Options to improve the uptake of IWVTA

OICA general consideration on IWVTA-44-05 and IWVTA IWG IWVTA-45-05(Rev.1)

It’s appreciated this general comment is referred, prior to the Yes/No questions.

**OICA agrees the basic concept on IWVTA-45-05 Rev.1 :**

* To simplify the regulatory processes on vehicle manufacturers so they could supply vehicles into multiple markets with the submission of fewer approvals and certification information.
* To utilize a few option packages ;
	+ which are aligned with the actual usage of any major market (option2), temporary on top f of” option1, as U-IWVTA “

and

* + which are simplified to a common minimum set of mandatory regulations, as L-IWVTA, in each market, e.g. for ASEAN, Africa where is establishing the vehicle type approval.

**Considerations-:**

To reach the goal of simplification, there might be several issues to cope with. The followings are the list of interest, at the very 1st stage.

1. Option 2 as temporary U-IWVTA
* The Option 1(U-IWVTA) could be kept in the R0. Usage of the option 2 is very similar the U-IWVTA.
* European Union and Japan might be the proper candidates, as proposed by Australia.
* The UNR item sets by Japan-TDS is the more feasible than EU-WVTA, at present. because

the fewer unique items are found in the VTA. Please refer to the draft comparison list.



(Challenge)

* It seems a big challenge to agree what CP is as Major country, as U-IWVTA.
* It seems difficult to set as “temporary”.
1. Option 3 as minimum sets of L-IWVTA
* The current L-IWVTA process is very flexible to select any items. However, it seems more practical to set any sample package.
* To set minimum requirements is the good trigger to initiate the VTA and harmonization.
* It is important to listen to such CPs views, who are not regular participants of IWVTA-IWG.

(Challenge)

To increase awareness of IWVTA of itself by such CPs is important.

e.g. An IWVTA workshop by IWG is appreciated.

**Priority of activities:**

OICA considers the road map might be necessary to proceed to reach the goal of above mentioned.

When the direction agreed in IWG, and to make the inquiries in WP29, then, the feasible road-map could be proposed by OICA. At present, to start study on option3 might be feasible.

# Contracting party / NGO survey on IWVTA

Name of Contracting Party or NGO\_\_\_\_\_\_\_OICA\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Refer to Q&A documents----

1. Question about U-IWVTA

Should the IWG on IWVTA do more to encourage uptake of new UN Regulations into U-IWVTA?

* 1. Would option 1 above be more suitable?  **~~Yes~~ /No**
	2. Would option 2 above be more suitable?  **Yes / ~~No~~**
	3. Do you have any other suggestions?

Reason to choose that option:

OICA would like to keep Option 1, to aim the ideal goal, as mentioned in the WP29-194-32e

**“Discussion** In theory, the IWVTA bundles approvals for many regulations into one. This should provide benefits both to vehicle manufacturers and contracting parties.”

However, to proceed the discussion practically, OICA would like to choose the Japan-TDS as the 1st priority of only ONE set for U-IWVTA. Because the Unique technical regulations in the VTA is less than EU-WVTA. The new UNRs will be introduced into the TDS, at the almost same timing of the UNR implementation.

R0 U-IWVTA certificate based on Japan-TDS is issued, it could be accepted in the major markets e.g EU, Aus, etc., to add some other unique regulations.

Other suggestions if any: Please refer to the general comment.

A good practice by Australia is expected to be shared.

1. Question about L-IWVTA

Should the IWG on IWVTA do more to encourage the usage of L-IWVTA?

* 1. Would option 3 above be suitable? **Yes** / ~~No~~
	2. Do you have any other suggestions?

Reason for Yes/No.:

Please refer to the general comment B)

Other suggestions if any:

Please refer to the general comment B)

1. Should the table in Annex 4 listing the UN Regulations required for a U-IWVTA be updated as soon as new UN Regulations applicable to M1 category vehicles are published?  **Yes/ No**
	1. If no, what triggers should be used to update the U-IWVTA requirements?

Reason for Yes/No:

OICA considers any validation process is necessary,

after publication of the new UNR, even if it would be only for M1.

Proposed Triggers:

The current process once a year update is useful. ,

If Option 2 is agreed as Japan-TDS, the regulation item is nominated into Annex4 as soon as Japan would decide its mandate.

1. Could you fill in the column “Mandatory application of the UN Reg. in its territory” of the following table? The collected information on the status of CPs mandatory application would help IWVTA IWG to select the candidate UN Regulations to be applicable to IWVTA.

**NGO is not expected to fill in this column.**

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| --- | --- | --- | --- |
| UN Regulation | Date of Entry into Force | Mandatory application of the UN Reg. in its territory: Yes or No?In case of Yes, The date to enforce mandatory application of the UN Reg. for new types / all types | Note |
| UN R144 AECS | 19/07/2018 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R145 ISOFIX | 19/07/2018 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R152 AEBS | 23/01/2020 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R153 EV Rear End Collision | 22/01/2021 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R155 Cyber Security | 22/01/2021 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R156 Software Update | 22/01/2021 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R157 ALKS | 22/01/2021 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R158 Rear Visibility or Detection | 10/06/2021 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R160 EDR | 30/09/2021 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R164 Studded Tires | 14/10/2022 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R166 VRU in Front and Side Close Proximity | 08/06/2023 | -Yes, or No?-In case of Yes.New types:All types: |  |
| UN R168 RDE | Expected in March 2024 | -Yes, or No?-In case of Yes.New types:All types: |  |

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# Industry Survey on IWVTA -For manufacturers of M1 category vehicles

Name of NGO \_\_\_\_\_ OICA \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Do you hold an IWVTA approval?  **Yes** / ~~No~~

-An OEM in JAMA, 2 vehicle types, the U-IWVTA certificate is used for Australia and the L-IWVTA for Japan-TDS.

Are there reasons why an IWVTA isn’t a useful tool for supplying vehicles into different markets?

The initial survey was done at #35 in 2021, since IWVTA was established in 2017.

It’s now the end in 2024, acknowledgement by the stakeholders (CPs, the TA authorities, the Test service, industries, etc.) seems less and less.

To increase the knowledge on IWVTA is more important.

It is appreciated if Australia could explain on how “IWVTA” is defined in its national legislation (Australian Design Rule). OICA understood Australia is the good practice, already. Such Information sharing is useful among IWG and among any CP, Industries. The further information from the other CPs, like Japan, UK, any member in EU (Type Approval Authority) is also appreciated.

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*The main negative points in IWVTA - 35 -05.*

1. ***It is not clear which countries would accept IWVTA certificates (either U-IWVTA or L-IWVTA)***
2. *IWVTA certification process seems to be time-consuming*
3. *Even with U-IWVTA certificate, vehicles cannot be placed on market. Country-specific certification will be additionally necessary.*

*\*\*\*\**

OICA would like to make the road-map to solve those issues step by step.