to move “assessor requirements” under the “Approval” section of the UNR (per Article x of the 1958 Agreement).
13	6.3.1.4.(b)	8.3.1.4.(b)	The integrity level used for development, verification and validation of the ADS and its features is appropriate to reduce the risk below the unreasonable risk threshold,		France: “integrity level” is not defined.
14	6.3.2.2.1.	8.3.2.2.1	The assessment shall verify that /The approval authority or its designated technical service shall verify that the manufacturer has used suitable and documented processes to derive behavioural competencies that are relevant to both the ODD and to the ADS safety case.	The approval authority or its designated technical service shall verify that the manufacturer has used suitable and documented processes to derive behavioural competencies and scenarios that are relevant to both the ODD and to the ADS safety case.	France: Align with 7.3.2.13. “The safety concept shall describe the approach used by the manufacturer to derive behavioural competencies and scenarios that are ODD-relevant.”
15	Annex 2	Annex 4	Maximum ADS-determined/estimated vehicle speed [10] seconds prior to the collision	Remove brackets	
			Maximum ADS vehicle longitudinal deceleration [10] seconds after the collision	Remove brackets	
			Maximum ADS vehicle longitudinal deceleration [10] seconds after the collision	Remove brackets	